10 Recirculated Responses to Comments

10.1 Recirculated Agency Responses to Comments

Comment Letter	Name	Date Received
RA-1	Riverside County Department of Environmental Health	12/22/23
RA-2	Riverside County Flood District	12/26/23
RA-3	Cahuilla Band of Indians	12/27/23
RA-4	Riverside County Fire-CALFIRE	12/28/23
RA-5	Morongo Band of Mission Indians	02/15/24
RA-6	South Coast Air Quality Management District	02/23/24
RA-7	City of Riverside	02/26/24
RA-8	Riverside County Transportation Department	02/26/24
RA-9	Riverside County Parks	02/26/24

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From: Lopez, Alberto <AlLopez@RIVCO.ORG>
Sent: Friday, December 22, 2023 2:58 PM
To: Dan Fairbanks
Subject: March Joint Power Authority - West Campus Upper Plateau Project
Attachments: JPA-West Campus Upper Plateau_DEH Planning Review Letter_12222023.pdf; Contracted City Planning Review Fees July 2022.pdf

Hello Dan,

Please see the attached letter and document for our departments comments regarding the Proposed March Joint Power Authority - West Campus Upper Plateau Project. RA-1.1

Thank you,

Alberto Lopez, MEA, REHS
Supervising Environmental Health Specialist
Riverside County Department of Environmental Health
Environmental Cleanup Program
4080 Lemon Street, 10th Floor, Riverside, CA 92501
Phone: 951-955-8980
Fax: 951-955-8988
E-mail: allopez@rivco.org
www.rivcoeh.org

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County of Riverside California

County of Riverside
DEPARTMENT OF ENVIRONMENTAL HEALTH
P.O. BOX 7909 ● RIVERSIDE, CA 92513-7909
JEFF JOHNSON, DIRECTOR

12/22/23

March Joint Power Authority
Planning Department
Attn: Dan Fairbanks
14205 Meridian Parkway, Suite 140
Riverside, CA. 92518

SUBJECT: DEPARTMENT OF ENVIRONMENTAL HEALTH REVIEW OF MARCH JOINT POWER AUTHORITY PLANNING CASES

Dear Mr. Fairbanks:

March Joint Power Authority, Planning Department is responsible for implementing the requirements of CEQA[1] for planning projects within their jurisdiction. To ensure compliance with CEQA[2], March Joint Power Authority Planners distribute projects to the appropriate Agencies/Departments for review by staff with the specific knowledge and experience to evaluate projects for compliance with State and Local laws/regulations specific to their department and areas of expertise.

RA-1.2

Proper review of proposed projects by appropriate staff ensures compliance with state and local laws and regulations as well as provides protection for the citizens of Riverside County and the environment from potential adverse effects of a project.

For Department of Environmental Health (DEH) to conduct a review of projects, the following items will need to be addressed:

RA-1.3

REVIEW FEES
Please refer to the attached "Environmental Health Review Fees" Tier chart for the appropriate fees. A minimum initial deposit will be required to conduct reviews. Additional fees may be required depending on time spent on the project. These fees will need to be collected prior to this Department issuing a final project comments letter.

[1] The California Environmental Quality Act (CEQA) CCR Title 14 15065 is a statute that requires state and local agencies to determine whether a project may have a significant effect on the environment.

[2] A project is an activity which must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency which may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

WATER AND WASTEWATER:
DEH will request information to evaluate a project's water source and method of sewage disposal. Information should be included in exhibits so that DEH can provide further comments as to what will be required for the project. RA-1.4

ENVIRONMENTAL CLEANUPS PROGRAM (ECP)
ECP conducts environmental reviews on planning projects to ensure that existing site conditions will not negatively affect human health or the environment. The intent of the environmental reviews is: to determine if there are potential sources of environmental and/or human exposures associated with the project, identify the significance of potential adverse effects from the contaminants, and evaluate the adequacy of mitigation measures for minimizing exposures and potential adverse effects from existing contamination and/or hazardous substance handling. RA-1.5

HAZARDOUS MATERIALS MANAGEMENT BRANCH (HMMB)
HMMB will review projects to determine if hazardous materials are being handled and will provide further comments as part of the review process as it relates to the project. RA-1.6

DISTRICT ENVIRONMENTAL SERVICES (DES)
DES will review and provide comments on projects that include the following: RA-1.7

- Food Facilities
- Pools/Spas/Water Features
- Facilities that sell tobacco

LOCAL ENFORCEMENT AGENCY (LEA)
LEA will review and provide comments on projects the following projects: RA-1.8

- Landfills, transfer stations, composting sites, and other specific solid waste activities
- Facilities that handle medical waste
- Body art facilities

Should you have any questions regarding this letter, please contact me at (951) 955-8980.

Sincerely,

Alberto Lopez, MEA, REHS
County of Riverside, Department of Environmental Health
Environmental Protection and Oversight Division
3880 North Lemon Street, Suite 200
Riverside, CA 92501

County of Riverside
DEPARTMENT OF ENVIRONMENTAL HEALTH
P.O. BOX 7909 ● RIVERSIDE, CA 92513-7909
JEFF JOHNSON, DIRECTOR

Environmental Health Review Fees
(Planning Case Transmittals for Contracted Cities)

DESCRIPTION	FEE
Tier 1 - Water and Sewer verification review • Will Serve Letter • Onsite Wastewater Treatment Systems • Advance Treatment Units • Soils Percolation Report • Issuance of a SAN 53 and/or Comments Letter • Wells Average time 3 hours for review	$597.00
Tier 2 - Phase I Environmental Site Assessment (ESA) review or additional report reviews, • Review of items aforementioned in Tier 1 Average time 7 hours for review	$1393.00
Tier 3 - Phase II Environmental Site Assessment (ESA) review and additional report reviews, • Review of items aforementioned in Tier 1 and Tier 2 Average time 10 hours for review	$1990.00

NOTES TO FEE SCHEDULE:

- The fees noted in the fee schedule are minimum fees to be paid at the time of application filing to cover the average Department cost of review. Should actual costs exceed the amount of the fee, the applicant will be billed for additional costs. Services are charged at a rate of $199/hour.
- An hourly rate of $199 shall be charged for other development-related fees which may be required, but are not necessarily limited to, well, and septic system fees.
- An application shall be filled with the Planning Department of the Contracted city prior to submitting any items listed above to this Department for Review. Please provide a copy of the Planning Case transmittal to this Department.

Rev 07/01/22

RA-1.9

RA-1

Riverside County Department of Environmental Health
December 22, 2023

RA-1.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-1.2 This comment is introductory in nature and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-1.3 This comment requests review fees for the Riverside County Department of Environmental Health (DEH) to conduct a review of the Project and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-1.4 The comment states that DEH will request information to evaluate the Project's water source and method of sewage disposal. Section 4.17, Utilities and Services Systems, analyzed the Project's impacts to water and sewer services and determined impacts to be less than significant. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-1.5 This comment discusses DEH's environmental cleanups program. Recirculated Section 4.8, Hazards and Hazardous Materials, analyzed the potential for contaminant exposures and hazardous substance handling. With implementation of MM-HAZ-1 (Abatement of Hazardous Building Materials) and MM-HAZ-2 (Materials Storage Near School), the Project's impacts with respect to hazards and hazardous materials would be less than significant. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-1.6 This comment discusses the role of the Hazardous Materials Management Branch. Recirculated Section 4.8, Hazards and Hazardous Materials, analyzed the potential for contaminant exposures and hazardous substance handling, and notes that it reviews and provides comments on projects regarding handling of hazardous materials. With implementation of MM-HAZ-1 (Abatement of Hazardous Building Materials) and MM-HAZ-2 (Materials Storage Near School), the Project's impacts with respect to hazards and hazardous materials would be less than significant. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-1.7 This comment indicates that the District Environmental Health Services reviews and provides comments on projects that include food facilities, pools/spas/water features, and facilities that sell tobacco. In the event such a use is proposed, March JPA would coordinate with DEHS for review and approval. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-1.8 This comment indicates that the Local Enforcement Agency reviews and provides comments on the following projects: landfills, transfer stations, composting sites, and other specific solid waste activities; facilities that handle medical waste; and body art facilities. In the event such a use is proposed, March JPA would coordinate with DEHS for review and approval. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-1.9 This comment is the Department of Environmental Heath's Review Fee schedule. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

From: McKinney, Elsa <EMcKinne@rivco.org>
Sent: Tuesday, December 26, 2023 9:09 AM
To: Dan Fairbanks
Cc: McNeill, Amy; Cornelius, William
Subject: West Campus Upper Plateau-Due 1/31/2024
Attachments: 254212_{63ED3E2D-3033-C6C6-8665-8C8E50500000}.pdf; 246941_RCFC letter 11-9-2022.pdf

Good morning Dan,

Attached you will find a copy of Riverside County Flood Control's comments pertaining to the above-mentioned project.

RA-2.1

Should you have any questions please feel free to contact us.

*please include, Amy McNeill (ammcneil@rivco.org), Elsa McKinney (emckinne@rivco.org), and William (Michael) Cornelius (wmcornel@RIVCO.ORG) to the City's distribution list for Flood Control. *This way we can ensure a timely response even if one of us is out of the office.*

Kind Regards,

Elsa McKinney, Engineering Aide
Development Review
Riverside County Flood Control & Water Conservation District
emckinne@rivco.org
1995 Market Street, Riverside, CA 92501
951.955.2878
*Off Fridays

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County of Riverside California

JASON E. UHLEY
General Manager-Chief Engineer

1995 MARKET STREET
RIVERSIDE, CA 92501
951.955.1200
951.788.9965 FAX
www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

254212

December 21, 2023

March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Attention: Dan Fairbanks

Re: West Campus Upper Plateau, Located West of the I-215, South of East Alessandro Boulevard and North of Van Buren Boulevard

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases, or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received December 5, 2023 and December 18, 2023. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.

☐ This project involves District proposed Master Drainage Plan facilities, namely, _____. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

☒ If this project proposes channels, storm drains larger than 36 inches in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of

RA-2.2

the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

☒ This project is located within the limits of the District's Perris Valley Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.

☒ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, March Business Center Storm Drains and Detention Basins, Stage 1 Line QQ and Line II. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266.

☒ The District's previous comments dated November 9, 2022 are still valid.

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

RA-2.2 Cont.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document (i.e., Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report) and/or Mitigation Monitoring and Reporting Program, if a CEQA document was prepared for the project. The project proponent shall also bear the responsibility for complying with all other federal, state, and local environmental rules and regulations that may apply.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,

Amy McNeill

AMY MCNEILL
Engineering Project Manager

Attachment
EM:blm

JASON E. UHLEY
General Manager-Chief Engineer

1995 MARKET STREET
RIVERSIDE, CA 92501
951.955.1200
951.788.9965 FAX
www.rcflood.org
246941

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT
November 9, 2022

March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Attention: Dan Fairbanks Re: West Campus Upper Plateau Specific Plan

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases, or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received November 2, 2022. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.

☐ This project involves District proposed Master Drainage Plan facilities, namely, _____. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

☒ If this project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

RA-2.3

☐ This project is located within the limits of the District's _____ Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.

☒ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, March Business Center Storm Drain and Detention Basins, Stage 1 Line QQ and Line ll . If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266.

☐ The District's previous comments are still valid.

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document (i.e., Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report) and/or Mitigation Monitoring and Reporting Program, if a CEQA document was prepared for the project. The project proponent shall also bear the responsibility for complying with all other federal, state, and local environmental rules and regulations that may apply.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

RA-2.3 Cont.

Very truly yours,

Amy McNeill

AMY MCNEILL
Engineering Project Manager

ec: Riverside County Planning Department
Attn: Timothy Wheeler

WMC:jss

RA-2

Riverside County Flood Control & Water Conservation District
December 26, 2023

RA-2.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-2.2 This comment discusses the focus of review by Riverside County Flood Control & Water Conservation District for the Project and provides general information about compliance with local, state, and federal water quality laws. The comment indicates the Project is located within the limits of the District's Perris Valley Area Drainage Plan and would be subject to applicable drainage fees for any additional impervious surface area created. As shown in Figure 4.9-2, Master Drainage Plan Areas, southeastern portions of the Conservation Easement are within the Perris Valley Area Drainage Plan. The Specific Plan Area is outside the Perris Valley Area Drainage Plan. As such, the Project proposes no additional impervious surface area within the Perris Valley Area Drainage Plan. The comment also refers to the District's previous comments dated November 9, 2022, which are attached to the comment. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-2.3 This comment is an attached Riverside County Flood Control & Water Conservation District letter, dated November 9, 2022, which covers the same information provided in RA-2.1 and RA-2.2. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Lorrie Gregory <LGregory@cahuilla-nsn.gov>
Sent: Wednesday, December 27, 2023 4:02 PM
To: Dan Fairbanks
Cc: BobbyRay Esparza
Subject: West Campus Upper Plateau Project

Good afternoon,

Thank you for reaching out to the Cahuilla Band of Indians concerning the West Campus Upper Plateau Project. From our understanding, this project is deferred to the Pechanga and Soboba Band of Indians. Since this project is within Cahuilla Traditional land use, we request that you send any cultural materials associated with the project for review. Also, will there be another chance to schedule an AB-52 consultation, or is the AB-52 comment period officially closed? Thanks. RA-3.1

Respectfully,

Lorrie Gregory
Cultural Resource Coordinator
Cahuilla Band of Indians
Phone: 1 (760) 315-6839
Email: lgregory@cahuilla-nsn.gov

RA-3

Cahuilla Band of Indians
December 27, 2023

RA-3.1 This comment acknowledges that the Project is deferred to the Pechanga and Soboba Band of Indians but also states that the Project is within the Cahuilla Traditional land use and requests cultural materials associated with the Project for review. The comment also includes an inquiry regarding the AB 52 consultation period. On January 16, 2024, March JPA responded separately to this request as a government-to-government communication. In the letter, March JPA provided a link for the Cultural Resources Report and site records. March JPA explained that the AB 52 notification letters were circulated on November 12, 2021, and that the consultation period is closed. The letter also noted that March JPA is consulting with the Pechanga and Soboba Bands of Luiseno Indians on this Project. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Owens, Olivia@CALFIRE <Olivia.Owens@fire.ca.gov>
Sent: Thursday, December 28, 2023 11:48 AM
To: Dan Fairbanks
Cc: CALFIRE RVC Planning Submittals
Subject: WEST CAMPUS UPPER PLATEAU
Attachments: MJPA NOTICE OF AVAILABILITY OF DRAFT EIR - RECIRCULATED WEST CAMPUS UPPER PLATEAU 12052023.pdf; MJPA NOTICE OF AVAILABILITY OF DRAFT EIR RECIRCULATED (EXTENDED REVIEW).pdf

Dan,

I hope this email finds you well, can you please let me know which project numbers you have associated with the following attachments we received via US Mail? If you have any questions, please feel free to reach out. I realize you are out of office; I hope you had a good Christmas and have a wonderful New Year!!

RA-4.1

Respectfully,

Olivia Owens
Administrative Services Assistant
Office of the Fire Marshal/Fire Planning Division
CAL FIRE/Riverside County Fire Department
Desk: 951-955-0694 | Main: 951-955-4777
4080 Lemon St, 10th Floor, Riverside, CA 92501
olivia.owens@fire.ca.gov | www.rvcfire.org

■ Leadership ■ Competence ■ Integrity ■ Safety ■ Customer Service ■

The Office of the County Fire Marshal is committed to facilitating fire and life safety solutions by empowering its employees to serve our community through innovation and partnership.

NOTICE OF AVAILABILITY OF DRAFT EIR – RECIRCULATED

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

Description of Nature, Purpose, and Beneficiaries of Project:

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

Project Site – Specify if project site is included on any list of hazardous waste facilities:	The Department of Toxic Substances Control's EnviroStor database and SWRCB's GeoTracker database identify the Project site is not located on a site with known contamination (SWRCB 2021) or hazardous materials site (DTSC 2021).
Place and time of scheduled meetings:	To Be Determined
Lead Agency:	March Joint Powers Authority
Division	Planning Department
Date when project noticed to public:	December 2, 2023

Address where copy of the recirculated EIR Sections (2.0 Introduction, 3.0 Project Description, 4.2 Air Quality, 4.8 Hazards and Hazardous Materials, and 4.10 Land Use and Planning pursuant to Section 15088.5(c)) is available and how it can be obtained in an electronic format:

March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA, 92518
https://marchjpa.com/mjpa-meridian-west-campus/

Review Period:	December 2, 2023 through January 16, 2024
Contact Person:	Dan Fairbanks, Planning Director: fairbanks@marchjpa.com
Contact Person's Telephone (Area Code/Extension:	(951) 656-7000

RA-4.2

Interstate 215
Van Buren Blvd
Alessandro Blvd
Cactus Avenue
MARCH AFB
MARCH ARB
RIVERSIDE
MORENO VALLEY
WOODCREST
RIVERSIDE NATIONAL CEMETERY
RIVERSIDE EAST QUADRANGLE
CALIFORNIA - RIVERSIDE COUNTY
7.5-MINUTE SERIES
U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY
USGS
US Topo
SCALE 1:24 000
ROAD CLASSIFICATION
RIVERSIDE EAST, CA
2018

RA-4.2
Cont.

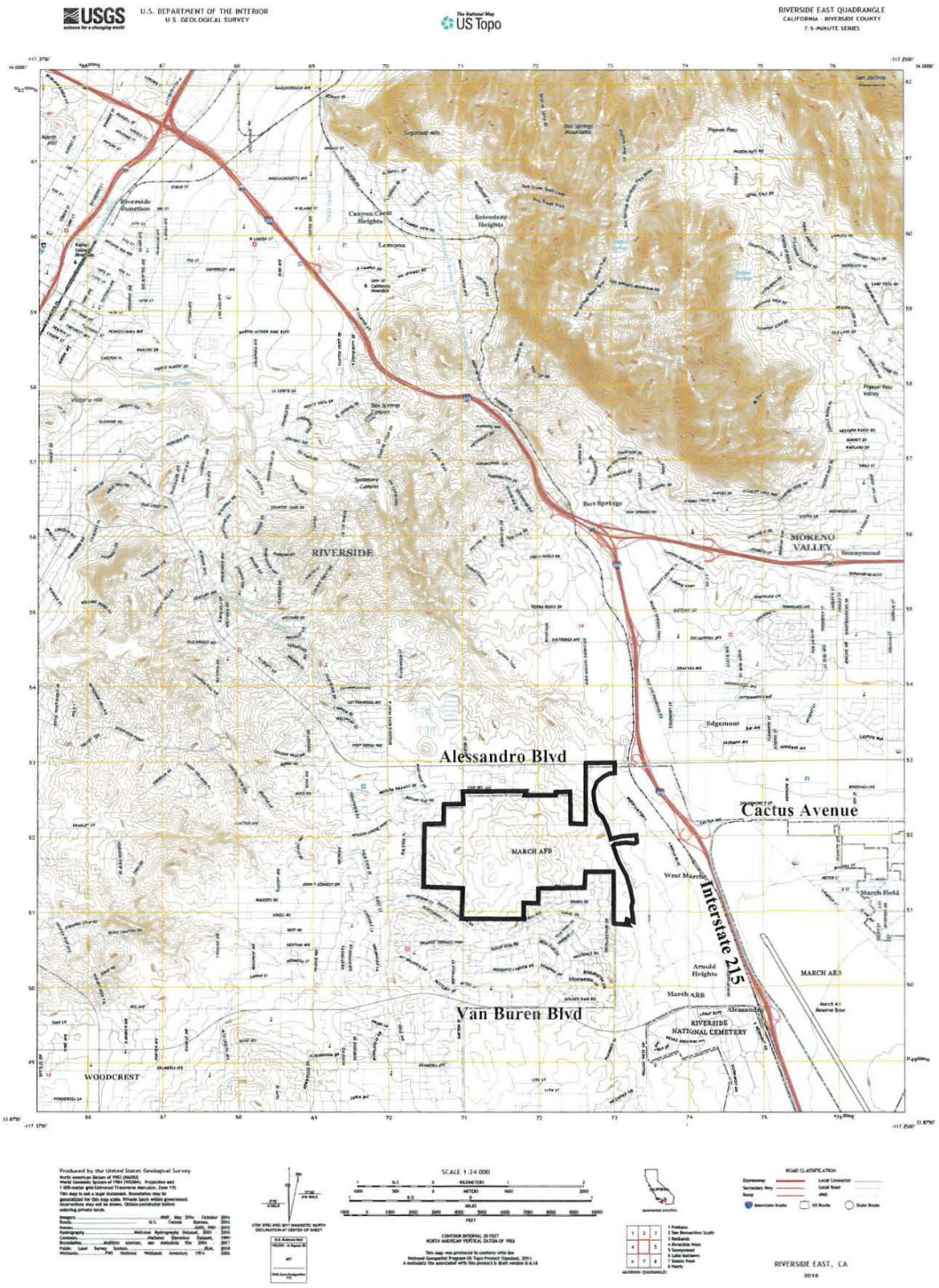
FIGURE 3-5
Site Plan

RA-4.2
Cont.

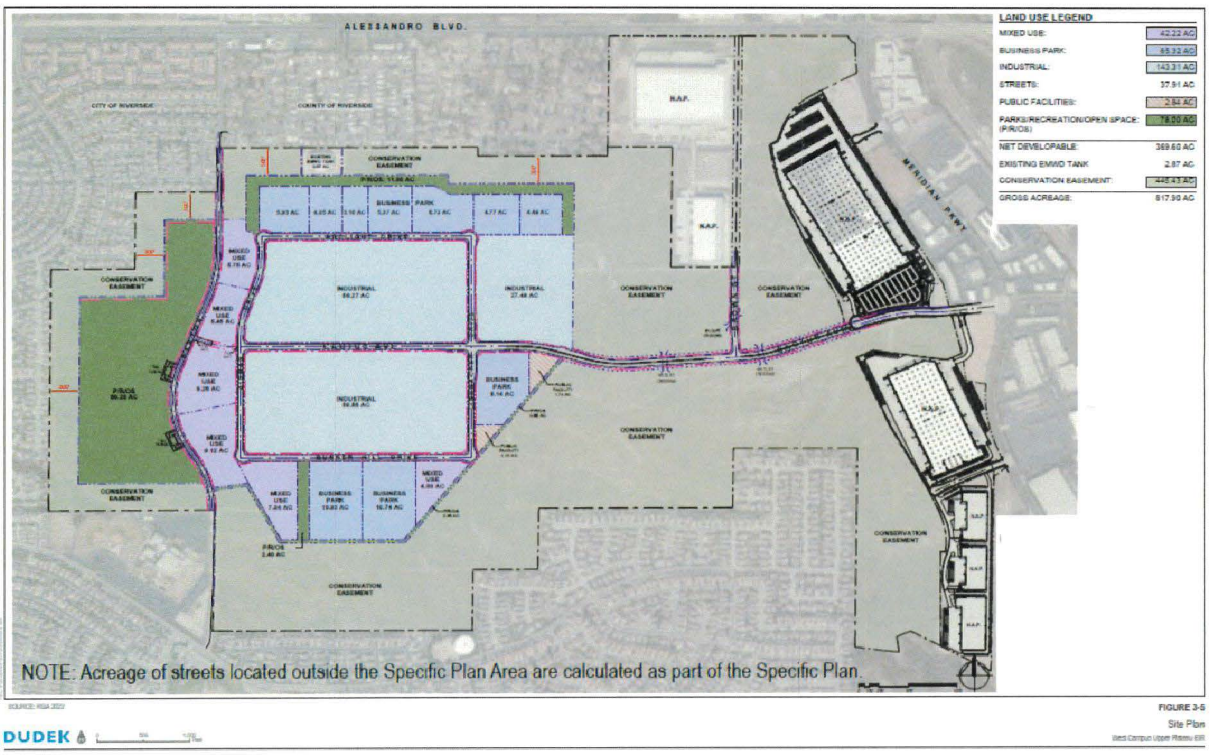
NOTICE OF AVAILABILITY OF DRAFT EIR – RECIRCULATED

Project Title:	West Campus Upper Plateau
Project Location – Specific; Identify street address and cross streets or attach a map showing project site (preferably a USGS 15' or 7 1/2' topographical map identified by quadrangle name):	Located at the extended alignments of Cactus Avenue and Barton Street, identified in the attached USGS map.
Project Location – Agency:	March Joint Powers Authority
Project Location – County:	Riverside
Description of Nature, Purpose, and Beneficiaries of Project: A proposal by Meridian Park West, LLC for a General Plan Amendment, Specific Plan, Zone Change, Tentative Parcel Map, two Plot Plans, and a Development Agreement to redevelop the former Air Force munitions bunkers and adjacent land. The Project consists of the following components: The Specific Plan Area is a campus development with a buildout scenario including 10 Business Park parcels totaling 65.32 acres, 6 Mixed Use parcels totaling 42.22 acres, 3 Industrial parcels totaling 143.31 acres, 2 Public Facility parcels totaling 2.84 acres, 3 open space parcels totaling 17.72 acres and public streets totaling 37.91 acres. Plot Plans for Buildings B and C totaling 1,837,000 square feet would be constructed on two of the Industrial Parcels. The remaining parcels would be developed with square footages as allowed under the Specific Plan. A proposed park component of the Project, consisting of 60.28-acres located west of the Barton Street extension, is included under the Specific Plan buildout scenario. Infrastructure improvements would include the installation of utility and roadway networks connecting to and throughout the Specific Plan Area, the construction of a new sewer lift station, the construction of a new electrical substation, and the construction of a new 0.5-million-gallon reclaimed water tank. Vehicular access at the Cactus Avenue and Barton Street location is prohibited, except emergency vehicles through a Knox box gate. Through a recorded Conservation Easement of approximately 445.43 acres, the undisturbed land surrounding the Specific Plan Area would be preserved in perpetuity, consistent with prior determinations made as part of the CBD Settlement Agreement.	
Project Site – Specify if project site is included on any list of hazardous waste facilities:	The Department of Toxic Substances Control's EnviroStor database and SWRCB's GeoTracker database identify the Project site is not located on a site with known contamination (SWRCB 2021) or hazardous materials site (DTSC 2021).
Place and time of scheduled meetings:	To Be Determined
Lead Agency:	March Joint Powers Authority
Division	Planning Department
Date when project noticed to public:	December 2, 2023
Address where copy of the recirculated EIR Sections (2.0 Introduction, 3.0 Project Description, 4.2 Air Quality, 4.8 Hazards and Hazardous Materials, and 4.10 Land Use and Planning pursuant to Section 15088.5(c)) is available and how it can be obtained in an electronic format: March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside CA, 92518 https://marchjpa.com/mjpa-meridian-west-campus/	
Review Period:	December 2, 2023 through January 16, 2024
Contact Person:	Dan Fairbanks, Planning Director: fairbanks@marchjpa.com
Contact Person's Telephone (Area Code/Extension:	(951) 656-7000

RA-4.3


USGS
U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY
US Topo
RIVERSIDE EAST QUADRANGLE
CALIFORNIA - RIVERSIDE COUNTY
7.5-MINUTE SERIES
RIVERSIDE
MORENO VALLEY
Alessandro Blvd
Cactus Avenue
MARCH AFB
Interstate 215
Van Buren Blvd
RIVERSIDE NATIONAL CEMETERY
WOODCREST
Edgemont
Lemona
Canyon Crest Heights
Belvedere Heights
Box Springs
Sunnymead
West Marche
Arnold Heights
March ARB
March Field
SCALE 1:24 000
RIVERSIDE EAST, CA

RA-4.3 Cont.


ALESSANDRO BLVD.
CITY OF RIVERSIDE
COUNTY OF RIVERSIDE
MERIDIAN PKWY
LAND USE LEGEND
MIXED USE: 42.22 AC
BUSINESS PARK: 65.32 AC
INDUSTRIAL: 143.31 AC
STREETS: 37.91 AC
PUBLIC FACILITIES: 2.84 AC
PARKS/RECREATION/OPEN SPACE (P/R/OS): 18.00 AC
NET DEVELOPABLE: 369.60 AC
EXISTING EMWD TANK: 2.87 AC
CONSERVATION EASEMENT: 445.43 AC
GROSS ACREAGE: 817.90 AC
NOTE: Acreage of streets located outside the Specific Plan Area are calculated as part of the Specific Plan.
DUDEK
FIGURE 3-5
Site Plan

RA-4.3
Cont.

RA-4

CAL FIRE/Riverside County Fire Department
December 28, 2023

RA-4.1 This comment requests project numbers from March JPA and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. March JPA confirmed the requested Project numbers in an email dated January 18, 2024.

RA-4.2 This attachment is the Recirculated Draft EIR Notice of Availability. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-4.3 This attachment is the Notice of Availability extending the public review period for the Recirculated Draft EIR. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Joan Schneider <jschneider@morongo-nsn.gov>
Sent: Thursday, February 15, 2024 10:02 PM
To: Dan Fairbanks
Cc: Ann Brierty; Laura Chatterton; Elisha Duncan; THPO Department
Subject: Recirculated Draft EIR for West Campus Upper Plateau/Historic Structure Assessment Section 106 Consultation
Attachments: Section 106 March Joint Powers Auth. W.Campus Upper Plateau Recirculation EIR; Historic Structures Assessment JSS 2.16.2024.pdf

Dear Mr. Fairbanks:
The Morongo Band of Mission Indians ("MBMI" or the "Tribe") Tribal Historic Preservation Office (THPO) received on January 23, 2024, the March Joint Powers Authority (MJPA) letter concerning the Extended Review for the Recirculated EIR for the West Campus Upper Plateau (Project) as well as a digital version of the Historic Structure Assessment for the West Campus Upper Plateau Project at March Air Reserve Base. The proposed initiation of the historic preservation review process required by Section 106 of the National Historic Preservation Act of 1966 (NHPA), and its implementing regulations at 36 C.F.R. Part 800, is of interest to the MBMI, as well as the implementation of the review process for AB 52 under CEQA
This letter serves as notice of the Tribe's intent to participate in meaningful government-to-government consultation with March Joint Powers Authority. The Project is within the extended ancestral territory and traditional use area of the Cahuilla and Serrano people of the Morongo Band of Mission Indians. Since tribal cultural resources are non-renewable and, therefore, of profound importance to the Tribe, tribal participation is usually recommended during all inventory and ground-disturbing activities within MBMI ancestral lands through the involvement of MBMI-appointed monitors. Please see the attached letter for further information and the reasons for requesting Tribal Monitors during structure demolition. Thank you.
Respectfully,

RA-5.1

Joan S Schneider, PhD
Tribal Archaeologist
Tribal Historic Preservation Office
Morongo Band of Mission Indians
12700 Pumarra Road
Banning, CA 92220
Phone and Text: (951) 233-5319

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TRIBAL HISTORIC PRESERVATION OFFICE

VIA ELECTRONIC MAIL

fairbanks@marchjpa.com

MORONGO BAND OF MISSION INDIANS
A SOVEREIGN NATION

Dan Fairbanks
March JPA Planning Director
March Joint Powers Authority
14205 Meridian Parkway, #140
Riverside, CA 92518

February 16, 2024

Re: Section 106 and AB 52 Government-to-Government Consultation: Notice of Availability (Extended Review) for the Recirculated Draft EIR for the West Campus Upper Plateau

Dear Mr. Fairbanks:

The Morongo Band of Mission Indians ("MBMI" or the "Tribe") Tribal Historic Preservation Office (THPO) received on January 23, 2024, the March Joint Powers Authority (MJPA) letter concerning the Extended Review for the Recirculated EIR for the West Campus Upper Plateau (Project) as well as a digital version of the Historic Structure Assessment for the West Campus Upper Plateau Project at March Air Reserve Base. The proposed initiation of the historic preservation review process required by Section 106 of the National Historic Preservation Act of 1966 (NHPA), and its implementing regulations at 36 C.F.R. Part 800, is of interest to the MBMI, as well as the implementation of the review process for AB 52 under CEQA This letter serves as notice of the Tribe's intent to participate in *meaningful* government-to-government consultation with March Joint Powers Authority.

RA-5.2

The Project is within the extended ancestral territory and traditional use area of the Cahuilla and Serrano people of the Morongo Band of Mission Indians. Since tribal cultural resources are non-renewable and, therefore, of profound importance to the Tribe, tribal participation is usually recommended during all inventory and ground-disturbing activities within MBMI ancestral lands through the involvement of MBMI-appointed monitors.

THPO staff reviewed the Historic Structure Assessment document (BFSA Environmental Services 2022) and concur with the assessment that the historic structures existing within the Project are not eligible for the NRHP. However, since these structures will be demolished for the purposes of the Project and were constructed before present-day legal requirements for archaeological and tribal monitoring during ground disturbance in areas with the potential for subsurface cultural resources deposits, Tribe requests monitoring during the ground disturbance associated with demolition.

RA-5.3

Since tribal cultural resources are non-renewable and, therefore, of profound importance to the Tribe, tribal participation (i.e., Tribal Monitors) is recommended during all forthcoming demolition of the subject structures as well as during all future construction phases of the Project. We look forward to working with

12700 Pumarra Road – Banning, CA 92220 – (951) 755-5259 – Fax (951) 572-6004 – THPO@morongo-nsn.gov

March Joint Powers Authority to protect these irreplaceable tribal cultural resources out of respect for the ancestors of the Morongo people who left them there, as well as their descendants and future generations.

In furtherance of the Tribe's request to initiate Section 106 and AB 52 government-to-government consultations, the THPO requests the following actions taken by March Joint Powers Authority to ensure meaningful consultation:

- Tribal participation (a.k.a. tribal monitors)

Furthermore, when construction is planned for any future project on the West Campus Upper Plateau, Tribe will be requesting the following items in order to conduct meaningful government-to-government consultation:

- Currently proposed Project design and Mass Grading Maps
- A records search conducted at the appropriate California Historical Resources Information System (CHRIS) center with at least a 1.0-mile search radius from the project boundary. If this work has already been done, please furnish copies of the cultural resource documentation (ArcMap Shapefiles, reports, and site records) generated through this search so that we can compare and review with our records to begin productive consultation.
- Shapefile(s) of the Project Area of Potential Effects (APE)
- Geotechnical Report

This letter does not conclude consultation. Please contact the MBMI THPO to arrange for Tribal Monitor(s) well in advance of demolition of the historic structures.

The lead contact for this Project is Bernadette Ann Brierty, Tribal Historic Preservation Officer (THPO). Dr. Joan Schneider Tribal Archaeologist is assisting the Tribe in the review of this Project. Please do not hesitate to contact us at ABrierty@morongo-nsn.gov, THPO@morongo-nsn.gov, or (951) 663-2842, should you have any questions. The Tribe looks forward to continuing meaningful government-to-government consultation with March Joint Powers Authority.

RA-5.3 Cont.

RA-5.4

RA-5.5

Respectfully,

Bernadette Ann Brierty

Tribal Historic Preservation Officer

CC: THPO

12700 Pumarra Road – Banning, CA 92220 – (951) 755-5259 – Fax (951) 572-6004 – THPO@morongo-nsn.gov

RA-5

Morongo Band of Mission Indians
February 15, 2024

RA-5.1 This comment requests that Morongo Band of Mission Indians participate in government-to-government consultation with March JPA. The comment also states that the Project is within the extended ancestral territory and traditional use area of the Cahuilla and Serano people of the Morongo Band of Mission Indians. March JPA responded separately to this request as a government-to-government communication. March JPA fully responded to all information and claims within the February 15, 2024, Morongo Band of Mission Indians letter, in a response letter dated March 20, 2024. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-5.2 This comment requests that Morongo Band of Mission Indians participate in government-to-government consultation with March JPA. The comment also states that the Project is within the extended ancestral territory and traditional use area of the Cahuilla and Serano people of the Morongo Band of Mission Indians. March JPA responded separately to this request as a government-to-government communication. March JPA fully responded to all information and claims within the February 15, 2024, Morongo Band of Mission Indians letter, in a response letter dated March 20, 2024. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-5.3 This comment conveys concurrence with the finding that the structures on the Project site are not eligible for listing in the National Register of Historic Places, and requests on-site tribal monitors during ground disturbance activities. Under MM-CUL-4, agreements with the Pechanga Band of Indians and the Soboba Band of Luiseño Indians will provide tribal monitoring during all mass grading and trenching activities. Tribal monitors will have the authority to temporarily halt and redirect earth-moving activities in the affected area if suspected archaeological resources are unearthed. March JPA fully responded to all information and claims within the February 15, 2024, Morongo Band of Mission Indians letter, in a response letter dated March 20, 2024.

RA-5.4 In addition to the Tribe's consultation request, this comment indicates that the Tribe will be requesting Project-specific information including Project design and mass grading maps, records search results, shape files for the Project's Area of Potential Effects, and the Geotechnical Report when construction is planned. March JPA understands that this information will be requested. March JPA fully responded to all information and claims within the February 15, 2024, Morongo Band of Mission Indians letter, in a response letter dated March 20, 2024. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-5.5 This comment states that this letter does not conclude consultation and provides contact information for tribal representatives. March JPA fully responded to all information and claims within the February 15, 2024, Morongo Band of Mission Indians letter, in a response letter dated March 20, 2024. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

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From: Danica Nguyen <dnguyen1@aqmd.gov>
Sent: Friday, February 23, 2024 1:03 PM
To: Dan Fairbanks
Cc: Sam Wang
Subject: South Coast AQMD staff's comments on the Recirculated Draft EIR for the Proposed West Campus Upper Plateau Project
Attachments: RVC231206-08 Recirculated DEIR West Campus Upper Plateau Project .pdf

Dear Dan Fairbanks,

Attached are South Coast AQMD staff's comments on the Recirculated Draft Environmental Impact Report (EIR) for the Proposed West Campus Upper Plateau Project (SCH No. 2021110304) (South Coast AQMD Control Number: RVC231206-08). Please contact me if you have any questions regarding these comments. RA-6.1

Regards,

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

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

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

February 23, 2024

Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) for the Proposed West Campus Upper Plateau Project (Proposed Project) (SCH No. 2021110304)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The March Joint Powers Authority is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

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

Based on the Recirculated Draft EIR, the Proposed Project comprises approximately 818 acres, of which 370 acres are for the Specific Plan Area, 3 acres are for an existing public facility, and 445 acres are for the Conservation Easement.[1] South Coast AQMD staff reviewed aerial photographs and found that the nearest sensitive receptors, existing residential developments, are located within 500 feet north of the Proposed Project. Construction of the Proposed Project is assumed to begin in June 2023 and last through October 2027, a 4.5-year construction period, with an opening in 2028.[2] The Proposed Project site is in the western portion of the March JPA planning area, west of Cactus Avenue's current terminus, east and south of the Mission Grove neighborhood, and north of the Orangecrest neighborhood in the City of Riverside, California.[3]

RA-6.2

South Coast AQMD Staff's Comments on the Recirculated Draft EIR

Toxic Air Contaminant (TAC) from Light Duty Passenger Cars

Section 4.2 – Air Quality of the Recirculated Draft EIR has a footnote that states, *"Light Duty passenger cars are not considered a significant source of mobile source TAC emissions, and there is no evidence that exposure to gasoline causes cancer in humans.[4]"* South Coast AQMD staff has concerns regarding this statement.

RA-6.3

[1] Recirculated Draft EIR. Page 3-1.
[2] *Ibid*. Page 3-19.
[3] *Ibid*. Page 3-1.
[4] *Ibid*. Page 4.2-8.

According to the United States Environmental Protection Agency (U.S. EPA), mobile sources (motor vehicles and nonroad equipment) contribute significantly to benzene, acrolein, 1,3-butadiene, and acetaldehyde nationwide emissions.[5] The U.S. EPA - Control of Emissions of Hazardous Air Pollutants from Motor Vehicles and Motor Vehicle Fuels[6] also states that 1) benzene is a component of gasoline; 2) cars emit small quantities of benzene in unburned fuel or as vapor when gasoline evaporates; 3) a significant amount of automotive benzene is generated from the incomplete combustion of gasoline compounds (e.g., toluene and xylene); 4) other compounds, such as acetaldehyde and formaldehyde, can be formed through a secondary process when mobile source pollutants undergo a chemical reaction in the atmosphere. In addition, the Public Health Statement for Benzene from the Agency for Toxic Substances and Disease Registry mentions that the International Agency for Cancer Research and the U.S. EPA have determined that benzene is carcinogenic to humans.[7] Furthermore, the U.S. EPA also identified nine air-toxic compounds with mobile sources as the considerable contributors, which are 1,3-butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter (diesel PM), ethylbenzene, formaldehyde, naphthalene, and polycyclic organic matter.[8] Although the Proposed project is not a National Environmental Policy Act (NEPA) project, it is recommended that the Lead Agency review the information regarding these air toxics as priority mobile sources in the Updated Guidance on Mobile Source Air Toxic Analysis in NEPA,[9] published by the Federal Highway Administration (FHWA).

RA-6.3 Cont.

The Proposed Project would generate over 34,000 passenger cars daily.[10] With benzene being carcinogenic to humans, it is essential to include it in the health risk assessment (HRA) in addition to the daily truck trips and estimate the cancer risk to the sensitive receptors surrounding the Proposed Project.

Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. South Coast AQMD staff recommends incorporating additional mitigation measures into the Final EIR.

RA-6.4

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

1) Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional

[5] United States Environmental Protection Agency (U.S. EPA). Accessing Outdoor Air Near School – Mobile Sources. Available at: https://www3.epa.gov/air/sat/mobile.html
[6] U.S. EPA. Control of Emissions of Hazardous Air Pollutants from Motor Vehicles and Motor Vehicle Fuels. Available at: https://archive.epa.gov/airtoxics/nata/web/pdf/r00023.pdf
[7] Agency for Toxic Substances and Disease Registry. Public Health Statement for Benzene. Available at: https://wwwn.cdc.gov/TSP/PHS/PHS.aspx?phsid=37&toxid=14#:~:text=Both%20the%20International%20Agency%20for,months%20had%20irregular%20menstrual%20periods
[8] Caltrans. Project-level Air Quality Analysis. Available at: https://dot.ca.gov/programs/environmental-analysis/air-quality/project-level-air-quality-analysis
[9] Federal Highway Administration (FHWA). Updated Interim Guidance on Mobile Source Air Toxic (MSAT) Analysis in National Environmental Policy Act (NEPA) Documents. Available at: https://www.fhwa.dot.gov/environment/air_quality/air_toxics/policy_and_guidance/msat/index.cfm
[10] Draft EIR. Appendix N – Transportation. Page 63.

NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2) Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts. Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3) At a minimum, require the use of a 2010 model year that meets CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. All heavy-duty haul trucks should meet CARB's lowest optional low-NOx standard starting in 2022. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document. Include the requirements in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. Regular inspections should be conducted by the Lead Agency to the maximum extent feasible to ensure compliance.

4) Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

5) Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

RA-6.4
Cont.

Mitigation Measures for Operational Air Quality Impacts from Other Area Sources

1) Maximize the use of solar energy by installing solar energy arrays.

2) Use light-colored paving and roofing materials.

3) Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1) Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).

2) Design the Proposed Project such that truck entrances and exits do not face sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.

3) Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.

4) Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.

5) Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

RA-6.4 Cont.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1) State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[11]

2) South Coast AQMD 2022 South Coast Air Quality Management Plan,[12] specifically:
   a. Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures
   b. Appendix IV-B – CARB's Strategy for South Coast
   c. Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measures

3) United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation[13]

RA-6.5

South Coast AQMD Air Permits and Role as a Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing

RA-6.6

[11] State of California – Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
[12] 2022 South Coast AQMP. Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan
[13] United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation

discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the Draft EIR is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at http://www.aqmd.gov/home/permits.

RA-6.6 Cont.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

RA-6.7

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,
Sam Wang

Sam Wang

Program Supervisor, CEQA-IGR
Planning, Rule Development & Implementation

SW:DN
RVC231206-08
Control Number

RA-6

South Coast Air Quality Management District
February 23, 2024

RA-6.1 This comment is an email transmittal of the comment letter. Specific comments regarding the Recirculated Draft EIR sections are provided and responded to below.

RA-6.2 This comment is introductory in nature and summarizes Project information from the Recirculated Draft EIR sections. Specific comments regarding the Recirculated Draft EIR sections are provided and responded to below.

RA-6.3 The comment questions the statement in the EIR that "there is no evidence of that exposure to gasoline causes cancer in humans." The EIR and Project AQIA cite the Agency for Toxic Substances and Disease Registry's September 1996 ToxFAQs regarding automotive gasoline. However, this authority is focused on gasoline fumes, not gasoline emissions. This statement has been removed and additional information regarding toxic air contaminants from gasoline-powered vehicles can be found at: https://www.epa.gov/gasoline-standards/learn-about-gasoline. The EPA implements a number of programs that reduces toxic contaminants in gasoline.

Diesel particulate matter (DPM) has been identified as the top contributor to cancer risk-weighted emissions, contributing more than 85% of the total carcinogenic potential of emissions. Carcinogenic compound contributions from gasoline-powered cars and light duty trucks include 1,3-butadiene (4%) and benzene (3%). Collectively, five compounds—DPM, 1,3-butadiene, benzene, formaldehyde, and acetaldehyde— were found to be responsible for more than 90% of the cancer risk attributed to emissions.[1] While passenger vehicles do emit some TACs, the inclusion of passenger vehicle emissions in the analysis would not alter the findings. For example based on the Bay Area Air Quality Management District (BAAQMD) data cited above, even if the Project operational risk estimates were increased by 15%, this would result in a risk of 5.23 in one million for the unmitigated scenario and 2.56 in one million for the mitigated scenario, both of which are well below the applicable threshold of 10 in one million. In addition, the BAQMD data is from 2014 when there were a limited number of electric vehicles available compared to current and future EV usage.[2] The increasing trend toward electric passenger vehicles will reduce the volume of gasoline related emissions and will further reduce any health risks associated with gasoline powered passenger vehicles. It should be noted that based on EMFAC data, the ratio of diesel trucks to passenger cars for the proposed Project closely matches that of Riverside County, with approximately 6% of the fleet mix being heavy duty trucks. Therefore, compared to gasoline-powered passenger vehicles, diesel truck emissions pose a significantly greater health risk.

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1 Bay Area Air Quality Management District, 2014, Improving Air Quality & Health in Bay Area Communities, Community Air Risk Evaluation Program Retrospective & Path Forward (2004 to 2013). https://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE_Retrospective_April2014.ashx?la=en

2 See https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/light-duty-vehicle. In Riverside County alone, there was an increase from 0.23% EVs on the road in 2014 to 2.64% in 2022. This trend will continue to increase given California's Advanced Clean Cars II regulations that mandated all new passenger cars, trucks, and SUVs sold in California will be zero-emission vehicles by 2035. https://ww2.arb.ca.gov/resources/documents/cars-and-light-trucks-are-going-zero-frequently-asked-questions#:~:text=As%20part%20of%20the%20Advanced,Advanced%20Clean%20Cars%20II%20regulations.

The estimation that passenger vehicles contribute approximately 15% of the total risk is further substantiated by data presented in SCAQMD's MATES V Study. Based on Figure ES-2 in the MATES V Final Report,[3] 1,3-butadiene and benzene contribute approximately 15% to the total risk. As stated on page 2-20 of the MATES V Final Report, these pollutants are largely associated with gasoline combustion.

Additionally, passenger vehicles and trucks differ in their speeds and behavior while visiting the Project site and on surrounding roadways. Passenger vehicles typically travel at higher speeds, and would presumably arrive at the site, park, and be turned off. Alternatively, trucks travel more slowly, spending a greater amount of time on the Project site and off-site roadways. Truck engines would also be operating for longer periods of time on the Project site while checking in at the facility, maneuvering, and parking at Project loading docks. Although CARB anti-idling requirements restrict idling to no more than 5 minutes, the analysis conservatively assumed that, unmitigated, trucks would idle for 15 minutes at building loading docks.

Diesel truck exhaust poses a greater health risk than gasoline passenger vehicles, because trucks "behave" differently at the Project site in a manner that would produce more emissions. Diesel truck exhaust is the primary driver of health risk for facilities such as the proposed Project.

The Project HRA was prepared in accordance with SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis[4] and was comprised of all relevant and appropriate procedures presented by the U.S. EPA, California EPA and SCAQMD. Consistent with SCAQMD guidance and standard CEQA analyses, the Project HRA analyzed emissions from both on-site and off-site truck trips, truck idling emissions, and emissions that would occur from TRU operation both on- and off-site, as well as emissions that would result from the use of operational on-site cargo handling equipment. The analysis concluded that any impacts would be less than significant.

Furthermore, the International Agency for Research on Cancer (IARC), which is part of the World Health Organization (WHO), has classified diesel engine exhaust as "carcinogenic to humans" (Group 1) based on sufficient evidence of its carcinogenicity to humans. This classification is in contrast to gasoline engine exhaust, which is classified as "probably carcinogenic to humans" (Group 2A) due to limited evidence in humans and strong evidence in experimental animals.[5]

RA-6.4 This comment sets forth recommended air quality mitigation measures that would reduce emissions. The Project already includes the mitigation measures addressing all issues raised by the commenting agency. Regarding fleet electrification, MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. The commenting agency recommends requiring the use of a 2010 model year at a minimum. MM-AQ-20 requires a minimum of a 2014 model year, which is a stricter standard. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero

3 https://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report-9-24-21.pdf
4 https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis
5 https://www.iarc.who.int/wp-content/uploads/2018/07/pr213_E.pdf

emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments on the Recirculated EIR, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed. This measure would not apply to vehicles that are not owned and operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any vehicle that is otherwise legal to operate on California roads and highways. MM-AQ-5 requires every site plan to provide documentation confirming the plan's environmental impacts, including truck trips, do not exceed the impacts identified and disclosed in the EIR; absent such documentation, additional environmental review will be required.

Additionally, MM-AQ-8 requires the Project to provide electrical hookups at all TRU loading docks in order to support electric TRUs, while MM-AQ-11 supports the electrification of truck fleets by requiring the Project to size main electrical supply lines and panels to support electric vehicle charging, including the charging of HHD and delivery trucks once these trucks become available. MM-GHG-7 requires each Project site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with the voluntary Tier 2 of the 2022 CALGreen Code.

Regarding air quality impacts from other area sources, pursuant to MM-GHG-1, the Project will install rooftop solar photovoltaic (PV) electricity generation sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. MM-GHG-2 through MM-GHG 6 require Energy Star certified light bulbs and light features; specified duct insulation and window insulation; solar-reflecting cool roof material; improved HVAC with a SEER rating of 14 or higher as required by Energy Star; high efficiency water heaters; include daylighting; enhanced building envelope insulation; and blower door home energy rating system verified envelope leakage. MM-GHG-8 through MM-GHG-10 require water efficient toilets; waterless urinals; and water efficient faucets. MM-AQ-10 requires the use of light colored solar-reflecting paving. Finally, MM-AQ-6 requires all buildings constructed to achieve 2023 LEED Silver certification standards or equivalent.

Regarding design considerations, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway.

Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. Industrial buildings must be set back a minimum of 1,000 feet from residential. In addition, any industrial-use building will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 3.5.4, Off-Street Loading Facilities, and Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan require truck courts and loading docks to be oriented away or screened to reduce visibility

public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties, and prohibits loading and unloading activities within view of public streets or residential land uses. Section 3.5.4, Off-Street Loading Facilities, requires loading or unloading facilities to be sized and located so that they do not require trucks to be located in required front or street side yards during loading and unloading activities, ensuring trucks do not spill onto surrounding public streets. Parking and maintenance activities are restricted to designated service areas, which will prevent these activities, including overnight parking, occurring on public streets. MM-AQ-12 requires an on-site signage program that clearly identifies the required on-site circulation system. MM-AQ-15 requires signage clearly identifying the approved truck routes to be installed along the truck routes to and from the project site and within the project site.

RA-6.5 This comment requests March JPA review identified references and incorporate additional mitigation measures as applicable. As discussed in Response RA-6.4, above, all feasible mitigation measures have been incorporated into the Project. Please Topical Response 2 – Air Quality, for an analysis of how the Project and its mitigation measures are consistent with the mitigation measures suggested for consideration by the commenting agency: (1) Office of the California Attorney General Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act; (2) Appendices IV-A, IV-B, and IV-C of the SCAQMD 2022 AQMP; and (3) U.S. EPA's Mobile Source Pollution – Environmental Justice and Transportation.

RA-6.6 This comment states that, should the proposed Project require the use of new stationary equipment, including emergency generators or fire pumps, permits from SCAQMD would be required, and recommends that this discussion be included in the Final EIR. This information is included in Recirculated Section 4.2, Air Quality. The analysis conservatively assumes that each industrial, business park, and mixed use parcel would include installation of a stationary emergency generator. Each generator was estimated to operate for up to 1 hour per day, 1 day per week, for up to 50 hours per year for maintenance and testing purposes. Because these emergency engines are each expected to exceed a rating of 50 horsepower, it is anticipated that each emergency engine would require an SCAQMD air permit. MM-AQ-24 prohibits the use of diesel-powered back-up generators, unless absolutely necessary, and then only Tier 4 Final or better. Modeling Tier 4 generators for the mitigated scenario conservatively understates the emissions reductions under MM-AQ-24 to provide the "worst case scenario." Should any additional stationary equipment be required, March JPA will inform SCAQMD as the responsible agency. However, at this time it is unknown what other types of equipment may be required, and as such it would be speculative to include stationary equipment beyond the anticipated emergency generators.

RA-6.7 This comment is conclusory in nature and includes the commenting agency's request for written responses to comments prior to certification of the Final EIR in accordance with the purpose and goals of CEQA on public disclosure. Consistent with the requirements of CEQA and the commenting agency's request, responses to the commenting agency's specific comments on the Draft EIR are provided and responded to above.

From: Palafox, Daniel <DPalafox@riversideca.gov>
Sent: Monday, February 26, 2024 4:55 PM
To: Dan Fairbanks
Cc: Tinio, Maribeth; Taylor, Matthew; Galera, Pamela; Hernandez, Gilbert
Subject: City of Riverside's Review of a Recirculated DEIR for the West Campus Upper Plateau Project
Attachments: 2023-03-10 Previous City Comment Letter_DEIR_West Campus Upper Plateau.pdf; Revised Scope - West Campus Upper Plateau TOA.pdf; VMT Analysis - West Campus Upper Plateau.pdf; 2024-02-26 Recirculated DEIR City Comment Letter_West Campus Upper Plateau.pdf

RA-7.1

Good afternoon Dan,

Please see the attached comment letter and associated enclosures from the City of Riverside regarding the recirculated DEIR for the West Campus Upper Plateau Project.

Feel free to let us know if you have any questions or comments.

Daniel Palafox | Associate Planner
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Community Development
Department
Planning Division

City of Arts & Innovation

February 26, 2024

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

Subject: Review of a Recirculated Draft Environmental Impact Report for the West Campus Upper Plateau Project (SCH#2021110304)

Dear Mr. Fairbanks:

Thank you for the opportunity to comment on the recirculated draft Environmental Impact Report (DEIR) for the West Campus Upper Plateau Project.

The City of Riverside (City) understands that the project consists of the creation of a Specific Plan that will provide development standards, design guidelines, infrastructure master plans, maintenance responsibilities, phasing schedule, and implementation procedures necessary to develop Project Site. The City further understands that the Specific Plan will create 42.22 acres of Mixed Use, 65.32 acres of Business Park, 143.31 acres of Industrial, 37.91 acres of streets and roadways, 78 acres of developed Parks, Recreation, and Open Space, and 2.84 acres of Public Facilities. RA-7.2

The City has reviewed the recirculated DEIR, and provides the following comments:

Public Works – Traffic Engineering

- It appears that there were no changes to the Vehicle Miles Traveled Study and Level of Service Study included in the recirculated DEIR as well as no responses to the City's previous comments on the original DEIR and technical studies. As such, the Traffic Division's comments on the Vehicle Miles Traveled Study and Level of Service Study will remain the same. See enclosures. RA-7.3

The following comments are not a part of the City's environmental review but are related to the project design and operation characteristics.

Parks, Recreation and Community Services

- The project should make every effort to reroute utility and infrastructure away from park land to provide flexibility for future improvements. RA-7.4
    - Figure 3-7A – Sewer System

- The proposed sewer lift station and force main on Barton St. should be placed outside of park land.

o Figure 3-7D – Storm Drain System
- The storm drain lines should be rerouted around the edge of the park land.

o Figure 3-7H – Gas Backbone
- The project should reroute any new gas lines along the edge of designated park lands.

RA-7.4 Cont.

The City would also like to reiterate the comments provided to March JPA on March 10, 2023. The letter provides substantial comments regarding the project and should be addressed through environmental review. See enclosures.

RA-7.5

Should you have any questions regarding this letter, please contact me at Matthew Taylor, at (951) 826-5944, or by e-mail at mtaylor@riversideca.gov.

The City of Riverside appreciates your consideration of the comments provided in this letter. We thank you again for the opportunity to provide comments on this proposal and look forward to working with you in the future.

RA-7.6

Sincerely,

Matthew Taylor
Principal Planner

Enclosures:
- March 10, 2023 - City of Riverside's Review of the Draft Environmental Impact Report for the West Campus Upper Plateau Project Comment Letter
- VMT Analysis – West Campus Upper Plateau
- Revised Scope – West Campus Upper Plateau TOA

cc: Patricia Lock Dawson Mayor
Riverside City Council Members
Mike Futrell, City Manager
Rafael Guzman, Assistant City Manager
Jennifer A. Lilley, Community & Economic Development, Director
Maribeth Tinio, City Planner
Gil Hernandez, Public Works Director
Pamela Galera, Parks and Recreation Director
Phaedra Norton, City Attorney

Community Development
Department
Planning Division

City of Arts & Innovation

March 10, 2023

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

Subject: City of Riverside's Review of the Draft Environmental Impact Report for the West Campus Upper Plateau Project

Dear Mr. Fairbanks:

Thank you for the opportunity to comment on March Joint Powers Authority's Draft Environmental Impact Report (DEIR) for the West Campus Upper Plateau Project, provided to the City on January 9, 2023.

The City of Riverside (City) understands that the project consists of the creation of a Specific Plan that will provide development standards, design guidelines, infrastructure master plans, maintenance responsibilities, phasing schedule, and implementation procedures necessary to develop Project Site. The City further understands that the Specific Plan will create 42.22 acres of Mixed Use, 65.32 acres of Business Park, 143.31 acres of Industrial, 37.91 acres of streets and roadways, 78 acres of developed Parks, Recreation, and Open Space, and 2.84 acres of Public Facilities.

RA-7.7

The City has reviewed the Draft West Campus Upper Plateau Specific Plan (Version 5) and submits the attached Summary of Comments for consideration.

In addition, the City has reviewed the DEIR and we wish to provide the following comments:

<u>Public Works – Traffic Engineering Division:</u>

- We request an opportunity to review the Construction Management Plan and request that March JPA schedule a meeting to discuss the traffic signal warrant analysis and associated improvements. Additionally, we request that March JPA coordinate with

the Riverside Transit Authority (RTA) on any proposed bus stop amenities for Barton Street. Please provide information on the timeline or phasing program for any improvements.

- For your reference, please see the attached Traffic Analysis with additional comments.

Appendix N – Transportation

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

RA-7.7 Cont.

<u>Community & Economic Development Department – Planning Division:</u>

Chapter 3.5 – Proposed Project

Section 3.5.1: Specific Plan Area

- **P117** – Uses table – This section of the Project Description indicates that "energy generation and distribution" are prohibited throughout all areas of the SPA. This would seem to prohibit rooftop or ground-mounted photovoltaics systems; however, elsewhere in the DEIR, installation of solar photovoltaics is required as a mitigation measure for various environmental impacts; please clarify. Additionally, the City recommends that the uses permitted within the Specific Plan be expanded to allow clean energy production including but not limited to hydrogen, solar and similar non-emitting renewable energy sources. Nonrenewable energy generation facilities (natural gas, etc.) should continue to be prohibited within the SPA.

- **P119 – Mixed Use Parcels** – The Project Description, and the proposed Specific Plan, propose no vehicular access from Barton Street for any of the Mixed Use parcels having frontage on this proposed street. However, given that the proposed Specific Plan allows for community-serving retail uses – and, indeed, assumes that 25% of the buildout of these parcels will be with retail uses – vehicular access from Barton Street would likely be necessary for the viability of retail and similar uses.
  If (and only if) Industrial-type uses, including Business Enterprise uses, are eliminated as permitted uses in the Mixed Use Zone as recommended by the City, the proposed Specific Plan should consider allowing vehicular access from Barton Street for neighborhood and visitor-serving retail uses only for the proposed Mixed-Use parcels along Barton Street, provided there is no vehicular access to Airman Drive. Vehicular through-access from Barton Street to Airman Drive and Cactus Avenue across the Mixed Use parcels should continue to be strictly prohibited. See also comments on Section 4.15 – Transportation.
  The DEIR and corresponding transportation and VMT analyses should be revised to analyze potential impacts and identify any necessary mitigation measures for this scenario if implemented.

Section 3.5.2: Project Design Features

- **P125 – PDF-NOI-1** – This PDF generally limits construction hours from 6am-10pm on any given day. In order to avoid potential noise impacts to surrounding sensitive receptors (i.e., residential neighborhoods), all outdoor construction activities throughout the project area should conform to City Noise Code (RMC Title 7) hours of operation (7-7, 8-5 Saturday, no construction Sunday or holidays).
- **P126 – PDF-TRA-1 – Barton Street** – This PDF states that the multipurpose trail "will only be accommodated for portions of Barton Street adjacent to the open space/parks." It is unclear from the project description which segments of the proposed Barton Street extension will and will not be constructed with the multipurpose trail improvements; and, further, it is unclear why this stipulation is proposed. Multipurpose trail connectivity should be accommodated along the entire length of the Barton Street extension in order to ensure connectivity and usability.
- **P127 – PDF-TRA-3 – Truck route enforcement** – This PDF states that truck route enforcement "shall be funded for 2 years." The project description indicates that construction of the project is anticipated to last at least 4.5 years; as such, it is unclear why 1) funding of the enforcement mechanism is limited to only 2 years; 2) when this 2-year funding period is intended to begin; and 3) how truck route enforcement will be funded and implemented after the conclusion of this 2-year period.
- **Figure 3-7H – Gas Backbone** – PDF-AQ-4 states that no natural gas infrastructure will be accommodated; however, this figure depicts the proposed construction of a full natural gas backbone infrastructure throughout the SPA. Why is this backbone network

RA-7.7 Cont.

necessary if no natural gas connections for future development will be accommodated?

Chapter 4 – Environmental Analysis

- **P172 – Cumulative Effects Analysis Methodology** – This section of the DEIR references a Figure 4-1, Cumulative Development Location Map, but this figure does not appear to be provided. Please clarify or revise the DEIR to incorporate this figure.

Section 4.2 – Air Quality

- **P242 – Operational Health Risk Assessment** – The DEIR should evaluate the potential health impacts of exposure to DPM and other emissions related to operation of the project on users of the proposed active park, particularly children and similarly vulnerable populations. Measures should be taken to reduce exposure of park users to particulate matter emissions generated by the project should be to the greatest extent feasible.

Section 4.4.1: Cultural Resources – Existing Conditions

- The integrity analysis for the Weapons Storage Area (WSA) Historic District was incorrectly completed as it analyzed historic integrity before determining eligibility. Eligibility must first be evaluated, then historic integrity is analyzed. The DEIR presents these items in the reverse. Per Chapter VIII of the National Register Bulletin #15, "Integrity is the ability of a property to convey its significance," and "Only after significance is fully established can you proceed to the issue of integrity." The significance of the structure is a key component of the integrity analysis as the weight of each aspect of integrity may vary based on the identified significance. For example, design will play more importance on a structure with architectural significance than a structure with significance for events. See page 45 of National Register Bulletin #15 for the steps in assessing integrity.
- Structures on the project site were not evaluated at the Riverside County level for designation as required by CEQA. Historical resources include only those that are eligible or listed within a local historical resources inventory.
- The evaluation of the WSA Igloos, states that the structures are the only of their kind in California yet asserts that they are not eligible for listing because they are not unique and other examples exists across the nation. The analysis does not consider local level of significance. As discussed in National Register Bulletin #15, "...if a property is of a type found throughout a State, or its boundaries extend over two States, but its importance relates only to a particular county, the property would be considered of local significance." While the WSA Igloos, may not have National significance, they are likely to have State and local significance, serving as the only examples in the State.

RA-7.7 Cont.

- The integrity analysis incorrectly applies integrity of association. Association is not solely connected to person of significance. Association include organization, agencies, groups, or events. Per National Register Bulletin #15, "Association is the direct link between an important historic event or person and the historic property." The analysis also incorrectly applies integrity of feeling. The analysis implies that feeling is directly connected to setting. Per National Register Bulletin #15, "Feeling is the property's expression of the aesthetic or historic sense of a particular period of time." Even if the setting has been altered, the structures may retain integrity of feeling as WSA Igloo provided there is sufficient presence of physical features that, taken together, convey the property's historic character.

Section 4.4.5: Cultural Resources – Impacts Analysis

- The Impacts Analysis for Threshold 1 only discusses California Register and National Register eligibility and should include local register eligibility. This analysis may need to be adjusted based on previous comments.

Section 4.4.5: Cultural Resources – Cumulative Effects

- The analysis may need to be adjusted based on previous comments.

Section 4.5: Energy

- **P381 – Feasible Renewable Energy Features** – This section of the DEIR states that the "Specific Plan Area would install approximately [?] solar PV" – what quantity of solar PV is proposed to be installed?

RA-7.7 Cont.

Section 4.7: Greenhouse Gas Emissions

- **P439 – Table 4.7-3 Scoping Plan Consistency** – Action beginning "Further reduce vehicle miles traveled" – Response does not appear to address the specific action from the Scoping Plan as discusses employment growth projections for the RTP/SCS and AQMP and does not directly address the project's consistency with efforts to reduce VMT. This project will generate a substantial amount of new VMT and may be inconsistent with this Scoping Plan action.
- **P444 – Table 4.7-5 Project Consistency with the SCAG Connect SoCal RTP/SCS** – Measure "Reduce greenhouse gas emissions and improve air quality" – The project may be inconsistent with this measure. The statement "implementation of the Specific Plan would reduce traffic congestion, pollution, and fossil fuel dependence" is unsubstantiated and not supported by evidence. Other sections of this EIR identify significant and unavoidable impacts to criteria air pollutant emissions associated with operation of the project.

Section 4.10 – Land Use and Planning

- **P561 – Table 4.10-1: Project Consistency with March JPA General Plan Goals – Land Use Element Transportation Goal 8** – The project may not be consistent with this General Plan goal. Although public transit access exists within the general vicinity of the project area, and MM-GHG-11 would fund improvements to proximate transit facilities, there is no direct transit service or access to service within the majority of the SPA. Transit users wishing to access the Industrial or Business Park sections of the SPA (intersection of Cactus Avenue and Linebacker Drive) would need to traverse on foot or by bicycle approximately 1.5 miles via future Cactus Avenue and Brown Street to the nearest RTA bus stop (far side Alessandro Boulevard and Meridian Parkway) or 1.4 miles to the Moreno Valley/March Field Metrolink station. Transit users whose destinations are accessed from Bunker Hill, Airman or Arclight Drives would need to walk or cycle even further. Transit uses wishing to access the Mixed Use sections of the SPA between Barton Street and Airman Drive would have a more reasonable 0.5-mile walking or cycling trip to the nearest RTA bus stop (far side Alessandro Boulevard and Barton Street), but would have effectively no access to the Moreno Valley/March Field Metrolink station. These conditions conflict with MJPA General Plan Goal 8 which promotes "adequate, affordable, equitably distributed and energy efficient [sic] public and mass transit services which promote mobility to, from, and within the planning area" (emphasis added). This conflict with the MJPA General Plan Land Use Element goals and policies could result in a potentially significant impact under Threshold LU-1. Appropriate mitigation measures should be developed and applied to the project, including but not limited to enhanced pedestrian connectivity to nearby transit facilities, last-mile solutions for equitable access to transit facilities, measures to promote transit use for employees and visitors to the project, and other measures as appropriate.
- **P567 – Table 4.10-1: Project Consistency with March JPA General Plan Goals – Housing** – The statement "housing is incompatible with airfield uses adjacent to the planning area" is unsubstantiated and contradicts the MARB/MIP LUCP, which only identifies residential development over 6.0du/ac (Compatibility Zone C2) or 3.0du/ac (Compatibility Zone C1) as incompatible land uses within these respective Compatibility Zones.
- **P570 – Table 4.10-1: Project Consistency with March JPA General Plan Goals – Resource Management Element – Goal 7**: This consistency assessment may need to be revised depending on revisions needed to Chapter 4.4 (Cultural Resources) - see previous comments on Section 4.4 Cultural Resources.

RA-7.7 Cont.

Section 4.11 – Noise

- **P623 – Onsite Operational Noise – Loading Dock Activity** – Site configurations, including loading dock locations, for all proposed parcels with the exception of the two proposed Plot Plans cannot reasonably be known at this level of analysis, and, as such,

potential noise impacts on surrounding sensitive receptors (i.e., residential uses to the north, west and south of the SPA) cannot be reliably estimated or evaluated. Potentially significant impacts related to onsite operational noise could therefore result if individual site design does not properly address noise impacts. Mitigation measures should be incorporated, or development standards should be written into the proposed Specific Plan, requiring that all loading docks be oriented away and fully screened by buildings or terrain with no direct line-of-sight to any surrounding residential land use for all parcels that would allow uses that involve loading and unloading of trucks.

- **P651 – Figure 4.11-9 – Operational Noise Source Locations** – This figure suggests that the noise model did not assume any loading dock activity occurring on any of the Mixed-Use parcels; however, the proposed Specific Plan would allow "Business Enterprise" storage and distribution uses within the Mixed-Use areas, including warehousing uses up to 200,000 square feet, which should reasonably be expected to include potential loading dock areas. The model and outputs should be revised, and the analysis updated, to reflect this potential use within the Mixed-Use areas.

Section 4.12 – Population and Housing

- **P656 – 4.12.1 Existing Conditions – Jobs/Housing Balance** – This paragraph states that the four member jurisdictions of the MJPA are "recognized by the State of California as in compliance with Housing Element Law"; however, unincorporated Riverside County does not have an HCD-certified Housing Element as of March 2023 and is in an "out of compliance" status with Housing Element Law. The City of Riverside Housing Element was certified by HCD on September 25, 2022.
- **P661 – Housing Projections and P 663 – 4.12.7 – Cumulative Effects** – The DEIR concludes that, with the area increase of 2,600 jobs at project buildout, "the potential need to provide housing for approximately 2,600 employees is supported by existing conditions within unincorporated Riverside County or within surrounding cities within the County" and that this impact is less than significant and not cumulatively considerable. However, SCAG's 6th Cycle RHNA Allocation Methodology, which determines the number of housing units each member jurisdiction must plan to accommodate within the 2021-2029 Housing Element cycle, relies heavily on population, household and employment growth projections from the 2016 Connect SoCal RTP/SCS. The 2016 RTP/SCS did not factor additional employment growth associated with the project into its growth forecast and, by extension, the RHNA allocation methodology does not account for the additional housing need induced by the project. By itself, this could be considered a potentially significant impact under threshold POP-1. Moreover, the 2016 RTP-SCS would not have incorporated other more recently adopted Specific Plans, Specific Plan Amendments and similar land use changes within the JPA and surrounding/member jurisdictions that result in additional employment growth that

RA-7.7 Cont.

would potentially cumulatively exceed the 2016 RTP/SCS growth projections and, by extension, the 6th Cycle RHNA allocation assigned to each jurisdiction that is necessary to accommodate the associated excess employment growth.

Section 4.15 – Transportation

- **P696** – The DEIR states that "Additionally, direct access to retail uses would be via internal roadways of Airman Drive, Arclight Drive, Linebacker Drive and Bunker Hill. There would be no direct access to retail uses from Barton Street." In order to provide opportunities for community-service retail uses to be established within the Mixed Use areas of the SPA, City Staff recommend that vehicular access to Mixed Use-zoned parcels fronting on Barton Street be permitted for non-industrial uses only; should the proposed Specific Plan be revised to permit vehicular access as such, this statement and the corresponding analysis in this Section of the DEIR should be revised accordingly.
- **P714 – 4.15.5 – Thresholds of Significance – VMT Impact Thresholds** – The DEIR states in this section that "The proposed Project would be considered a mix of retail, office, business park, medical, , research and development, and services." This statement 1) does not identify the land use categorization rubric used to establish the constituent land uses within the project and 2) appears to have omitted significant components of the proposed land use program, i.e., high-cube fulfillment and cold storage warehouse, for example. The DEIR should clarify whether, and, if so, under which category, the multiple millions of square feet of warehousing and logistics-related land uses proposed were categorized for the purpose of determining appropriate significance thresholds for the Project's VMT impacts.
- **P717 – 4.15.6 – Impacts Analysis – Specific Plan Area, Operations** – The DEIR states in this section describes physical improvements (e.g., "channelization") that would prevent large vehicles such as trucks from making specified turning movements onto roadways within and surrounding the project area. The DEIR further concludes that "the above-mentioned improvements would enhance public transit, roadway, bicycle, or pedestrian facilities. The Project would not include any improvements that would interfere with the construction of pedestrian or bicycle facilities in the future. Therefore, no impacts to alternative transportation facilities would occur, and no mitigation measures are required." This conclusion does not address potential future bus or other mass transit service that may be established within the SPA in the future to serve users accessing the proposed SPA. This conclusion should be reevaluated to address the potential for bus service on roadways within the SPA in the future and address whether there are potential impacts to future transit service that are not sufficiently addressed in the DEIR.

RA-7.7 Cont.

Chapter 5.5 – Growth-Inducing Impacts

- **P858** – The DEIR states that the project would stimulate population growth "consistent with employment growth envisioned in local and regional land use plans […] because the planned growth of the Project and its land use intensity have been factored into the underlying growth projections of the SCAG 2020-2045 RTP/SCS." This project involves land use changes that have not been adopted by the MJPA, are thus not reflected in the MJPA General Plan, and were therefore not a part of the baseline conditions used to prepare the 2020 RTP/SCS growth projections. For this reason, this conclusion is inaccurate.

Chapter 6.4 – Alternatives Under Consideration

- **P861 – Alternative 3 – Restricted Industrial Building Size Alternative** – There is no clear rationale offered for the reduction of industrial building size conceived under this alternative development scenario (two, 490,225-sf buildings in lieu of one, 1,225,000-sf buildings). This alternative could have just as easily evaluated a larger or smaller reduction in building size or division of this proposed parcel into more than two lots with similar FARs as that which was analyzed in the DEIR. There is further no clear explanation or rationale as to why other alternative scenarios, such as a development plan with a further reduced Industrial land use (in favor of expanded Mixed Use or Business Park land uses), or an alternative development plan with no Industrial land uses at all (opting instead for all Business Park, all Mixed Use, or a combination of both) was not considered. Reductions in developable square footage or potential employment resulting from reduced or eliminated Industrial land uses comparted to the project could be offset by changes to the Specific Plan development standards governing maximum development intensity within the Business Park and/or Mixed Use areas. None of these scenarios would fail to meet any of the Project Objectives; all are within the reasonable range of alternatives warranting consideration by the Lead Agency and therefore warrant analysis as alternatives to the Project in addition to those considered in the DEIR.
- **P913 – Figure 6-1 – Reduced Development Area Alternative** – this figure does not appear to depict the Reduced Development Area alternative described in the DEIR and in fact appears to depict the project as proposed.

RA-7.7 Cont.

Appendix C-1 – Air Quality Report

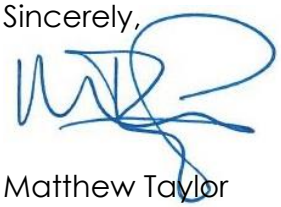
- We request detailed information on how the project will comply with Rule 2305 and how future lease agreements will implement emission reducing strategies.
- Please include public signage which displays the South Coast Air Quality Management District's, or appropriate authority's, phone number to report violations.

Appendix C-2 – Health Risk Assessment

- The modeling and analysis should be revised evaluate the potential health impacts of exposure to DPM and other emissions related to operation of the project on users of the proposed active park, particularly children and similarly vulnerable populations.

Should you have any questions regarding this letter, please contact Scott Watson, Historic Preservation Officer, at (951) 826-5507, or by e-mail at swatson@riversideca.gov.
The City of Riverside appreciates your consideration of the comments provided in this letter. We thank you again for the opportunity to provide comments on this proposal and look forward to working with you in the future.

Sincerely,



Matthew Taylor
Principal Planner

RA-7.7
Cont.

Attachments:

- MJPA West Campus Upper Plateau Specific Plan – Draft #5 – Comments Summary
- Comments from the Traffic Division on the Traffic Analysis
- National Register Bulletin: How To Apply the National Register Criteria for Evaluation

cc: Patricia Lock Dawson, Mayor
Riverside City Council Members
Mike Futrell, City Manager
Rafael Guzman, Assistant City Manager
Jennifer Lilley, Director, Community & Economic Development Department
Maribeth Tinio, City Planner
Gil Hernandez, Public Works Director
Phaedra Norton, City Attorney

MJPA West Campus Upper Plateau Specific Plan – Draft #5

City of Riverside Planning Division Staff Comments – March 9, 2023

1. **Chapter ES.1 – Project Overview**
    a. **Land Uses**
        i. **Business Park (BP)**: Includes warehousing up to 200,000sf as a permitted use. Recommend limiting to 100,000sf within 800ft of residential zone or use for consistency with City standards.
        ii. **Mixed Use (MU)**: Not consistent with uses that typically comprise mixed-use districts in the City of Riverside. Recommend eliminate Business Enterprises uses from this land use designation.
2. **Chapter 1 – Introduction**
    a. **1.2 – Specific Plan Objectives**
        i. Recommend additional objective to be added: "Prioritize compatibility of new development with existing adjoining sensitive land uses, particularly residential neighborhoods, park and recreation areas, schools and places of worship through comprehensive and context-sensitive development and design standards."
    b. **1.7 – Discretionary Actions**
        i. **Plot Plans:** Why are these specific development applications included in the Specific Plan document? These should be subsequent rather than concurrent approvals.

RA-7.7 Cont.

3. **Chapter 2 – Land Use**
    a. **2.3 – Land Use Compatibility**
        i. There is no discussion in this section of land use compatibility with other adjoining sensitive uses including but not limited to residential neighborhoods, park, recreation and open space areas, schools and places of worship. Recommend this section be expanded to address how the Specific Plan preserves, maintains and promotes compatibility with adjoining and nearby land uses.
    b. **2.4 – Land Use Plan**
        i. **Business Park**: Includes warehousing up to 200,000sf as a permitted use. Recommend limiting to 100,000sf within 800ft of residential for consistency with City standards.
        ii. **Mixed Use**: Not consistent with uses that typically comprise mixed-use districts. Recommend eliminate Business Enterprise uses from this land use designation.
4. **Chapter 3 – Development Regulations**
    a. **3.4 – Permitted, Conditional and Ancillary Uses**
        i. **Table 3-1 – West Campus Upper Plateau Specific Plan Land Use Table**

1. Recommend prohibiting Business Enterprise uses in the Mixed Use District.
2. Recommend adding non-emitting, renewable energy generation and distribution facilities (including but not limited to hydrogen, solar photovoltaics, etc.) as a permitted use (nonrenewable generation should remain prohibited).
3. Recommend reinstating deleted Footnote 4 and modifying footnote to limit Business Enterprise uses to a maximum of 100,000sf when located within 800 feet of a residential zone or use.

b. 3.5 – Development Standards

i. Table 3-2 – Development Standards

ii. 3.5.3 – Driveway Widths and Locations

1. If Industrial (including Business Enterprise) uses are eliminated as permitted uses in the Mixed Use Zone as recommended above, then recommend vehicular access be permitted from Barton Street provided that there is no vehicular access provided to Airman Drive.

iii. 3.5.4 – Off-Street Loading Facilities

1. These provisions should be expanded to require that off-street loading and unloading facilities shall be fully screened from view of any residential zone or property through building orientation and/or fully opaque screen walls.

RA-7.7 Cont.

5. Chapter 4 – Design Guidelines

a. 4.1 – Purpose and Intent

i. Recommend additional objective: "To protect surrounding sensitive uses, including residential neighborhoods, parks, open space and recreation areas, schools and places of worship, from the potential negative visual and aesthetic impacts of future development within the Specific Plan Area."

b. 4.3 – Architectural Design Guidelines

i. 4.3.1 – Building Form

1. **b.** - Recommend this be made more specific/objective. "Periodic" is a subjective measure.

ii. 4.3.2 – Building Materials, Colors and Textures

1. **d.** – Recommend building color schemes be "light earth, neutral or gray tones"

c. 4.4 – Site Features

i. 4.4.2 – Truck Courts and Loading Docks

1. **a.** – This provision should be a “shall” instead of a “should”

2. **b.** – This provision should be amended to add "or in any location having a direct line of site from surrounding residential land uses."
3. **c.** – This provision should be removed from the Design Guidelines (Chapter 4) and made into a Development Standard (Chapter 3), and be revised to delete "should" in favor of "shall."

ii. 4.4.4 – Rooftop Equipment

1. **a.** - Recommended addition or new provision: "Building parapet walls shall be at least as high at the shortest distance between roof surface and top of parapet as the tallest piece of roof-mounted equipment." This ensures that roof-mounted equipment is fully screened from any vantage point.

iii. 4.4.8 – Conservation Easement Protection

1. **c.** – "All lighting *near* the Conservation Easement shall be in compliance with the Dark Sky parameters […]" – this provision should be amended to eliminate the term "near" in favor of a specified distance.

6. Chapter 6 – Infrastructure and Grading

a. 6.8 – Grading

i. 6.8.1 – Grading Plan Development Standards

1. "Cut and fill slopes shall be constructed at inclinations of no steeper than two horizontal feet to one vertical foot *unless otherwise approved by the MJPA*." Through what processes and under what circumstances? Are there standard criteria for whether departures from minimum grading standards shall be granted?
2. Recommend reduction of minimum slope height requiring permanent landscaping and irrigation from 10 feet to 6 feet, consistent with City of Riverside requirements for manufactured slopes.

RA-7.7 Cont.

7. Chapter 7 – Implementation

a. 7.4 – Development Review Process

i. 7.4.2 – Development Plan Review

1. Recommend addition of a requirement for public notification of pending development applications by certified US Mail to surrounding property owners within a specified radius for a specified minimum of period of time prior to decision on discretionary actions consistent with Section 9.020.200 of the March JPA Development Code.
2. Further recommend a formalized requirement for notification to surrounding jurisdictions of all pending development applications upon acceptance of completed application.

MEMORANDUM

Engineering

DATE: 02/06/2023

TO: Fairbanks, Dan
FROM: Vital Patel
CC: Philip Nitollama
RE: March JPA – West Campus Upper Plateau Project

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

1. The Public works Traffic Division would like to request a meeting to discuss the traffic signal warrant analysis and the improvements.

2. The Traffic Division would like to request an opportunity to review the Construction Management Plan.

3. Please provide information on timeline/ phasing program of improvements.

4. Please provide information and co-ordinate with RTA on any proposed bus stop and bus-stop amenities for the Barton Street.

5. Section 1.10 – Traffic calming measure: The project should be conditioned to construct the speed feedback signs, speed limit signs, advisory speed signs, curb ahead warning signs and associated striping along Barton Street. Locations and quantities to be determined.

6. Section 3.5, Truck route: The section includes that "No trucks access is permitted along Barton Street. The Project Applicant and the City should work together on an appropriate mitigation measure to ensure Project traffic adheres to the routes as shown on the Project (Truck) trip distribution." – The project should be conditioned to work with the City of Riverside to finalize appropriate improvements to ensure that project truck traffic adheres to the adopted truck routes.

RA-7.7 Cont.

7. Section 1.6.1 Site Adjacent and Site Access Recommendations:

   Recommendation 5 – Barton Street:

   - Please provide on-street parking adjacent to trail. If no parking is permitted on the street, then is there an off-street parking facility available? Where do trail users park?

   - Please evaluate adding a parking lane next to the multi-purpose trail segment and adding "No Parking" signs for the rest of the roadway segment.

8. Table 1-4: If striping plans are not provided prior to acceptance of the traffic study, can a condition of approval be added to the project to provide the striping plan? (Striping plans are to show feasibility of all the improvements)

RA-7.7
Cont.

NATIONAL REGISTER BULLETIN

Technical information on the the National Register of Historic Places:
survey, evaluation, registration, and preservation of cultural resources

U.S. Department of the Interior
National Park Service
Cultural Resources
National Register, History and Education

How to Apply the National Register Criteria for Evaluation

The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to tribes.

The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.

This material is partially based upon work conducted under a cooperative agreement with the National Conference of State Historic Preservation Officers and the U.S. Department of the Interior.

Date of publication: 1990; revised 1991, 1995, 1997. Revised for Internet 1995.

Cover

(Top Left) ***Criterion B - Frederick Douglass Home,*** *Washington, D.C. From 1877-1899, this was the home of Frederick Douglass, the former slave who rose to become a prominent author, abolitionist, editor, orator, and diplomat. (Walter Smalling, Jr.)*

(Top Right) ***Criterion D - Francis Canyon Ruin,*** *Blanco vicinity, Rio Arriba County, New Mexico. A fortified village site composed of 40 masonry-walled rooms arranged in a cluster of four house blocks. Constructed ca. 1716-1742 for protection against raiding Utes and Comanches, the site has information potential related to Navajo, Pueblo, and Spanish cultures. (Jon Samuelson)*

(Bottom Left) ***Criterion C - Bridge in Cherrytree Township,*** *Venago County, Pennsylvania. Built in 1882, this Pratt through truss bridge is significant for engineering as a well preserved example of a type of bridge frequently used in northwestern Pennsylvania in the late 19th century. (Pennsylvania Department of Transportation)*

(Bottom Right) ***Criterion A - Main Street/Market Square Historic District,*** *Houston, Harris County, Texas. Until well into the 20th century this district marked the bounds of public and business life in Houston. Constructed between the 1870s and 1920s, the district includes Houston's municipal and county buildings, and served as the city's wholesale, retail, and financial center. (Paul Hester)*

PREFACE

Preserving historic properties as important reflections of our American heritage became a national policy through passage of the Antiquities Act of 1906, the Historic Sites Act of 1935, and the National Historic Preservation Act of 1966, as amended. The Historic Sites Act authorized the Secretary of the Interior to identify and recognize properties of national significance (National Historic Landmarks) in United States history and archeology. The National Historic Preservation Act of 1966 authorized the Secretary to expand this recognition to properties of local and State significance in American history, architecture, archeology, engineering, and culture, and worthy of preservation. The National Register of Historic Places is the official list of these recognized properties, and is maintained and expanded by the National Park Service on behalf of the Secretary of the Interior.[1]

The National Register of Historic Places documents the appearance and importance of districts, sites, buildings, structures, and objects significant in our prehistory and history. These properties represent the major patterns of our shared local, State, and national experience. To guide the selection of properties included in the National Register, the National Park Service has developed the National Register Criteria for Evaluation. These criteria are standards by which every property that is nominated to the National Register is judged. In addition, the National Park Service has developed criteria for the recognition of nationally significant properties, which are designated National Historic Landmarks and prehistoric and historic units of the National Park System. Both these sets of criteria were developed to be consistent with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation*, which are uniform, national standards for preservation activities.[2]

This publication explains how the National Park Service applies these criteria in evaluating the wide range of properties that may be significant in local, State, and national history.

It should be used by anyone who must decide if a particular property qualifies for the National Register of Historic Places.

Listing properties in the National Register is an important step in a nationwide preservation process. The responsibility for the identification, initial evaluation, nomination, and treatment of historic resources lies with private individuals, State historic preservation offices, and Federal preservation offices, local governments, and Indian tribes. The final evaluation and listing of properties in the National Register is the responsibility of the Keeper of the National Register.

This bulletin was prepared by staff of the National Register Branch, Interagency Resources Division, National Park Service, with the assistance of the History Division. It was originally issued in draft form in 1982. The draft was revised into final form by Patrick W. Andrus, Historian, National Register, and edited by Rebecca H. Shrimpton, Consulting Historian.

Beth L. Savage, National Register and Sarah Dillard Pope, National Register, NCSHPO coordinated the latest revision of this bulletin. Antionette J. Lee, Tanya Gossett, and Kira Badamo coordinated earlier revisions.

[1]Properties listed in the National Register receive limited Federal protection and certain benefits. For more information concerning the effects of listing, and how the National Register may be used by the general public and Certified Local Governments, as well as by local, State, and Federal agencies, and for copies of National Register Bulletins, contact the National Park Service, National Register, 1849 C Street, NW, NC400, Washington, D.C., 20240. Information may also be obtained by visiting the National Register Web site at **www.cr.nps.gov/nr** or by contacting any of the historic preservation offices in the States and territories.

[2]The *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* are found in the *Federal Register*, Vol. 48, No. 190 (Thursday, September 29, 1983). A copy can be obtained by writing the National Park Service, Heritage Preservation Services (at the address above).

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I. INTRODUCTION

The National Register is the nation's inventory of historic places and the national repository of documentation on the variety of historic property types, significance, abundance, condition, ownership, needs, and other information. It is the beginning of a national census of historic properties. The National Register Criteria for Evaluation define the scope of the National Register of Historic Places; they identify the range of resources and kinds of significance that will qualify properties for listing in the National Register. The Criteria are written broadly to recognize the wide variety of historic properties associated with our prehistory and history.

Decisions concerning the significance, historic integrity, documentation, and treatment of properties can be made reliably only when the resource is evaluated within its historic context. The historic context serves as the framework within which the National Register Criteria are applied to specific properties or property types. (See *Part V* for a brief discussion of historic contexts. Detailed guidance for developing and applying historic contexts is contained in *National Register Bulletin: How to Complete the National Register Registration Form* and *National Register Bulletin: How to Complete the National Register Multiple Property Documentation Form*)

The guidelines provided here are intended to help you understand the National Park Service's use of the Criteria for Evaluation, historic contexts, integrity, and Criteria Considerations, and how they apply to properties under consideration for listing in the National Register. Examples are provided throughout, illustrating specific circumstances in which properties are and are not eligible for the National Register. This bulletin should be used by anyone who is:

- Preparing to nominate a property to the National Register,
- Seeking a determination of a property's eligibility,
- Evaluating the comparable significance of a property to those listed in the National Register, or
- Expecting to nominate a property as a National Historic Landmark in addition to nominating it to the National Register.

This bulletin also contains a summary of the National Historic Landmarks Criteria for Evaluation (see *Part IX*). National Historic Landmarks are those districts, sites, buildings, structures, and objects designated by the Secretary of the Interior as possessing national significance in American history, architecture, archeology, engineering, and culture. Although National Register documentation includes a recommendation about whether a property is significant at the local, State, or national level, the only official designation of national significance is as a result of National Historic Landmark designation by the Secretary of the Interior, National Monument designation by the President of the United States, or establishment as a unit of the National Park System by Congress. These properties are automatically listed in the National Register.

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II. THE NATIONAL REGISTER CRITERIA FOR EVALUATION

CRITERIA FOR EVALUATION:[3]

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

B. That are associated with the lives of persons significant in our past; or

C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. That have yielded, or may be likely to yield, information important in prehistory or history.

CRITERIA CONSIDERATIONS:

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

a. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or

b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

c. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or

d. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or

g. A property achieving significance within the past 50 years if it is of exceptional importance.

[3]The Criteria for Evaluation are found in the *Code of Federal Regulations, Title 36, Part 60,* and are reprinted here in full.

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III. HOW TO USE THIS BULLETIN TO EVALUATE A PROPERTY

For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by:

- **Being associated with an important historic context** *and*
- **Retaining historic integrity of those features necessary to convey its significance.**

Information about the property based on physical examination and documentary research is necessary to evaluate a property's eligibility for the National Register. Evaluation of a property is most efficiently made when following this sequence:

1. Categorize the property (Part IV). A property must be classified as a district, site, building, structure, or object for inclusion in the National Register.
2. **Determine which prehistoric or historic context(s) the property represents** (Part V). A property must possess significance in American history, architecture, archeology, engineering, or culture when evaluated within the historic context of a relevant geographic area.
3. Determine whether the property is significant under the National Register Criteria (Part VI). This is done by identifying the links to important events or persons, design or construction features, or information potential that make the property important.
4. Determine if the property represents a type usually excluded from the National Register (Part VII). If so, determine if it meets any of the Criteria Considerations.
5. Determine whether the property retains integrity (Part VIII). Evaluate the aspects of location, design, setting, workmanship, materials, feeling, and association that the property must retain to convey its historic significance.

If, after completing these steps, the property appears to qualify for the National Register, the next step is to prepare a written nomination. (Refer to *National Register Bulletin: How to Complete the National Register Registration Form.*)

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IV. HOW TO DEFINE CATEGORIES OF HISTORIC PROPERTIES

The National Register of Historic Places includes significant properties, classified as buildings, sites, districts, structures, or objects. It is not used to list intangible values, except in so far as they are associated with or reflected by historic properties. The National Register does not list cultural events, or skilled or talented individuals, as is done in some countries. Rather, the National Register is oriented to recognizing physically concrete properties that are relatively fixed in location.

For purposes of National Register nominations, small groups of properties are listed under a single category, using the primary resource. For example, a city hall and fountain would be categorized by the city hall (building), a farmhouse with two outbuildings would be categorized by the farmhouse (building), and a city park with a gazebo would be categorized by the park (site). Properties with large acreage or a number of resources are usually considered districts. Common sense and reason should dictate the selection of categories.

BUILDING

A building, such as a house, barn, church, hotel, or similar construction, is created principally to shelter any form of human activity. "Building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.

Buildings eligible for the National Register must include all of their basic structural elements. Parts of buildings, such as interiors, facades, or wings, are not eligible independent of the rest of the existing building. The whole building must be considered, and its significant features must be identified.

If a building has lost any of its basic structural elements, it is usually considered a "ruin" and is categorized as a site.

Examples of buildings include:

administration building
carriage house
church
city or town hall
courthouse
detached kitchen, barn, and privy
dormitory
fort
garage
hotel
house
library
mill building
office building
post office
school
social hall
shed
stable
store
theater
train station

STRUCTURE

The term "structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter.

Structures nominated to the National Register must include all of the extant basic structural elements. Parts of structures can not be considered eligible if the whole structure remains. For example, a truss bridge is composed of the metal or wooden truss, the abutments, and supporting piers, all of which, if extant, must be included when considering the property for eligibility.

If a structure has lost its historic configuration or pattern of organization through deterioration or demolition, it is usually considered a "ruin" and is categorized as a site.

Examples of structures include:

aircraft
apiary
automobile
bandstand
boats and ships
bridge
cairn
canal
carousel
corncrib
dam
earthwork
fence
gazebo
grain elevator
highway
irrigation system
kiln
lighthouse
railroad grade
silo
trolley car
tunnel
windmill

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OBJECT

The term "object" is used to distinguish from buildings and structures those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.

Small objects not designed for a specific location are normally not eligible. Such works include transportable sculpture, furniture, and other decorative arts that, unlike a fixed outdoor sculpture, do not possess association with a specific place.

Objects should be in a setting appropriate to their significant historic use, roles, or character. Objects relocated to a museum are inappropriate for listing in the National Register.

Examples of objects include:

boundary marker
fountain
milepost
monument
scupture
statuary

SITE

A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.

A site can possess associative significance or information potential or both, and can be significant under any or all of the four criteria. A site need not be marked by physical remains if it is the location of a prehistoric or historic event or pattern of events and if no buildings, structures, or objects marked it at the time of the events. However, when the location of a prehistoric or historic event cannot be conclusively determined because no other cultural materials were present or survive, documentation must be carefully evaluated to determine whether the traditionally recognized or identified site is accurate.

A site may be a natural landmark strongly associated with significant prehistoric or historic events or patterns of events, if the significance of the natural feature is well documented through scholarly research. Generally, though, the National Register excludes from the definition of "site" natural waterways or bodies of water that served as determinants in the location of communities or were significant in the locality's subsequent economic development. While they may have been "avenues of exploration," the features most appropriate to document this significance are the properties built in association with the waterways.

Examples of sites include:

battlefield
campsite
cemeteries significant for information potential or historic association
ceremonial site
designed landscape
habitation site
natural feature (such as a rock formation) having cultural significance
petroglyph
rock carving
rock shelter
ruins of a building or structure
shipwreck
trail
village site

DISTRICT

A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.

CONCENTRATION, LINKAGE, & CONTINUITY OF FEATURES

A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties. For example, a district can reflect one principal activity, such as a mill or a ranch, or it can encompass several interrelated activities, such as an area that includes industrial, residential, or commercial buildings, sites, structures, or objects. A district can also be a grouping of archeological sites related primarily by their common components; these types of districts often will not visually represent a specific historic environment.

SIGNIFICANCE

A district must be significant, as well as being an identifiable entity. It must be important for historical, architectural, archeological, engineering, or cultural values. Therefore, districts that are significant will usually meet the last portion of Criterion C plus Criterion A, Criterion B, other portions of Criterion C, or Criterion D.

TYPES OF FEATURES

A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.

A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity. In archeological districts, the primary factor to be considered is the effect of any disturbances on the information potential of the district as a whole.

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GEOGRAPHICAL BOUNDARIES

A district must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management, or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.

DISCONTIGUOUS DISTRICTS

A district is usually a single geographic area of contiguous historic properties; however, a district can also be composed of two or more definable significant areas separated by nonsignificant areas. A discontiguous district is most appropriate where:

- Elements are spatially discrete;
- Space between the elements is not related to the significance of the district; and
- Visual continuity is not a factor in the significance.

In addition, a canal can be treated as a discontiguous district when the system consists of man-made sections of canal interspersed with sections of river navigation. For scattered archeological properties, a discontiguous district is appropriate when the deposits are related to each other through cultural affiliation, period of use, or site type.

It is not appropriate to use the discontiguous district format to include an isolated resource or small group of resources which were once connected to the district, but have since been separated either through demolition or new construction. For example, do not use the discontiguous district format to nominate individual buildings of a downtown commerical district that have become isolated through demolition.

Examples of districts iE,[;lude:

business districts
canal systems
groups of habitation sites
college campuses
estates and farms with large acreage/ numerous properties
industrial complexes
irrigation systems
residential areas
rural villages
transportation networks
rural historic districts

Ordeman-Shaw Historic District, *Montgomery, Montgomery County, Alabama. Historic districts derive their identity from the interrationship of their resources. Part of the defining characteristics of this 19th century residential district in Montgomery, Alabama, is found in the rhythmic pattern of the rows of decorative porches. (Frank L. Thiermonge, III)*

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V. HOWTOEVALUATEA PROPERTY WITHIN ITS HISTORIC CONTEXT

UNDERSTANDING HISTORIC CONTEXTS

To qualify for the National Register, a property must be significant; that is, it must represent a significant part of the history, architecture, archeology, engineering, or culture of an area, and it must have the characteristics that make it a good representative of properties associated with that aspect of the past. This section explains how to evaluate a property within its historic context.

The significance of a historic property can be judged and explained only when it is evaluated within its historic context. Historic contexts are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear. Historians, architectural historians, folklorists, archeologists, and anthropologists use different words to describe this phenomena such as trend, pattern, theme, or cultural affiliation, but ultimately the concept is the same.

The concept of historic context is not a new one; it has been fundamental to the study of history since the 18th century and, arguably, earlier than that. Its core premise is that resources, properties, or happenings in history do not occur in a vacuum but rather are part of larger trends or patterns.

In order to decide whether a property is significant within its historic context, the following five things must be determined:

- The facet of prehistory or history of the local area, State, or the nation that the property represents;
- Whether that facet of prehistory or history is significant;
- Whether it is a type of property that has relevance and importance in illustrating the historic context;
- How the property illustrates that history; and finally
- Whether the property possesses the physical features necessary to convey the aspect of prehistory or history with which it is associated.

These five steps are discussed in detail below. If the property being evaluated does represent an important aspect of the area's history or prehistory *and* possesses the requisite quality of integrity, then it qualifies for the National Register.

HOW TO EVALUATE APROPERTY WITHIN ITS HISTORIC CONTEXT

Identify what the property represents: the theme(s), geographical limits, and chronological period that provide a perspective from which to evaluate the property's significance.

Historic contexts are historical patterns that can be identified through consideration of the history of the property and the history of the surrounding area. Historic contexts may have already been defined in your area by the State historic preservation office, Federal agencies, or local governments. In accordance with the National Register Criteria, the historic context may relate to one of the following:

- An event, a series of events or activities, or patterns of an area's development (Criterion A);
- Association with the life of an important person (Criterion B);
- A building form, architectural style, engineering technique, or artistic values, based on a stage of physical development, or the use of a material or method of construction that shaped the historic identity of an area (Criterion C); or
- A research topic (Criterion D).

[4] For a complete discussion of historic contexts, see *National Register Bulletin: Guidelines for Completing National Register of Historic Places Registration Forms.*

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Determine how the theme of the context is significant in the history of the local area, the State, or the nation.

A theme is a means of organizing properties into coherent patterns based on elements such as environment, social/ethnic groups, transportation networks, technology, or political developments that have influenced the development of an area during one or more periods of prehistory or history. A theme is considered significant if it can be demonstrated, through scholarly research, to be important in American history. Many significant themes can be found in the following list of Areas of Significance used by the National Register.

AREAS OF SIGNIFICANCE

Agriculture
Architecture
Archeology
  Prehistoric
  Historic—Aboriginal
  Historic—Non-Aboriginal
Art
Commerce
Communications
Community Planning and Development
Conservation
Economics
Education
Engineering
Entertainment/Recreation
Ethnic Heritage
  Asian
  Black
  European
  Hispanic
  Native American
  Pacific Islander
  Other
Exploration/Settlement
Health/Medicine
Industry
Invention
Landscape Architecture
Law
Literature
Maritime History
Military
Performing Arts
Philosophy
Politics/Government
Religion
Science
Social History
Transportation
Other

Determine what the property type is and whether it is important in illustrating the historic context.

A context may be represented by a variety of important property types. For example, the context of "Civil War Military Activity in Northern Virginia" might be represented by such properties as: a group of mid-19th century fortification structures; an open field where a battle occurred; a knoll from which a general directed troop movements; a sunken transport ship; the residences or public buildings that served as company headquarters; a railroad bridge that served as a focal point for a battle; and earthworks exhibiting particular construction techniques.

Because a historic context for a community can be based on a distinct period of development, it might include numerous property types. For example, the context "Era of Industrialization in Grand Bay, Michigan, 1875 - 1900" could be represented by important property types as diverse as sawmills, paper mill sites, salt refining plants, flour mills, grain elevators, furniture factories, workers housing, commercial buildings, social halls, schools, churches, and transportation facilities.

A historic context can also be based on a single important type of property. The context "Development of County Government in Georgia, 1777 - 1861" might be represented solely by courthouses. Similarly, "Bridge Construction in Pittsburgh, 1870 - 1920" would probably only have one property type.

Determine how the property represents the context through specific historic associations, architectural or engineering values, or information potential (the Criteria for Evaluation).

For example, the context of county government expansion is represented under Criterion A by historic districts or buildings that reflect population growth, development patterns, the role of government in that society, and political events in the history of the State, as well as the impact of county government on the physical development of county seats. Under Criterion C, the context is represented by properties whose architectural treatments reflect their governmental functions, both practically and symbolically. (See *Part VI: How to Identify the Type of Significance of a Property.*)

Determine what physical features the property must possess in order for it to reflect the significance of the historic context.

These physical features can be determined after identifying the following:

- Which types of properties are associated with the historic context,
- The ways in which properties can represent the theme, and
- The applicable aspects of integrity.

Properties that have the defined characteristics are eligible for listing. (See *Part VIII: How to Evaluate the Integrity of a Property.*)

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PROPERTIES SIGNIFICANT WITHIN MORE THAN ONE HISTORIC CONTEXT

A specific property can be significant within one or more historic contexts, and, if possible, all of these should be identified. For example, a public building constructed in the 1830s that is related to the historic context of Civil War campaigns in the area might also be related to the theme of political developments in the community during the 1880s. A property is only required, however, to be documented as significant in one context.

COMPARING RELATED PROPERTIES

Properties listed in the National Register must possess significance when evaluated in the perspective of their historic context. Once the historic context is established and the property type is determined, it is not necessary to evaluate the property in question against other properties *if*:

- It is the sole example of a property type that is important in illustrating the historic context or
- It clearly possesses the defined characteristics required to strongly represent the context.

If these two conditions do not apply, then the property will have to be evaluated against other examples of the property type to determine its eligibility. The geographic level (local, State, or national) at which this evaluation is made is the same as the level of the historic context. (See *Part V: How to Evaluate a Property Within Its Historic Context.*)

LOCAL, STATE, AND NATIONAL HISTORIC CONTEXTS

Historic contexts are found at a variety of geographical levels or scales. The geographic scale selected may relate to a pattern of historical development, a political division, or a cultural area. Regardless of the scale, the historic context establishes the framework from which decisions about the significance of related properties can be made.

LOCAL HISTORIC CONTEXTS

A local historic context represents an aspect of the history of a town, city, county, cultural area, or region, or any portions thereof. It is defined by the importance of the property, not necessarily the physical location of the property. For instance, if a property is of a type found throughout a State, or its boundaries extend over two States, but its importance relates only to a particular county, the property would be considered of local significance.

The level of context of archeological sites significant for their information potential depends on the scope of the applicable research design. For example, a Late Mississippian village site may yield information in a research design concerning one settlement system on a regional scale, while in another research design it may reveal information of local importance concerning a single group's stone tool manufacturing techniques or house forms. It is a question of how the available information potential is likely to be used.

STATE HISTORIC CONTEXTS

Properties are evaluated in a State context when they represent an aspect of the history of the State as a whole (or American Samoa, the District of Columbia, the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, or the Virgin Islands). These properties do not necessarily have to belong to property types found throughout the entire State: they can be located in only a portion of the State's present political boundary. It is the property's historic context that must be important statewide. For example, the "cotton belt" extends through only a portion of Georgia, yet its historical development in the antebellum period affected the entire State. These State historic contexts may have associated properties that are statewide or locally significant representations. A cotton gin in a small town might be a locally significant representation of this context, while one of the largest cotton producing plantations might be of State significance.

A property whose historic associations or information potential appears to extend beyond a single local area might be significant at the State level. A property can be significant to more than one community or local area, however, without having achieved State significance.

A property that overlaps several State boundaries can possibly be significant to the State or local history of each of the States. Such a property is not necessarily of national significance, however, nor is it necessarily significant to all of the States in which it is located.

Prehistoric sites are not often considered to have "State" significance, per se, largely because States are relatively recent political entities and usually do not correspond closely to Native American political territories or cultural areas. Numerous sites, however, may be of significance to a large region that might geographically encompass parts of one, or usually several, States. Prehistoric resources that might be of State significance include regional sites that provide a diagnostic assemblage of artifacts for a particular cultural group or time period or that provide chronological control (specific dates or relative order in time) for a series of cultural groups.

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NATIONAL HISTORIC CONTEXTS

Properties are evaluated in a national context when they represent an aspect of the history of the United States and its territories as a whole. These national historic contexts may have associated properties that are locally or statewide significant representations, as well as those of national significance.

Properties designated as nationally significant and listed in the National Register are the prehistoric and historic units of the National Park System and those properties that have been designated National Historic Landmarks. The National Historic Landmark criteria are the standards for nationally significant properties; they are found in the *Code of Federal Regulations, Title 36, Part 65* and are summarized in this bulletin in *Part IX: Summary of National Historic Landmarks Criteria for Evaluation.*

A property with national significance helps us understand the history of the nation by illustrating the nationwide impact of events or persons associated with the property, its architectural type or style, or information potential. It must be of exceptional value in representing or illustrating an important theme in the history of the nation.

Nationally significant properties do not necessarily have to belong to a property type found throughout the entire country: they can be located in only a portion of the present political boundaries. It is their historic context that must be important nationwide. For example, the American Civil War was fought in only a portion of the United States, yet its impact was nationwide. The site of a small military skirmish might be a locally significant representation of this national context, while the capture of the State's largest city might be a statewide significant representation of the national context.

When evaluating properties at the national level for designation as a National Historic Landmark, please refer to the National Historic Landmarks outline, *History and Prehistory in the National Park System and the National Historic Landmarks Program 1987.* (For more information about the National Historic Landmarks program, please write to the Department of the Interior, National Park Service, National Historic Landmarks, 1849 C Street, NW, NC400, Washington, DC 20240.)

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VI. HOW TO IDENTIFY THE TYPE OF SIGNIFICANCE OF A PROPERTY

INTRODUCTION

When evaluated within its historic context, a property must be shown to be significant for *one or more of the four Criteria for Evaluation - A, B, C, or D* (listed earlier in *Part II*). The Criteria describe how properties are significant for their association with important events or persons, for their importance in design or construction, or for their information potential.

The basis for judging a property's significance and, ultimately, its eligibility under the Criteria is *historic context*. The use of historic context allows a property to be properly evaluated in a nearly infinite number of capacities. For instance, Criterion C: Design/Construction can accommodate properties representing construction types that are unusual or widely practiced, that are innovative or traditional, that are "high style" or vernacular, that are the work of a famous architect or an unknown master craftsman. *The key to determining whether the characteristics or associations of a particular property are significant is to consider the property within its historic context.*

After identifying the relevant historic context(s) with which the property is associated, the four Criteria are applied to the property. Within the scope of the historic context, the National Register Criteria define the kind of significance that the properties represent.

For example, within the context of "19th Century Gunpowder Production in the Brandywine Valley," Criterion A would apply to those properties associated with important events in the founding and development of the industry. Criterion B would apply to those properties associated with persons who are significant in the founding of the industry or associated with important inventions related to gunpowder manufacturing. Criterion C would apply to those buildings, structures, or objects whose architectural form or style reflect important design qualities integral to the industry. And Criterion D would apply to properties that can convey information important in our understanding of this industrial process. If a property qualifies under more than one of the Criteria, its significance under each should be considered, if possible, in order to identify all aspects of its historical value.

NATIONAL REGISTER CRITERIA FOR EVALUATION*

The National Register Criteria recognize different types of values embodied in districts, sites, buildings, structures, and objects. These values fall into the following categories:

Associative value (Criteria A and B): Properties significant for their association or linkage to events (Criterion A) or persons (Criterion B) important in the past.

Design or Construction value (Criterion C): Properties significant as representatives of the manmade expression of culture or technology.

Information value (Criterion D): Properties significant for their ability to yield important information about prehistory or history.

*For a complete listing of the Criteria for Evaluation, refer to Part II of this bulletin.

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CRITERION A: EVENT

Properties can be eligible for the National Register if they are associated with events that have made a significant contribution to the broad patterns of our history.

UNDERSTANDING CRITERION A: EVENT

To be considered for listing under Criterion A, a property must be associated with one or more events important in the defined historic context. Criterion A recognizes properties associated with single events, such as the founding of a town, or with a pattern of events, repeated activities, or historic trends, such as the gradual rise of a port city's prominence in trade and commerce. The event or trends, however, must clearly be important within the associated context: settlement, in the case of the town, or development of a maritime economy, in the case of the port city. Moreover, the property must have an important association with the event or historic trends, and it must retain historic integrity. (See *Part V: How to Evaluate a Property Within its Historic Context.)*

Several steps are involved in determining whether a property is significant for its associative values:

- Determine the nature and origin of the property,
- Identify the historic context with which it is associated, and
- Evaluate the property's history to determine whether it is associated with the historic context in any important way.

APPLYING CRITERION A: EVENT

TYPES OF EVENTS

A property can be associated with either (or both) of two types of events:

- A specific event marking an important moment in American prehistory or history and
- A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation.

Refer to the sidebar on the right for a list of specific examples.

ASSOCIATION OF THE PROPERTY WITH THE EVENTS

The property you are evaluating must be documented, through accepted means of historical or archeological research (including oral history), to have existed at the time of the event or pattern of events *and* to have been associated with those events. A property is *not* eligible if its associations are speculative. For archeological sites, well reasoned inferences drawn from data recovered at the site can be used to establish the association between the site and the events.

SIGNIFICANCE OF THE ASSOCIATION

Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well. For example, a building historically in commercial use must be shown to have been significant in commercial history.

EXAMPLES OF PROPERTIES ASSOCIATED WITH EVENTS

Properties associated with specific events:

- *The site of a battle.*
- *The building in which an important invention was developed.*
- *A factory district where a significant strike occurred.*
- *An archeological site at which a major new aspect of prehistory was discovered, such as the first evidence of man and extinct Pleistocene animals being contemporaneous.*
- *A site where an important facet of European exploration occurred.*

Properties associated with a pattern of events:

- *A trail associated with western migration.*
- *A railroad station that served as the focus of a community's transportation system and commerce.*
- *A mill district reflecting the importance of textile manufacturing during a given period.*
- *A building used by an important local social organization.*
- *A site where prehistoric Native Americans annually gathered for seasonally available resources and for social interaction.*
- *A downtown district representing a town's growth as the commercial focus of the surrounding agricultural area.*

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TRADITIONAL CULTURAL VALUES

Traditional cultural significance is derived from the role a property plays in a community's historically rooted beliefs, customs, and practices. Properties may have significance under Criterion A if they are associated with events, or series of events, significant to the cultural traditions of a community.[5]

Eligible

- A hilltop associated in oral historical accounts with the founding of an Indian tribe or society is eligible.
- A rural community can be eligible whose organization, buildings, or patterns of land use reflect the cultural traditions valued by its long-term residents.
- An urban neighborhood can be eligible as the traditional home of a particular cultural group and as a reflection of its beliefs and practices.

Not Eligible

- A site viewed as sacred by a recently established utopian or religious community does not have traditional cultural value and is not eligible.

Criterion A - The Old Brulay Plantation, *Brownsville vicinity, Cameron county, Texas. Historically significant for its association with the development of agriculture in southeast Texas, this complex of 10 brick buildings was constructed by George N. Brulay, a French immigrant who introduced commercial sugar production and irrigation to the Rio Grande Valley. (Photo by Texas Historical Commission).*

[5] For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties.*

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CRITERION B: PERSON

Properties may be eligible for the National Register if they are associated with the lives of persons significant in our past.

UNDERSTANDING CRITERION B: PERSON[6]

Criterion B applies to properties associated with individuals whose specific contributions to history can be identified and documented. Persons "significant in our past" refers to individuals whose activities are demonstrably important within a local, State, or national historic context. The criterion is generally restricted to those properties that illustrate (rather than commemorate) a person's important achievements. (The policy regarding commemorative properties, birthplaces, and graves is explained further in *Part VIII: How to Apply the Criteria Considerations.)*

Several steps are involved in determining whether a property is significant for its associative values under Criterion B. First, determine the importance of the individual. Second, ascertain the length and nature of his/her association with the property under study and identify the other properties associated with the individual. Third, consider the property under Criterion B, as outlined below.

EXAMPLES OF PROPERTIES ASSOCIATED WITH PERSONS

Properties associated with a Significant Person:

- *The home of an important merchant or labor leader.*
- *The studio of a significant artist.*
- *The business headquarters of an important industrialist.*

***Criterion B - The William Whitney House,** Hinsdale, DuPage County, Illinois. This building is locally significant for its historical association with William Whitney, the founder of the town of Hinsdale, Illinois. Whitney, a citizen of New York State, moved to Illinois, established the town, and while living here between 1870 and 1879 was a prominent local businessman and politician. (Photo by Frederick C. Cue).*

[6] For further information on properties eligible under Criterion B, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Properties Associated with Significant Persons.*

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APPLYING CRITERION B: PERSON

SIGNIFICANCE OF THE INDIVIDUAL

The persons associated with the property must be *individually* significant within a historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.

Eligible

- The residence of a doctor, a mayor, or a merchant is eligible under Criterion B if the person was significant in the field of medicine, politics, or commerce, respectively.

Not Eligible

- A property is not eligible under Criterion B if it is associated with an individual about whom no scholarly judgement can be made because either research has not revealed specific information about the person's activities and their impact, or there is insufficient perspective to determine whether those activities or contributions were historically important.

ASSOCIATION WITH THE PROPERTY

Properties eligible under Criterion B are usually those associated with a person's *productive* life, reflecting the time period when he or she achieved significance. In some instances this may be the person's home; in other cases, a person's business, office, laboratory, or studio may best represent his or her contribution. Properties that pre- or post-date an individual's significant accomplishments are usually not eligible. (See *Comparison to Related Properties*, below, for exceptions to this rule.)

The individual's association with the property must be documented by accepted methods of historical or archeological research, including written or oral history. Speculative associations are not acceptable. For archeological sites, well reasoned inferences drawn from data recovered at the site are acceptable.

COMPARISON TO RELATED PROPERTIES

Each property associated with an important individual should be compared to other associated properties to identify those that best represent the person's historic contributions. The best representatives usually are properties associated with the person's adult or *productive* life. Properties associated with an individual's formative or later years may also qualify if it can be demonstrated that the person's activities during this period were historically significant *or* if no properties from the person's productive years survives. Length of association is an important factor when assessing several properties with similar associations.

A community or State may contain several properties eligible for associations with the same important person, if each represents a different aspect of the person's productive life. A property can also be eligible if it has brief but consequential associations with an important individual. (Such associations are often related to specific events that occurred at the property and, therefore, it may also be eligible under Criterion A.)

ASSOCIATION WITH GROUPS

For properties associated with several community leaders or with a prominent family, it is necessary to identify specific individuals and to explain their significant accomplishments.

Eligible

- A residential district in which a large number of prominent or influential merchants, professionals, civic leaders, politicians, etc., lived will be eligible under Criterion B if the significance of one or more specific individual residents is explicitly justified.
- A building that served as the seat of an important family is eligible under Criterion B if the significant accomplishments of one or more individual family members is explicitly justified.

Not Eligible

- A residential district in which a large number of influential persons lived is not eligible under Criterion B if the accomplishments of a specific individual(s) cannot be documented. If the significance of the district rests in the cumulative importance of prominent residents, however, then the district might still be eligible under Criterion A. Eligibility, in this case, would be based on the broad pattern of community development, through which the neighborhood evolved into the primary residential area for this class of citizens.
- A building that served as the seat of an important family will not be eligible under Criterion B if the significant accomplishments of individual family members cannot be documented. In cases where a succession of family members have lived in a house and collectively have had a demonstrably significant impact on the community, as a family, the house is more likely to be significant under Criterion A for association with a pattern of events.

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ASSOCIATION WITH LIVING PERSONS

Properties associated with living persons are usually not eligible for inclusion in the National Register. Sufficient time must have elapsed to assess both the person's field of endeavor and his/her contribution to that field. Generally, the person's active participation in the endeavor must be finished for this historic perspective to emerge. (See Criteria Considerations C and G in *Part VII: How to Apply the Criteria Considerations.)*

ASSOCIATION WITH ARCHITECTS/ARTISANS

Architects, artisans, artists, and engineers are often represented by their works, which are eligible under Criterion C. Their homes and studios, however, can be eligible for consideration under Criterion B, because these usually are the properties with which they are most personally associated.

NATIVE AMERICAN SITES

The known major villages of individual Native Americans who were important during the contact period or later can qualify under Criterion B. As with all Criterion B properties, the individual associated with the property must have made some specific important contribution to history. Examples include sites significantly associated with Chief Joseph and Geronimo.[7]

[7] For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties.*

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CRITERION C: DESIGN/CONSTRUCTION

Properties may be eligible for the National Register if they embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Richland Plantation, *East Feliciana Parish, Louisiana. Properties can qualify under Criterion C as examples of high style architecture. Built in the 1830s, Richland is a fine example of a Federal style residence with a Greek Revival style portico. (Photo by Dave Gleason).*

UNDERSTANDING CRITERION C: DESIGN/ CONSTRUCTION

This criterion applies to properties significant for their physical design or construction, including such elements as architecture, landscape architecture, engineering, and artwork. To be eligible under Criterion C, a property must meet *at least one* of the following requirements:

- Embody distinctive characteristics of a type, period, or method of construction.
- Represent the work of a master.
- Possess high artistic value.
- Represent a significant and distinguishable entity whose components may lack individual distinction.

The first requirement, that properties "embody the distinctive characteristics of a type, period, or method of construction," refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. "The work of a master" refers to the technical or aesthetic achievements of an architect or craftsman. "High artistic values" concerns the expression of aesthetic ideals or preferences and applies to aesthetic achievement.

Resources "that represent a significant and distinguishable entity whose components may lack individual distinction" are called "districts." In the Criteria for Evaluation (as published in the *Code of Federal Regulations* and reprinted here in Part II), districts are defined within the context of Criterion C. *Districts, however, can be considered for eligibility under all the Criteria,* individually or in any combination, as is appropriate. For this reason, the full discussion of districts is contained in *Part IV: How to Define Categories of Historic Properties.* Throughout the bulletin, however, districts are mentioned within the context of a specific subject, such as an individual Criterion.

Grant Family House*, Saco vicinity, York County, Maine. Properties possessing high artistic value meet Criterion C through the expression of aesthetic ideals or preferences. The Grant Family House, a modest Federal style residence, is significant for its remarkably well-preserved stenciled wall decorative treatment in the entry hall and parlor. Painted by an unknown artist ca. 1825, this is a fine example of 19th century New England regional artistic expression. (Photo by Kirk F. Mohney).*

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EXAMPLES OF PROPERTIES ASSOCIATED WITH DESIGN/ CONSTRUCTION

Properties associated with design and construction:

- *A house or commercial building representing a significant style of architecture.*
- *A designed park or garden associated with a particular landscape design philosophy.*
- *A movie theater embodying high artistic value in its decorative features.*
- *A bridge or dam representing technological advances.*

APPLYING CRITERION C: DESIGN/ CONSTRUCTION

DISTINCTIVE CHARACTERISTICS OF TYPE, PERIOD, AND METHOD OF CONSTRUCTION

This is the portion of Criterion C under which most properties are eligible, for it encompasses all architectural styles and construction practices. To be eligible under this portion of the Criterion, a property must clearly illustrate, through "distinctive characteristics," the following:

- The pattern of features common to a particular class of resources,
- The individuality or variation of features that occurs within the class,
- The evolution of that class, or
- The transition between classes of resources.

Distinctive Characteristics: "Distinctive characteristics" are the physical features or traits that commonly recur in individual types, periods, or methods of construction. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction.

Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials. They can be general, referring to ideas of design and construction such as basic plan or form, or they can be specific, referring to precise ways of combining particular kinds of materials.

Eligible

- A building eligible under the theme of Gothic Revival architecture must have the distinctive characteristics that make up the vertical and picturesque qualities of the style, such as pointed gables, steep roof pitch, board and batten siding, and ornamental bargeboard and veranda trim.
- A late Mississippian village that illustrates the important concepts in prehistoric community design and planning will qualify.
- A designed historic landscape will qualify if it reflects a historic trend or school of theory and practice, such as the City Beautiful Movement, evidencingdistinguished design, layout, and the work of skilled craftsmanship.

Not Eligible

- A commercial building with some Art Deco detailing is not eligible under Criterion C if the detailing was added merely as an afterthought, rather than fully integrated with overall lines and massing typical of the Art Deco style or the transition between that and another style.
- A designed landscape that has had major changes to its historic design, vegetation, original boundary, topography/ grading, architectural features, and circulation system will not qualify.

Type, Period, and Method of Construction: "Type, period, or method of construction" refers to the way certain properties are related to one another by cultural tradition or function, by dates of construction or style, or by choice or availability of materials and technology.

A structure is eligible as a specimen of its type or period of construction if it is an important example (within its context) of building practices of a particular time in history. For properties that represent the variation, evolution, or transition of construction types, it must be demonstrated that the variation, etc., was an important phase of the architectural development of the area or community in that it had an impact as evidenced by later buildings. A property is not eligible, however, simply because it has been identified as the only such property ever fabricated; it must be demonstrated to be significant as well.

Eligible

- A building that has some characteristics of the Romanesque Revival style and some characteristics of the Commercial style can qualify if it illustrates the transition of architectural design and the transition itself is considered an important architectural development.
- A Hopewellian mound, if it is an important example of mound building construction techniques, would qualify as a method or type of construction.
- A building which illustrates the early or the developing technology of particular structural systems, such as skeletal steel framing, is eligible as an example of a particular method of construction.

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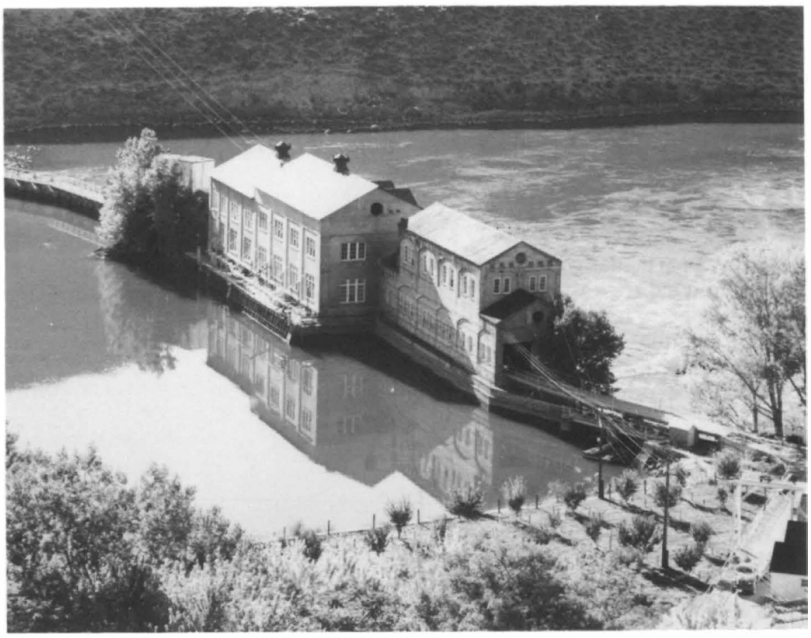

Swan Falls Dam and Power Plant, *Murphy vicinity, Ada County, Idaho. Significant works of engineering can qualify under Criterion C. Built between 1900-1907 the Swan Falls Dam and Power Plant across the Snake River is one of the early hydroelectric plants in the State of Idaho. (Photo by H.L. Hough).*

Looney House, *Asheville vicinity, St. Clair County, Alabama. Examples of vernacular styles of architecture can qualify under Criterion C. Built ca. 1818, the Looney House is significant as possibly the State's oldest extant two-story dogtrot type of dwelling. The defining open center passage of the dogtrot was a regional building response to the southern climate. (Photo by Carolyn Scott).*

HISTORIC ADAPTATION OF THE ORIGINAL PROPERTY

A property can be significant not only for the way it was originally constructed or crafted, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.

A district is eligible under this guideline if it illustrates the evolution of historic character of a place over a particular span of time.

Eligible

- A Native American irrigation system modified for use by Europeans could be eligible if it illustrates the technology of either or both periods of construction.
- An early 19th century farmhouse modified in the 1880s with Queen Anne style ornamentation could be significant for the modification itself, if it represented a local variation or significant trend in building construction or remodelling, was the work of a local master (see *Works of a Master* on page 20), or reflected the tastes of an important person associated with the property at the time of its alteration.
- A district encompassing the commercial development of a town between 1820 and 1910, characterized by buildings of various styles and eras, can be eligible.

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WORKS OF A MASTER

A master is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft.

A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although it might meet other portions of the Criterion, for instance as a representative of the Prairie style.

The work of an unidentified craftsman is eligible if it rises above the level of workmanship of the other properties encompassed by the historic context.

PROPERTIES POSSESSING HIGH ARTISTIC VALUES

High artistic values may be expressed in many ways, including areas as diverse as community design or planning, engineering, and sculpture. A property is eligible for its high artistic values if it so fully articulates a particular concept of design that it expresses an aesthetic ideal. A property is not eligible, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type.

Eligible

- A sculpture in a town square that epitomizes the design principles of the Art Deco style is eligible.
- A building that is a classic expression of the design theories of the Craftsman Style, such as carefully detailed handwork, is eligible.
- A landscaped park that synthesizes early 20th century principles of landscape architecture and expresses an aesthetic ideal of environment can be eligible.
- Properties that are important representatives of the aesthetic values of a cultural group, such as petroglyphs and ground drawings by Native Americans, are eligible.

Not Eligible

- A sculpture in a town square that is a typical example of sculpture design during its period would not qualify for high artistic value, although it might be eligible if it were significant for other reasons.
- A building that is a modest example (within its historic context) of the Craftsman Style of architecture, or a landscaped park that is characteristic of turn of the century landscape design would not qualify for high artistic value.

A Significant and Distinguishable Entity Whose Components May Lack Individual Distinction. This portion of Criterion C refers to districts. For detailed information on districts, refer to *Part IV* of this bulletin.

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CRITERION D: INFORMATION POTENTIAL

Properties may be eligible for the National Register if they have yielded, or may be likely to yield, information important in prehistory or history.

UNDERSTANDING CRITERION D: INFORMATION POTENTIAL

Certain important research questions about human history can only be answered by the actual physical material of cultural resources. Criterion D encompasses the properties that have the potential to answer, in whole or in part, those types of research questions. The most common type of property nominated under this Criterion is the archeological site (or a district comprised of archeological sites). Buildings, objects, and structures (or districts comprised of these property types), however, can also be eligible for their information potential.

Criterion D has two requirements, which must *both* be met for a property to qualify:

- The property must have, or have had, information to contribute to our understanding of human history or prehistory, and
- The information must be considered important.

Under the first of these requirements, a property is eligible if it has been used as a source of data and contains more, as yet unretrieved data. A property is also eligible if it has not yet yielded information but, through testing or research, is determined a likely source of data.

Under the second requirement, the information must be carefully evaluated within an appropriate context to determine its importance. Information is considered "important" when it is shown to have a significant bearing on a research design that addresses such areas as: 1) current data gaps or alternative theories that challenge existing ones or 2) priority areas identified under a State or Federal agency management plan.

APPLYING CRITERION D: INFORMATION POTENTIAL

ARCHEOLOGICAL SITES

Criterion D most commonly applies to properties that contain or are likely to contain information bearing on an important archeological research question. The property must have characteristics suggesting the likelihood that it possesses configurations of artifacts, soil strata, structural remains, or other natural or cultural features that make it possible to do the following:

- Test a hypothesis or hypotheses about events, groups, or processes in the past that bear on important research questions in the social or natural sciences or the humanities; or
- Corroborate or amplify currently available information suggesting that a hypothesis is either true or false; or
- Reconstruct the sequence of archeological cultures for the purpose of identifying and explaining continuities and discontinuities in the archeological record for a particular area.

BUILDINGS, STRUCTURES, AND OBJECTS

While most often applied to archeological districts and sites, Criterion D can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D, they themselves must be, or must have been, the principal source of the important information.

Eligible

- A building exhibiting a local variation on a standard design or construction technique can be eligible if study could yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development.

Not Eligible

- The ruins of a hacienda once contained murals that have since been destroyed. Historical documentation, however, indicates that the murals were significant for their highly unusual design. The ruins can not be eligible under Criterion D for the importance of the destroyed murals if the information is contained only in the documentation.

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Criterion D - Champe-Fremont 1 Archeological Site, *Omaha vicinity, Douglas County, Nebraska. This archeological site, dating from ca. 1100-1450 A.D., consists of pit houses and storage pits which have the potential to yield important information concerning the subsistence patterns, religious and mortuary practices, and social organization of the prehistoric residents of eastern Nebraska. (Nebraska State Historical Society)*

ASSOCIATION WITH HUMAN ACTIVITY

A property must be associated with *human activity* and be critical for understanding a site's historic environment in order to be eligible under Criterion D. A property can be linked to human activity through events, processes, institutions, design, construction, settlement, migration, ideals, beliefs, lifeways, and other facets of the development or maintenance of cultural systems.

The natural environment associated with the properties was often very different from that of the present and strongly influenced cultural development. Aspects of the environment that are pertinent to human activities should be considered when evaluating properties under Criterion D.

Natural features and paleontological (floral and faunal) sites are not usually eligible under Criterion D in and of themselves. They can be eligible, however, if they are either directly related to human activity or critical to understanding a site's historic environment. In a few cases, a natural feature or site unmarked by cultural materials, that is primarily eligible under Criterion A, may also be eligible under Criterion D, *if* study of the feature, or its location, setting, etc. (usually in the context of data gained from other sources), will yield important information about the event or period with which it is associated.

ESTABLISHING A HISTORIC CONTEXT

The information that a property yields, or will yield, must be evaluated within an appropriate historic context. This will entail consulting the body of information already collected from similar properties or other pertinent sources, including modern and historic written records. The researcher must be able to anticipate if and how the potential information will affect the definition of the context. The information likely to be obtained from a particular property must confirm, refute, or supplement in an important way existing information.

A property is *not* eligible if it cannot be related to a particular time period or cultural group and, as a result, lacks any historic context within which to evaluate the importance of the information to be gained.

DEVELOPING RESEARCH QUESTIONS

Having established the importance of the information that may be recovered, it is necessary to be explicit in demonstrating the connection between the important information and a specific property. One approach is to determine if specific important research questions can be answered by the data contained in the property. Research questions can be related to property-specific issues, to broader questions about a large geographic area, or to theoretical issues independent of any particular geographic location. These questions may be derived from the academic community or from preservation programs at the local, regional, State, or national level. Research questions are usually developed as part of a "research design," which specifies not only the questions to be asked, but also the types of data needed to supply the answers, and often the techniques needed to recover the data.

Eligible

- When a site consisting of a village occupation with midden deposits, hearths, ceramics, and stratified evidence of several occupations is being evaluated, three possible research topics could be: 1) the question of whether the site occupants were indigenous to the area prior to the time of occupation or recent arrivals, 2) the investigation of the settlement-subsistence pattern of the occupants, 3) the question of whether the region was a center for the domestication of plants. Specific questions could include: A) Do the deposits show a sequential development or sudden introduction of Ceramic Type X? B) Do the dates of the occupations fit our expectations based on the current model for the reoccupation behavior of slash-and-burn agriculturalists? C) Can any genetic changes in the food plant remains be detected?

Not Eligible

- A property is not eligible if so little can be understood about it that it is not possible to determine if specific important research questions can be answered by data contained in the property.

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ESTABLISHING THE PRESENCE OF ADEQUATE DATA

To support the assertion that a property has the data necessary to provide the important information, the property should be investigated with techniques sufficient to establish the presence of relevant data categories. What constitutes appropriate investigation techniques would depend upon specific circumstances including the property's location, condition, and the research questions being addressed, and could range from surface survey (or photographic survey for buildings), to the application of remote sensing techniques or intensive subsurface testing. Justification of the research potential of a property may be based on analogy to another better known property if sufficient similarities exist to establish the appropriateness of the analogy.

Eligible

- Data requirements depend on the specific research topics and questions to be addressed. To continue the example in "Developing Research Questions" above, we might want to ascertain the following with reference to questions A, B, and C: A) The site contains Ceramic Type X in one or more occupation levels and we expect to be able to document the local evaluation of the type or its intrusive nature. B) The hearths contain datable carbon deposits and are associated with more than one occupation. C) The midden deposits show good floral/faunal preservation, and we know enough about the physical evolution of food plants to interpret signs that suggest domestication.

Not Eligible

- Generally, if the applicable research design requires clearly stratified deposits, then subsurface investigation techniques must be applied. A site composed only of surface materials can not be eligible for its potential to yield information that could only be found in stratified deposits.

INTEGRITY

The assessment of integrity for properties considered for information potential depends on the data requirements of the applicable research design. A property possessing information potential does not need to recall *visually* an event, person, process, or construction technique. It is important that the significant data contained in the property remain sufficiently intact to yield the expected important information, if the appropriate study techniques are employed.

Eligible

- An irrigation system significant for the information it will yield on early engineering practices can still be eligible even though it is now filled in and no longer retains the appearance of an open canal.

Not Eligible

- A plowed archeological site contains several superimposed components that have been mixed to the extent that artifact assemblages cannot be reconstructed. The site cannot be eligible if the data requirements of the research design call for the study of artifacts specific to one component.

PARTLY EXCAVATED OR DISTURBED PROPERTIES

The current existence of appropriate physical remains must be ascertained in considering a property's ability to yield important information. Properties that have been partly excavated or otherwise disturbed and that are being considered for their potential to yield additional important information must be shown to retain that potential in their remaining portions.

Eligible

- A site that has been partially excavated but still retains substantial intact deposits (or a site in which the remaining deposits are small but contain critical information on a topic that is not well known) is eligible.

Not Eligible

- A totally collected surface site or a completely excavated buried site is not eligible since the physical remains capable of yielding important information no longer exist at the site. (See *Completely Excavated Sites*, on page 24, for exception.) Likewise, a site that has been looted or otherwise disturbed to the extent that the remaining cultural materials have lost their important depositional context (horizontal or vertical location of deposits) is not eligible.
- A reconstructed mound or other reconstructed site will generally not be considered eligible, because original cultural materials or context or both have been lost.

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COMPLETELY EXCAVATED SITES

Properties that have yielded important information in the past and that no longer retain additional research potential (such as completely excavated archeological sites) must be assessed essentially as historic sites under Criterion A. Such sites must be significant for associative values related to: 1) the importance of the data gained or 2) the impact of the property's role in the history of the development of anthropology/archeology or other relevant disciplines. Like other historic properties, the site must retain the ability to convey its association as the former repository of important information, the location of historic events, or the representative of important trends.

Eligible

- A property that has been excavated is eligible if the data recovered was of such importance that it influenced the direction of research in the discipline, as in a site that clearly established the antiquity of the human occupation of the New World. (See Criterion A in *Part VI: How to Identify the Type of Significance of a Property* and Criteria Consideration G in *Part VII: How to Apply the Criteria Considerations.*)

Not Eligible

- A totally excavated site that at one time yielded important information but that no longer can convey either its historic/prehistoric utilization or significant modern investigation is not eligible.

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VII. HOW TO APPLY THE CRITERIA CONSIDERATIONS

INTRODUCTION

Certain kinds of properties are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past fifty years. These properties *can* be eligible for listing, however, if they meet special requirements, called Criteria Considerations, in addition to meeting the regular requirements (that is, being eligible under one or more of the four Criteria and possessing integrity). *Part VII* provides guidelines for determining which properties must meet these special requirements and for applying each Criteria Consideration.

The Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district. These are the general steps to follow when applying the Criteria Considerations to your property:

- Before looking at the Criteria Considerations, make sure your property meets one or more of the four Criteria for Evaluation and possesses integrity.
- If it does, check the Criteria Considerations (next column) to see if the property is of a type that is usually excluded from the National Register. The sections that follow also list specific examples of properties of each type. If your property clearly *does not* fit one of these types, then it does not need to meet any special requirements.
- If your property *does* fit one of these types, then it must meet the special requirements stipulated for that type in the Criteria Considerations.

CRITERIA CONSIDERATIONS*

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past fifty years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

a. a religious property deriving primary significance from architectural or artistic distinction or historical importance; or

b. a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

c. a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or

d. a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events; or

e. a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

f. a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,

g. a property achieving significance within the past 50 years if it is of exceptional importance.

*The Criteria Considerations are taken from the Criteria for Evaluation, found in the *Code of Federal Regulations, Title 36, Part 60.*

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CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

A religious property is eligible if it derives its primary significance from architectural or artistic distinction or historical importance.

UNDERSTANDING CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

A religious property requires justification on architectural, artistic, or historic grounds to avoid any appearance of judgment by government about the validity of any religion or belief. Historic significance for a religious property cannot be established on the merits of a religious doctrine, but rather, for architectural or artistic values or for important historic or cultural forces that the property represents. A religious property's significance under Criterion A, B, C, or D must be judged in purely secular terms. A religious group may, in some cases, be considered a cultural group whose activities are significant in areas broader than religious history.

Criteria Consideration for Religious Properties applies:

- If the resource was constructed by a religious institution.
- If the resource is presently owned by a religious institution or is used for religious purposes.
- If the resource was owned by a religious institution or used for religious purposes during its Period of Significance.
- If Religion is selected as an Area of Significance.

Examples of Properties that MUST Meet Criteria Consideration A: Religious Properties

- *A historic church where an important non-religious event occurred, such as a speech by Patrick Henry.*
- *A historic synagogue that is significant for architecture.*
- *A private residence is the site of a meeting important to religious history.*
- *A commercial block that is currently owned as an investment property by a religious institution.*
- *A historic district in which religion was either a predominant or significant function during the period of significance.*

Example of Properties that DO NOT Need to Meet Criteria Consideration A: Religious Properties

- *A residential or commercial district that currently contains a small number of churches that are not a predominant feature of the district.*
- *A town meeting hall that serves as the center of community activity and houses a wide variety of public and private meetings, including religious service. The resource is significant for architecture and politics, and the religious function is incidental.*
- *A town hall, significant for politics from 1875 to 1925, that housed religious services during the 1950s. Since the religious function occurred after the Period of Significance, the Criteria Consideration does not apply.*

APPLYING CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

ELIGIBILITY FOR HISTORIC EVENTS

A religious property can be eligible under Criterion A for any of three reasons:

- It is significant under a theme in the history of religion having secular scholarly recognition; or
- It is significant under another historical theme, such as exploration, settlement, social philanthropy, or education; or
- It is significantly associated with traditional cultural values.

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RELIGIOUS HISTORY

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern in the history of religion.

Eligible

- The site of a convention at which a significant denominational split occurred meets the requirements of Criteria Consideration A. Also eligible is a property that illustrates the broad impact of a religious institution on the history of a local area.

Not Eligible

- A religious property cannot be eligible simply because was the place of religious services for a community, or was the oldest structure used by a religious group in a local area.

OTHER HISTORICAL THEMES

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern that is significant in another historic context. A religious property would also qualify if it were significant for its associations that illustrate the importance of a particular religious group in the social, cultural, economic, or political history of the area. Eligibility depends on the importance of the event or broad pattern and the role of the specific property.

Eligible

- A religious property can qualify for its important role as a temporary hospital during the Revolutionary War, or if its school was significant in the history of education in the community.

Not Eligible

- A religious property is not significant in the history of education in a community simply because it had occasionally served as a school.

TRADITIONAL CULTURAL VALUES

When evaluating properties associated with traditional cultures, it is important to recognize that often these cultures do not make clear distinctions between what is secular and what is sacred. Criteria Consideration A is not intended to exclude traditional cultural resources merely because they have religious uses or are considered sacred. A property or natural feature important to a traditional culture's religion and mythology is eligible if its importance has been ethnohistorically documented and if the site can be clearly defined. It is critical, however, that the activities be documented and that the associations not be so diffuse that the physical resource cannot be adequately defined.[8]

Eligible

- A specific location or natural feature that an Indian tribe believes to be its place of origin and that is adequately documented qualifies under Criteria Consideration A.

ELIGIBILITY FOR HISTORIC PERSONS

A religious property can be eligible for association with a person important in religious history, if that significance has scholarly, secular recognition or is important in other historic contexts. Individuals who would likely be considered significant are those who formed or significantly influenced an important religious institution or movement, or who were important in the social, economic, or political history of the area. Properties associated with individuals important only within the context of a single congregation and lacking importance in any other historic context would not be eligible under Criterion B.

Eligible

- A religious property strongly associated with a religious leader, such as George Whitefield or Joseph Smith, is eligible.

[8] For more information on applying Criteria Consideration A to traditional cultural properties, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties.*

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ELIGIBILITY FOR ARCHITECTURAL OR ARTISTIC DISTINCTION

A religious property significant for its architectural design or construction should be evaluated as are other properties under Criterion C; that is, it should be evaluated within an established architectural context and, if necessary, compared to other properties of its type, period, or method of construction. (See "Comparing Related Properties" in *Part V: How to Evaluate a Property Within Its Historic Context.)*

Eligible

- A historic camp meeting district that meets the requirements of Criterion C for its significance as a type of construction is eligible.

ELIGIBILITY FOR INFORMATION POTENTIAL

A religious property, whether a district, site, building, structure, or object, is eligible if it can yield important information about the religious practices of a cultural group or other historic themes. This kind of property should be evaluated as are other properties under Criterion D, in relation to similar properties, other information sources, and existing data gaps.

Eligible

- A 19th century camp meeting site that could provide information about the length and intensity of site use during revivals of the Second Great Awakening is eligible.
- Rock cairns or medicine wheels that had a historic religious mythological function and can provide information about specific cultural beliefs are eligible.

ABILITY TO REFLECT HISTORIC ASSOCIATIONS

As with all eligible properties, religious properties must physically represent the period of time for which they are significance. For instance, a recent building that houses an older congregation cannot qualify based on the historic activities of the group because the current building does not convey the earlier history. Likewise, an older building that housed the historic activities of the congregation is eligible if it still physically represents the period of the congregation's significance. However, if an older building has been remodeled to the extent that its appearance dates from the time of the remodeling, it can only be eligible if the period of significance corresponds with the period of the alterations.

Eligible

- A church built in the 18th century and altered beyond recognition in the 19th century is eligible only if the additions are important in themselves as an example of late 19th century architecture or as a reflection of an important period of the congregation's growth.

Not Eligible

- A synagogue built in the 1920s cannot be eligible for the important activities of its congregation in the 18th and 19th centuries. It can only be eligible for significance obtained after its construction date.
- A rural 19th century frame church recently sheathed in brick is not eligible because it has lost its characteristic appearance and therefore can no longer convey its 19th century significance, either for architectural value or historic association.

Criteria Consideration A - Religious Properties. *A religious property can qualify as an exception to the Criteria if it is architecturally significant.* ***The Church of the Navity*** *in Rosedale, Iberville Parish, Louisiana, qualified as a rare example in the State of a 19th century small frame Gothic Revival style chapel. (Robert Obier)*

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CRITERIA CONSIDERATION B: MOVED PROPERTIES

A property removed from its original or historically significant location can be eligible if it is significant primarily for architectural value or it is the surviving property most importantly associated with a historic person or event.

UNDERSTANDING CRITERIA CONSIDERATION B: MOVED PROPERTIES

The National Register criteria limit the consideration of moved properties because significance is embodied in locations and settings as well as in the properties themselves. Moving a property destroys the relationships between the property and its surroundings and destroys associations with historic events and persons. A move may also cause the loss of historic features such as landscaping, foundations, and chimneys, as well as loss of the potential for associated archeological deposits. Properties that were moved *before* their period of significance do not need to meet the special requirements of Criteria Consideration B.

One of the basic purposes of the National Register is to encourage the preservation of historic properties as living parts of their communities. In keeping with this purpose, it is not usual to list artificial groupings of buildings that have been created for purposes of interpretation, protection, or maintenance. Moving buildings to such a grouping destroys the integrity of location and setting, and can create a false sense of historic development.

APPLYING CRITERIA CONSIDERATION B: MOVED PROPERTIES

ELIGIBILITY FOR ARCHITECTURAL VALUE

A moved property significant under Criterion C must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association.

Examples of Properties that MUST Meet Criteria Consideration B: Moved Properties

- *A resource moved from one location on its original site to another location on the property, during or after its Period of Significance.*
- *A district in which a significant number of resources have been moved from their original location.*
- *A district which has one moved building that makes an especially significant contribution to the district.*
- *A portable resource, such as a ship or railroad car, that is relocated to a place incompatible with its original function.*
- *A portable resource, such as a ship or railroad car, whose importance is critically linked to its historic location or route and that is moved.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration B: Moved Properties

- *A property that is moved prior to its Period of Significance.*
- *A district in which only a small percentage of typical buildings in a district are moved.*
- *A moved building that is part of a complex but is of less significance than the remaining (unmoved) buildings.*
- *A portable resource, such as a ship or railroad car, that is eligible under Criterion C and is moved within its natural setting (water, rails, etc.).*
- *A property that is raised or lowered on its foundations.*

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ELIGIBILITY FOR HISTORIC ASSOCIATIONS

A moved property significant under Criteria A or B must be demonstrated to be the surviving property most importantly associated with a particular historic event or an important aspect of a historic person's life. The phrase "most importantly associated" means that it must be the single surviving property that is most closely associated with the event or with the part of the person's life for which he or she is significant.

Eligible

- A moved building occupied by an business woman during the majority of her productive career would be eligible if the other extant properties are a house she briefly inhabited prior to her period of significance and a commercial building she owned after her retirement.

Not Eligible

- A moved building associated with the beginning of rail transportation in a community is not eligible if the original railroad station and warehouse remained intact on their original sites.

SETTING AND ENVIRONMENT

In addition to the requirements above, moved properties must still have an orientation, setting, and general environment that are comparable to those of the historic location and that are compatible with the property's significance.

Eligible

- A property significant as an example of mid-19th century rural house type can be eligible after a move, provided that it is placed on a lot that is sufficient in size and character to recall the basic qualities of the historic environment and setting, and provided that the building is sited appropriately in relation to natural and manmade surroundings.

Not Eligible

- A rural house that is moved into an urban area and a bridge that is no longer situated over a waterway are not eligible.

ASSOCIATION DEPENDENT ON THE SITE

For a property whose design values or historical associations are directly dependent on its location, any move will cause the property to lose its integrity and prevent it from conveying its significance.

Eligible

- A farm structure significant only as an example of a method of construction peculiar to the local area is still eligible if it is moved within that local area and the new setting is similar to that of the original location.

Not Eligible

- A 19th century rural residence that was designed around particular topographic features, reflecting that time period's ideals of environment, is not eligible if moved.

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PROPERTIES DESIGNED TO BE MOVED

A property designed to move or a property frequently moved during its historic use must be located in a historically appropriate setting in order to qualify, retaining its integrity of setting, design, feeling, and association. Such properties include automobiles, railroad cars and engines, and ships.

Eligible

- A ship docked in a harbor, a locomotive on tracks or in a railyard, and a bridge relocated from one body of water to another are eligible.

Not Eligible

- A ship on land in a park, a bridge placed in a pasture, or a locomotive displayed in an indoor museum are not eligible.

ARTIFICIALLY CREATED GROUPINGS

An artificially created grouping of buildings, structures, or objects is not eligible unless it has achieved significance since the time of its assemblage. It cannot be considered as a reflection of the time period when the individual buildings were constructed.

Eligible

- A grouping of moved historic buildings whose creation marked the beginning of a major concern with past lifestyles can qualify as an early attempt at historic preservation and as an illustration of that generation's values.

Not Eligible

- A rural district composed of a farmhouse on its original site and a grouping of historic barns recently moved onto the property is not eligible.

PORTIONS OF PROPERTIES

A moved *portion* of a building, structure, or object is not eligible because, as a fragment of a larger resource, it has lost integrity of design, setting, materials, workmanship, and location.

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CRITERIA CONSIDERATION C: BIRTHPLACES OR GRAVES

A birthplace or grave of a historical figure is eligible if the person is of outstanding importance and if there is no other appropriate site or building directly associated with his or her productive life.

UNDERSTANDING CRITERIA CONSIDERATION C: BIRTHPLACES AND GRAVES

Birthplaces and graves often attain importance as reflections of the origins of important persons or as lasting memorials to them. The lives of persons significant in our past normally are recognized by the National Register through listing of properties illustrative of or associated with that person's productive life's work. Birthplaces and graves, as properties that represent the beginning and the end of the life of distinguished individuals, may be temporally and geographically far removed from the person's significant activities, and therefore are not usually considered eligible.

Examples of Properties that MUST Meet Criteria Consideration C: Birthplaces and Graves

- *The birthplace of a significant person who lived elsewhere during his or her Period of Significance.*
- *A grave that is nominated for its association with the significant person buried in it.*
- *A grave that is nominated for information potential.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration C: Birthplaces and Graves

- *A house that was inhabited by a significant person for his or her entire lifetime.*
- *A grave located on the grounds of the house where a significant person spent his or her productive years.*

APPLYING CRITERIA CONSIDERATION C: BIRTHPLACES AND GRAVES

PERSONS OF OUTSTANDING IMPORTANCE

The phrase "a historical figure of outstanding importance" means that in order for a birthplace or grave to qualify, it cannot be simply the birthplace or grave of a person significant in our past (Criterion B). It must be the birthplace or grave of an individual who was of outstanding importance in the history of the local area, State, or nation. The birthplace or grave of an individual who was one of several people active in some aspect of the history of a community, a state, or the Nation would not be eligible.

LAST SURVIVING PROPERTY ASSOCIATED WITH A PERSON

When an geographical area strongly associated with a person of outstanding importance has lost all other properties directly associated with his or her formative years or productive life, a birthplace or grave may be eligible.

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ELIGIBILITY FOR OTHER ASSOCIATIONS

A birthplace or grave can also be eligible if it is significant for reasons other than association with the productive life of the person in question. It can be eligible for significance under Criterion A for association with important events, under Criterion B for association with the productive lives of *other* important persons, or under Criterion C for architectural significance. A birthplace or grave can also be eligible in rare cases if, after the passage of time, it is significant for its commemorative value. (See Criteria Consideration F for a discussion of commemorative properties.) A birthplace or grave can also be eligible under Criterion D if it contains important information on research, *e.g.,* demography, pathology, mortuary practices, socioeconomic status differentiation.

***Criteria Consideration** C - **Birthplaces.** A birthplace of a historical figure is eligible if the person is of outstanding importance and there is no other appropriate site or building associated with his or her productive life. The **Walter Reed Birthplace,** Gloucester vicinity, Gloucester County, Virginia is the most appropriate remaining building associated with the life of the man who, in 1900, discovered the cause and mode of transmission of the great scourge of the tropics, yellow fever. (Virginia Historic Landmarks Commission)*

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CRITERIA CONSIDERATION D: CEMETERIES

A cemetery is eligible if it derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events.

UNDERSTANDING CRITERIA CONSIDERATION D: CEMETERIES

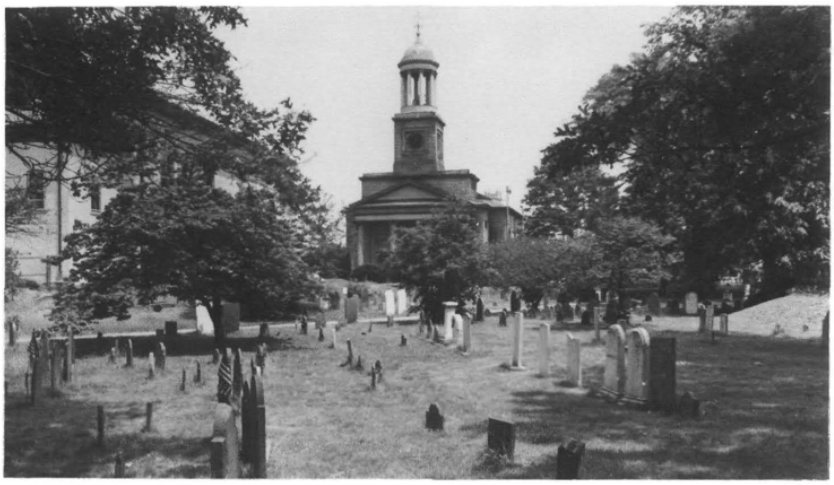
A cemetery is a collection of graves that is marked by stones or other artifacts or that is unmarked but recognizable by features such as fencing or depressions, or through maps, or by means of testing. Cemeteries serve as a primary means of an individual's recognition of family history and as expressions of collective religious and/or ethnic identity. Because cemeteries may embody values beyond personal or family-specific emotions, the National Register criteria allow for listing of cemeteries under certain conditions.

Examples of Properties that MUST Meet Criteria Consideration D: Cemeteries

- *A cemetery that is nominated individually for Criterion A, B, or C.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration D: Cemeteries

- *A cemetery that is nominated along with its associated church, but the church is the main resource nominated.*
- *A cemetery that is nominated under Criterion D for information potential.*
- *A cemetery that is nominated as part of a district but is not the focal point of the district.*



Criteria Consideration D - Cemeteries. *The* ***Hancock Cemetery,*** *Quincy, Norfolk County, Massachusetts meets the exception to the Criteria because it derives its primary significance from its great age (the earliest burials date from 1640) and from the distinctive design features found in its rich collection of late 17th and early 18th century funerary art. (N. Hobart Holly)*

APPLYING CRITERIA CONSIDERATION D: CEMETERIES

PERSONS OF TRANSCENDENT IMPORTANCE

A cemetery containing the graves of persons of transcendent importance may be eligible. To be of transcendent importance the persons must have been of great eminence in their fields of endeavor or had a great impact upon the history of their community, State, or nation. (A single grave that is the burial place of an important person and is located in a larger cemetery that does not qualify under this Criteria Consideration should be treated under Criteria Consideration C: Birthplaces and Graves.)

Eligible

- A historic cemetery containing the graves of a number of persons who were exceptionally significant in determining the course of a State's political or economic history during a particular period is eligible.

Not Eligible

- A cemetery containing graves of State legislators is not eligible if they simply performed the daily business of State government and did not have an outstanding impact upon the nature and direction of the State's history.

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ELIGIBILITY ON THE BASIS OF AGE

Cemeteries can be eligible if they have achieved historic significance for their relative great age in a particular geographic or cultural context.

Eligible

- A cemetery dating from a community's original 1830s settlement can attain significance from its association with that very early period.

ELIGIBILITY FOR DESIGN

Cemeteries can qualify on the basis of distinctive design values. These values refer to the same design values addressed in Criterion C and can include aesthetic or technological achievement in the fields of city planning, architecture, landscape architecture, engineering, mortuary art, and sculpture. As for all other nominated properties, a cemetery must clearly express its design values and be able to convey its historic appearance.

Eligible

- A Victorian cemetery is eligible if it clearly expresses the aesthetic principles related to funerary design for that period, through such features as the overall plan, landscaping, statuary, sculpture, fencing, buildings, and grave markers.

Not Eligible

- A cemetery cannot be eligible for design values if it no longer conveys its historic appearance because of the introduction of new grave markers.

ELIGIBILITY FOR ASSOCIATION WITH EVENTS

Cemeteries may be associated with historic events including specific important events or general events that illustrate broad patterns.

Eligible

- A cemetery associated with an important Civil War battle is eligible.
- A cemetery associated with the settlement of an area by an ethnic or cultural group is eligible if the movement of the group into the area had an important impact, if other properties associated with that group are rare, and if few documentary sources have survived to provide information about the group's history.

Not Eligible

- A cemetery associated with a battle in the Civil War does not qualify if the battle was not important in the history of the war.
- A cemetery associated with an area's settlement by an ethnic or cultural group is not eligible if the impact of the group on the area cannot be established, if other extant historic properties better convey association with the group, or if the information that the cemetery can impart is available in documentary sources.

ELIGIBILITY FOR INFORMATION POTENTIAL

Cemeteries, both historic and prehistoric, can be eligible if they have the potential to yield important information. The information must be important within a specific context and the potential to yield information must be demonstrated.

A cemetery can qualify if it has potential to yield important information provided that the information it contains is not available in extant documentary evidence.

Eligible

- A cemetery associated with the settlement of a particular cultural group will qualify if it has the potential to yield important information about subjects such as demography, variations in mortuary practices, or the study of the cause of death correlated with nutrition or other variables.

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INTEGRITY

Assessing the integrity of a historic cemetery entails evaluating principal design features such as plan, grave markers, and any related elements (such as fencing). Only that portion of a historic cemetery that retains its historic integrity can be eligible. If the overall integrity has been lost because of the number and size of recent grave markers, some features such as buildings, structures, or objects that retain integrity may be considered as individual properties if they are of such historic or artistic importance that they individually meet one or more of the requirements listed above.

NATIONAL CEMETERIES

National Cemeteries administered by the Veterans Administration are eligible because they have been designated by Congress as primary memorials to the military history of the United States. Those areas within a designated national cemetery that have been used or prepared for the reception of the remains of veterans and their dependents, as well as any landscaped areas that immediately surround the graves may qualify. Because these cemeteries draw their significance from the presence of the remains of military personnel who have served the country throughout its history, the age of the cemetery is not a factor in judging eligibility, although integrity must be present.

A national cemetery or a portion of a national cemetery that has only been set aside for use in the future is not eligible.

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CRITERIA CONSIDERATION E: RECONTRUCTED PROPERTIES

A reconstructed property is eligible when it is accurately executed in a suitable environment *and* presented in a dignified manner as part of a restoration master plan *and* when no other building or structure with the same associations has survived. All three of these requirements must be met.

UNDERSTANDING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

"Reconstruction" is defined as the reproduction of the exact form and detail of a vanished building, structure, object, or a part thereof, as it appeared at a specific period of time. Reconstructed buildings fall into two categories: buildings wholly constructed of new materials and buildings reassembled from some historic and some new materials. Both categories of properties present problems in meeting the integrity requirements of the National Register criteria.

Examples of Properties that MUST Meet Criteria Consideration E: Reconstructed Properties

- *A property in which most or all of the fabric is not original.*
- *A district in which an important resource or a significant number of resources are reconstructions.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration E: Reconstructed Properties

- *A property that is remodeled or renovated and still has the majority of its original fabric.*

APPLYING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

ACCURACY OF THE RECONSTRUCTION

The phrase "accurately executed" means that the reconstruction must be based upon sound archeological, architectural, and historic data concerning the historic construction and appearance of the resource. That documentation should include both analysis of any above or below ground material and research in written and other records.

SUITABLE ENVIRONMENT

The phrase "suitable environment" refers to: 1) the physical context provided by the historic district and 2) any interpretive scheme, if the historic district is used for interpretive purposes. This means that the reconstructed property must be located at the same site as the original. It must also be situated in its original grouping of buildings, structures, and objects (as many as are extant), and that grouping must retain integrity. In addition, the reconstruction must not be misrepresented as an authentic historic property.

Eligible

- A reconstructed plantation manager's office building is considered eligible because it is located at its historic site, grouped with the remaining historic plantation buildings and structures, and the plantation as a whole retains integrity. Interpretation of the plantation district includes an explanation that the manager's office is not the original building, but a reconstruction.

Not Eligible

- The same reconstructed plantation manager's office building would not qualify if it were rebuilt at a location different from that of the original building, or if the district as a whole no longer reflected the period for which it is significant, or if a misleading interpretive scheme were used for the district or for the reconstruction itself.

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RESTORATION MASTER PLANS

Being presented "as part of a restoration master plan" means that: 1) a reconstructed property is an essential component in a historic district and 2) the reconstruction is part of an overall restoration plan for an entire district. "Restoration" is defined as accurately recovering the form and details of a property and its setting as it appeared at a particular period by removing later work or by replacing missing earlier work (as opposed to completely rebuilding the property). The master plan for the entire property must emphasize restoration, not reconstruction. In other words, the master plan for the entire resource would not be acceptable under this consideration if it called for reconstruction of a majority of the resource.

Eligible

- A reconstructed plantation manager's office is eligible if the office were an important component of the plantation *and* if the reconstruction is one element in an overall plan for restoring the plantation *and* if no other building or structure with the same associations has survived.
- The reconstruction of the plantation manager's office building can be eligible only if the majority of buildings, structures, and objects that comprised the plantation are extant and are being restored. For guidance regarding restoration see the *Secretary of the Interior's Standards for Historic Preservation Projects.*

LAST SURVIVING PROPERTY OF A TYPE

This consideration also stipulates that a reconstruction can qualify if, in addition to the other requirements, no other building, object, or structure with the same association has survived. A reconstruction that is part of a restoration master plan is appropriate only if: 1) the property is the only one in the district with which a particular important activity or event has been historically associated or 2) no other property with the same associative values has survived.

RECONSTRUCTIONS OLDER THAN FIFTY YEARS

After the passage of fifty years, a reconstruction may attain its own significance for what it reveals about the period in which it was built, rather than the historic period it was intended to depict. On that basis, a reconstruction can possibly qualify under any of the Criteria.

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CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

A property primarily commemorative in intent can be eligible if design, age, tradition, or symbolic value has invested it with its own historical significance.

UNDERSTANDING CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

Commemorative properties are designed or constructed after the occurrence of an important historic event or after the life of an important person. They are not directly associated with the event or with the person's productive life, but serve as evidence of a later generation's assessment of the past. Their significance comes from their value as cultural expressions at the date of their creation. Therefore, a commemorative property generally must be over fifty years old and must possess significance based on its own value, not on the value of the event or person being memorialized.

Examples of Properties that MUST Meet Criteria Consideration F: Commemorative Properties

- *A property whose sole or primary function is commemorative or in which the commemorative function is of primary significance.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration F: Commemorative Properties

- *A resource that has a non-commemorative primary function or significance.*
- *A single marker that is a component of a district (whether contributing or non-contributing).*

APPLYING CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

ELIGIBILITY FOR DESIGN

A commemorative property derives its design from the aesthetic values of the period of its creation. A commemorative property, therefore, may be significant for the architectural, artistic, or other design qualities of its own period in prehistory or history.

Eligible

- A commemorative statue situated in a park or square is eligible if it expresses the aesthetics or craftsmanship of the period when it was made, meeting Criterion C.
- A late 19th century statue erected on a courthouse square to commemorate Civil War veterans would qualify if it reflects that era's shared perception of the noble character and valor of the veterans and their cause. This was commonly conveyed by portraying idealized soldiers or allegorical figures of battle, victory, or sacrifice.

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ELIGIBILITY FOR AGE, TRADITION, OR SYMBOLIC VALUE

A commemorative property cannot qualify for association with the event or person it memorializes. A commemorative property may, however, acquire significance after the time of its creation through *age, tradition,* or *symbolic* value. This significance must be documented by accepted methods of historical research, including written or oral history, and must meet one or more of the Criteria.

Eligible

- A commemorative marker erected by a cultural group that believed the place was the site of its origins is eligible if, for subsequent generations of the group, the marker itself became the focus of traditional association with the group's historic identity.
- A building erected as a monument to an important historical figure will qualify if through the passage of time the property itself has come to symbolize the value placed upon the individual and is widely recognized as a reminder of enduring principles or contributions valued by the generation that erected the monument.
- A commemorative marker erected early in the settlement or development of an area will qualify if it is demonstrated that, because of its relative great age, the property has long been a part of the historic identity of the area.

Not Eligible

- A commemorative marker erected in the past by a cultural group at the site of an event in its history would not be eligible if the marker were significant only for association with the event, and it had not become significant itself through tradition.
- A building erected as a monument to an important historical figure would not be eligible if its only value lay in its association with the individual, and it has not come to symbolize values, ideas, or contributions valued by the generation that erected the monument.
- A commemorative marker erected to memorialize an event in the community's history would not qualify simply for its association with the event it memorialized.

INELIGIBILITY AS THE LAST REPRESENTATIVE OF AN EVENT OR PERSON

The loss of properties directly associated with a significant event or person does not strengthen the case for consideration of a commemorative property. Unlike birthplaces and graves, a commemorative property usually has no direct historic association. The commemorative property can qualify for historic association only if it is clearly significant in its own right, as stipulated above.

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CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS[9]

A property achieving significance within the last fifty years is eligible if it is of exceptional importance.

UNDERSTANDING CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS

The National Register Criteria for Evaluation exclude properties that achieved significance within the last fifty years unless they are of exceptional importance. Fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance. This consideration guards against the listing of properties of passing contemporary interest and ensures that the National Register is a list of truly historic places.

Examples of Properties that MUST Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- *A property that is less than fifty years old.*
- *A property that continues to achieve significance into a period less than fifty years before the nomination.*
- *A property that has non-contiguous Periods of Significance, one of which is less than fifty years before the nomination.*
- *A property that is more than fifty years old and had no significance until a period less than fifty years before the nomination.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- *A resource whose construction began over fifty years ago, but the completion overlaps the fifty year period by a few years or less.*
- *A resource that is significant for its plan or design, which is over fifty years old, but the actual completion of the project overlaps the fifty year period by a few years.*
- *A historic district in which a few properties are newer than fifty years old, but the majority of properties and the most important Period of Significance are greater than fifty years old.*

[9] For more information on Criteria Consideration G, refer to *National Register Bulletin: Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Last Fifty Years.*

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APPLYING CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE PAST FIFTY YEARS

ELIGIBILITY FOR EXCEPTIONAL IMPORTANCE

The phrase "exceptional importance" may be applied to the extraordinary importance of an event or to an entire category of resources so fragile that survivors of any age are unusual. Properties listed that had attained significance in less than fifty years include: the launch pad at Cape Canaveral from which men first traveled to the moon, the home of nationally prominent playwright Eugene O'Neill, and the Chrysler Building (New York) significant as the epitome of the "Style Moderne" architecture.

Properties less than fifty years old that qualify as exceptional because the entire category of resources is fragile include a recent example of a traditional sailing canoe in the Trust Territory of the Pacific Islands, where because of rapid deterioration of materials, no working Micronesian canoes exist that are more than twenty years old. Properties that by their nature can last more than fifty years cannot be considered exceptionally important because of the fragility of the class of resources.

The phrase "exceptional importance" does not require that the property be of national significance. It is a measure of a property's importance within the appropriate historic context, whether the scale of that context is local, State, or national.

Eligible

- The General Laundry Building in New Orleans, one of the few remaining Art Deco Style buildings in that city, was listed in the National Register when it was forty years old because of its exceptional importance as an example of that architectural style.

HISTORICAL PERSPECTIVE

A property that has achieved significance within the past fifty years can be evaluated only when sufficient historical perspective exists to determine that the property is exceptionally important. The necessary perspective can be provided by scholarly research and evaluation, and must consider both the historic context and the specific property's role in that context.

In many communities, properties such as apartment buildings built in the 1950s cannot be evaluated because there is no scholarly research available to provide an overview of the nature, role, and impact of that building type within the context of historical and architectural developments of the 1950s.

NATIONAL PARK SERVICE RUSTIC ARCHITECTURE

Properties such as structures built in a rustic style by the National Park Service during the 1930s and 1940s can be evaluated because a broad study, *National Park Service Rustic Architecture* (1977), provides the context for evaluating properties of this type and style. Specific examples were listed in the National Register prior to reaching fifty years of age when documentation concerning the individual properties established their significance within the historical and architectural context of the type and style.

VETERANS ADMINISTRATION HOSPITALS

Hospitals less than fifty years old that were constructed by the Veterans Bureau and Veterans Administration can be evaluated because the collection of forty-eight facilities built between 1920 and 1946 has been analyzed in a study prepared by the agency. The study provided a historic and architectural context for development of veteran's care within which hospitals could be evaluated. The exceptional importance of specific individual facilities constructed within the past fifty years could therefore be determined based on their role and their present integrity.

COMPARISON WITH RELATED PROPERTIES

In justifying exceptional importance, it is necessary to identify other properties within the geographical area that reflect the same significance or historic associations and to determine which properties *best* represent the historic context in question. Several properties in the area could become eligible with the passage of time, but few will qualify now as exceptionally important.

POST-WORLD WAR II PROPERTIES

Properties associated with the post-World War II era must be identified and evaluated to determine which ones in an area could be judged exceptionally important. For example, a public housing complex may be eligible as an outstanding expression of the nation's post-war urban policy. A military installation could be judged exceptionally important because of its contribution to the Cold War arms race. A church building in a Southern city may have served as the pivotal rallying point for the city's most famous civil rights protest. A post-war suburban subdivision may be the best reflection of contemporary siting and design tenets in a metropolitan area. In each case, the nomination preparer must justify the *exceptional* importance of the property relative to similar properties in the community, State, or nation.

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ELIGIBILITY FOR INFORMATION POTENTIAL

A property that has achieved significance within the past fifty years can qualify under Criterion D only if it can be demonstrated that the information is of exceptional importance within the appropriate context and that the property contains data superior to or different from those obtainable from other sources, including other culturally related sites. An archeological site less than fifty years old may be eligible if the former inhabitants are so poorly documented that information about their lifeways is best obtained from examination of the material remains.

Eligible

- Data such as the rate of adoption of modern technological innovations by rural tenant farmers in the 1950s may not be obtainable through interviews with living persons but could be gained by examination of homesites.

Not Eligible

- A recent archeological site such as the remains of a Navajo sheep corral used in the 1950s would not be considered exceptionally significant for its information potential on animal husbandry if better information on the same topic is available through ethnographic studies or living informants.

HISTORIC DISTRICTS

Properties which have achieved significance within the past fifty years can be eligible for the National Register if they are an integral part of a district which qualifies for National Register listing. This is demonstrated by documenting that the property dates from within the district's defined Period of Significance and that it is associated with one or more of the district's defined Areas of Significance.

Properties less than fifty years old may be an integral part of a district when there is sufficient perspective to consider the properties as historic. This is accomplished by demonstrating that: 1) the district's Period of Significance is justified as a discrete period with a defined beginning and end, 2) the character of the district's historic resources is clearly defined and assessed, 3) specific resources in the district are demonstrated to date from that discrete era, and 4) the majority of district properties are over fifty years old. In these instances, it is not necessary to prove exceptional importance of either the district itself or the less-than-fifty-year-old properties. Exceptional importance still must be demonstrated for district where the majority of properties or the major Period of Significance is less than fifty years old, and for less-than-fifty-year-old properties which are nominated individually.

PROPERTIES MORE THAN FIFTY YEARS IN AGE, LESS THAN FIFTY YEARS IN SIGNIFICANCE

Properties that are more than fifty years old, but whose significant associations or qualities are less than fifty years old, must be treated under the fifty year consideration.

Eligible

- A building constructed early in the twentieth century (and having no architectural importance), but that was associated with an important person during the 1950s, must be evaluated under Criteria Consideration G because the Period of Significance is within the past fifty years. Such a property would qualify if the person was of exceptional importance.

REQUIREMENT TO MEET THE CRITERIA, REGARDLESS OF AGE

Properties that are less than fifty years old and are not exceptionally important will *not* automatically qualify for the National Register once they are fifty years old. In order to be listed in the National Register, all properties, regardless of age, must be demonstrated to meet the Criteria for Evaluation.

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VIII. HOW TO EVALUATE THE INTEGRITY OF A PROPERTY

INTRODUCTION

Integrity is the ability of a property to convey its significance. To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance.

Historic properties either retain integrity (this is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognizes seven aspects or qualities that, in various combinations, define integrity.

To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining *which* of these aspects are most important to a particular property requires knowing why, where, and when the property is significant. The following sections define the seven aspects and explain how they combine to produce integrity.

SEVEN ASPECTS OF INTEGRITY

- Location
- Design
- Setting
- Materials
- Workmanship
- Feeling
- Association

UNDERSTANDING THE ASPECTS OF INTEGRITY

LOCATION

Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved. (See Criteria Consideration B in *Part VII: How to Apply the Criteria Considerations*, for the conditions under which a moved property can be eligible.)

DESIGN

Design is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials.

A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.

Design can also apply to districts, whether they are important primarily for historic association, architectural value, information potential, or a combination thereof. For districts significant primarily for historic association or architectural value, design concerns more than just the individual buildings or structures located within the boundaries. It also applies to the way in which buildings, sites, or structures are related: for example, spatial relationships between major features; visual rhythms in a streetscape or landscape plantings; the layout and materials of walkways and roads; and the relationship of other features, such as statues, water fountains, and archeological sites.

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SETTING

Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historical role. It involves *how*, not just where, the property is situated and its relationship to surrounding features and open space.

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as:

- Topographic features (a gorge or the crest of a hill);
- Vegetation;
- Simple manmade features (paths or fences); and
- Relationships between buildings and other features or open space.

These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its *surroundings*. This is particularly important for districts.

MATERIALS

Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area's sense of time and place.

A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved. The property must also be an actual historic resource, not a recreation; a recent structure fabricated to look historic is not eligible. Likewise, a property whose historic features and materials have been lost and then reconstructed is usually not eligible. (See Criteria Consideration E in *Part VII: How to Apply the Criteria Considerations* for the conditions under which a reconstructed property can be eligible.)

WORKMANSHIP

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques.

Workmanship is important because it can furnish evidence of the technology of a craft, illustrate the aesthetic principles of a historic or prehistoric period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principles. Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery. Examples of workmanship in prehistoric contexts include Paleo-Indian clovis projectile points; Archaic period beveled adzes; Hopewellian birdstone pipes; copper earspools and worked bone pendants; and Iroquoian effigy pipes.

FEELING

Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character. For example, a rural historic district retaining original design, materials, workmanship, and setting will relate the feeling of agricultural life in the 19th century. A grouping of prehistoric petroglyphs, unmarred by graffiti and intrusions and located on its original isolated bluff, can evoke a sense of tribal spiritual life.

ASSOCIATION

Association is the direct link between an important historic event or person and a historic property. A property retains association if it *is* the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. For example, a Revolutionary War battlefield whose natural and manmade elements have remained intact since the 18th century will retain its quality of association with the battle.

Because feeling and association depend on individual perceptions, their retention *alone* is never sufficient to support eligibility of a property for the National Register.

ASSESSING INTEGRITY IN PROPERTIES

Integrity is based on significance: why, where, and when a property is important. Only after significance is fully established can you proceed to the issue of integrity.

The steps in assessing integrity are:

- Define the **essential physical features** that must be present for a property to represent its significance.
- Determine whether the **essential physical features are visible** enough to convey their significance.
- Determine whether the property needs to be **compared with similar properties.** And,
- Determine, based on the significance and essential physical features, **which aspects of integrity** are particularly vital to the property being nominated and if they are present.

Ultimately, the question of integrity is answered by whether or not the property retains the **identity** for which it is significant.

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DEFINING THE ESSENTIAL PHYSICAL FEATURES

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both *why* a property is significant (Applicable Criteria and Areas of Significance) and *when* it was significant (Periods of Significance). They are the features without which a property can no longer be identified as, for instance, a late 19th century dairy barn or an early 20th century commercial district.

CRITERIA A AND B

A property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s). If the property is a site (such as a treaty site) where there are no material cultural remains, the setting must be intact.

Archeological sites eligible under Criteria A and B must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to convey important associations with events or persons.

CRITERION C

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible *if* it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

Archeological sites eligible under Criterion C must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to illustrate a site type, time period, method of construction, or work of a master.

CRITERION D

For properties eligible under Criterion D, including archeological sites and standing structures studied for their information potential, less attention is given to their overall condition, than it they were being considered under Criteria A, B, or C. Archeological sites, in particular, do not exist today exactly as they were formed. There are always cultural and natural processes that alter the deposited materials and their spatial relationships.

For properties eligible under Criterion D, integrity is based upon the property's potential to yield specific data that addresses important research questions, such as those identified in the historic context documentation in the Statewide Comprehensive Preservation Plan or in the research design for projects meeting the *Secretary of the Interior's Standards for Archeological Documentation.*

INTERIORS

Some historic buildings are virtually defined by their exteriors, and their contribution to the built environment can be appreciated even if their interiors are not accessible. Examples of this would include early examples of steel-framed skyscraper construction. The great advance in American technology and engineering made by these buildings can be read from the outside. The change in American popular taste during the 19th century, from the symmetry and simplicity of architectural styles based on classical precedents, to the expressions of High Victorian styles, with their combination of textures, colors, and asymmetrical forms, is readily apparent from the exteriors of these buildings.

Other buildings "are" interiors. The Cleveland Arcade, that soaring 19th century glass-covered shopping area, can only be appreciated from the inside. Other buildings in this category would be the great covered train sheds of the 19th century.

In some cases the loss of an interior will disqualify properties from listing in the National Register—a historic concert hall noted for the beauty of its auditorium and its fine acoustic qualities would be the type of property that if it were to lose its interior, it would lose its value as a historic resource. In other cases, the overarching significance of a property's exterior can overcome the adverse effect of the loss of an interior.

In borderline cases particular attention is paid to the significance of the property and the remaining historic features.

HISTORIC DISTRICTS

For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance.

When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.

A component of a district cannot contribute to the significance if:

- it has been substantially altered since the period of the district's significance *or*
- it does not share the historic associations of the district.

VISIBILITY OF PHYSICAL FEATURES

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction. Archeological properties are often the exception to this; by nature they usually do not require visible features to convey their significance.

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NON-HISTORIC EXTERIORS

If the historic *exterior* building material is covered by non-historic material (such as modern siding), the property can still be eligible *if* the significant form, features, and detailing are not obscured. If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.

PROPERTY CONTAINED WITHIN ANOTHER PROPERTY

Some properties contain an earlier structure that formed the nucleus for later construction. The exterior property, if not eligible in its own right, can qualify on the basis of the interior property *only if* the interior property can yield significant information about a specific construction technique or material, such as rammed earth or tabby. The interior property *cannot* be used as the basis for eligibility if it has been so altered that it no longer contains the features that could provide important information, or if the presence of important information cannot be demonstrated.

SUNKEN VESSELS

A sunken vessel can be eligible under Criterion C as embodying the distinctive characteristics of a method of construction if it is structurally intact. A *deteriorated* sunken vessel, no longer structurally intact, can be eligible under Criterion D if the remains of either the vessel or its contents is capable of yielding significant information. For further information, refer to *National Register Bulletin: Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places.*

Natural Features

A natural feature that is associated with a historic event or trend, such as a rock formation that served as a trail marker during westward expansion, must retain its historic appearance, unobscured by modern construction or landfill. Otherwise it is not eligible, even though it remains intact.

COMPARING SIMILAR PROPERTIES

For some properties, comparison with similar properties should be considered during the evaluation of integrity. Such comparison may be important in deciding what physical features are essential to properties of that type. In instances where it has not been determined what physical features a property must possess in order for it to reflect the significance of a historic context, comparison with similar properties should be undertaken during the evaluation of integrity. This situation arises when scholarly work has not been done on a particular property type or when surviving examples of a property type are extremely rare. (See **Comparing Related Properties** in *Part V: How to Evaluate a Property within its Historic Context.)*

RARE EXAMPLES OF A PROPERTY TYPE

Comparative information is particularly important to consider when evaluating the integrity of a property that is a rare surviving example of its type. The property must have the essential physical features that enable it to convey its historic character or information. The rarity and poor condition, however, of other extant examples of the type may justify accepting a greater degree of alteration or fewer features, provided that enough of the property survives for it to be a significant resource.

Eligible

- A one-room schoolhouse that has had all original exterior siding replaced and a replacement roof that does not exactly replicate the original roof profile can be eligible if the other extant rare examples have received an even greater degree of alteration, such as the subdivision of the original one-room plan.

Not Eligible

- A mill site contains information on how site patterning reflects historic functional requirements, but parts of the site have been destroyed. The site is not eligible for its information potential if a comparison of other mill sites reveals more intact properties with complete information.

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DETERMINING THE RELEVANT ASPECTS OF INTEGRITY

Each type of property depends on certain aspects of integrity, more than others, to express its historic significance. Determining which of the aspects is most important to a particular property requires an understanding of the property's significance and its essential physical features.

CRITERIA A AND B

A property important for association with an event, historical pattern, or person(s) ideally might retain *some* features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance, and would not be relevant if the property were a site. A basic integrity test for a property associated with an important event or person is whether a historical contemporary would recognize the property as it exists today.

For archeological sites that are eligible under Criteria A and B, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the potential to yield information is required.

Eligible

A mid-19th century waterpowered mill important for its association with an area's industrial development is eligible if:

- it is still on its original site (**Location**), and
- the important features of its setting are intact (**Setting**), and
- it retains most of its historic materials (**Materials**), and
- it has the basic features expressive of its design and function, such as configuration, proportions, and window pattern (**Design**).

Not Eligible

A mid-19th century waterpowered mill important for its association with an area's industrial development is not eligible if:

- it has been moved (**Location, Setting, Feeling**, and **Association**), or
- substantial amounts of new materials have been incorporated (**Materials, Workmanship,** and **Feeling**), or
- it no longer retains basic design features that convey its historic appearance or function (**Design, Workmanship,** and **Feeling**).

CRITERION C

A property significant under Criterion C must retain those physical features that characterize the type, period, or method of construction that the property represents. Retention of design, workmanship, and materials will usually be more important than location, setting, feeling, and association. Location and setting will be important, however, for those properties whose design is a reflection of their immediate environment (such as designed landscapes and bridges).

For archeological sites that are eligible under Criterion C, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the *potential* to yield information is required.

Eligible

A 19th century wooden covered bridge, important for illustrating a construction type, is eligible if:

- the essential features of its design are intact, such as abutments, piers, roof configuration, and trusses (**Design, Workmanship,** and **Feeling**), and
- most of the historic materials are present (**Materials, Workmanship**, and **Feeling**), and
- evidence of the craft of wooden bridge technology remains, such as the form and assembly technique of the trusses (**Workmanship**).
- Since the design of a bridge relates directly to its function as a transportation crossing, it is also important that the bridge still be situated over a waterway (**Setting, Location, Feeling,** and **Association**).

Not Eligible

For a 19th century wooden covered bridge, important for its construction type, replacement of some materials of the flooring, siding, and roofing would not necessarily damage its integrity. Integrity would be lost, however, if:

- the abutments, piers, or trusses were substantially altered (**Design, Workmanship,** and **Feeling**) or
- considerable amounts of new materials were incorporated (**Materials, Workmanship,** and **Feeling**).
- Because environment is a strong factor in the design of this property type, the bridge would also be ineligible if it no longer stood in a place that conveyed its function as a crossing (**Setting, Location, Feeling,** and **Association**).

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CRITERION D

For properties eligible under Criterion D, setting and feeling may not have direct bearing on the property's ability to yield important information. Evaluation of integrity probably will focus primarily on the location, design, materials, and perhaps workmanship.

Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns can be eligible if:

- floral or faunal remains are found in clear association with cultural material (**Materials** and **Association**) and
- the site exhibits stratigraphic separation of cultural components (**Location**).

Not Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns would not be eligible if:

- floral or faunal remains were so badly decomposed as to make identification impossible (**Materials**), or
- floral or faunal remains were disturbed in such a manner as to make their association with cultural remains ambiguous (**Association**), or
- the site has lost its stratigraphic context due to subsequent land alterations (**Location**).

Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period can be eligible if:

- the site contains lithic debitage, finished stone tools, hammerstones, or antler flakers (**Material** and **Design**), and
- the site contains datable material (**Association**).

Not Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period would not be eligible if:

- the site contains natural deposits of lithic materials that are impossible to distinguish from culturally modified lithic material (**Design**) or
- the site does not contain any temporal diagnostic evidence that could link the site to the Late Archaic period (**Association**).

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IX. SUMMARY OF THE NATIONAL HISTORIC LANDMARKS CRITERIA FOR EVALUATION

A property being nominated to the National Register may also merit consideration for potential designation as a National Historic Landmark. Such consideration is dependent upon the stringent application of the following distinct set of criteria (found in the *Code of Federal Regulations, Title 36, Part 65*).

NATIONAL HISTORIC LANDMARKS CRITERIA

The quality of national significance is ascribed to districts, sites, buildings, structures, and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering, and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association, and:

1. That are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or
2. That are associated importantly with the lives of persons nationally significant in the history of the United States; or
3. That represent some great idea or ideal of the American people; or
4. That embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; or
5. That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or
6. That have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

NATIONAL HISTORIC LANDMARK EXCLUSIONS

Ordinarily, cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings and properties that have achieved significance within the past fifty years are not eligible for designation. If such properties fall within the following categories they may, nevertheless, be found to qualify:

1. A religious property deriving its primary national significance from architectural or artistic distinction or historical importance; or
2. A building or structure removed from its original location but which is nationally significant primarily for its architectural merit, or for association with persons or events of transcendent importance in the nation's history and the association consequential; or
3. A site of a building or structure no longer standing but the person or event associated with it is of transcendent importance in the nations's history and the association consequential; or

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4. A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building, or structure directly associated with the productive life of that person exists; or
5. A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or an exceptionally significant event; or
6. A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived; or
7. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or
8. A property achieving national significance within the past 50 years if it is of extraordinary national importance.

COMPARING THE NATIONAL HISTORIC LANDMARKS CRITERIA AND THE NATIONAL REGISTER CRITERIA

In general, the instructions for preparing a National Register nomination and the guidelines stated in this bulletin for applying the National Register Criteria also apply to Landmark nominations and the use of the Landmark criteria. While there are specific distinctions discussed below, *Parts IV and V* of this bulletin apply equally to National Register listings and Landmark nominations. That is, the categories of historic properties are defined the same way; historic contexts are identified similarly; and comparative evaluation is carried out on the same principles enumerated in *Part V*.

There are some differences between National Register and National Historic Landmarks Criteria. The following is an explanation of how each Landmark Criterion compares with its National Register Criteria counterpart:

CRITERION 1

This Criterion relates to National Register Criterion A. Both cover properties associated with events. The Landmark Criterion, however, requires that the events associated with the property be *outstandingly* represented by that property and that the property be related to the broad national patterns of U.S. history. Thus, the quality of the property to convey and interpret its meaning must be of a higher order and must relate to national themes rather than the narrower context of State or local themes.

CRITERION 2

This Criterion relates to National Register Criterion B. Both cover properties associated with significant people. The Landmark Criterion differs in that it specifies that the association of a person to the property in question be an important one and that the person associated with the property be of *national* significance.

CRITERION 3

This Criterion has no counterpart among the National Register Criteria. It is rarely, if ever, used alone. While not a landmark at present, the Liberty Bell is an object that might be considered under this Criterion. The application of this Criterion obviously requires the most careful scrutiny and would apply only in rare instances involving ideas and ideals of the highest order.

CRITERION 4

This Criterion relates to National Register Criterion C. Its intent is to qualify exceptionally important works of architecture or collective elements of architecture extraordinarily significant as an ensemble, such as a historic district. Note that the language is more restrictive than that of the National Register Criterion in requiring that a candidate in architecture be "a specimen exceptionally valuable for the study of a period, style, or method of construction" rather than simply embodying distinctive characteristics of a type, period, or method of construction. With regard to historic districts, the Landmarks Criterion requires an entity that is distinctive and exceptional. Unlike National Register Criterion C, this Criterion will not qualify the works of a master, per se, but only such works which are exceptional or extraordinary. Artistic value is considered only in the context of history's judgement in order to avoid current conflicts of taste.

CRITERION 5

This Criterion does not have a strict counterpart among the National Register Criteria. It may seem redundant of the latter part of Landmark Criterion 4. It is meant to cover collective entities such as Greenfield Village and historic districts like New Bedford, Massachusetts, which qualify for their collective association with a nationally significant event, movement, or broad pattern of national development.

CRITERION 6

The National Register counterpart of this is Criterion D. Criterion 6 was developed specifically to recognize archeological sites. All such sites must address this Criterion. The following are the qualifications that distinguish this Criterion from its National Register counterpart: the information yielded or likely to be yielded must be of *major* scientific importance by revealing new cultures, or by shedding light upon periods of occupation *over large areas* of the United States. Such sites should be expected to yield data affecting *theories, concepts, and ideas* to a *major degree.*

The data recovered or expected to be recovered must make a major contribution to the existing corpus of information. Potentially recoverable data must be likely to revolutionize or substantially modify a major theme in history or prehistory, resolve a substantial historical or anthropological debate, or close a serious gap in a major theme of U. S. history or prehistory.

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EXCLUSIONS AND EXCEPTIONS TO THE EXCLUSIONS

This section of the National Historic Landmarks Criteria has its counterpart in the National Register's "Criteria Considerations." The most abundant difference between them is the addition of the qualifiers "national," "exceptional," or "extraordinary" before the word significance. Other than this, the following are the most notable distinctions:

EXCLUSION 2

Buildings moved from their original location, qualify only if one of two conditions are met: 1) the building is nationally significant for architecture, *or* 2) the persons or events with which they are associated are of *transcendent* national significance and the association is consequential.

Transcendent significance means an order of importance higher than that which would ordinarily qualify a person or event to be nationally significant. A consequential association is a relationship to a building that had an evident impact on events, rather than a connection that was incidental and passing.

EXCLUSION 3

This pertains to the site of a structure no longer standing. There is no counterpart to this exclusion in the National Register Criteria. In order for such a property to qualify for Landmark designation it must meet the second condition cited for Exclusion 2.

EXCLUSION 4

This exclusion relates to Criteria Consideration C of the National Register Criteria. The only difference is that a burial place qualifies for Landmark designation only if, in addition to other factors, the person buried is of *transcendent* national importance.

When evaluating properties at the national level for designation as a National Historic Landmark, please refer to the National Historic Landmarks outline, *History and Prehistory in the National Park System and the National Historic Landmarks Program, 1987*. (For more information about the National Historic Landmarks program, please write to Department of the Interior, National Park Service, National Historic Landmarks, 1849 C Street, NW, NC400, Washington, DC 20240.)

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X. GLOSSARY

Associative Qualities - An aspect of a property's history that links it with historic events, activities, or persons.

Code of Federal Regulations - Commonly referred to as "CFR." The part containing the National Register Criteria is usually referred to as 36 CFR 60, and is available from the National Park Service.

CLG - Certified Local Government.

Culture - A group of people linked together by shared values, beliefs, and historical associations, together with the group's social institutions and physical objects necessary to the operation of the institution.

Cultural Resource - See Historic Resource.

Evaluation - Process by which the significance and integrity of a historic property are judged and eligibility for National Register listing is determined.

Historic Context - An organizing structure for interpreting history that groups information about historic properties that share a common theme, common geographical area, and a common time period. The development of historic contexts is a foundation for decisions about the planning, identification, evaluation, registration, and treatment of historic properties, based upon comparative historic significance.

Historic Integrity - The unimpaired ability of a property to convey its historical significance.

Historic Property - See Historic Resource.

Historic Resource - Building, site, district, object, or structure evaluated as historically significant.

Identification - Process through which information is gathered about historic properties.

Listing - The formal entry of a property in the National Register of Historic Places. See also, Registration.

Nomination - Official recommendation for listing a property in the National Register of Historic Places.

Property Type - A grouping of properties defined by common physical and associative attributes.

Registration - Process by which a historic property is documented and nominated or determined eligible for listing in the National Register.

Research Design - A statement of proposed identification, documentation, investigation, or other treatment of a historic property that identifies the project's goals, methods and techniques, expected results, and the relationship of the expected results to other proposed activities or treatments.

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XI. LIST OF NATIONAL REGISTER BULLETINS

The Basics
How to Apply National Register Criteria for Evaluation *

Guidelines for Completing National Register of Historic Places Form
Part A: How to Complete the National Register Form *
Part B: How to Complete the National Register Multiple Property Documentation Form *

Researching a Historic Property *

Property Types
Guidelines for Evaluating and Documenting Historic **Aids to Navigation** *

Guidelines for Identifying, Evaluating and Registering **America's Historic Battlefields**

Guidelines for Evaluating and Registering Historical **Archeological Sites**

Guidelines for Evaluating and Documenting Historic **Aviation Properties**

Guidelines for Evaluating and Registering **Cemeteries and Burial Places**

How to Evaluate and Nominate **Designed Historic Landscapes** *

Guidelines for Identifying, Evaluating and Registering Historic **Mining Sites**

How to Apply National Register Criteria to **Post Offices** *

Guidelines for Evaluating and Documenting **Properties Associated with Significant Persons**

Guidelines for Evaluating and Documenting **Properties That Have Achieved Significance Within the Last Fifty Years** *

Guidelines for Evaluating and Documenting **Rural Historic Landscapes** *

Guidelines for Evaluating and Documenting **Traditional Cultural Properties** *

Nominating Historic **Vessels and Shipwrecks** to the National Register of Historic Places

Technical Assistance
Defining Boundaries for National Register Properties*

Guidelines for Local Surveys: A Basis for Preservation Planning *

How to Improve the Quality of Photographs for National Register Nominations

National Register Casebook: Examples of Documentation *

Using the UTM Grid System to Record Historic Sites

To order these publications, write to: National Register of Historic Places, National Park Service, 1849 C St., NC 400, NW, Washington, D.C. 20240, or e-mail at: nr_reference@nps.gov. Publications marked with an asterisk (*) are also available in electronic form at **www.cr.nps.gov/nr**.

U.S. GOVERNMENT PRINTING OFFICE: 2005—717-788

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West Campus Upper Plateau

TRAFFIC ANALYSIS

MARCH JOINT POWERS AUTHORITY MARCH JPA

RA-7.8

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OCTOBER 18, 2022

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LIST OF ABBREVIATED TERMS

(1)	Reference
ADT	Average Daily Traffic
CA MUTCD	California Manual on Uniform Traffic Control Devices
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CMP	Congestion Management Program
DIF	Development Impact Fee
E+P	Existing Plus Project
EAP	Existing plus Ambient Growth plus Project
EVA	Emergency Vehicle Access
HCM	Highway Capacity Manual
ITE	Institute of Transportation Engineers
LOS	Level of Service
March JPA	March Joint Powers Authority
NCHRP	National Cooperative Highway Research Program
PHF	Peak Hour Factor
Project	West Campus Upper Plateau
RCTC	Riverside County Transportation Commission
RIVCOM	Riverside Transportation Analysis Model
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
TA	Traffic Analysis
TUMF	Transportation Uniform Mitigation Fee
v/c	Volume to Capacity
vphgpl	Vehicles per Hour Green per Lane
WRCOG	Western Riverside Council of Governments

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1 SUMMARY OF FINDINGS

This report presents the results of the traffic analysis (TA) for the proposed West Campus Upper Plateau (Project), which is within the jurisdiction of the March Joint Powers Authority (March JPA) and located west of Cactus Avenue's current terminus, to the east and south of the Mission Grove neighborhood, and to the north of the Orangecrest neighborhood in the City of Riverside, California, as shown on Exhibit 1-1. The Project would include the extensions of Cactus Avenue, Brown Street, and Barton Street.

The purpose of this TA is to evaluate the potential circulation system deficiencies that may result from the development of the proposed Project, and where necessary recommend improvements to achieve acceptable operations consistent with General Plan level of service goals and policies. This traffic study has been prepared in accordance with the March JPA's Final Traffic Impact Study Preparation Guide (February 2020), guidance from the California Department of Transportation (Caltrans), and through consultation with March JPA, County of Riverside, City of Riverside, and City of Moreno Valley staff during the scoping process. (1) The Project Traffic Study Scoping agreement is provided in Appendix 1.1 of this TA.

1.1 SUMMARY OF FINDINGS

The Project is to construct the following improvements as design features in conjunction with development of the site:

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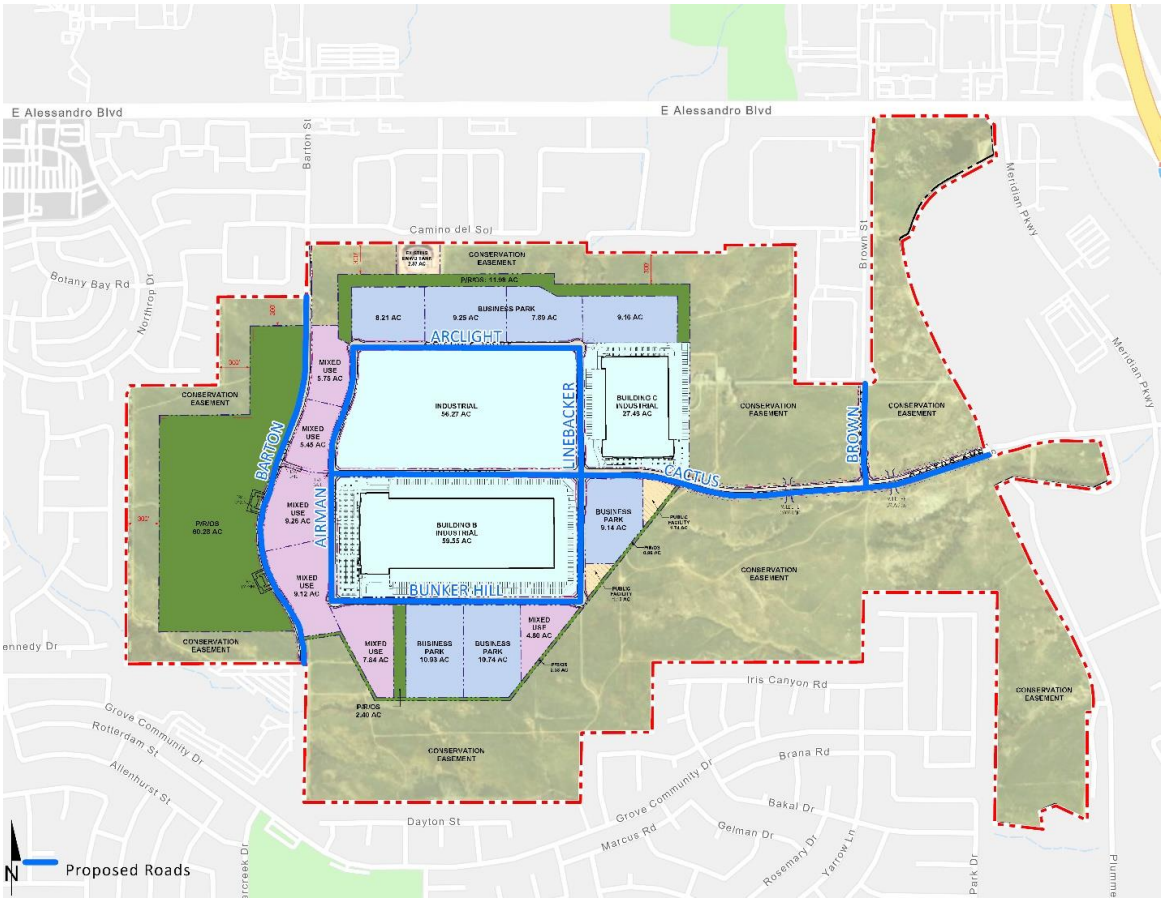
- Project to construct signalized intersections at along Cactus Avenue at Airman Drive, Linebacker Drive, and Brown Street.
- Cactus Avenue will be constructed to its ultimate cross-section as a Modified Secondary Highway from Linebacker Drive to the easterly Specific Plan boundary with a 98-foot right-of-way and 76-foot curb-to-curb pavement width. Cactus Avenue will be constructed to its ultimate cross-section as a Modified Industrial Collector west of Linebacker Drive to Airman Drive with a 76-foot right-of-way and 54-foot curb-to-curb pavement width. However, the eastbound approach of Cactus Avenue towards Linebacker Drive will require additional right-of-way to accommodate the lane geometrics needed at the intersection (2nd eastbound through).
- Barton Street will be constructed to its ultimate cross-section as a Collector from the existing northerly and southerly termini with a 66-foot right-of-way and 40-foot curb-to-curb pavement width consistent with the City of Riverside's Circulation Element. Once completed, the roadway will provide a connection between the existing Mission Grove community to the north and Orangecrest community to the south
- Brown Street will be constructed to its ultimate cross-section as an Industrial Collector from its existing terminus south of Alessandro Boulevard to Cactus Avenue with a 78-foot right-of-way and 56-foot curb-to-curb pavement width.
- Other streets internal to the Specific Plan such as Arclight Drive, Airman Drive, Bunker Hill Drive, and Linebacker Drive will be constructed at their ultimate cross-section as Modified Industrial Collectors that have a 76-foot right-of-way with 54-foot curb-to-curb pavement width.

EXHIBIT 1-1: PRELIMINARY LAND USE PLAN



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Additional details and intersection lane geometrics are provided in Section 1.6 *Recommendations* of this report.

The development of the proposed Project is anticipated to require the construction of off-site improvements, in conjunction with additional improvement needs at off-site intersections for future traffic analysis scenarios where the Project would contribute traffic (as measured by 50 or more peak hour trips). As such, the Project Applicant's responsibility for the Project's contributions towards off-site intersection deficiencies is fulfilled through a combination of construction, payment of fair share, and/or participation in the pre-existing fee programs that would be assigned to construction of the identified recommended improvements (see Section 9 *Local and Regional Funding Mechanisms*).

1.2 PROJECT OVERVIEW

The Project site is located on either side of Barton Street and Cactus Avenue in the jurisdiction of the March Joint Powers Authority (March JPA) and unincorporated Riverside County. Interstate 215 (I-215) is located approximately 2.5 miles east of the Project site via Cactus Avenue, Alessandro Boulevard, and Van Buren Boulevard. Cactus Avenue will not extend west of Airman Drive to Barton Street; however, an emergency vehicle access (EVA) only connection will be maintained and not be accessible by any vehicular traffic.

The proposed Project (see Exhibit 1-1) consists of the following uses:

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use and 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1,280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 42.20 Acre Active Park (with sports fields)
- 18.08 Acres of Public Park
- The proposed Project also includes an approximately 445-acre Conservation Area that is not anticipated to generate traffic.

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The proposed Project is anticipated to generate a total of 35,314 trip-ends per day with 1,761 AM peak hour trips, 3,389 PM peak hour trips, and 1,642 Saturday peak hour trips (in actual vehicles). The assumptions and methods used to estimate the Project's trip generation characteristics are discussed in greater detail in Section 4.1 *Project Trip Generation* of this report.

1.3 ANALYSIS SCENARIOS

For the purposes of this TA, potential deficiencies to traffic and circulation have been assessed for each of the following conditions:

- Existing (2021) Conditions
- Existing plus Project (E+P) Conditions
- Existing plus Ambient Growth plus Project (EAP)
- Opening Year Cumulative (2028) Without Project Conditions
- Opening Year Cumulative (2028) With Project Conditions
- Horizon Year (2045) Without Project Conditions
- Horizon Year (2045) With Project Conditions

1.3.1 EXISTING (2021) CONDITIONS

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic data based on an adjustment of both historic (2019) traffic count data and new (2021) traffic count data collected in November 2021. Traffic counts were adjusted due to the currently ongoing COVID-19 pandemic. Adjusted factors was calculated based on historic (2019) traffic counts in conjunction with a 2.0% per year growth rate (compounded annually) to reflect 2021 conditions and compared to new (2021) traffic count data at the same intersections. Other locations where historic count data was not available, the traffic counts were adjusted and increased from the 2021 collected data based on a factor derived from the locations with both historic and 2021 traffic count data.

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1.3.2 EXISTING PLUS PROJECT CONDITIONS

The E+P analysis determines traffic deficiencies that would occur on the existing roadway system with the addition of Project traffic. This analysis scenario is a hypothetical analysis scenario in which Project traffic is added to existing traffic without any additional growth; however, the analysis has been presented for the purposes of identifying improvement needs that are attributable to the addition of Project traffic alone.

1.3.3 EXISTING PLUS AMBIENT GROWTH PLUS PROJECT (EAP) (2028) CONDITIONS

The EAP (2028) analysis determines traffic deficiencies that would occur on the existing roadway system with the addition of Project traffic along with additional ambient background traffic that is calculated at 2.0% per year compounded annually over 7 years, or 14.87%.

1.3.4 OPENING YEAR CUMULATIVE (2028) CONDITIONS

The Opening Year Cumulative (2028) conditions analysis determines the potential near-term cumulative circulation system deficiencies. To account for background traffic growth, traffic associated with other known cumulative development projects in conjunction with an ambient growth from Existing (2021) conditions of 14.87% is included for Opening Year Cumulative (2028) traffic conditions (2.0% per year compounded annually over 7 years). A list of cumulative

development projects was compiled from information provided by the March JPA and is consistent with other recent studies in the study area. Relevant projects from other nearby agencies (including the cities of Moreno Valley and Riverside as provided by those respective agencies) have also been included for the purposes of this TA.

1.3.5 HORIZON YEAR (2045) CONDITIONS

Traffic projections for Horizon Year (2045) with Project conditions were derived from the latest Riverside Transportation Analysis Model (RIVCOM). The Horizon Year (2045) conditions analysis has been utilized to determine if improvements funded through regional transportation fee programs, such as the Development Impact Fee (DIF) program or Western Riverside Council of Governments (WRCOG) Transportation Uniform Mitigation Fee (TUMF), or other approved funding mechanisms can accommodate the long-range cumulative traffic at the target level of service (LOS) identified by the March JPA (lead agency). Other improvements needed beyond the "funded" improvements (such as localized improvements to non-DIF facilities) are identified as such.

1.4 STUDY AREA

To ensure that this TA satisfies the March JPA's requirements, Urban Crossroads, Inc. prepared a Project TA scoping package for review by March JPA staff prior to the preparation of this report. The Agreement provides an outline of the Project study area, trip generation, trip distribution, and analysis methodology. The agreement is included in Appendix 1.1 of this TA. The scoping agreement was also shared with the County of Riverside, City of Riverside, and City of Moreno Valley for review and comment, and those comments have also been taken into consideration as part of this TA.

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The following 38 study area intersections shown on Exhibit 1-2 and listed in Table 1-1 were selected for this TA based on consultation with March JPA staff. The "50 peak hour trip" criterion generally represents a minimum number of trips at which a typical intersection would have the potential to be affected by a given development proposal. Although each intersection may have unique operating characteristics, this traffic engineering rule of thumb is a widely utilized tool for estimating a potential area of influence (i.e., study area). Other analysis intersections, within the adjacent cities were not selected for evaluation as the Project is anticipated to contribute less than 50 weekday peak hour trips.

1.4.1 INTERSECTIONS

The following 38 study area intersections listed in Table 1-1 and shown on Exhibit 1-2 were selected for this TA.

EXHIBIT 1-2: LOCATION MAP

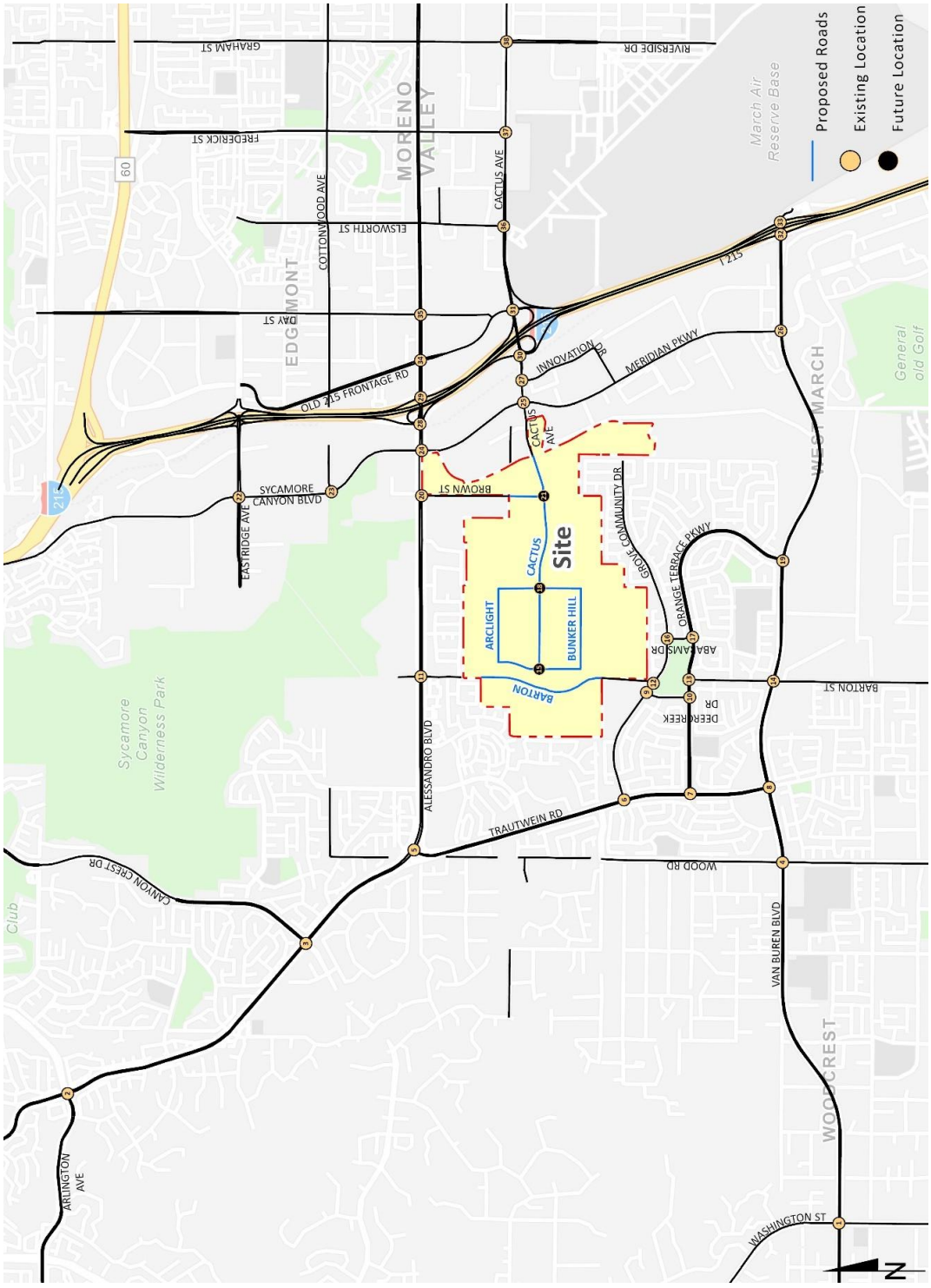

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TABLE 1-1: INTERSECTION ANALYSIS LOCATIONS

ID	Intersection Location	Jurisdiction	CMP?
1	Washington St. & Van Buren Blvd.	County of Riv.	No
2	Alessandro Blvd. & Arlington Av./Chicago Av.	City of Riverside	No
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.	City of Riverside	No
4	Wood Rd. & Van Buren Blvd.	City of Riverside	No
5	Trautwein Rd. & Alessandro Blvd.	City of Riverside	No
6	Trautwein Rd. & Grove Community Dr.	City of Riverside	No
7	Trautwein Rd. & Orange Terrace Pkwy.	City of Riverside	No
8	Trautwein Rd. & Van Buren Blvd.	City of Riverside	No
9	Deercreek Dr. & Grove Community Dr.	City of Riverside	No
10	Deercreek Dr. & Orange Terrace Pkwy.	City of Riverside	No
11	Barton St. & Alessandro Blvd.	City of Riverside, March JPA	No
12	Barton St. & Grove Community Dr.	City of Riverside	No
13	Barton St. & Orange Terrace Pkwy.	City of Riverside	No
14	Barton St. & Van Buren Blvd.	County of Riv., City of Riverside, March JPA	No
15	Airman Dr. & Cactus Av.	March JPA	No
16	Abrams Dr. & Grove Community Dr.	City of Riverside	No
17	Abrams Dr. & Orange Terrace Pkwy.	City of Riverside	No
18	Linebacker Dr. & Cactus Av.	March JPA	No
19	Orange Terrace Pkwy. & Van Buren Blvd.	County of Riv., City of Riverside, March JPA	No
20	Brown St. & Alessandro Blvd.	County of Riv., City of Riverside, March JPA	No
21	Brown St. & Cactus Av.	March JPA	No
22	Sycamore Canyon Blvd. & Eastridge Av.	City of Riverside	No
23	Sycamore Canyon Blvd. & Cottonwood Av.	City of Riverside	No
24	Meridian Pkwy. & Alessandro Blvd.	County of Riv., City of Riverside, March JPA	No
25	Meridian Pkwy. & Cactus Av.	March JPA	No
26	Meridian Pkwy. & Van Buren Blvd.	County of Riv., March JPA	No
27	Innovation Dr. & Cactus Av.	March JPA	No
28	I-215 SB Ramps & Alessandro Blvd.	City of Riv., JPA, Caltrans	No
29	I-215 NB Ramps & Alessandro Blvd.	City of Riv., JPA, Caltrans	No
30	I-215 SB Ramps & Cactus Av.	March JPA, Caltrans	No
31	I-215 NB Ramps & Cactus Av.	JPA, City of MV, Caltrans	No
32	I-215 SB Ramps & Van Buren Blvd.	March JPA, Caltrans	No
33	I-215 NB Ramps & Van Buren Blvd.	March JPA, Caltrans	No
34	Old 215 Frontage Rd. & Alessandro Blvd.	County of Riv., March JPA, City of MV	No
35	Day St. & Alessandro Blvd.	City of Moreno Valley	No
36	Elsworth St. & Cactus Av.	City of Moreno Valley	No
37	Frederick St. & Cactus Av.	City of Moreno Valley	No
38	Graham St./Riverside Dr. & Cactus Av.	City of Moreno Valley	No

RA-7.8 Cont.

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The County of Riverside CMP became effective with the passage of Proposition 111 in 1990 and most recently updated in 2019 as part of the Riverside County Long Range Transportation Study. The Riverside County Transportation Commission (RCTC) adopted the 2019 CMP for the County of Riverside in December 2019. (3) There are no study area intersections identified as a Riverside County CMP intersection.

1.4.2 ROADWAY SEGMENTS

Pursuant to the approved scoping agreement, the following study area roadway segments have been evaluated for the purposes of this TA (see Exhibit 1-2 and Table 1-2):

TABLE 1-2: ROADWAY SEGMENT ANALYSIS LOCATIONS

ID	Roadway Segment	Limits	Jurisdiction
1	Alessandro Bl.	Trautwein Rd. to Mission Grove Pkwy.	City of Riverside
2	Alessandro Bl.	Mission Grove Pkwy. to Barton St.	City of Riverside
3	Alessandro Bl.	Barton St. to Brown St.	County of Riverside, City of Riverside, March JPA
4	Alessandro Bl.	Brown St. to Meridian Pkwy.	County of Riverside, City of Riverside, March JPA
5	Alessandro Bl.	Meridian Pkwy. to I-215 Freeway	County of Riverside, City of County Riverside, JPA, Caltrans
6	Cactus Av.	Airman Dr. to Linebacker Dr.	March JPA
7	Cactus Av.	Linebacker Dr. to Brown St.	March JPA
8	Cactus Av.	Brown St. to Meridian Pkwy.	March JPA
9	Cactus Av.	Meridian Pkwy. to I-215 Freeway	March JPA
10	Barton St.	Alessandro Bl. to Cactus Av. (EVA)	City of Riverside, March JPA
11	Barton St.	Cactus Av. (EVA) to Grove Community Dr.	City of Riverside, March JPA
12	Brown St.	Alessandro Bl. to Cactus Av.	March JPA
13	Sycamore Canyon Bl.	Cottonwood Av. to Alessandro Bl.	City of Riverside
14	Meridian Pkwy.	Alessandro Bl. to Cactus Av.	March JPA
15	Meridian Pkwy.	Cactus Av. to Van Buren Bl.	March JPA

RA-7.8 Cont.

1.5 DEFICIENCIES

This section provides a summary of deficiencies by analysis scenario. Section 2 *Methodologies* provides information on the methodologies used in the analysis and Section 3 *Existing Traffic Conditions*, Section 5 *E+P Traffic Conditions*, Section 6 *EAP (2028) Traffic Conditions*, Section 7 *Opening Year Cumulative (2028) Traffic* Conditions, and Section 8 *Horizon Year (2045) Traffic Conditions* includes the detailed analysis. A summary of LOS results for all analysis scenarios is presented on Exhibit 1-3 for study area intersections and Exhibit 1-4 for study area roadway segments. For the purposes of this analysis, the minimum LOS at study area intersections and roadway segments for all applicable agencies is LOS D.

1.5.1 EXISTING (2021) CONDITIONS

Intersections

The following study area intersections are currently operating at an unacceptable LOS during one or more peak hours under Existing (2021) traffic conditions:

- Alessandro Bl. & Arlington Av./Chicago Av. (#2) – LOS E AM peak hour; LOS F PM peak hour
- Trautwein Rd. & Alessandro Bl. (#5) – LOS F AM peak hour only
- Deercreek Dr. & Orange Terrace Pkwy. (#10) – LOS F AM peak hour only
- Barton St. & Orange Terrace Pkwy. (#13) – LOS F AM and Saturday peak hours
- Barton St. & Van Buren Bl. (#14) – LOS E AM peak hour only
- Meridian Pkwy. & Alessandro Bl. (#24) – LOS F AM peak hour only
- I-215 NB Ramps & Alessandro Bl. (#29) – LOS F AM peak hour only
- I-215 NB Ramps & Cactus Av. (#31) – LOS E AM peak hour only
- Elsworth St. & Cactus Av. (#36) – LOS F AM peak hour; LOS E PM peak hour

RA-7.8 Cont.

Roadway Segments

The following study area roadway segment is currently operating at an unacceptable LOS under Existing (2021) traffic conditions:

- Meridian Pkwy. from Alessandro Bl. to Cactus Av. (#14) – LOS E

Off-Ramp Queuing Analysis

A queuing analysis was performed for the I-215 Freeway off-ramps at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard for Existing (2021) traffic conditions. The analysis indicates there are currently no queuing issues that may potentially "spill back" onto the I-215 Freeway mainline at the study area interchanges

EXHIBIT 1-3: SUMMARY OF DEFICIENT INTERSECTIONS BY ANALYSIS SCENARIO

#	Intersection	Existing (2021)			E+P			EAP			OYC (2028) Without Project			OYC (2028) With Project			Horizon Year (2045) Without Project			Horizon Year (2045) With Project		
		AM	PM	SAT	AM	PM	SAT	AM	PM	SAT	AM	PM	SAT	AM	PM	SAT	AM	PM	SAT	AM	PM	SAT
1	Washington St. & Van Buren Blvd.																					
2	Alessandro Blvd. & Arlington Av./Chicago Av.[5]																					
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.																					
4	Wood Rd. & Van Buren Blvd.																					
5	Trautwein Rd. & Alessandro Blvd.																					
6	Trautwein Rd. & Grove Community Dr.																					
7	Trautwein Rd. & Orange Terrace Pkwy.[2]																					
8	Trautwein Rd. & Van Buren Blvd.																					
9	Deercreek Dr. & Grove Community Dr.																					
10	Deercreek Dr. & Orange Terrace Pkwy.																					
11	Barton St. & Alessandro Blvd.[2 8]																					
12	Barton St. & Grove Community Dr.																					
13	Barton St. & Orange Terrace Pkwy.																					
14	Barton St. & Van Buren Blvd.																					
15	Airman Dr. & Cactus Av.	N/A	N/A	N/A							N/A	N/A	N/A				N/A	N/A	N/A			
16	Abrams Dr. & Grove Community Dr.																					
17	Abrams Dr. & Orange Terrace Pkwy.																					
18	Linebacker Dr. & Cactus Av.	N/A	N/A	N/A							N/A	N/A	N/A				N/A	N/A	N/A			
19	Orange Terrace Pkwy. & Van Buren Blvd.																					
20	Brown St. & Alessandro Blvd.[3]																					
21	Brown St. & Cactus Av.	N/A	N/A	N/A							N/A	N/A	N/A				N/A	N/A	N/A			
22	Sycamore Canyon Blvd. & Eastridge Av.																					
23	Sycamore Canyon Blvd. & Cottonwood Av.																					
24	Meridian Pkwy. & Alessandro Blvd.[5]																					
25	Meridian Pkwy. & Cactus Av.[2 5]																					
26	Meridian Pkwy. & Van Buren Blvd.[6]																					
27	Innovation Dr. & Cactus Av.																					
28	I-215 SB Ramps & Alessandro Blvd.																					
29	I-215 NB Ramps & Alessandro Blvd.																					
30	I-215 SB Ramps & Cactus Av.																					
31	I-215 NB Ramps & Cactus Av.																					
32	I-215 SB Ramps & Van Buren Blvd.[5]																					
33	I-215 NB Ramps & Van Buren Blvd.																					
34	Old 215 Frontage Rd. & Alessandro Blvd.																					
35	Day St. & Alessandro Blvd.																					
36	Elsworth St. & Cactus Av.[7]																					
37	Frederick St. & Cactus Av.																					
38	Graham St./Riverside Dr. & Cactus Av.																					

LOS=A-D
LOS=E
LOS=F

RA-7.8
Cont.

EXHIBIT 1-4: SUMMARY OF DEFICIENT ROADWAY SEGMENTS BY ANALYSIS SCENARIO

#	Roadway Segment	Existing (2021)	E+P	EAP	OYC (2028) Without Project	OYC (2028) With Project	Horizon Year (2045) Without Project	Horizon Year (2045) With Project
1	Alessandro Bl., Trautwein Rd. to Mission Grove Pkwy.	A-D	A-D	A-D	A-D	A-D	F	F
2	Alessandro Bl., Mission Grove Pkwy. to Barton St.	A-D	A-D	A-D	A-D	A-D	F	F
3	Alessandro Bl., Barton St. to Brown St.	A-D	A-D	A-D	A-D	A-D	F	F
4	Alessandro Bl., Brown St. to Meridian Pkwy.	A-D	A-D	A-D	A-D	A-D	F	F
5	Alessandro Bl., Meridian Pkwy. to I-215 Freeway	A-D	A-D	A-D	A-D	E	E	F
6	Cactus Av., Airman Dr. to Linebacker Dr.	A-D	F	F	A-D	F	A-D	F
7	Cactus Av., Linebacker Dr. to Brown St.	A-D	F	F	A-D	F	A-D	F
8	Cactus Av., Brown St. to Meridian Pkwy.	A-D	E	E	A-D	E	A-D	E
9	Cactus Av. Meridian Pkwy. to I-215 Freeway	A-D	A-D	A-D	A-D	A-D	A-D	A-D
10	Barton St., Alessandro Bl. to Cactus Av. (EVA)	A-D	E	E	A-D	E	A-D	F
11	Barton St., Cactus Av. (EVA) to Grove Community Dr.	A-D	A-D	A-D	A-D	A-D	A-D	A-D
12	Brown St., Alessandro Bl. to Cactus Av.	A-D	F	F	A-D	F	A-D	F
13	Sycamore Canyon Bl., Cottonwood Av. to Alessandro Bl.	A-D	A-D	A-D	A-D	A-D	A-D	A-D
14	Meridian Pkwy., Alessandro Bl. to Cactus Av.	E	E	F	F	F	F	F
15	Meridian Pkwy., Cactus Av. to Van Buren Bl.	A-D	F	F	F	F	F	F

LOS=A-D
LOS=E
LOS=F

RA-7.8
Cont.

1.5.2 E+P CONDITIONS

Intersections

The study area intersections are anticipated to continue to operate at an acceptable LOS during the peak hours with the addition of Project traffic (for E+P traffic condition), with the exception of the following intersections, which are in addition to those identified previously under Existing (2021) traffic conditions:

- Canyon Crest Dr./Overlook Pkwy. & Alessandro Bl. (#3) – LOS E AM peak hour; LOS F PM peak hour
- Brown St. & Alessandro Bl. (#20) – LOS F PM and Saturday peak hours
- Meridian Pkwy. & Cactus Av. (#25) – LOS F PM peak hour only

Roadway Segments

The following additional study area roadway segments are anticipated to operate at an unacceptable LOS under E+P traffic conditions, in addition to the location previously identified under Existing (2021) traffic conditions:

- Cactus Av., from Airman Dr. to Linebacker Dr. (#6) – LOS F
- Cactus Av. from Linebacker Dr. to Brown St. (#7) – LOS E
- Cactus Av., from Brown St. to Meridian Pkwy. (#8) – LOS E
- Barton Rd. from Alessandro Bl. to Cactus Av. (#10) – LOS E
- Brown St., from Alessandro Bl. to Cactus Av. (#12) – LOS F
- Meridian Pkwy. from Cactus Av. to Van Buren Bl. (#15) – LOS F

RA-7.8 Cont.

Off-Ramp Queues

There are no movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95th percentile traffic flows for E+P traffic conditions, consistent with Existing (2021) traffic conditions.

1.5.3 EAP (2028) CONDITIONS

Intersections

The following study area intersections are anticipated to operate at an unacceptable LOS during one or more peak hours under EAP (2028) traffic conditions, in addition to those locations identified previously under Existing (2021) traffic conditions:

- Washington St. & Van Buren Bl. (#1) – LOS E AM and PM peak hours
- Canyon Crest Dr./Overlook Pkwy. & Alessandro Bl. (#3) – LOS E AM peak hour; LOS F PM peak hour
- Wood Rd. & Van Buren Bl. (#4) – LOS E AM and PM peak hours
- Trautwein Rd. & Orange Terrace Pkwy. (#7) – LOS E AM peak hour only
- Trautwein Rd. & Van Buren Bl. (#8) – LOS E AM peak hour only
- Brown St. & Alessandro Bl. (#20) – LOS F PM and Saturday peak hours
- Meridian Pkwy. & Cactus Av. (#25) – LOE E AM peak hour; LOS F PM peak hour

Roadway Segments

The following study area roadway segments are anticipated to operate at an unacceptable LOS under EAP (2028) traffic conditions:

- Cactus Av., from Airman Dr. to Linebacker Dr. (#6) – LOS F
- Cactus Av. from Linebacker Dr. to Brown St. (#7) – LOS E
- Cactus Av., from Brown St. to Meridian Pkwy. (#8) – LOS E
- Barton Rd. from Alessandro Bl. to Cactus Av. (#10) – LOS E
- Brown St., from Alessandro Bl. to Cactus Av. (#12) – LOS F
- Meridian Pkwy. from Cactus Av. to Van Buren Bl. (#15) – LOS F

RA-7.8 Cont.

Off-Ramp Queues

There are no movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95th percentile traffic flows for EAP (2028) traffic conditions, consistent with Existing (2021) traffic conditions.

1.5.4 OPENING YEAR CUMULATIVE (2028) CONDITIONS

Intersections

The following study area intersections are anticipated to operate at an unacceptable LOS during one or more peak hours under Opening Year Cumulative (2028) Without Project traffic conditions:

- Washington St. & Van Buren Bl. (#1) – LOS F AM and PM peak hours
- Alessandro Bl. & Arlington Av./Chicago Av. (#2) – LOS F AM and PM peak hours
- Canyon Crest Dr./Overlook Pkwy. & Alessandro Bl. (#3) – LOS F AM and PM peak hours
- Wood Rd. & Van Buren Bl. (#4) – LOS F AM and PM peak hours
- Trautwein Rd. & Alessandro Bl. (#5) – LOS F AM peak hour only
- Trautwein Rd. & Grove Community Dr. (#6) – LOS E AM peak hour only
- Trautwein Rd. & Orange Terrace Pkwy. (#7) – LOS F AM peak hour only
- Trautwein Rd. & Van Buren Bl. (#8) – LOS F AM and PM peak hours
- Deercreek Dr. & Orange Terrace Pkwy. (#10) – LOS F AM peak hour only
- Barton St. & Alessandro Bl. (#11) – LOS E AM peak hour only
- Barton St. & Orange Terrace Pkwy. (#13) – LOS F AM and Saturday peak hours
- Barton St. & Van Buren Bl. (#14) – LOS F AM and PM peak hours; LOS E Saturday peak hour
- Meridian Pkwy. & Alessandro Bl. (#24) – LOS F AM and PM peak hours
- Meridian Pkwy. & Cactus Av. (#25) – LOS E AM peak hour; LOS F PM peak hour
- Meridian Pkwy. & Van Buren Bl. (#26) – LOS F AM and PM peak hours
- I-215 NB Ramps & Alessandro Bl. (#29) – LOS F AM peak hour only
- I-215 NB Ramps & Cactus Av. (#31) – LOS F AM and PM peak hours
- I-215 SB Ramps & Van Buren Bl. (#32) – LOS F PM peak hour only
- Old 215 Frontage Rd. & Alessandro Bl. (#34) – LOS E AM peak hour only
- Elsworth St. & Cactus Av. (#36) – LOS F AM and PM peak hours
- Frederick St. & Cactus Av. (#37) – LOS E AM peak hour only

With the addition of Project traffic, the following additional study area intersection is anticipated to operate at a deficient LOS during one or more peak hours:

- Brown St. & Alessandro Bl. (#20) – LOS F PM and Saturday peak hours

Roadway Segments

The following study area roadway segments are anticipated to operate at an unacceptable LOS under Opening Year Cumulative (2028) Without Project traffic conditions:

- Meridian Pkwy. from Alessandro Bl. to Cactus Av. (#14) – LOS F
- Meridian Pkwy. from Cactus Av. to Van Buren Bl. (#15) – LOS F

RA-7.8 Cont.

With the addition of Project traffic, the following additional study area roadway segments are anticipated to operate at a deficient LOS:

- Alessandro Bl., from Meridian Pkwy. to I-215 Freeway (#5) – LOS E
- Cactus Av., from Airman Dr. to Linebacker Dr. (#6) – LOS F
- Cactus Av. from Linebacker Dr. to Brown St. (#7) – LOS E
- Cactus Av., from Brown St. to Meridian Pkwy. (#8) – LOS E
- Barton Rd. from Alessandro Bl. to Cactus Av. (#10) – LOS E
- Brown St., from Alessandro Bl. to Cactus Av. (#12) – LOS F

Off-Ramp Queues

There are no movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95th percentile traffic flows for Opening Year Cumulative (2028) Without and With Project traffic conditions, consistent with Existing (2021) traffic conditions.

1.5.5 HORIZON YEAR (2045) CONDITIONS

Intersections

The following study area intersections are anticipated to operate at an unacceptable LOS during the peak hours under Horizon Year (2045) Without Project traffic conditions:

RA-7.8 Cont.

- Washington St. & Van Buren Bl. (#1) – LOS F AM and PM peak hours
- Alessandro Bl. & Arlington Av./Chicago Av. (#2) – LOS F AM and PM peak hours
- Canyon Crest Dr./Overlook Pkwy. & Alessandro Bl. (#3) – LOS F AM and PM peak hours
- Wood Rd. & Van Buren Bl. (#4) – LOS F AM and PM peak hours; LOS E Saturday peak hour
- Trautwein Rd. & Alessandro Bl. (#5) – LOS F AM and PM peak hours
- Trautwein Rd. & Grove Community Dr. (#6) – LOS E AM peak hour only
- Trautwein Rd. & Orange Terrace Pkwy. (#7) – LOS F AM and PM peak hours
- Trautwein Rd. & Van Buren Bl. (#8) – LOS F AM and PM peak hours; LOS E Saturday peak hour
- Deercreek Dr. & Orange Terrace Pkwy. (#10) – LOS F AM peak hour only
- Barton St. & Alessandro Bl. (#11) – LOS F AM and PM peak hours
- Barton St. & Orange Terrace Pkwy. (#13) – LOS F AM and Saturday peak hours
- Barton St. & Van Buren Bl. (#14) – LOS F AM, PM, and Saturday peak hours
- Brown St. & Alessandro Bl. (#20) – LOS E AM peak hour only
- Meridian Pkwy. & Alessandro Bl. (#24) – LOS F AM and PM peak hours
- Meridian Pkwy. & Cactus Av. (#25) – LOS F AM and PM peak hours
- Meridian Pkwy. & Van Buren Bl. (#26) – LOS F AM and PM peak hours
- I-215 NB Ramps & Alessandro Bl. (#29) – LOS F AM peak hour only
- I-215 NB Ramps & Cactus Av. (#31) – LOS F AM and PM peak hours

- I-215 SB Ramps & Van Buren Bl. (#32) – LOS F AM and PM peak hours
- Old 215 Frontage Rd. & Alessandro Bl. (#34) – LOS F AM peak hour only
- Day St. & Alessandro Bl. (#35) – LOS F AM peak hour; LOS E PM peak hour
- Elsworth St. & Cactus Av. (#36) – LOS F AM and PM peak hours
- Frederick St. & Cactus Av. (#37) – LOS F AM peak hour only
- Graham St./Riverside Dr. & Cactus Av. (#38) – LOS F AM and PM peak hours

With the addition of Project traffic, the following additional study area intersections are anticipated to operate at a deficient LOS during one or more peak hours:

- Orange Terrace Pkwy. & Van Buren Bl. (#19) – LOS E PM peak hour only
- I-215 SB Ramps & Cactus Av. (#30) – LOS F PM peak hour only

Roadway Segment Capacity Analysis

The following study area roadway segments are anticipated to operate at an unacceptable LOS under Horizon Year (2045) Without Project traffic conditions:

- Alessandro Bl. from Trautwein Rd. to Mission Grove Pkwy. (#1) – LOS F
- Alessandro Bl. from Mission Grove Pkwy. to Barton St. (#2) – LOS E
- Alessandro Bl. from Barton St. to Brown St. (#3) – LOS E
- Alessandro Bl. from Brown St. to Meridian Pkwy. (#4) – LOS E
- Alessandro Bl. from Meridian Pkwy. to I-215 Freeway (#5) – LOS F
- Meridian Pkwy. from Alessandro Bl. to Cactus Av. (#14) – LOS F
- Meridian Pkwy. from Cactus Av. to Van Buren Bl. (#15) – LOS F

RA-7.8 Cont.

With the addition of Project traffic, the following additional study area roadway segments are anticipated to operate at a deficient LOS:

- Cactus Av., from Airman Dr. to Linebacker Dr. (#6) – LOE F
- Cactus Av. from Linebacker Dr. to Brown St. (#7) – LOS E
- Cactus Av., from Brown St. to Meridian Pkwy. (#8) – LOS F
- Barton Rd. from Alessandro Bl. to Cactus Av. (#10) – LOS F
- Brown St., from Alessandro Bl. to Cactus Av. (#12) – LOS F

Off-Ramp Queues

There are no movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95th percentile traffic flows for Horizon Year (2045) Without and With Project traffic conditions, consistent with Existing (2021) traffic conditions.

A Summary of the traffic signal warrant analysis is shown in Table 1-3.

TABLE 1-3: TRAFFIC SIGNAL WARRANT ANALYSIS SUMMARY

	INTERSECTION	Existing	E+P	EAP	OYC NP	OYC WP	2045 NP	2045 WP
9	Deercreek Dr. & Grove Community Dr.							Met
10	Deercreek Dr. & Orange Terrace Pkwy.	Met						
12	Barton Rd. & Grove Community Dr.							
13	Barton St. & Orange Terrace Pkwy.	Met						
15	Airman Dr. & Cactus Av.	DNE			DNE		DNE	
16	Abrams Dr. & Grove Community Dr.							
17	Abrams Dr. & Orange Terrace Pkwy.							
18	Linebacker Dr. & Cactus Av.	DNE	Met		DNE		DNE	
21	Brown St. & Cactus Av.	DNE	Met		DNE		DNE	

*DNE = Does Not Exist

1.6 RECOMMENDATIONS

1.6.1 SITE ADJACENT AND SITE ACCESS RECOMMENDATIONS

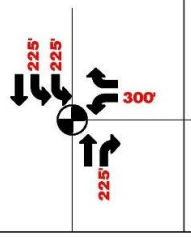
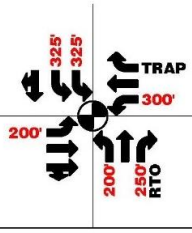
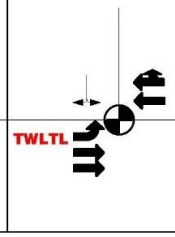
The following recommendations are based on the improvements needed to accommodate site access. The site adjacent recommendations are shown on Exhibit 1-4.

Recommendation 1 – ***Airman Dr. & Cactus Av. (#15)*** – The following improvements are necessary to accommodate site access:

- Project to install a traffic signal.
- Project to construct a northbound shared through lane and right turn lane (225-feet of storage).
- Project to construct a dual southbound left turn lanes (225-feet of storage) and a through lane.
- Project to construct a westbound left turn lane (300-feet of storage) and a right turn lane.

RA-7.8 Cont.

EXHIBIT 1-4: SITE ADJACENT ROADWAY AND SITE ACCESS RECOMMENDATIONS

15 Airman Dr. & Cactus Av.	18 Linebacker Dr. & Cactus Av.	21 Brown St. & Cactus Av.
		

= *New Traffic Signal*
= *Existing Lane*
= *Lane Improvement*
100' = *Recommended Turn Pocket Length*
TRAP = *Trap Lane*
RTO = *Right Turn Overlap*
TWLTL = *Two Way Left turn Lane*

RA-7.8 Cont.

Recommendation 2 – ***Linebacker Dr. & Cactus Av. (#18)*** – The following improvements are necessary to accommodate site access:

- Project to install a traffic signal.
- Project to construct the northbound approach with a left turn lane (200-feet of storage), through lane, and right turn lane (250-feet) with overlap phasing.
- Project to construct the southbound approach with dual left turn lanes (325-feet of storage) and shared through-right turn lane.
- Project to construct eastbound approach with one left turn lane (200-feet of storage), one through lane, and one shared through-right turn lane.
- Project to construct westbound approach with one left turn lane (300-feet of storage), one through lane, and one right turn lane (trap lane, no pocket length).

Recommendation 3 – ***Brown St. & Cactus Av. (#21)*** – The following improvements are necessary to accommodate site access:

- Project to install a traffic signal.
- Project to construct the southbound approach with a shared left-right turn lane.
- Project to construct the eastbound approach with a left turn lane (two-way-left-turn lane) and two through lanes.
- Project to construct the westbound approach with a through lane and shared through-right turn lane.

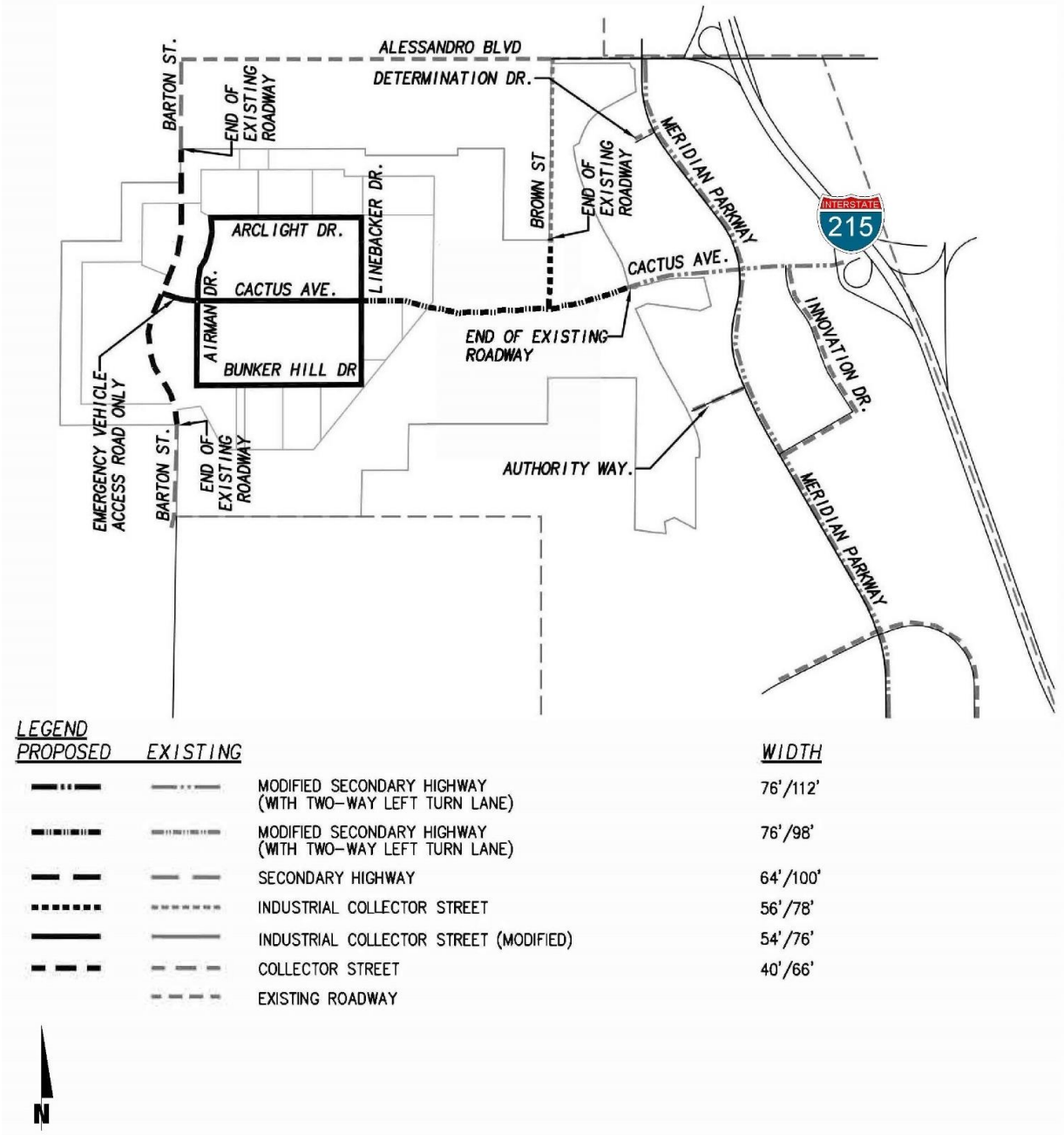
RA-7.8 Cont.

Recommendation 4 – Cactus Avenue is an east-west oriented roadway bisecting the Project and will provide the main access to and from the site. The Project will construct Cactus Avenue at its ultimate full-section width as a Modified Secondary Highway (98-foot right-of-way, 76-foot curb-to-curb) between Linebacker Drive and the existing terminus west of Meridian Parkway. The right-of-way will accommodate 6-foot sidewalks and 4.5-feet of parkway on both sides along with a 5-foot bike lane, landscaped median, and two traveled lanes in each direction. The West Campus Upper Plateau roadway cross-sections are shown on Exhibit 1-5.

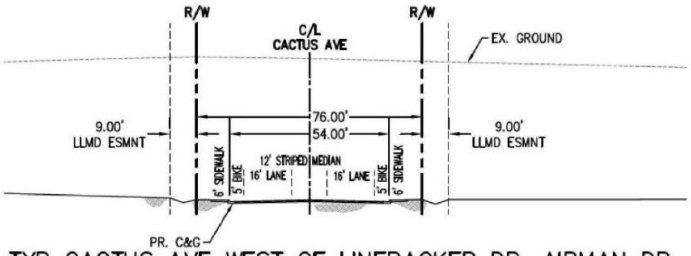
The Project will construct Cactus Avenue at its ultimate full-section width as a Modified Industrial Collector (76-foot right-of-way, 54-foot curb-to-curb) west of Linebacker Drive to Airman Drive. The right-of-way will accommodate 5-foot sidewalks on both sides along with a 5-foot bike lane and a single traveled lane in each direction (of 16-feet) separated by a 12-foot striped median. Sidewalks along Cactus Avenue, west of Linebacker Drive, will be detached sidewalks. Additional right-of-way will be required on approach to the intersection of Linebacker Drive at Cactus Avenue in order to accommodate the recommended lanes identified on Exhibit 1-4.

An emergency access only connection will be maintained between the terminus of Cactus Avenue at Airman Drive and Barton Street.

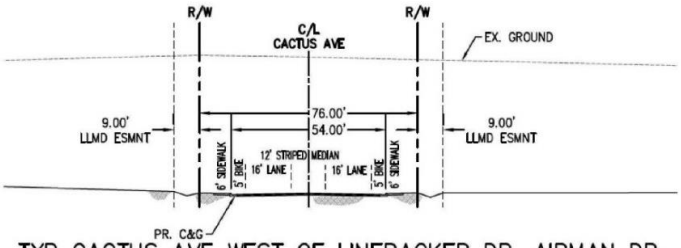
EXHIBIT 1-5: WEST CAMPUS UPPER PLATEAU ROADWAY CROSS-SECTIONS



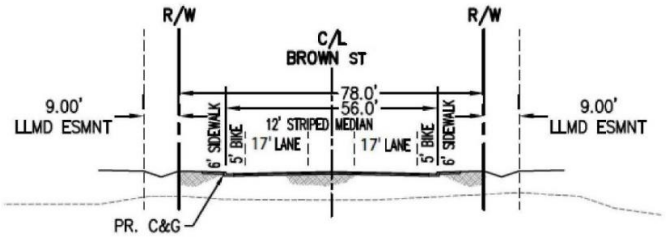
RA-7.8 Cont.



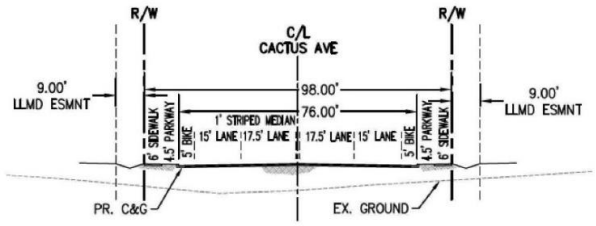
TYP CACTUS AVE WEST OF LINEBACKER DR, AIRMAN DR, LINEBACKER DR, BUNKER HILL DR, ARCLIGHT DR



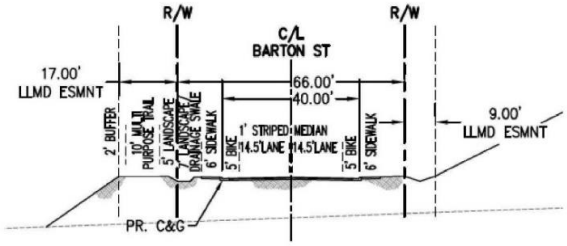
TYP CACTUS AVE WEST OF LINEBACKER DR, AIRMAN DR, LINEBACKER DR, BUNKER HILL DR, ARCLIGHT DR



TYP BROWN ST



TYP CACTUS EAST OF LINEBACK DR

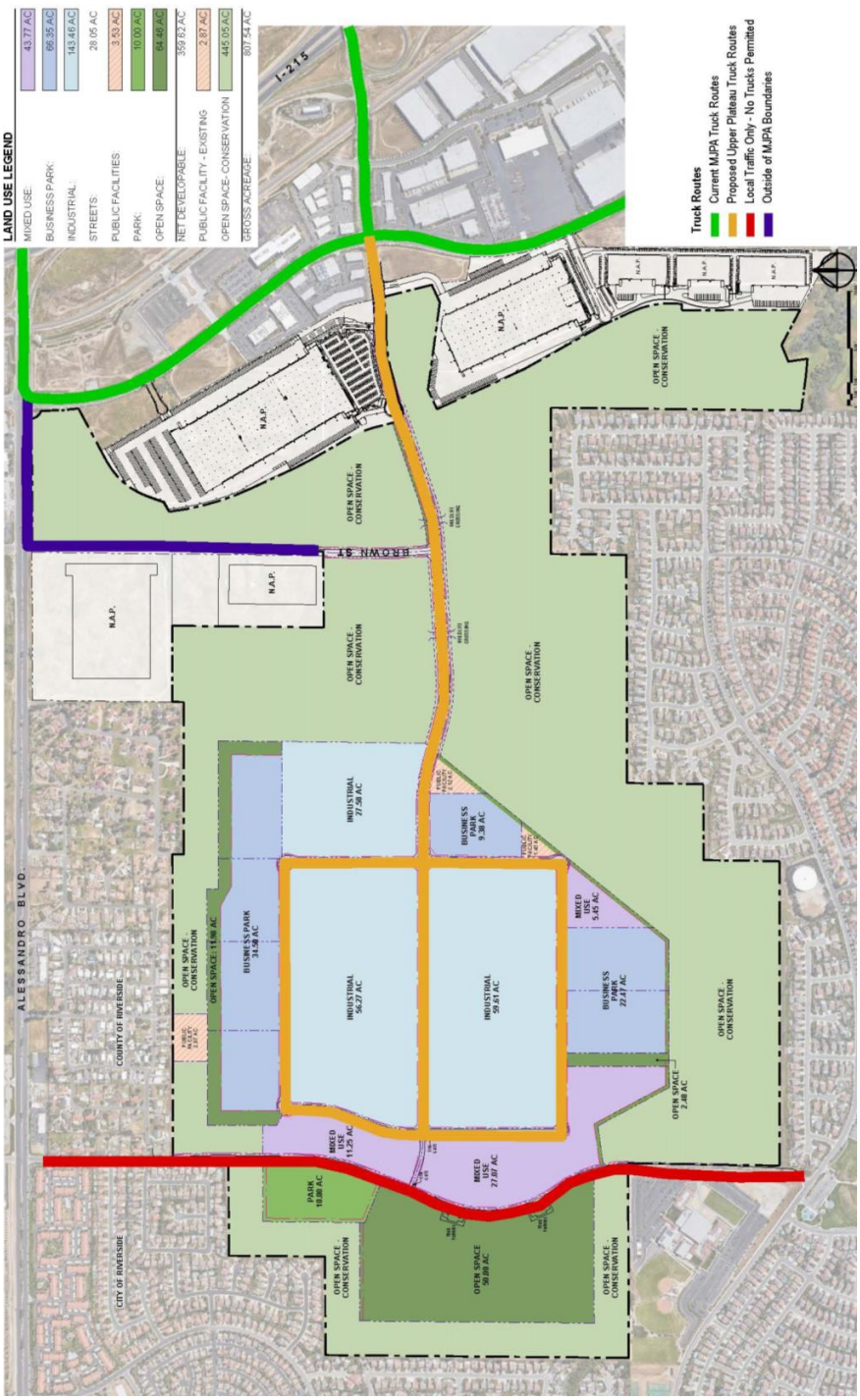


TYP BARTON ST

(WEST SIDE CONFIGURATION FOR PORTIONS ALONG OPEN SPACE/PARK ONLY)

RA-7.8 Cont.

EXHIBIT 1-6: PROPOSED TRUCK ROUTES



RA-7.8 Cont.

Recommendation 5 – Barton Street is a north-south oriented roadway located adjacent to the open space and mixed-use areas of the Project. The Project will construct Barton Street at its ultimate full-section width as a Collector (66-foot right-of-way, 40-foot curb-to-curb) between the existing northerly and southerly termini. Once completed, the roadway will provide a connection between the existing Mission Grove community to the north and Orangecrest community to the south. The right-of-way will accommodate 6-foot sidewalks on the east side with 10-foot multipurpose trail and 5-feet of landscape on the other side along with a 5-foot bike lane and a single traveled lane in each direction (of 14.5-feet). The multipurpose trail will only be accommodated for portions of Barton Street adjacent to the open space/parks. "No Parking" signs should be added along Barton Road to restrict on-street parking. It should be noted, the traffic safety mitigation for Barton Street will be approved by the March JPA Civil Engineer and installed by the developer, in compliance with a three-party memorandum of understanding mitigation executed by the City of Riverside, March JPA, and Meridian Park, LLC.

Recommendation 6 – Brown Street is a north-south oriented roadway providing secondary access to the Project from Alessandro Boulevard. The Project will construct Brown Street at its ultimate full-section width as an Industrial Collector (78-foot right-of-way, 56-foot curb-to-curb) between the existing northerly terminus and Cactus Avenue. The right-of-way will accommodate 6-foot sidewalks on both sides along with a 5-foot bike lane and a single traveled lane in each direction (of 17-feet) separated by a 12-foot striped median.

Recommendation 7 – Remaining Internal Streets such as Linebacker Drive, Airman Drive, Bunker Hill Drive, and Arclight Drive are internal Project roadways. The Project will construct these roadways at their ultimate full-section width as an Industrial Collector (76-foot right-of-way, 54-foot curb-to-curb). The right-of-way will accommodate 6-foot sidewalks on both sides along with a 5-foot bike lane and a single traveled lane in each direction (of 16-feet) separated by a 12-foot striped median.

RA-7.8
Cont.

The Project will extend the existing March JPA truck routes as shown on Exhibit 1-6. Truck routes will be extended along Barton Street to Cactus Avenue, and Cactus Avenue west from Meridian Parkway. Internal Project roadways of Linebacker Drive, Arclight Drive, Bunker Hill Drive, and Airman Drive will also be truck routes. No trucks access is permitted along Barton Street. The Project Applicant and the City should work together on an appropriate mitigation measure to ensure Project truck traffic adheres to the routes as shown on the Project (Truck) trip distribution exhibit.

On-site traffic signing and striping should be implemented consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD) and in conjunction with detailed construction plans for the Project site. Sight distance at each project access point should be reviewed with respect to standard Caltrans and March JPA sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

1.6.2 OFF-SITE RECOMMENDATIONS

The improvements needed to address the cumulative deficiencies identified under Existing (2021), E+P, EAP (2028), Opening Year Cumulative (2028), and Horizon Year (2045) traffic conditions are summarized in Table 1-4. For those improvements listed in Table 1-4 and not constructed as part of the Project, the Project Applicant's responsibility for the Project's contributions towards deficient intersections is fulfilled through payment of fair share and/or fees. Table 1-4 also summarizes the applicable cost associated with each of the recommended improvements.

1.7 QUEUING ANALYSIS

A queuing analysis was performed for the intersections of Airman Drive and Linebacker Drive on Cactus Avenue. The traffic modeling and signal timing optimization software package SimTraffic has been utilized to assess the queues. SimTraffic is designed to model networks of signalized and unsignalized intersections, with the primary purpose of checking and fine-tuning signal operations. SimTraffic uses the input parameters from Synchro to generate random simulations. These random simulations generated by SimTraffic have been utilized to determine the 95th percentile queue lengths observed for each applicable turn lane. A SimTraffic simulation has been recorded up to 5 times, during the weekday AM, weekday PM, and Saturday peak hours, and has been seeded for 15-minute periods with 60-minute recording intervals. Queuing analysis worksheets are provided in Appendix 1.2 of this report. The turn pocket storage length recommendations reflected on Exhibit 1-4 are recommended to support the 95th percentile peak hour queues reported in Appendix 1.2.

RA-7.8
Cont.

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TABLE 1-4: SUMMARY OF IMPROVEMENTS AND ROUGH ORDER OF MAGNITUDE COSTS

#	Intersection Location	Jurisdiction	E+P	EAP	Opening Year Cumulative (2028) With Project	Horizon Year (2045) With Project	Improvements in TUMF?[1]	Project Responsibility[2]	Total Cost[4]	Fair Share %[3]	Fair Share Cost[11]
1	Washington St. & Van Buren Blvd.	County of Riverside	- None	- Add EB 3rd Through Lane	- Same	- Same	No	Fair Share	$301,320	7.6%	$22,792
				- Add WB 3rd Through Lane	- Same	- Same	No	Fair Share	$301,320		$22,792
									$602,640		**$45,584**
2	Alessandro Blvd. & Arlington Av./Chicago Av.	Riverside	- None[13]	- None[13]	- None[13]	- None[13]	--	--	--	--	--
									$0		**$0**
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.	Riverside	- Add SB 3rd left lane by restriping adjacent lane	- Same	- Same	- Same	No	Fair Share	$41,850	8.5%	$3,548
									$41,850		**$3,548**
4	Wood Rd. & Van Buren Blvd.	Riverside	- None	- Add EB 3rd through lane	- Same	- Same	Yes (TUMF)	Fees	--		--
				- Add WB 3rd through lane	- Same	- Same	Yes (TUMF)	Fees			
									$0		**$0**
5	Trautwein Rd. & Alessandro Blvd.	Riverside	- None	- None[13]	- None[13]	- None[13]	--	--	--	--	--
									$0		**$0**
7	Trautwein Rd. & Orange Terrace Pkwy.	Riverside	- None	- Restripe to accommodate WB 2nd left turn lane	- None[15]	- None[15]	No	Fair Share	$41,850	0.0%	$0
									$41,850		**$0**
8	Trautwein Rd. & Van Buren Blvd.	Riverside	- None	- Add EB 3rd through lane	- Same	- Same	Yes (TUMF)	Fees	--		--
									$0		**$0**
10	Deercreek Dr. & Orange Terrace Pkwy.	Riverside	- None	- Install a traffic signal	- Same	- None[15]	No	Fair Share	$600,000	0.0%	$0
									$600,000		**$0**
11	Barton St. & Alessandro Blvd.	Riverside / March JPA	- None	- None	- Restripe NB through as left turn lane	- Same	No	Construct	--	20.6%	--
					- Restripe NB right as shared	- Same	No	Construct	--		--
					- Restripe SB through as left turn lane[12]	- Same	No	Fair Share	$41,850		$8,617
					- Restripe SB right as shared through-right lane[12]	- Same	No	Fair Share	$41,850		$8,617
					- Modify TS for N/S left turn from permissive to protected phasing	- Same	No	Fair Share	$12,555		$2,585
									$96,255		**$19,820**
13	Barton St. & Orange Terrace Pkwy.	Riverside	- None	- Install a traffic signal	- Same	- Same	No	Fair Share	$600,000	17.7%	$106,267
									$600,000		**$106,267**
14	Barton St. & Van Buren Blvd.	Riverside / March JPA / County	- Add an EB right turn lane	- Same	- Same	- Same	No	Fair Share	$83,700	12.6%	$10,526
			- Modify the TS to implement EB right turn lane with overlap phasing	- Same	- Same	- Same	No	Fair Share	$12,555		$1,579
				- Add 3rd EB through lane	- Same	- Same	Yes (TUMF)	Fees	--		--
					- Add 2nd WB left turn lane	- Same	No	Fair Share	$83,700		$10,526
									$179,955		**$22,631**
19	Orange Terrace Pkwy. & Van Buren Blvd.	Riverside / March JPA / County	- None	- None	- None	- Modify the TS to implement NB/EB/WB right turn lanes with overlap phasing[14]	No	Fair Share	$12,555	11.9%	$1,494
									$12,555		**$1,494**
20	Brown St. & Alessandro Blvd.	Riverside / March JPA / County	- None[13]	- None[13]	- None[13]	- None[13]	--	--	--	--	--
									$0		**$0**
24	Meridian Pkwy. & Alessandro Blvd.	Riverside / County	- None	- None[13]	- None[13]	- None[13]	--	--	--	--	--
									$0		**$0**

RA-7.8 Cont.

#	Intersection Location	Jurisdiction	E+P	EAP	2025 With Project	Horizon Year (2045) With Project	Improvements in TUMF?[1]	Project Responsibility[2]	Total Cost[4]	Fair Share %[3]	Fair Share Cost[11]
25	Meridian Pkwy. & Cactus Av.	March JPA	- Restripe EB right lane as shared through-right lane	- Same	- Same	- Same	No	Construct	--	68.7%	--
			- Modify the TS to implement WB right turn lane with overlap phasing	- Same	- Same	- Same	No	Construct	--		--
						- Add SB 3rd through lane by restripe right lane as shared through-right lane	No	Fair Share	$41,850		$28,746
									$41,850		**$28,746**
26	Meridian Pkwy. & Van Buren Blvd.	County / March JPA	- None	- None	- Restripe SB through as shared left-through lane	- Same	No	Fair Share	$41,850	15.6%	$6,514
									$41,850		**$6,514**
29	I-215 NB Ramps & Alessandro Blvd.	Riverside / March JPA / Caltrans	- Add NB 2nd left turn lane	- Same	- Same	- Same	No	Fair Share	$83,700	20.2%	$16,926
									$83,700		**$16,926**
30	I-215 SB Ramps & Cactus Av.[5]	March JPA, Caltrans	- None	- None	- None	- Add EB 3rd through lane	Yes (TUMF)	Fees	--		--
						- Add WB 3rd through lane	Yes (TUMF)	Fees			
									$0		**$0**
31	I-215 NB Ramps & Cactus Av.[5]	Moreno Valley / March JPA / Caltrans	- Add NB 2nd left turn lane	- Same	- Same	- Same	Yes (TUMF)	Fees	--		--
			- Add EB right turn lane	- Same	- Same	- Same	Yes (TUMF)	Fees			
			- Add WB 3rd through lane	- Same	- Same	- Same	Yes (TUMF)	Fees			
						- Add EB 3rd through lane	Yes (TUMF)	Fees			
						- Add 4th WB through lane	Yes (TUMF)	Fees			
									$0		**$0**
32	I-215 SB Ramps & Van Buren Blvd.	March JPA / Caltrans	- None	- None	- Restripe SB through as a left lane	- Same	No	Fair Share	$41,850	4.7%	$1,962
					- Modify EB right turn lane to single free right turn lane	- Same	No	Fair Share	$41,850		$1,962
						- Add WB 3rd through lane	Yes (TUMF)	Fees	--		--
									$83,700		**$3,925**
34	Old 215 Frontage Rd. & Alessandro Blvd.	Moreno Valley / Riverside / County	- None	- None	- Add WB 3rd through lane	- Same	Yes (TUMF)	Fees	--		--
									$0		**$0**
35	Day St. & Alessandro Blvd.	Moreno Valley	- None	- None	- None	- Add EB right turn lane	No	Fair Share	$83,700	9.8%	$8,233
						- Add WB 3rd through lane	Yes (TUMF)	Fees	--		--
									$83,700		**$8,233**
36	Elsworth St. & Cactus Av.	Moreno Valley	- Modify TS to Implement N/S from split phasing to protected left turn phasing.	- Same	- Same	- Same	No	Fair Share	$12,555	10.9%	$1,363
					- Add EB 4th through lane	- Same	No	Fair Share	$301,320		$32,709
						- Add WB 4th through lane	No	Fair Share	$301,320		$32,709
						- Add NB 2nd left turn lane	No	Fair Share	$83,700		$9,086
									$698,895		**$75,867**
38	Graham St./Riverside Dr. & Cactus Av.	Moreno Valley	- None	- None	- None	- Add SB 2nd left turn lane	No	Fair Share	$83,700	3.7%	$3,097
									$83,700		**$3,097**
								Total Project Fair Share Contribution to the March JPA (non-TUMF)[6]	**$89,978**		**$36,553**
								Total Project Fair Share Contribution to the City of Riverside[7]	**$1,566,188**		**$152,467**
								Total Project Fair Share Contribution to the County of Riverside[8]	**$602,640**		**$45,584**
								Total Project Fair Share Contribution to the City of Moreno Valley[9]	**$866,295**		**$87,196**
								Total	**$3,125,100**		**$321,799**

[1] Improvements included in TUMF fee program. Although identified as a TUMF facility, the improvement is not currently identified on the Central Zone 5-Year Transportation Improvement Program Amendment (2021).

[2] Identifies the Project's responsibility to construct an improvement or contribute fair share or fee payment towards the implementation of the improvements shown. If identified as a Project construct obligation, then no fair share percentage has been identified.

[3] Program improvements constructed by Project may be eligible for fee credit, at discretion of the March JPA. See Table 9-1 for Fair Share Calculations. The highest peak hour fair share percentage for each intersection, as shown in Table 9-1, has been utilized.

[4] Costs have been estimated using the data provided in Appendix "G" of the CMP (2003) for preliminary construction costs. A growth factor of 1.674 has been utilized to reflect 2022 costs.

[5] The 2016 TUMF nexus update study identifies I-215/Cactus overcrossing ($25,558,000). Although the individual improvements are not specifically identified in the nexus study, they are likely to be part of the overall interchange improvements.

[6] Total project fair share contribution consists of the improvements which are not already included in the County TUMF for those intersections wholly or partially within the March JPA.

[7] Total project fair share contribution consists of the improvements which are not already included in a fee program for those intersections wholly or partially within the City of Riverside.

[8] Total project fair share contribution consists of the improvements which are not already included in a fee program for those intersections wholly or partially within the County of Riverside.

[9] Total project fair share contribution consists of the improvements which are not already included in a fee program for those intersections wholly or partially within the City of Moreno Valley.

[10] Total project fair share contribution consists of the improvements which are not already included in a fee program for those intersections wholly or partially within Caltrans' jurisdiction.

[11] Rough order of magnitude cost estimate.

[12] Per the City of Riverside, improvements will be constructed as part of the Sycamore Hills project.

[13] There are no feasible intersection improvements. As such, on improvements have been identified.

[14] Improvement includes restricting U-turn movements for the westbound approach. Proper signage should be installed.

[15] Intersection does not meet the City's criteria for a project-related traffic deficiency, based on the thresholds identified in the City's traffic study guidelines. Therefore, no improvements have been identified for this scenario.

RA-7.8
Cont.

1.8 PARKING ASSESSMENT

Parking has been assessed for only Buildings B and C as they are the only buildings being processed. Other areas of the Project are comprised of land use assumptions only and no specific development is being proposed for those areas at this time. Per the minimum passenger car parking requirements per the Specific Plan (see Table 3-3 of the Specific Plan), the off-street parking requirements for warehouse/distribution uses are as follows:

- 1 space per 1,000 square feet for the first 20,000 square feet, 1 space per 2,000 square feet of 20,000 – 100,000 square feet of building space, 1 space per 5,000 square feet for the square footage over 100,000 square feet, 1 space per 300 square feet for the office space.

Based on the criteria outlined above, the minimum parking requirements have been calculated for Buildings B and C below:

- Building B consists of 1,250,000 square feet of high-cube fulfillment warehousing use which includes 50,000 square feet of office space. The minimum parking required is 447 spaces:
    - 50,000 square feet of office x 1 space per 300 square feet = 167 spaces
    - 0-20,000 square feet of warehouse/distribution x 1 space per 1,000 square feet = 20 spaces
    - 20,000-100,000 square feet of warehouse/distribution x 1 space per 2,000 square feet = 40 spaces
    - 100,000-1,200,000 square feet of warehouse/distribution x 1 space per 5,000 square feet = 220 spaces
- Building C consists of 587,000 square feet of high-cube fulfillment warehousing use which includes 40,000 square feet of office space. The minimum parking required is 291 spaces:
    - 40,000 square feet of office x 1 space per 300 square feet = 133 spaces
    - 0-20,000 square feet of warehouse/distribution x 1 space per 1,000 square feet = 20 spaces
    - 20,000-100,000 square feet of warehouse/distribution x 1 space per 2,000 square feet = 40 spaces
    - 100,000-587,000 square feet of warehouse/distribution x 1 space per 5,000 square feet = 98 spaces

RA-7.8 Cont.

1.9 ACTIVE TRANSPORTATION

Bicycle and pedestrian connections within the Project will help reduce vehicle trips as well as provide recreational opportunities for future employees and visitors. The proposed roadway network includes Class II (on-street, striped) bike lanes along all roadways, a 10-foot-wide multi-purpose trail along the western side of Barton Street fronting the open space and park areas of the Project, and recreational trails. Recreational trails will be retained and maintained within the open space areas of the Project. The currently existing service roads within the Conservation Area may continue to be utilized by the public for passive recreation as authorized by the March JPA; however, public vehicular access will continue to be prohibited. In conjunction with the 5-foot bike lanes on all Project roadways, there are also 6-foot sidewalks to promote walkability. All

these connections within the Project enhance connectivity to the existing Metrolink Station approximately 1.2-miles to the east on Meridian Parkway and travel to and from recreational amenities within the Project from other surrounding existing residential developments in close proximity to the Project. Sidewalks and bike lanes will provide direct access to the proposed Project uses. The Project should construct sidewalk improvements up to the intersection of Grove Community Drive and Barton Street and provide bike racks and bike lockers.

1.10 TRAFFIC CALMING – BARTON STREET

At the request of City of Riverside staff during the scoping process, traffic calming measures have been reviewed for Barton Street. The purpose of implementing traffic calming measures is to reduce volume and/or speed along roadways. In general, wider roadways encourage higher vehicular speeds and the implementation of traffic calming measures that either physically or psychologically encourage drivers to travel at slower speeds. Maintaining low speeds will help to create a pedestrian-friendly environment. In order for traffic calming measures to be effective, most measures should be placed every 250-400 feet. Spreading the measures out too far may lead to speeding between installations. A single traffic calming measure or a combination of multiple traffic calming measures can be utilized to achieve the desired speed control along roadways.

The Project is anticipated to complete the connection of Barton Street between the existing northerly and southerly termini and in order to address potential speeding, the following traffic calming measures have been reviewed for implementation. It should be noted that some of the recommendations listed below may be appropriate for retrofitting onto existing roadways, but for new roadways, such as Barton Street, the roadway should be designed in such a way to discourage speeding (by adding curvature, narrow lanes, etc.).

RA-7.8
Cont.

- **Raised Crosswalks/Sidewalk Extensions:**
    - Advantages: improve safety for both pedestrians and vehicles, add positive aesthetic value, effective in reducing speeds.
    - Disadvantages: textured material can be expensive, potential impacts on drainage should be considered, noise and air pollution may increase.
    - Speed humps are similar to the raised crosswalks but would not be recommended for a roadway like Barton Street. The implementation of speed humps may induce speeding between installations.
- **Raised Intersections:**
    - Could be a retrofit improvement for any existing intersection and/or could be implemented at any new intersections/driveways along the Barton Street extension.
    - Advantages: improved safety for both pedestrians and vehicles, add positive aesthetic value, calming two streets with one installation, ideal for locations with substantial pedestrian activity.
    - Disadvantages: cost of textured materials, potential impacts on drainage should be considered, found to be less effective in reducing speeds as compared to speed humps/speed tables/raised crosswalks.

- **Chicane:**
  - Advantages: effective method of changing the driver perception of the roadway, reduces speed without affecting emergency response, minimum inconvenience to local traffic, reduced crossing distances for pedestrians, greater visual obstruction.
  - Disadvantages: cost, appropriate for midblock locations only (not at intersections), most effective when traffic volumes are relatively equal in both directions of travel, increased maintenance.
- **Centerline & Curb Adjacent Striping (done to visually narrow the roadway):**
  - Advantages: fast and cost effective, typically used on rural roadways with no shoulders.
  - Disadvantages: low success rate
- **Roundabouts:**
  - Could be a retrofit improvement for any existing intersection and/or could be implemented at any new intersections/driveways along the Barton Street extension.
  - Advantages: reductions to potential crashes that typically occur at traditional intersections, reduces speed on approach, low-cost maintenance as compared to a signal, effective for multi-leg intersections, good for cyclists, restrictive for larger vehicles.
  - Disadvantages: may require additional signage and lighting, right-of-way, maintenance of landscaped areas, may push traffic onto adjacent streets.
- **Lane Narrowing (expanding sidewalks/landscaped areas, on-street parking, etc.):**
  - Advantages: good for pedestrians (shorter crossing distance), opportunities for additional landscaping, slows traffic without affecting emergency vehicle response time, effective when used in a series, single lane narrowing reduces vehicle speed and through traffic volume.
  - Disadvantages: double lane narrowing is not as effective as single lane narrowing, can be unfriendly to cyclists if not designed correctly, conflict of opposing drivers crossing simultaneously (especially for larger vehicles).

RA-7.8 Cont.

All of the aforementioned measures can also be supplemented with speed activated speed limit signs/warning signs, additional signage, flashing beacons, etc. Implementation of one or more of the aforementioned measures should be reviewed and discussed with the City of Riverside.

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RA-7.8
Cont.

2 METHODOLOGIES

This section of the report presents the methodologies used to perform the traffic analyses summarized in this report. The methodologies described are consistent with March JPA's guidelines.

2.1 LEVEL OF SERVICE

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow.

2.2 INTERSECTION CAPACITY ANALYSIS

The definitions of LOS for interrupted traffic flow (flow restrained by the existence of traffic signals and other traffic control devices) differ slightly depending on the type of traffic control. The LOS is typically dependent on the quality of traffic flow at the intersections along a roadway. The 6th Edition Highway Capacity Manual (HCM) methodology expresses the LOS at an intersection in terms of delay time for the various intersection approaches. (4) The HCM uses different procedures depending on the type of intersection control.

RA-7.8 Cont.

2.2.1 SIGNALIZED INTERSECTIONS

The March JPA, City of Moreno Valley, City of Riverside, and County of Riverside require signalized intersection operations analysis based on the methodology described in the HCM. (4) Intersection LOS operations are based on an intersection's average control delay. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. For signalized intersections LOS is directly related to the average control delay per vehicle and is correlated to a LOS designation as described in Table 2-1.

The traffic modeling and signal timing optimization software package Synchro (Version 11) is utilized to analyze signalized intersections. Synchro is a macroscopic traffic software program that is based on the signalized intersection capacity analysis as specified in the HCM. Macroscopic level models represent traffic in terms of aggregate measures for each movement at the study intersections. Equations are used to determine measures of effectiveness such as delay and queue length. The level of service and capacity analysis performed by Synchro takes into consideration optimization and coordination of signalized intersections within a network.

TABLE 2-1: SIGNALIZED INTERSECTION LOS THRESHOLDS

Description	Average Control Delay (Seconds), V/C ≤ 1.0	Level of Service, V/C ≤ 1.0	Level of Service, V/C > 1.0
Operations with very low delay occurring with favorable progression and/or short cycle length.	0 to 10.00	A	F
Operations with low delay occurring with good progression and/or short cycle lengths.	10.01 to 20.00	B	F
Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	20.01 to 35.00	C	F
Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	35.01 to 55.00	D	F
Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	55.01 to 80.00	E	F
Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths.	80.01 and up	F	F

Source: HCM (6th Edition)

As the March JPA guidelines does not provide saturation flow rates, a saturation flow rate of 1900 vphgpl has been utilized, consistent with County of Riverside guidelines. The peak hour traffic volumes have been adjusted using a peak hour factor (PHF) to reflect peak 15-minute volumes. Common practice for LOS analysis is to use a peak 15-minute rate of flow. However, flow rates are typically expressed in vehicles per hour. The PHF is the relationship between the peak 15-minute flow rate and the full hourly volume (e.g., PHF = [Hourly Volume] / [4 x Peak 15-minute Flow Rate]). The use of a 15-minute PHF produces a more detailed analysis as compared to analyzing vehicles per hour. Existing PHFs have been used for all analysis scenarios. Per the HCM, PHF values over 0.95 often are indicative of high traffic volumes with capacity constraints on peak hour flows while lower PHF values are indicative of greater variability of flow during the peak hour. (4)

RA-7.8 Cont.

2.2.2 UNSIGNALIZED INTERSECTIONS

The March JPA, City of Moreno Valley, City of Riverside, and County of Riverside require the operations of unsignalized intersections be evaluated using the methodology described in the HCM. (4) The LOS rating is based on the weighted average control delay expressed in seconds per vehicle (see Table 2-2).

TABLE 2-2: UNSIGNALIZED INTERSECTION LOS THRESHOLDS

Description	Average Control Delay Per Vehicle (Seconds)	Level of Service, V/C ≤ 1.0	Level of Service, V/C > 1.0
Little or no delays.	0 to 10.00	A	F
Short traffic delays.	10.01 to 15.00	B	F
Average traffic delays.	15.01 to 25.00	C	F
Long traffic delays.	25.01 to 35.00	D	F
Very long traffic delays.	35.01 to 50.00	E	F
Extreme traffic delays with intersection capacity exceeded.	> 50.00	F	F

Source: HCM (6th Edition)

At two-way or side-street stop-controlled intersections, LOS is calculated for each controlled movement and for the left turn movement from the major street, as well as for the intersection as a whole. For approaches composed of a single lane, the delay is computed as the average of all movements in that lane. The worst LOS for any one movement is reported for any two-way or side-street stop-controlled intersection per HCM. For all-way stop controlled intersections, LOS is computed and reported for the intersection as a whole.

2.3 ROADWAY SEGMENT CAPACITY ANALYSIS METHODOLOGY

Roadway segment operations have been evaluated using the applicable average daily traffic (ADT) roadway capacity values provided in either the County or City of Riverside's guidelines (JPA's roadway segment criteria are consistent with the County's). The County guidelines have been used for the roadway segments located within the County or the March JPA. The roadway capacities utilized for the purposes of this analysis are considered "rule of thumb" estimates for planning purposes and are affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic) and pedestrian bicycle traffic.

RA-7.8 Cont.

While using ADT for planning purposes is suitable with regards to evaluating potential volume to capacity with future forecasts, it is not suitable for operational analysis because it does not account for the factors listed previously. As such, where the ADT based roadway segment analysis indicates a deficiency (unacceptable LOS), a review of the more detailed peak hour intersection analysis and progression analysis are undertaken. The more detailed peak hour intersection analysis explicitly accounts for factors that affect roadway capacity. Therefore, roadway segment widening is typically only recommended if the peak hour intersection analysis indicates the need for additional through lanes.

The County of Riverside and City of Riverside roadway segment capacities are provided on Tables 2-3 and 2-4.

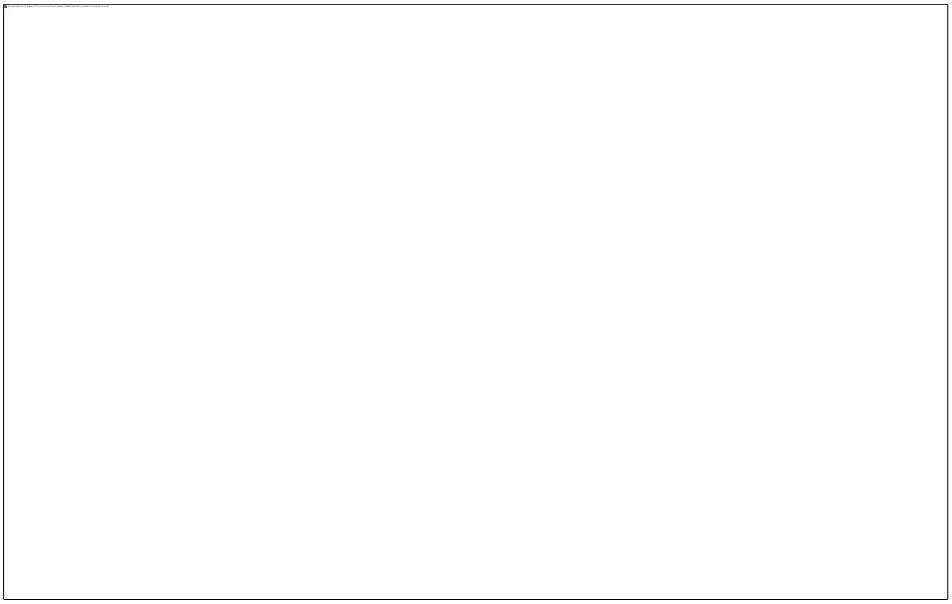
TABLE 2-3: ROADWAY SEGMENT CAPACITIES FOR COUNTY OF RIVERSIDE/MARCH JPA

Roadway Classification	Number of Lanes	Maximum Two-Way Traffic Volume (ADT)[2]		
		Service Level C	Service Level D	Service Level E
Collector	2	10,400	11,700	13,000
Secondary	4	20,700	23,300	25,900
Major	4	27,300	30,700	34,100
Arterial	2	14,400	16,200	18,000
Arterial	4	28,700	32,300	35,900
Mountain Arterial[3]	2	12,900	14,500	16,100
Mountain Arterial	3	16,700	18,800	20,900
Mountain Arterial	4	29,800	33,500	37,200
Urban Arterial	4	28,700	32,300	35,900
Urban Arterial	6	43,100	48,500	53,900
Urban Arterial	8	57,400	64,600	71,800
Expressway	4	32,700	36,800	40,900
Expressway	6	49,000	55,200	61,300
Expressway	8	65,400	73,500	81,700
Freeway	4	61,200	68,900	76,500
Freeway	6	94,000	105,800	117,500
Freeway	8	128,400	144,500	160,500
Freeway	10	160,500	180,500	200,600
Ramp[4]	1	16,000	18,000	20,000

NOTES:
[1] All capacity figures are based on optimum conditions and are intended as guidelines for planning purposes only.
[2] Maximum two-way ADT values are based on the 1999 Modified Highway Capacity Manual Level of Service Tables as defined in the Riverside County Congestion Management Program.
[3] Two-lane roadways designated as future arterials that conform to arterial design standards for vertical and horizontal alignments are analyzed as arterials.
[4] Ramp capacity is given as a one-way traffic volume.

RA-7.8 Cont.

TABLE 2-4: ROADWAY SEGMENT CAPACITIES FOR CITY OF RIVERSIDE



2.4 FREEWAY OFF-RAMP QUEUING ANALYSIS

Consistent with Caltrans requirements, the 95th percentile queuing of vehicles has been assessed at the off-ramps to determine potential queuing deficiencies at the freeway ramp intersections at the I-215 Freeway at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard interchanges. Specifically, the queuing analysis is utilized to identify any potential queuing and "spill back" onto the I-215 Freeway mainline from the off-ramps.

RA-7.8
Cont.

The traffic progression analysis tool and HCM intersection analysis program, Synchro, has been used to assess the potential deficiencies/needs of the intersections with traffic added from the proposed Project. Storage (turn-pocket) length recommendations at the ramps have been based upon the 95th percentile queue resulting from the Synchro progression analysis. The footnote from the Synchro output sheets indicates if the 95th percentile cycle exceeds capacity. Traffic is simulated for two complete cycles of the 95th percentile traffic in Synchro in order to account for the effects of spillover between cycles. In practice, the 95th percentile queue shown will rarely be exceeded and the queues shown with the footnote are acceptable for the design of storage bays.

2.5 TRAFFIC SIGNAL WARRANT ANALYSIS METHODOLOGY

The term "signal warrants" refers to the list of established criteria used by the California Department of Transportation (Caltrans) and other public agencies to quantitatively justify or ascertain the potential need for installation of a traffic signal at an otherwise unsignalized intersection. This TA uses the signal warrant criteria presented in the latest edition of the Caltrans California Manual on Uniform Traffic Control Devices (CA MUTCD). (5)

The signal warrant criteria for Existing study area intersections are based upon several factors, including volume of vehicular and pedestrian traffic, frequency of accidents, and location of school areas. The CA MUTCD indicates that the installation of a traffic signal should be considered if one or more of the signal warrants are met. (5) Specifically, this TA utilizes the Peak Hour Volume-based Warrant 3 as the appropriate representative traffic signal warrant analysis for existing traffic conditions. Warrant 3 is appropriate to use for this TA because it provides specialized warrant criteria for intersections with rural characteristics (e.g., located in communities with populations of less than 10,000 persons or with adjacent major streets operating above 40 miles per hour). For the purposes of this study, the speed limit was the basis for determining whether Urban or Rural warrants were used for a given intersection.

Future intersections that do not currently exist have been assessed regarding the potential need for new traffic signals based on future average daily traffic (ADT) volumes, using the Caltrans planning level ADT-based signal warrant analysis worksheets. Pursuant to the scoping agreement, traffic signal warrant analysis has been conducted for unsignalized intersections operating at LOS E or F, which consist of the following study area intersections shown in Table 2-5:

TABLE 2-5: TRAFFIC SIGNAL WARRANT ANALYSIS LOCATIONS

ID	Intersection Location	Jurisdiction	CMP?
9	Deercreek Dr. & Grove Community Dr.	City of Riverside	No
10	Deercreek Dr. & Orange Terrace Pkwy.	City of Riverside	No
12	Barton St. & Grove Community Dr.	City of Riverside	No
13	Barton St. & Orange Terrace Pkwy.	City of Riverside	No
15	Airman Dr. & Cactus Av.	March JPA	No
16	Abrams Dr. & Grove Community Dr.	City of Riverside	No
17	Abrams Dr. & Orange Terrace Pkwy.	City of Riverside	No
18	Linebacker Dr. & Cactus Av.	March JPA	No
21	Brown St. & Cactus Av.	March JPA	No

RA-7.8 Cont.

The Existing conditions traffic signal warrant analysis is presented in the subsequent section, Section 3 *Area Conditions* of this report. The traffic signal warrant analyses for future conditions are presented in Section 5 *E+P Traffic Conditions,* Section 6 *EAP (2028) Traffic Conditions*, Section 7 *Opening Year Cumulative (2028) Traffic Conditions*, and Section 8 *Horizon Year (2045) Traffic Conditions* of this report. It is important to note that a signal warrant defines the minimum condition under which the installation of a traffic signal might be warranted. Meeting this threshold condition does not require that a traffic control signal be installed at a particular location, but rather, that other traffic factors and conditions be evaluated in order to determine whether the signal is truly justified. It should also be noted that signal warrants do not necessarily correlate with LOS. An intersection may satisfy a signal warrant condition and operate at or above acceptable LOS or operate below acceptable LOS and not meet a signal warrant.

2.6 MINIMUM ACCEPTABLE LEVELS OF SERVICE (LOS)

Minimum Acceptable LOS and associated definitions of intersection deficiencies has been obtained from each of the applicable surrounding jurisdictions.

2.6.1 MARCH JPA

Based on the March Joint Powers Authority Traffic Impact Study Preparation Guide (February 10, 2021), all intersections and roadway segments within the March JPA Planning Area shall operate at LOS D or better with limited circumstances of LOS E to occur. LOS E may also be allowed to the extent that would support transit-oriented development (TOD) and walkable communities. LOS E is also acceptable during peak hours at interchange ramp intersections where ramp metering occurs. The Project is not proposed to be a TOD and neither the Alessandro Boulevard nor Cactus Avenue on-ramps are currently metered, as such, the minimum LOS utilized for the purposes of this analysis is LOS D. (1)

2.6.2 COUNTY OF RIVERSIDE

The definition of an intersection deficiency has been obtained from the County of Riverside General Plan. Riverside County General Plan Policy C 2.1 states that the County will maintain the following County-wide target LOS:

The following minimum target levels of service have been designated for the review of development proposals in the unincorporated areas of Riverside County with respect to transportation impacts on roadways designated in the Riverside County Circulation Plan which are currently County maintained, or are intended to be accepted into the County maintained roadway system:

RA-7.8 Cont.

- *LOS C shall apply to all development proposals in any area of the Riverside County not located within the boundaries of an Area Plan, as well as those areas located within the following Area Plans: REMAP, Eastern Coachella Valley, Desert Center, Palo Verde Valley, and those non-Community Development areas of the Elsinore, Lake Mathews/Woodcrest, Mead Valley and Temescal Canyon Area Plans.*
- *LOS D shall apply to all development proposals located within any of the following Area Plans: Eastvale, Jurupa, Highgrove, Reche Canyon/Badlands, Lakeview/Nuevo, Sun City/Menifee Valley, Harvest Valley/Winchester, Southwest Area, The Pass, San Jacinto Valley, Western Coachella Valley and those Community Development Areas of the Elsinore, Lake Mathews/Woodcrest, Mead Valley and Temescal Canyon Area Plans.*
- *LOS E may be allowed by the Board of Supervisors within designated areas where transit-oriented development and walkable communities are proposed.*

The applicable minimum LOS utilized for the purposes of this analysis is LOS D per the County-wide target LOS for projects located within the Mead Valley Area Plans.

2.6.3 CITY OF MORENO VALLEY

The definition of an intersection deficiency has been obtained from the Moreno Valley General Plan. The City's General Plan policies states that the City will maintain the following City-wide target LOS:

- *Policy C.3-1: Strive to maintain Level of Service (LOS) C on roadway links, wherever possible, and LOS D in the vicinity of SR-60 Freeway and high employment centers. Strive to maintain LOS D at intersection during peak hours.*
- *Policy C.3-2: Allow for a list of locations to be exempt from the LOS policy based on right-of-way constraints and goals and values of the community. The City Engineer shall update the excepted intersections and roadway segments list periodically to be included with the traffic impact study guidelines and adopted by ordinance.*
- *Policy C.3-3: Where new developments would increase traffic flows beyond the LOS C (or LOS D, where applicable), require appropriate and feasible improvement measures as a condition of approval. Such measures may include extra right-of-way and improvements to accommodate additional left-turn and right-turn lanes at intersections, or other improvements*

The applicable minimum LOS utilized for the purposes of this analysis is LOS D for study area intersections located within the City of Moreno Valley. Policy C.3-2 is not applicable to the study area intersections.

2.6.4 CITY OF RIVERSIDE

RA-7.8 Cont.

The City of Riverside General Plan states the City will strive to maintain LOS D or better on arterial streets wherever possible. At some key locations, such as City arterial roadways, which are used as freeway bypass by regional through traffic and at heavily traveled freeway intersections, LOS E may be acceptable as determined on a case-by-case basis. Locations that may warrant the LOS E standard include portions of Arlington Avenue/Alessandro Boulevard, Van Buren Boulevard throughout the City, portions of La Sierra Avenue, and selected freeway interchanges. A higher standard, such as LOS C or better, may be adopted for Local and Collector streets in residential areas. The City recognizes that along key freeway feeder segments during peak commute hours, LOS F may be expected due to regional travel patterns.

At the City's request, the analysis for all study area intersections and roadway segments that lie within the City of Riverside will be evaluated based on the guidelines outlined in the City's Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (July 2020). As such, the minimum LOS utilized for the purposes of this analysis is LOS D for intersections located partially or wholly within the City of Riverside.

2.6.5 CALTRANS

Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D on State highway facilities; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than this target LOS, the existing measure of effectiveness should be maintained. In general, the region-wide goal for an acceptable LOS on

all freeways, roadways segments, and intersections is LOS D. For undeveloped or not densely developed locations, the goal may be to achieve LOS C. As such, the minimum LOS utilized for the purposes of this analysis is LOS D.

2.7 DEFICIENCY CRITERIA

2.7.1 MARCH JPA

March JPA has determined that the effect of a project's traffic would result in a deficiency if project traffic (during the AM and/or PM peak hours or during the project's peak hour or period) is 2%, or more, of total peak hour traffic on a roadway segment or at an intersection. As summarized below and on Table 2-6. The following is a summary of the criteria:

A project-related traffic deficiency will be designated if both of the following conditions occur:

- Peak hour project traffic plus existing traffic causes a roadway segment or intersection to operate at LOS "E" or "F"; and
- Peak hour project traffic comprises 2% or more of the total peak hour traffic on the roadway segment or intersection for LOS "E" and 2% or more for LOS "F".

A traffic deficiency will be designated if both of the following conditions occur:

- Peak hours project traffic plus existing peak hour traffic and peak hour traffic from other near-term and future projects causes a roadway segment or intersection to operate at LOS "E" or "F"; and
- Peak hour project traffic comprises 2% or more of total peak hour traffic on the roadway segment or intersection for LOS "E" and 2% or more for LOS "F".

RA-7.8 Cont.

TABLE 2-6: MARCH JPA DEFICIENCY CRITERIA

Level of Service with Project	Allowable Percent Increase Due To Project During the Project Peak Hour	
	Roadway Segments	Intersections
E	2%	2%
F	2%	2%

2.7.2 COUNTY OF RIVERSIDE

This section outlines the methodology used in this analysis related to identifying circulation system deficiencies. The following deficiency criteria has been utilized for the County of Riverside. To determine whether the addition of project-related traffic at a study intersection would result in a deficiency, the following will be utilized:

- A deficiency occurs at study area intersections if the pre-Project condition is at or better than LOS D (i.e., acceptable LOS), and the addition of project trips causes the peak hour LOS of the study area intersection to operate at unacceptable LOS (i.e., LOS E or F). Per the County of Riverside traffic study guidelines, for intersections currently operating at unacceptable LOS (LOS E or F), a deficiency will occur if the Project contributes 50 or more peak hour trips to pre-project traffic conditions.

2.7.3 CITY OF MORENO VALLEY

This section outlines the methodology used in this analysis related to identifying circulation system deficiencies. The following deficiency criteria is utilized for the City per its Guidelines. To determine whether the addition of project-related traffic at a study intersection would result in a deficiency at a signalized intersection, the following will be utilized:

- Any signalized intersection operating at an acceptable LOS without project traffic in which the addition of project traffic causes the intersection to degrade to unacceptable LOS shall identify improvements to provide acceptable LOS.
- Any signalized study intersection that is operating at an unacceptable LOS without project traffic where the project increases delay by 5.0 or more seconds shall identify improvements to offset the increase in delay.

An operational improvement would be required if the study determines that either section a) or both sections b) and c) occur for unsignalized intersections:

a) The addition of project related traffic causes the intersection to degrade from an acceptable LOS to unacceptable LOS.

OR

b) The project adds 5.0 seconds or more of delay to an intersection hat is already projected to operate without project traffic at unacceptable LOS,

c) The intersection meets the peak hour traffic signal warrant after the addition of project traffic.

RA-7.8 Cont.

If the conditions above are satisfied, improvement should be identified to achieve LOS D or better for conditions a) above and pre-project LOS and delay for case b) above.

2.7.4 CITY OF RIVERSIDE

To determine whether the addition of Project traffic (as defined through the comparison of Existing traffic conditions to E+P traffic conditions) at a study intersection would result in a direct project-specific traffic deficiency, the following will be utilized:

- When the pre-Project condition is at or better than LOS D (i.e., acceptable LOS), and project-generated traffic, as measured by 50 or more peak hour trips, causes deterioration below LOS D (i.e., unacceptable LOS) or increases to the peak hour delay as defined in Table 2-4, a deficiency is deemed to occur.

TABLE 2-7: CITY OF RIVERISDE INTERSECTION DEFICIENCY CRITERIA

Pre-Project LOS	Project-Related Delay Increase	Recommended Improvements
A/B	10.0 Seconds or More	Achieve Pre-project delay or better
C	8.0 Seconds or More	Achieve Pre-project delay or better
D	5.0 Seconds or More	Achieve Pre-project delay or better
E	2.0 Seconds or More	Achieve Pre-project delay or better
F	1.0 Second or More	Achieve Pre-project delay or better

However, when the pre-Project condition is already below LOS D (i.e., unacceptable LOS), the Project will be responsible for recommending improvements to achieve a level of service equal to or better than it was without the Project for intersections that receive 50 or more peak hour project-related trips. For intersections currently operating at unacceptable LOS during one or more peak hours under Existing traffic conditions, improvements have been identified to achieve an intersection LOS that is equal to or better than pre-Project conditions.

Cumulative traffic deficiencies are created as a result of a combination of the proposed Project together with other future developments contributing to the overall traffic deficiencies requiring additional improvements to maintain acceptable level of service operations with or without the Project.

2.7.5 CALTRANS

Per guidance from Caltrans, intersections operating at a deficient LOS (LOS E or F) should identify improvements to achieve acceptable LOS (LOS D or better) during the peak hours.

2.8 PROJECT FAIR SHARE CALCULATION METHODOLOGY

Improvements found to be included in the TUMF and/or DIF will be identified as such. For improvements that do not appear to be in either of the pre-existing fee programs, a fair share contribution based on the Project's proportional share may be imposed in order to address the Project's share of deficiencies in lieu of construction. It should be noted that fair share calculations are for informational purposes only and the March JPA will determine the appropriate improvements to be implemented by a project (to be identified in the conditions of approval).

RA-7.8 Cont.

If the intersection is currently operating at acceptable LOS under Existing traffic conditions, the Project's fair share cost of improvements would be determined based on the following equation, which is the ratio of Project traffic to new traffic, where new traffic is total future traffic less existing baseline traffic:

Project Fair Share % = Project Traffic / (Horizon Year (2045) Total Traffic – Existing (2021) Traffic)

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RA-7.8
Cont.

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3 AREA CONDITIONS

This section provides a summary of the existing circulation network, the March JPA General Plan Circulation Network, and a review of existing peak hour intersection operations, roadway segment analysis, traffic signal warrant, and off-ramp queuing analyses.

3.1 EXISTING CIRCULATION NETWORK

Pursuant to the agreement with March JPA, County of Riverside, City of Riverside, and City of Moreno Valley staff (Appendix 1.1), the study area includes a total of 38 existing and future intersections as shown previously on Exhibit 1-2. Exhibit 3-1 illustrates the study area intersections located near the proposed Project and identifies the number of through traffic lanes for existing roadways and intersection traffic controls.

3.2 MARCH JPA GENERAL PLAN CIRCULATION ELEMENT

The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area, as identified on the March JPA General Plan Circulation Element, are described subsequently. Exhibit 3-2 shows the March JPA General Plan Circulation Element and Exhibit 3-3 illustrates the March JPA General Plan roadway cross-sections.

3.3 COUNTY OF RIVERSIDE, CITY OF MORENO VALLEY, AND CITY OF RIVERSIDE GENERAL PLAN CIRCULATION ELEMENT

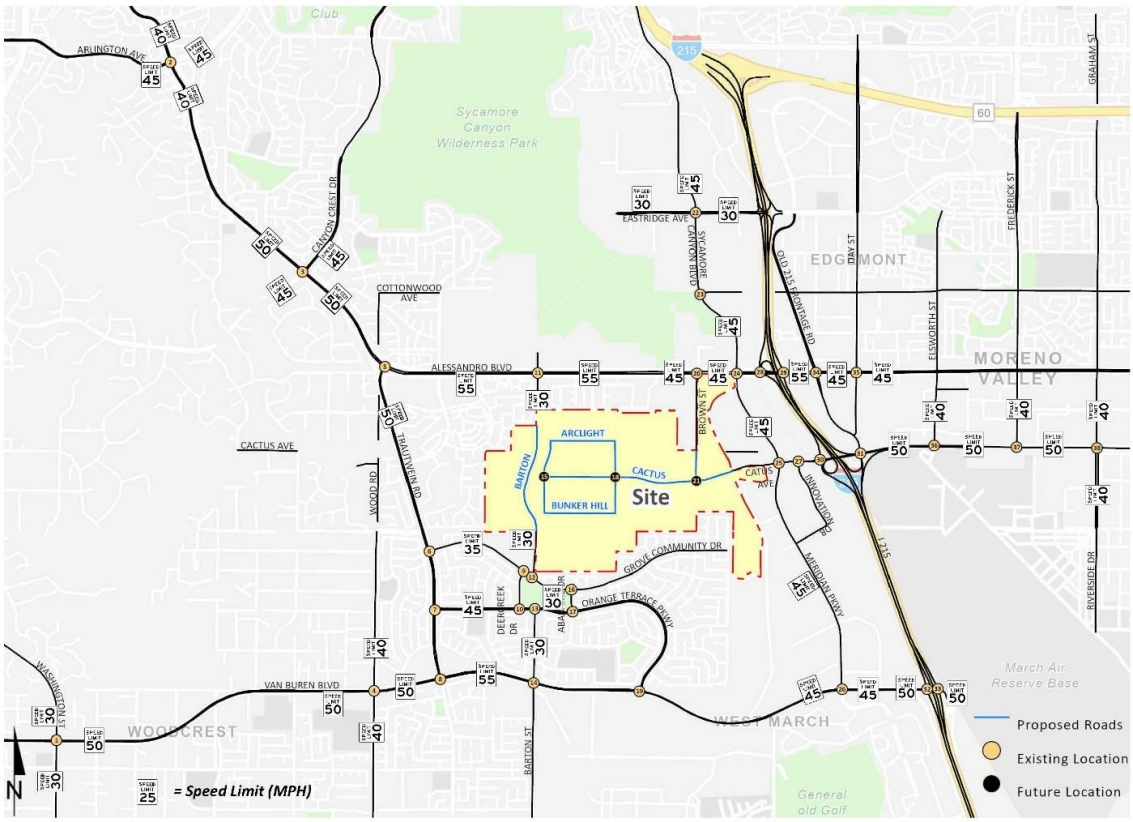
RA-7.8
Cont.

Exhibits 3-4 and 3-5 show the County of Riverside's General Plan Circulation Element and roadway cross-sections, respectively. Exhibits 3-6 and 3-7 show the City of Moreno Valley's General Plan Circulation Element and roadway cross-sections, respectively. Exhibits 3-8 and 3-9 show the City of Riverside's General Plan Circulation Element and roadway cross-sections, respectively.

3.4 BICYCLE & PEDESTRIAN FACILITIES

Field observations conducted in 2019 indicate moderate pedestrian and bicycle activity within the study area (last observed pre-COVID), specifically during the lunch time and afternoon hours when employees utilize sidewalks during breaks. March JPA does not have a bike/pedestrian facilities exhibit. Exhibit 3-10 illustrates the City of Moreno Valley Bike Plan and Exhibit 3-11 shows the City of Moreno Valley Master Plan of Trails. Exhibit 3-12 illustrates the City of Riverside Proposed Bikeways and Trails Improvements. Existing pedestrian facilities adjacent to the study area intersections are shown on Exhibit 3-13. It should be noted, the existing pedestrian facilities shown on Exhibit 3-13 are for facilities adjacent to the study area intersections only, and not the study area as a whole.

EXHIBIT 3-1: EXISTING NUMBER OF THROUGH LANES AND INTERSECTION CONTROLS



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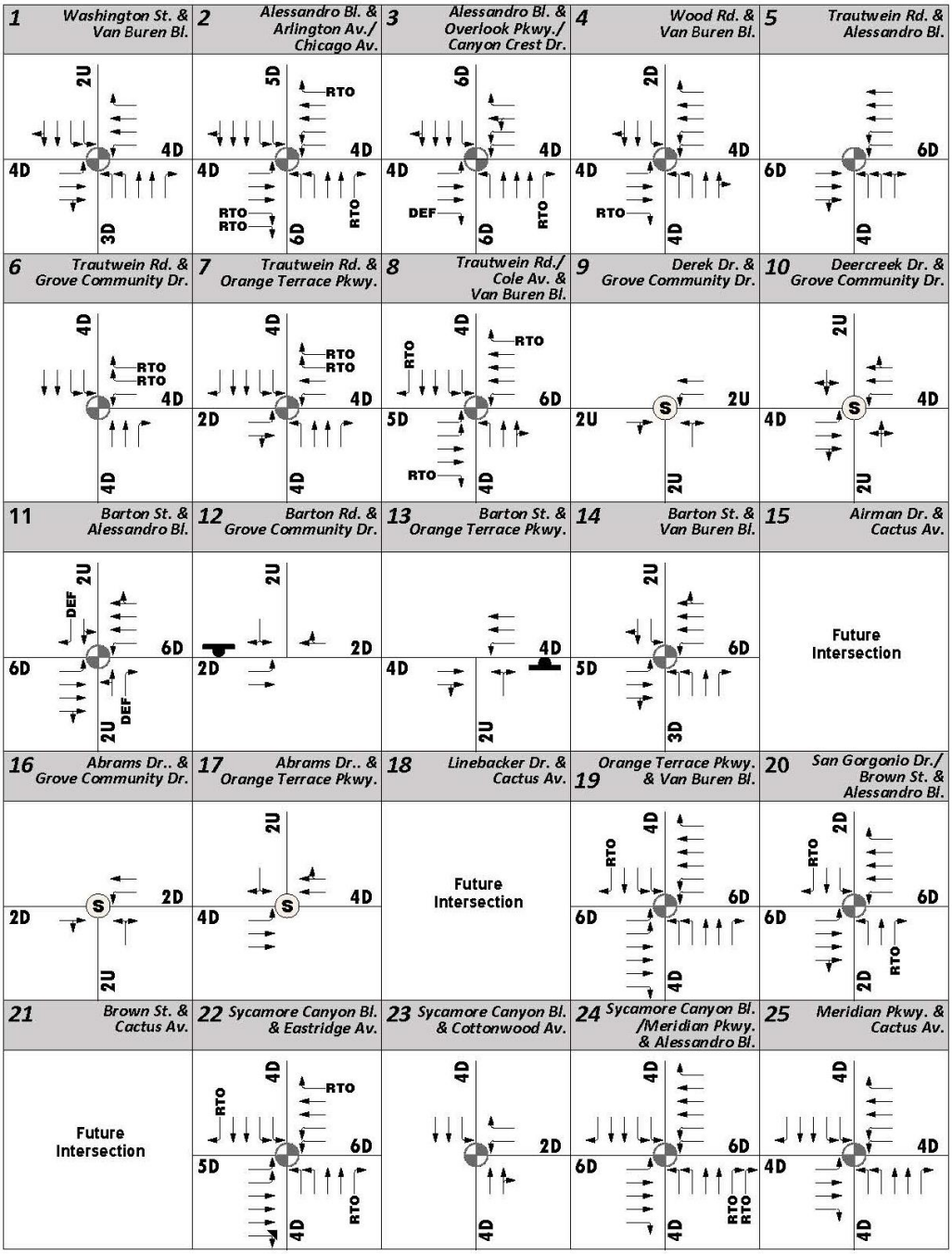
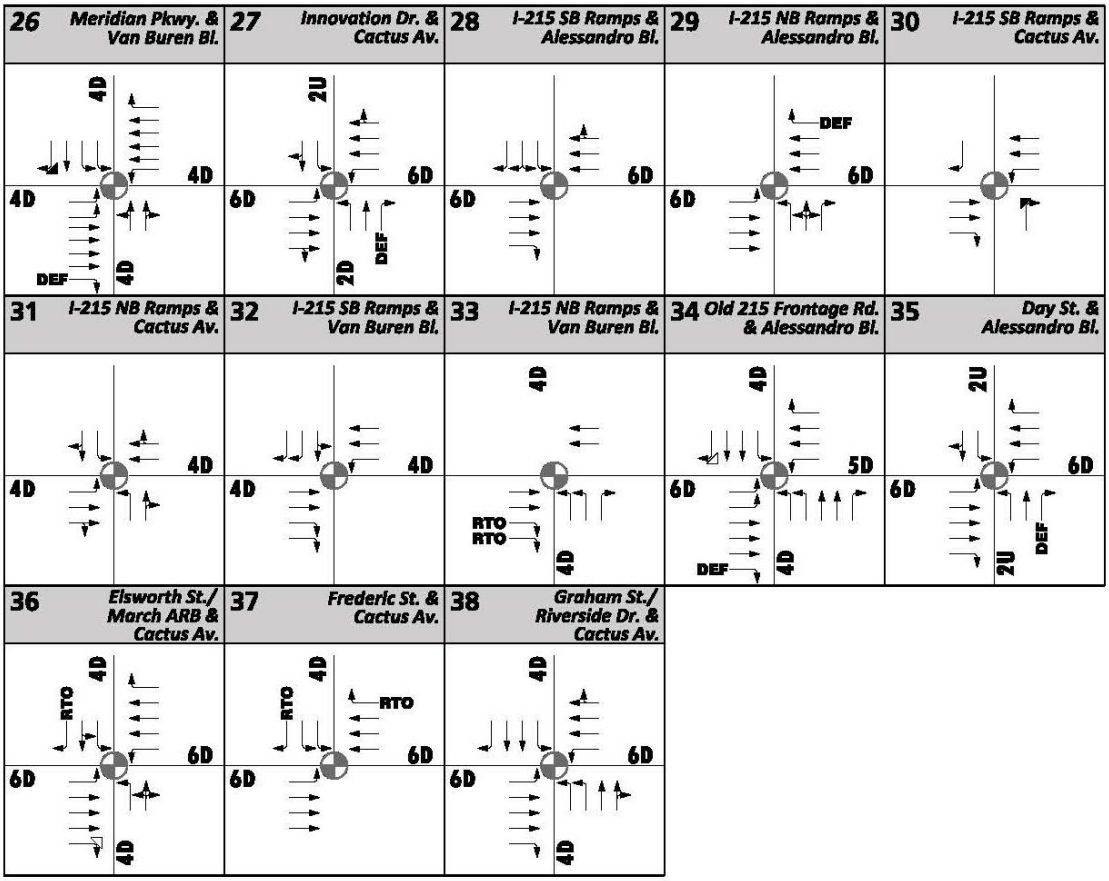
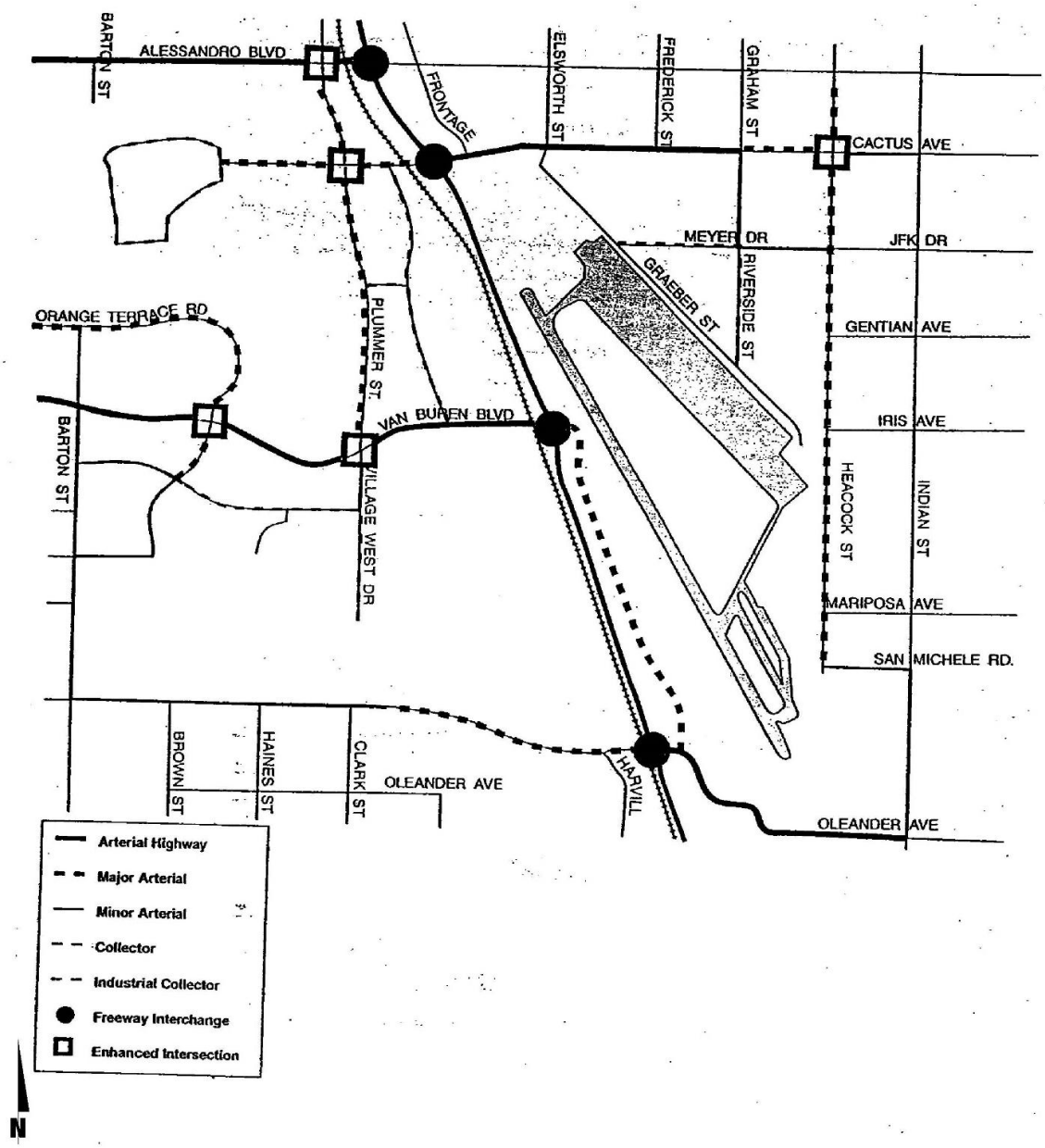

1 Washington St. & Van Buren Bl.
2 Alessandro Bl. & Arlington Av./ Chicago Av.
3 Alessandro Bl. & Overlook Pkwy./ Canyon Crest Dr.
4 Wood Rd. & Van Buren Bl.
5 Trautwein Rd. & Alessandro Bl.
6 Trautwein Rd. & Grove Community Dr.
7 Trautwein Rd. & Orange Terrace Pkwy.
8 Trautwein Rd./ Cole Av. & Van Buren Bl.
9 Derek Dr. & Grove Community Dr.
10 Deercreek Dr. & Grove Community Dr.
11 Barton St. & Alessandro Bl.
12 Barton Rd. & Grove Community Dr.
13 Barton St. & Orange Terrace Pkwy.
14 Barton St. & Van Buren Bl.
15 Airman Dr. & Cactus Av.
16 Abrams Dr.. & Grove Community Dr.
17 Abrams Dr.. & Orange Terrace Pkwy.
18 Linebacker Dr. & Cactus Av.
19 Orange Terrace Pkwy. & Van Buren Bl.
20 San Gorgonio Dr./ Brown St. & Alessandro Bl.
21 Brown St. & Cactus Av.
22 Sycamore Canyon Bl. & Eastridge Av.
23 Sycamore Canyon Bl. & Cottonwood Av.
24 Sycamore Canyon Bl. /Meridian Pkwy. & Alessandro Bl.
25 Meridian Pkwy. & Cactus Av.
Future Intersection
Future Intersection
Future Intersection
= Traffic Signal
= All Way Stop
4 = Number of Lanes
D = Divided
U = Undivided
DEF = Defacto Right Turn
RTO = Right Turn Overlap
= Free Right Turn
N

RA-7.8 Cont.


26 Meridian Pkwy. & Van Buren Bl.
27 Innovation Dr. & Cactus Av.
28 I-215 SB Ramps & Alessandro Bl.
29 I-215 NB Ramps & Alessandro Bl.
30 I-215 SB Ramps & Cactus Av.
31 I-215 NB Ramps & Cactus Av.
32 I-215 SB Ramps & Van Buren Bl.
33 I-215 NB Ramps & Van Buren Bl.
34 Old 215 Frontage Rd. & Alessandro Bl.
35 Day St. & Alessandro Bl.
36 Elsworth St./ March ARB & Cactus Av.
37 Frederic St. & Cactus Av.
38 Graham St./ Riverside Dr. & Cactus Av.
= Traffic Signal
4 = Number of Lanes
D = Divided
U = Undivided
DEF = Defacto Right Turn
RTO = Right Turn Overlap
= Channelized Yield
N

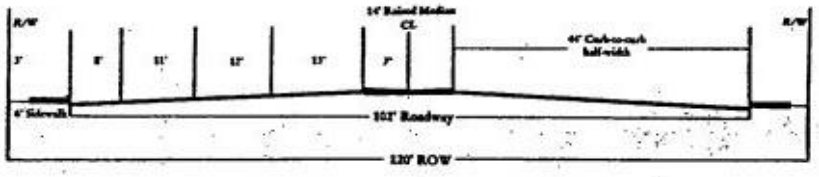
RA-7.8 Cont.

EXHIBIT 3-2: MARCH JPA GENERAL PLAN CIRCULATION ELEMENT

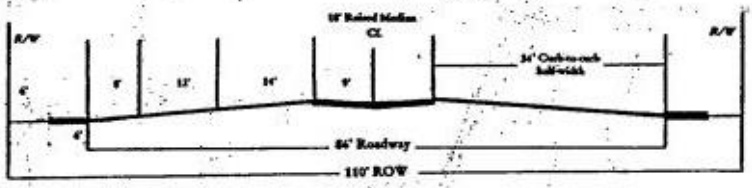


RA-7.8 Cont.

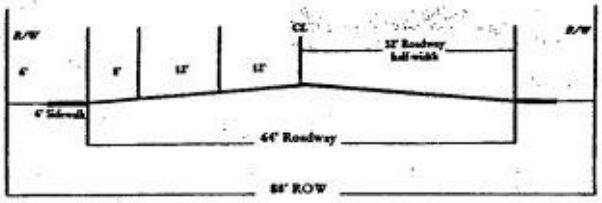
EXHIBIT 3-3: MARCH JPA GENERAL PLAN ROADWAY CROSS-SECTIONS



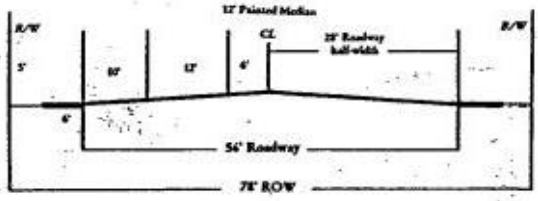
ARTERIAL HIGHWAY



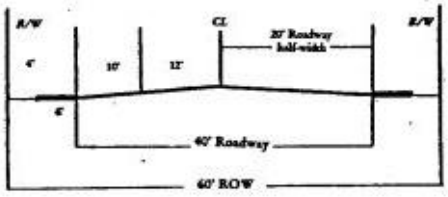
MAJOR ARTERIAL



MINOR ARTERIAL



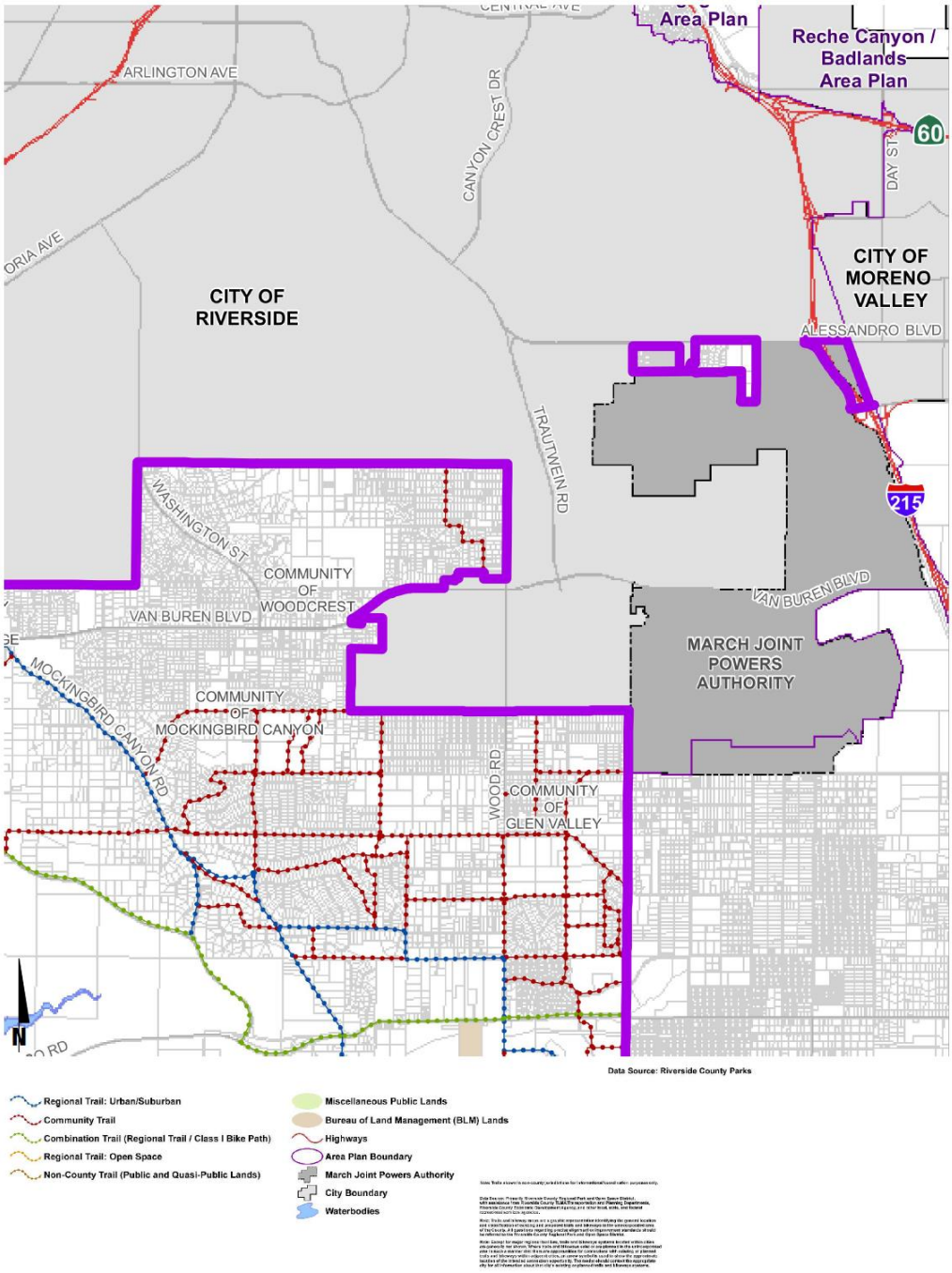
INDUSTRIAL
COLLECTOR



LOCAL STREET

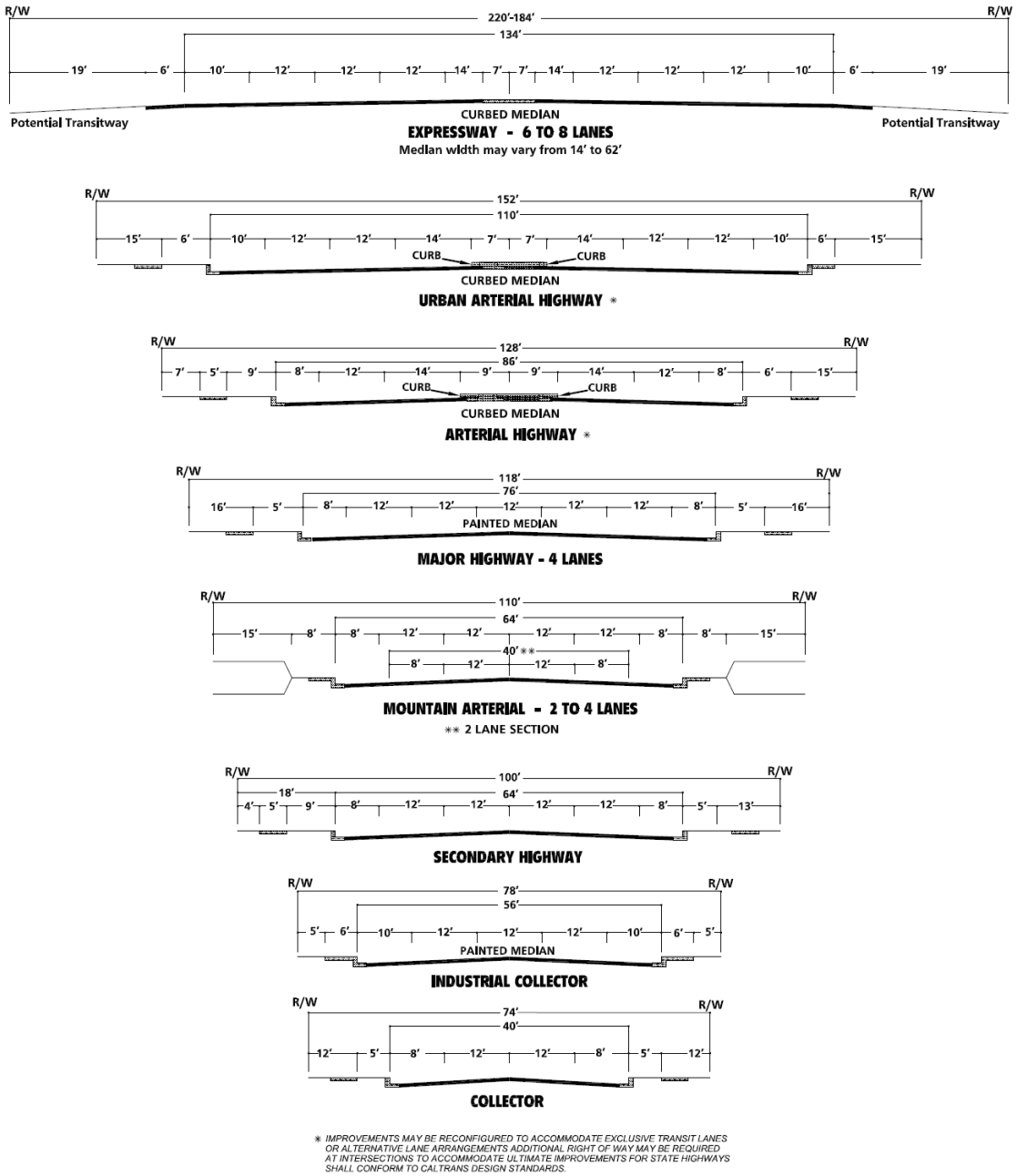
RA-7.8
Cont.

EXHIBIT 3-4: COUNTY OF RIVERSIDE GENERAL PLAN CIRCULATION ELEMENT



RA-7.8 Cont.

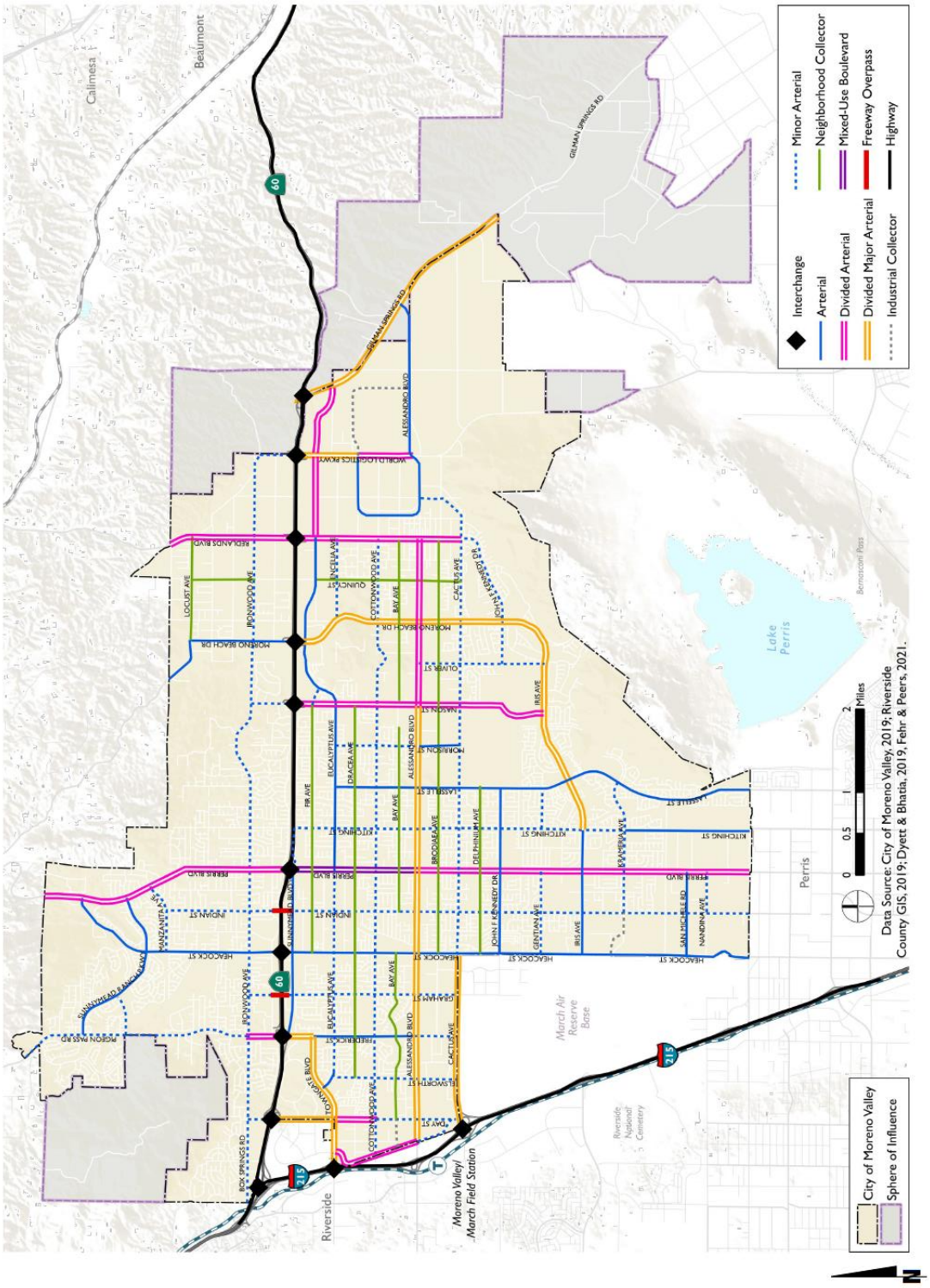
EXHIBIT 3-5: COUNTY OF RIVERSIDE GENERAL PLAN ROADWAY CROSS-SECTIONS



* *IMPROVEMENTS MAY BE RECONFIGURED TO ACCOMMODATE EXCLUSIVE TRANSIT LANES OR ALTERNATIVE LANE ARRANGEMENTS ADDITIONAL RIGHT OF WAY MAY BE REQUIRED AT INTERSECTIONS TO ACCOMMODATE ULTIMATE IMPROVEMENTS FOR STATE HIGHWAYS SHALL CONFORM TO CALTRANS DESIGN STANDARDS.*

RA-7.8
Cont.

EXHIBIT 3-6: CITY OF MORENO VALLEY GENERAL PLAN CIRCULATION ELEMENT



RA-7.8 Cont.

EXHIBIT 3-7: CITY OF MORENO VALLEY GENERAL PLAN ROADWAY CROSS-SECTIONS

STREET CLASSIFICATION AND CROSS SECTION DESIGN STANDARDS

STANDARD CITY PLAN NO.	STREET CLASS	ROW/ CURB TO CURB (FT)	TYPICAL SECTION (PARKING, TRAVEL LANES & MEDIAN) *** (FT)	PARKWAY WIDTH (FT)	THRU LANES	LOS C CAPACITY (ADT)	TRAFFIC INDEX ▲▲	MIN BUS BAY WIDTH (FT)	MIN THICKNESS AC OVER CAB (FT)
MVSI-101A-0, MVSI-101B-0	DIVIDED MAJOR ARTERIAL	134/110 (RAISED MEDIAN)	8 | 12 | 12 | 14 | 18 | 14 | 12 | 12 | 8	12 **	6 ▲	45,000	10	10	.50/1.00
	ALT.	142/110							
MVSI-102A-0, MVSI-102B-0	MODIFIED DIVIDED MAJOR ARTERIAL	120/102 (RAISED MEDIAN)	8 | 12 | 12 | 12 | 14 | 12 | 12 | 12 | 8	9 **	6 ▲	45,000	10	10	.50/1.00
	ALT.	130/102							
MVSI-103A-0, MVSI-103B-0	4-LANE DIVIDED ARTERIAL	110/86 (RAISED MEDIAN)	8 | 12 | 14 | 18 | 14 | 12 | 8	12 **	4 ▲	30,000	10	10	.50/1.00
	ALT.	114/86							
MVSI-103C-0	6-LANE DIVIDED ARTERIAL	110/86 (RAISED MEDIAN)	13 | 11 | 12 | 14 | 12 | 11 | 13	12	6	45,000	10	10	.50/1.00
MVSI-104A-0, MVSI-104B-0	ARTERIAL	100/76	8 | 12 | 12 | 12 | 12 | 12 | 8 ****	12 **	4 ▲	20,000	10	10	.50/1.00
	ALT.	104/76	6 | 12 | 13 | 14 | 13 | 12 | 6 *****			30,000			
MVSI-105A-0, MVSI-105B-0	MINOR ARTERIAL	88/64	8 | 12 | 12 | 12 | 12 | 8 6 | 11 | 10 | 10 | 10 | 11 | 6 7 | 10 | 10 | 10 | 10 | 10 | 7	12 **	4	20,000	9	10	.45/.75
MVSI-105C-0	PIGEON PASS RD.	98/74	6 | 13 | 12 | 12 | 12 | 13 | 6	12	4 ▲	20,000	9	10	.45/.75
MVSI-106A-0	INDUSTRIAL COLLECTOR	78/56	10 | 12 | 12 | 12 | 10	11	2 ▲	10,000	10	10	.50/1.00
MVSI-106B-0	COLLECTOR	66/44	8 | 14 | 14 | 8	11	2	N/A	7	N/A	.30/.50
MVSI-107A-0	LOCAL STREET	56/36	7 | 11 | 11 | 7	10	2	N/A	6	N/A	.30/.50
MVSI-107B-0	MODIFIED LOCAL STREET	50/36	7 | 11 | 11 | 7	7	2	N/A	6	N/A	.30/.50
MVSI-104C-0, MVSI-104D-0, MVSI-104E-0	SUNNYMEAD BOULEVARD	100/72	20 | 12 | 12 | 12 | 16	12/16	4	30,000	10	10	.50/1.00
		100/68	16 | 12 | 12 | 12 | 16	16	4	30,000	10	10	.50/1.00
		100/68	16 | 12 | 12 | 12 | 16 6 | 11 | 11 | 12 | 11 | 11 | 6	16	4	30,000	10	10	.50/1.00

NOT TO SCALE

RA-7.8 Cont.

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EXHIBIT 3-8: CITY OF RIVERSIDE GENERAL PLAN CIRCULATION ELEMENT

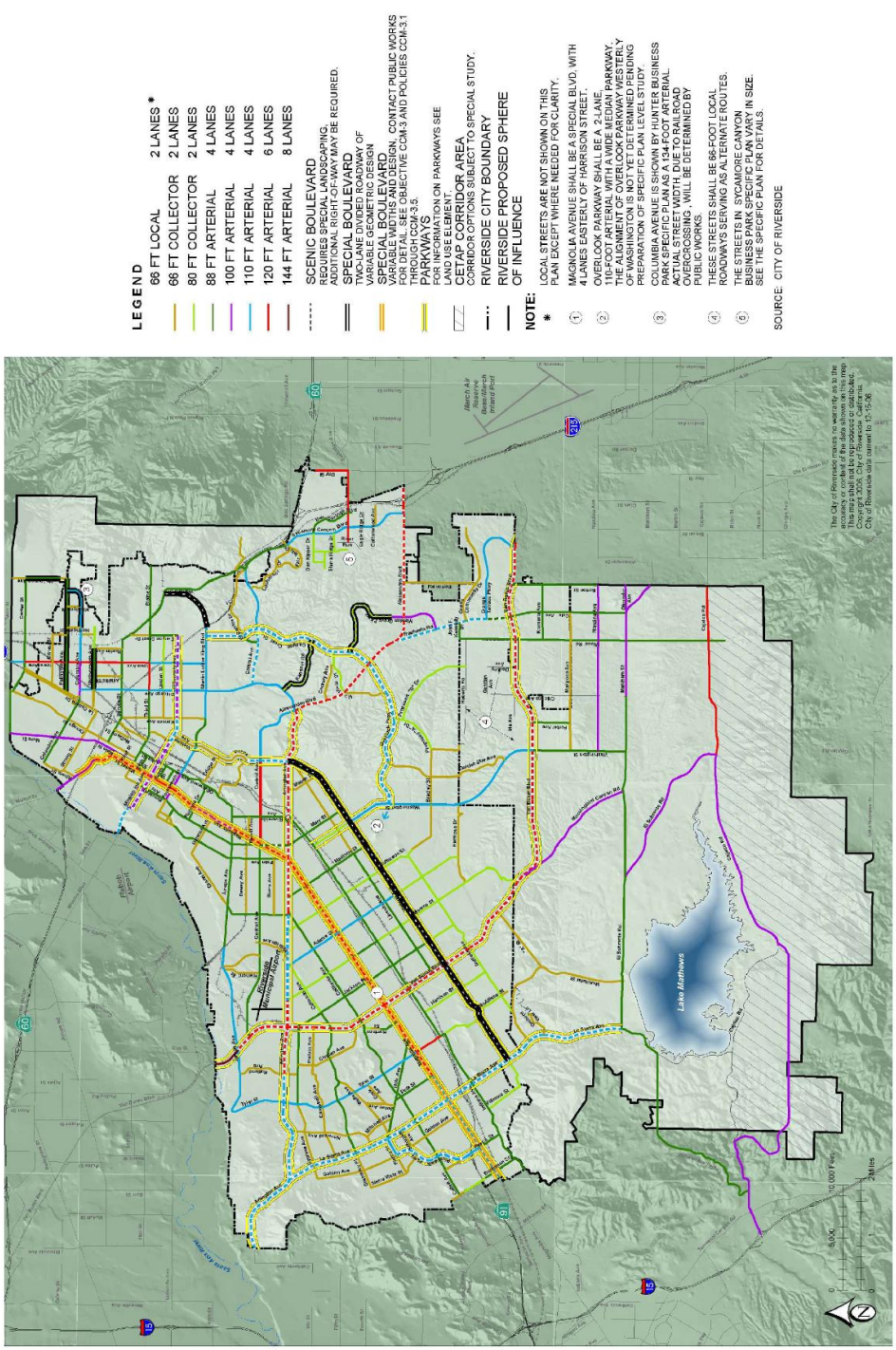
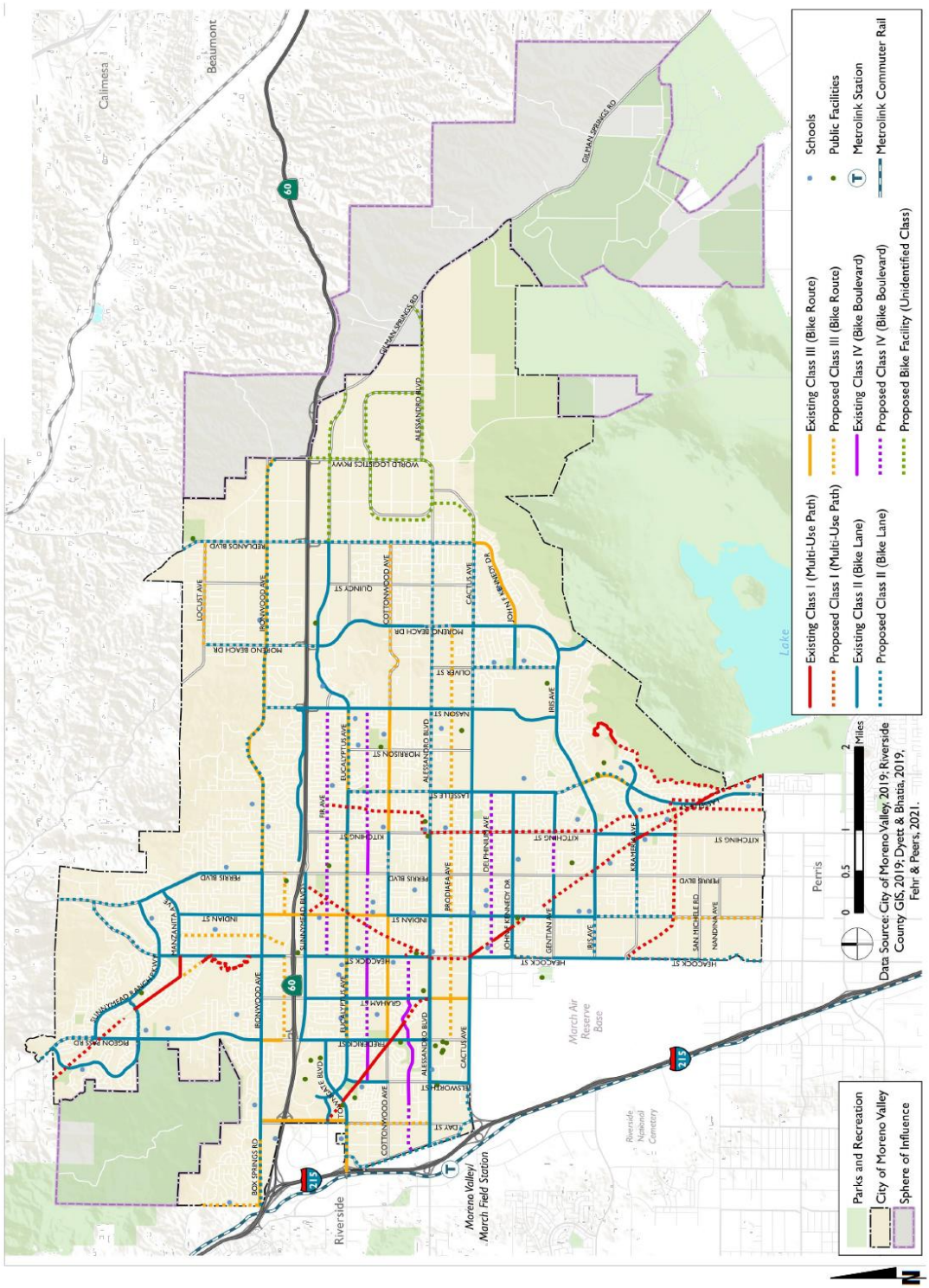


EXHIBIT 3-9: CITY OF RIVERSIDE GENERAL PLAN ROADWAY CROSS-SECTIONS

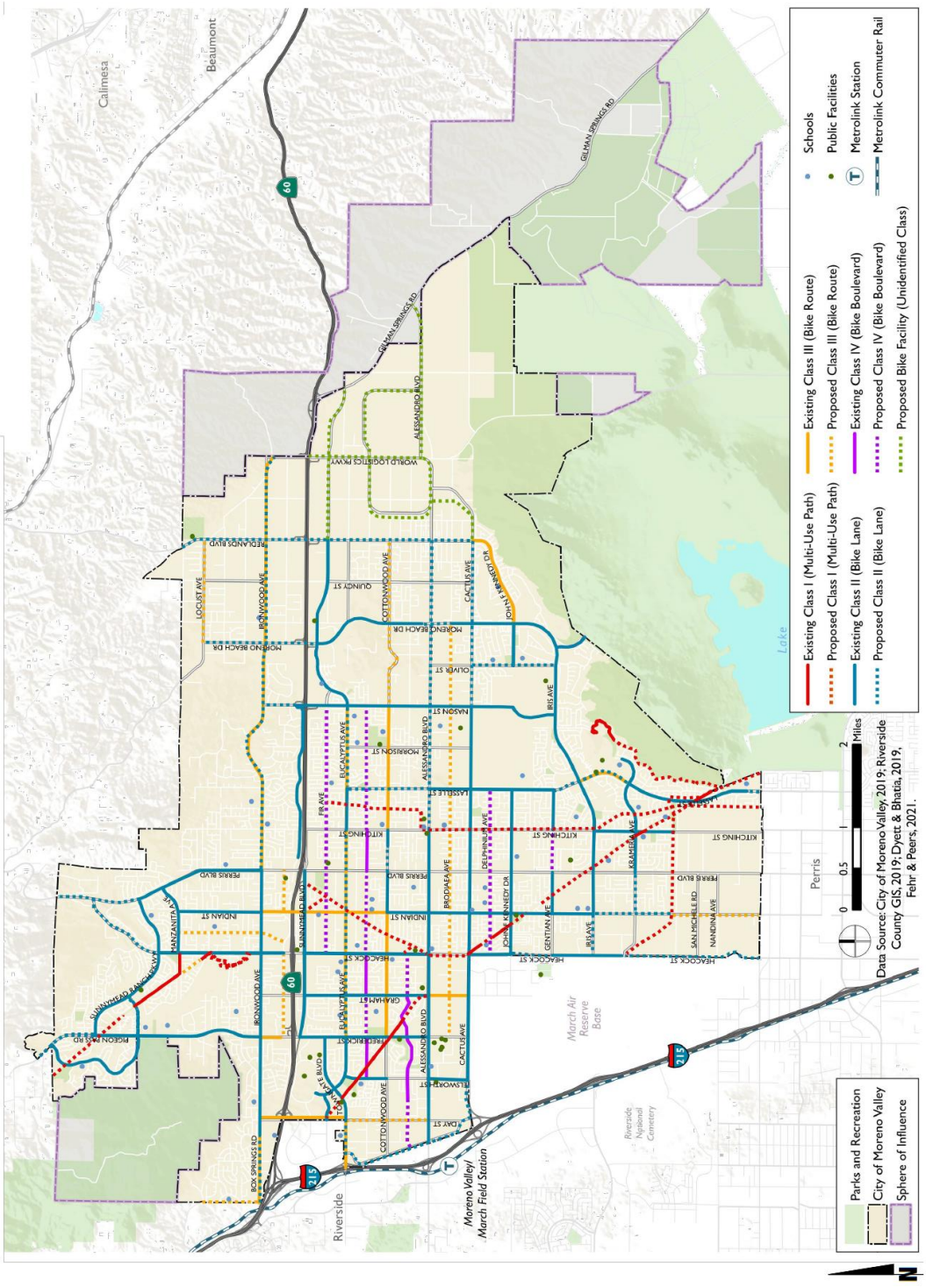
RA-7.8
Cont.

EXHIBIT 3-10: CITY OF MORENO VALLEY BIKE PLAN



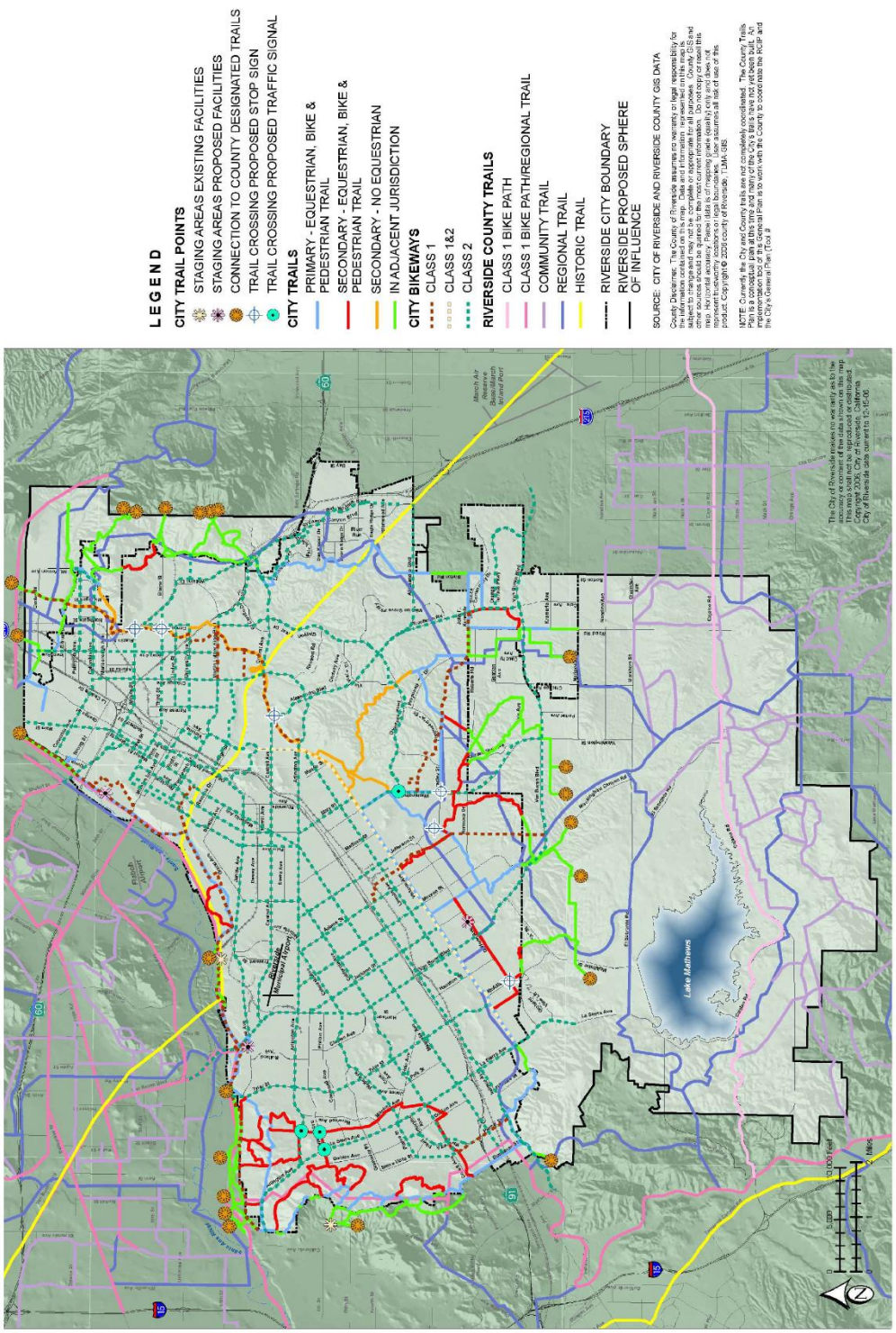
RA-7.8 Cont.

EXHIBIT 3-11: CITY OF MORENO VALLEY MASTER PLAN OF TRAILS



RA-7.8 Cont.

EXHIBIT 3-12: CITY OF RIVERSIDE PROPOSED BIKEWAYS AND TRAILS IMPROVEMENTS



RA-7.8 Cont.

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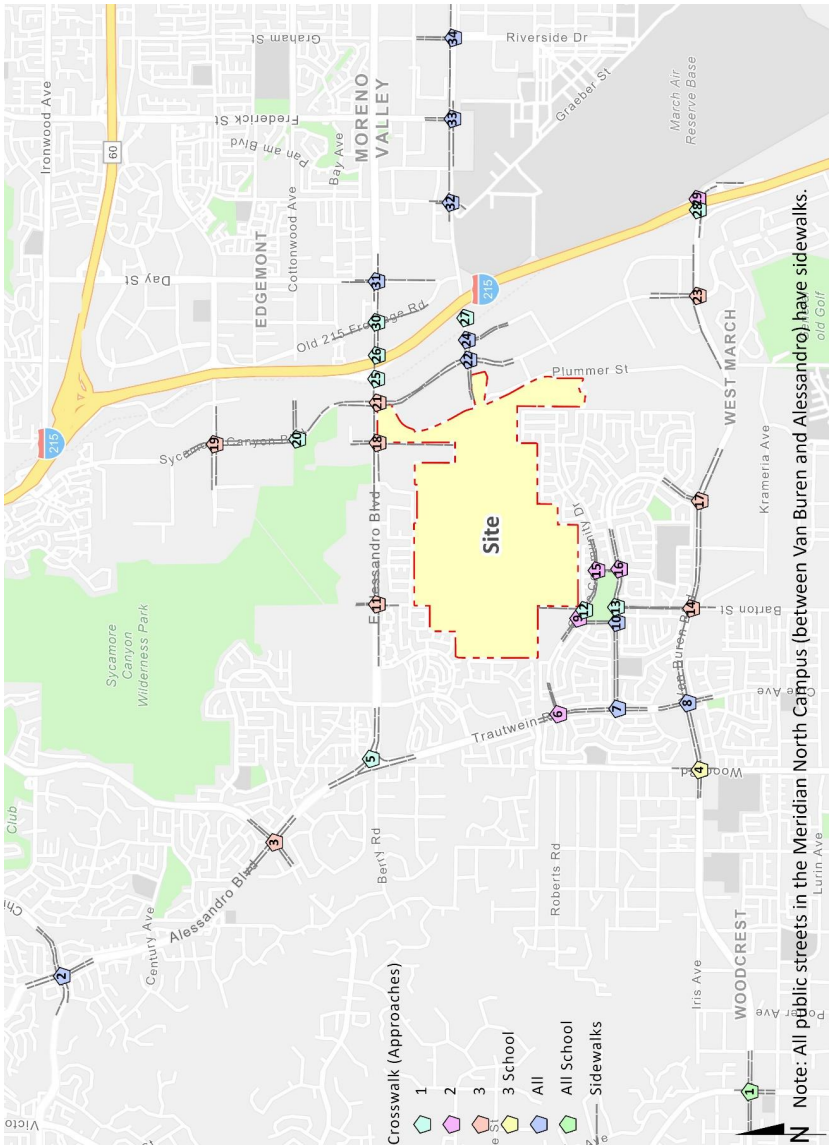
EXHIBIT 3-13: EXISTING PEDESTRIAN FACILITIES AT STUDY AREA INTERSECTIONS



3.5 TRUCK ROUTES

The March JPA designated truck route map is shown on Exhibit 3-14. Alessandro Boulevard, Meridian Parkway, Cactus Avenue, and Van Buren Boulevard are the designated March JPA truck routes within the study area. The City of Moreno Valley designated truck route map is shown on Exhibit 3-15. Alessandro Boulevard, Cactus Avenue, Elsworth Street, Frederick Street, and Graham Street are also designated truck routes within the City of Moreno Valley. The Project will extend the JPA truck routes west on Cactus Avenue and along Airman Drive, Linebacker Drive, Bunker Hill Drive, and Arclight Drive. The designated truck route maps for have been utilized to route truck traffic for the proposed Project and for future cumulative development projects throughout the study area.

3.6 TRANSIT SERVICE

The March JPA is currently served by the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. Existing transit routes in the vicinity of the study area are illustrated on Exhibit 3-16. As shown, the existing RTA Route 20 provides to service from Alessandro Boulevard to the Moreno Valley March Field Metrolink Station. RTA Route 27 also runs along Orange Terrace Parkway and Van Buren Boulevard to the south of the Project. There is an existing bus stop on Alessandro Boulevard near Brown Street. Transit service is reviewed and updated by RTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. As such, it is recommended that the Project Applicant work in conjunction with RTA to potentially extend the existing routes to accommodate bus service to the site.

RA-7.8 Cont.

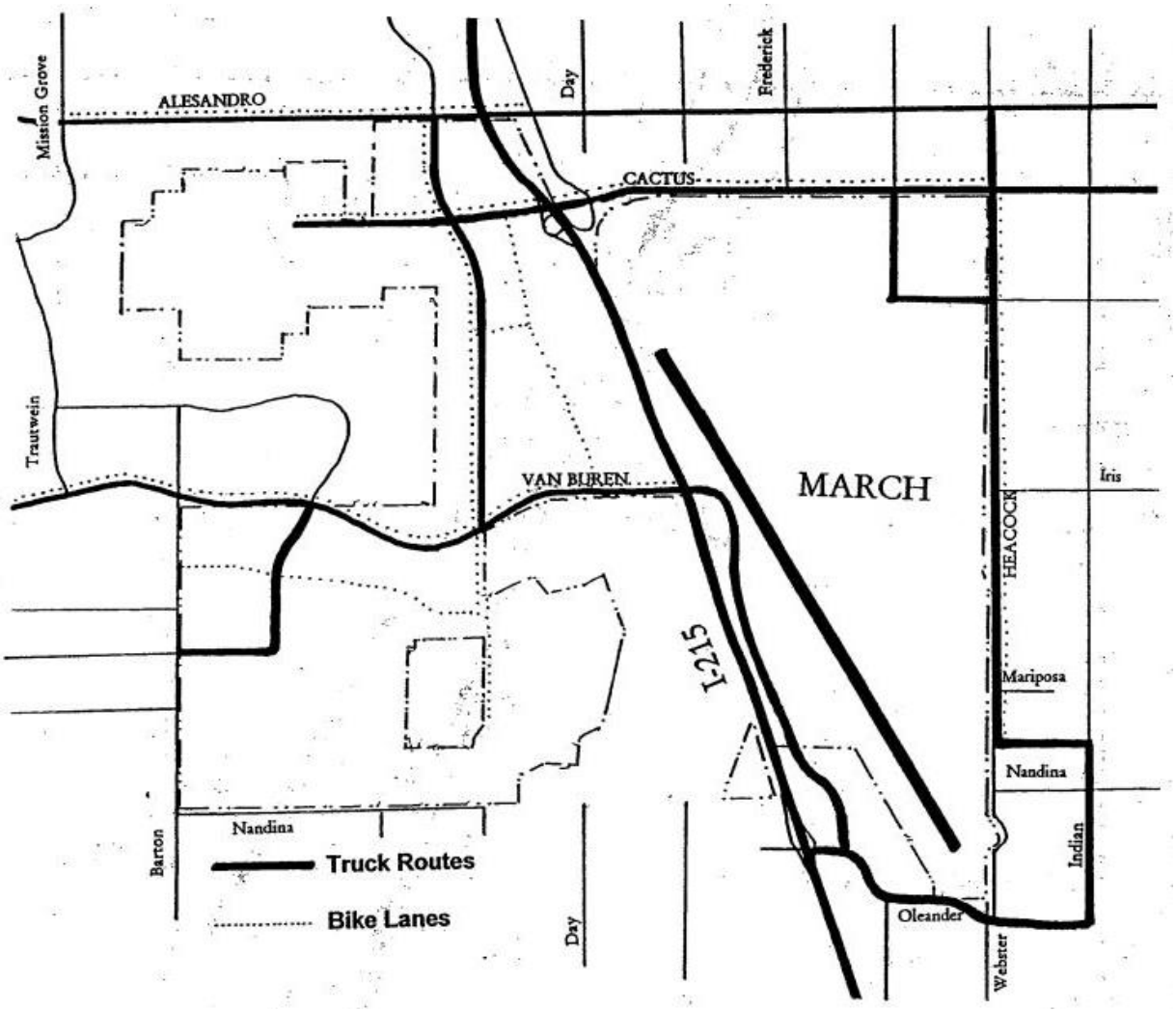
3.7 EXISTING (2021) TRAFFIC COUNTS

The AM and PM peak hour intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic data based on an adjustment of both historic (2019) traffic count data and new (2021) traffic count data collected in November 2021. The Saturday peak hour traffic counts were collected in September 2022. The following peak hours were selected for analysis:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)
- Weekend Saturday Peak Hour (peak hour between 11:00 AM and 2:00 PM)

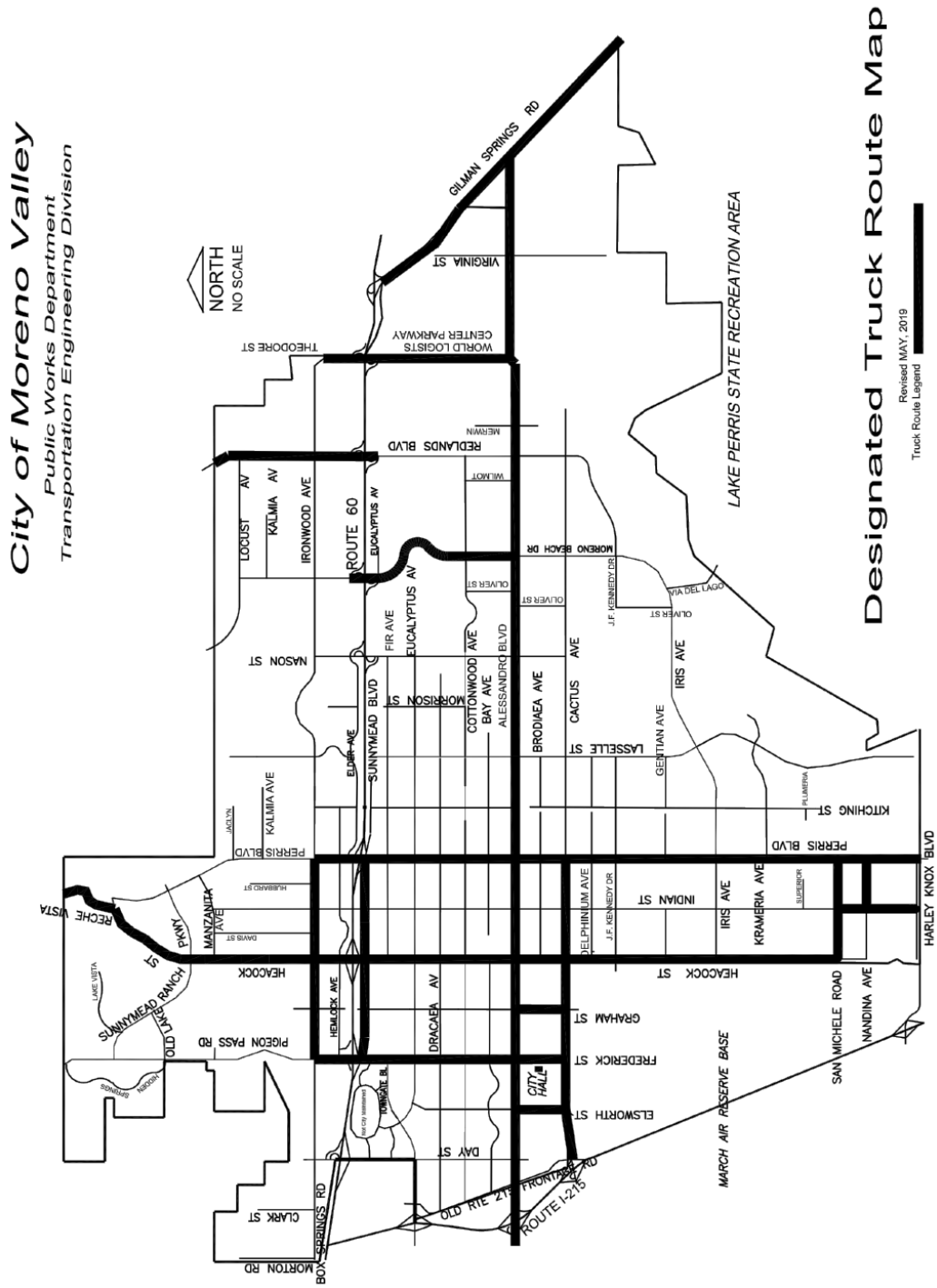
Adjusted factors were calculated based on historic (2019) traffic counts in conjunction with a 2.0% per year growth rate (compounded annually) to reflect 2021 conditions and compared to new (2021) traffic count data at the same intersections for the AM and PM peak hours. No adjustments were made to the 2022 traffic counts. There were no observations made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour routes and near-by schools were in session and operating on normal schedules. The raw manual peak hour turning movement traffic count data sheets are included in Appendix 3.1.

EXHIBIT 3-14: MARCH JPA TRUCK ROUTES



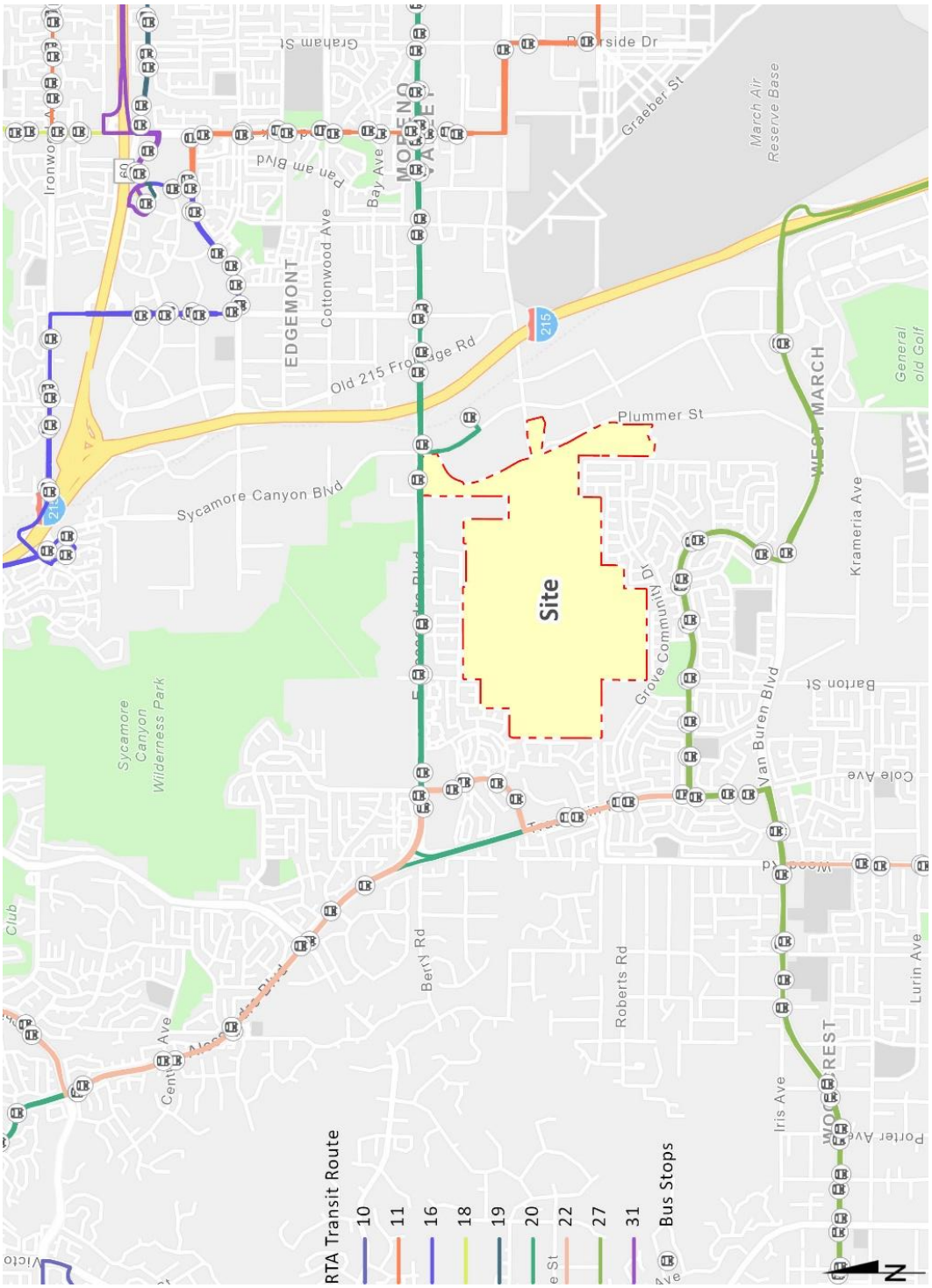
RA-7.8 Cont.

EXHIBIT 3-15: CITY OF MORENO VALLEY TRUCK ROUTES



RA-7.8
Cont.

EXHIBIT 3-16: EXISTING TRANSIT ROUTES



RA-7.8 Cont.

The traffic counts collected in November 2021 and September 2022 include the following vehicle classifications: Passenger Cars, 2-Axle Trucks, 3-Axle Trucks, and 4 or More Axle Trucks. To represent the effects large trucks, buses and recreational vehicles have on traffic flow, truck traffic has been accounted for in the analysis as a percentage of total traffic at the study area intersections. Where historic counts were unavailable, the AM and PM peak hour factors were applied to adjust the 2021 count data. Existing weekday ADT volumes are shown on Exhibit 3-17. Where actual 24-hour tube count data was not available, Existing ADT volumes were based upon factored intersection peak hour counts collected by Urban Crossroads, Inc. using the following formula for each intersection leg:

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

A comparison of the PM peak hour and daily traffic volumes of various roadway segments within the study area indicated that the peak-to-daily relationship is approximately 9.80 percent. As such, the above equation utilizing a factor of 10.20 estimates the ADT volumes on the study area roadway segments assuming a peak-to-daily relationship of approximately 9.8 percent (i.e., 1/0.09802 = 10.20) and was assumed to sufficiently estimate average daily traffic (ADT) volumes for planning-level analyses. Existing weekday AM and weekday PM peak hour intersection volumes are shown on Exhibit 3-17. Existing weekend Saturday peak hour intersection volumes are shown on Exhibit 3-18.

For the purposes of this analysis, it is proposed that the actual vehicles be utilized in order to reflect the effects of heavy trucks most accurately in the analysis. Trucks will be accounted for in the analysis as a percentage of total traffic, which will be input into the analysis software (Synchro 11). As such, trip generation is reflected in actual vehicles only and not in passenger car equivalent (PCE).

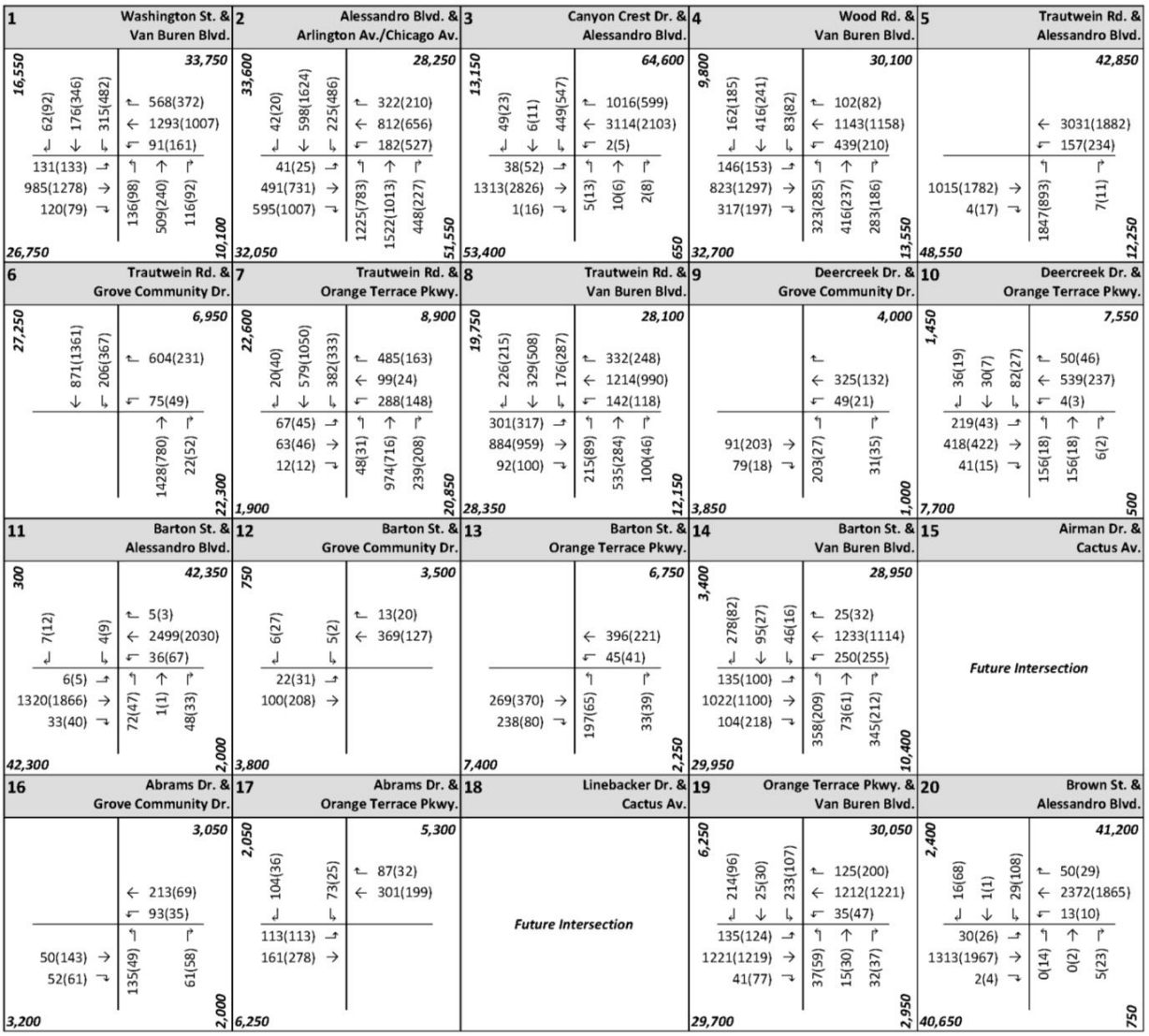
RA-7.8 Cont.

3.8 INTERSECTION OPERATIONS ANALYSIS

Existing peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2.2 *Intersection Capacity Analysis* of this report. The intersection operations analysis results are summarized in Table 3-1, which indicates that the study area intersections are currently operating at an acceptable LOS during the peak hours, with the exception of the following intersections:

- Alessandro Bl. & Arlington Av./Chicago Av. (#2) – LOS E AM peak hour; LOS F PM peak hour
- Trautwein Rd. & Alessandro Bl. (#5) – LOS F AM peak hour only
- Deercreek Dr. & Orange Terrace Pkwy. (#10) – LOS F AM peak hour only
- Barton St. & Orange Terrace Pkwy. (#13) – LOS F AM and Saturday peak hours
- Barton St. & Van Buren Bl. (#14) – LOS E AM peak hour only
- Meridian Pkwy. & Alessandro Bl. (#24) – LOS F AM peak hour only
- I-215 NB Ramps & Alessandro Bl. (#29) – LOS F AM peak hour only
- I-215 NB Ramps & Cactus Av. (#31) – LOS E AM peak hour only
- Elsworth St. & Cactus Av. (#36) – LOS F AM peak hour; LOS E PM peak hour

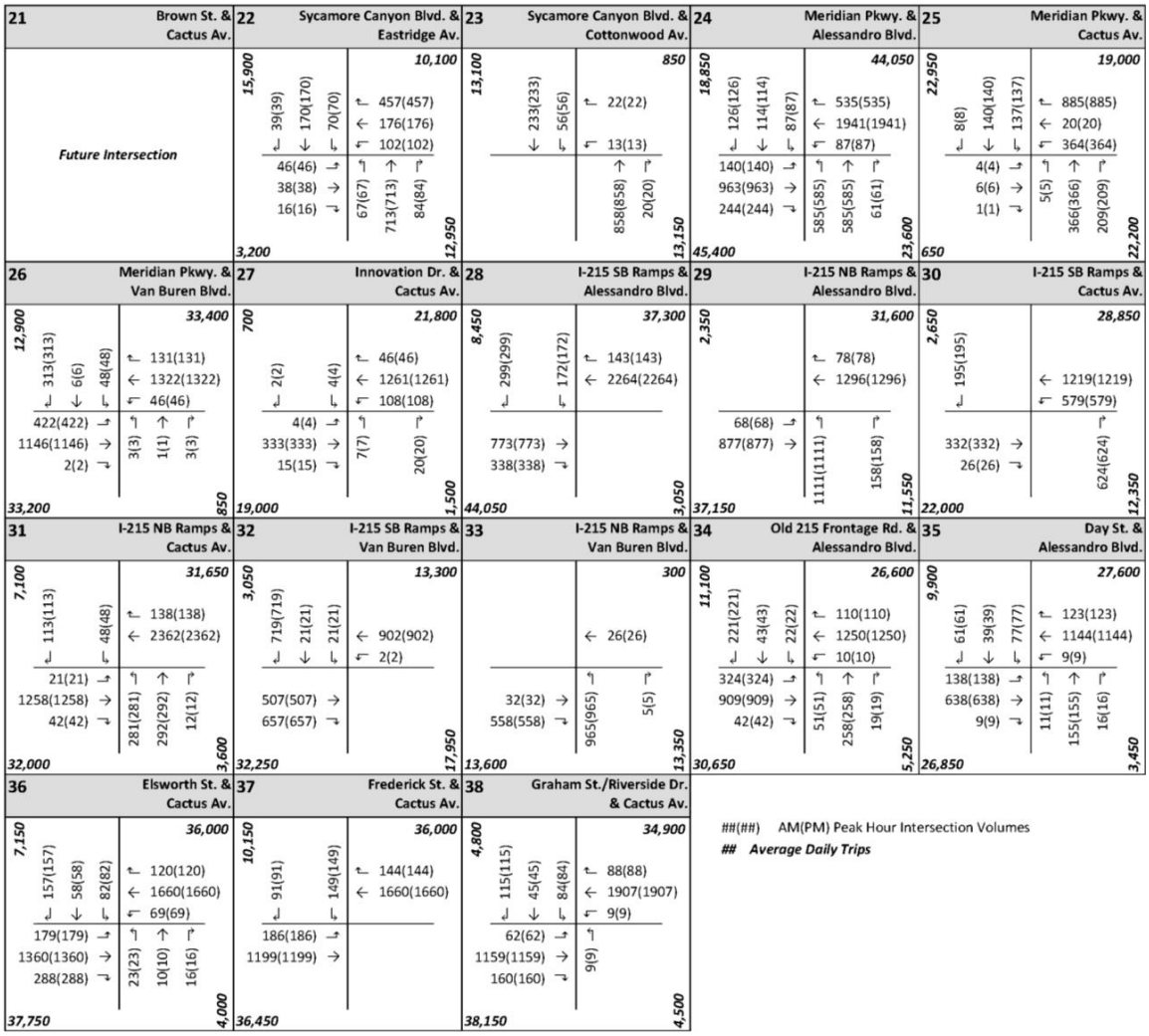
EXHIBIT 3-17: EXISTING (2021) WEEKDAY TRAFFIC VOLUMES



##(##) AM(PM) Peak Hour Intersection Volumes

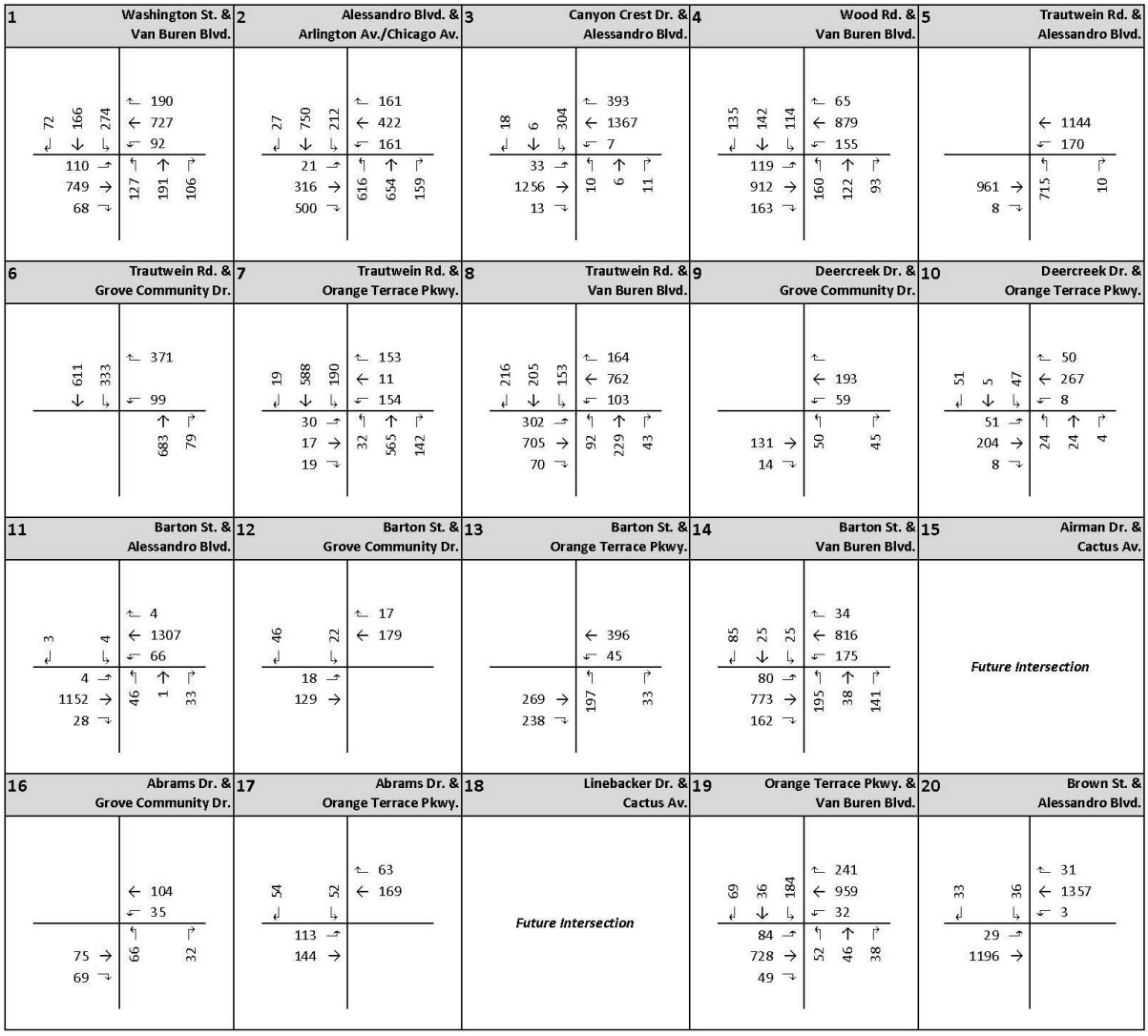
Average Daily Trips

RA-7.8 Cont.


21 Brown St. & Cactus Av.
Future Intersection
22 Sycamore Canyon Blvd. & Eastridge Av.
15,900
39(39) 170(170) 70(70)
46(46)
38(38)
16(16)
67(67) 713(713) 84(84)
10,100
457(457)
176(176)
102(102)
3,200
12,950
23 Sycamore Canyon Blvd. & Cottonwood Av.
13,100
233(233) 56(56)
858(858) 20(20)
22(22)
13(13)
850
45,400
13,150
24 Meridian Pkwy. & Alessandro Blvd.
18,850
126(126) 114(114) 87(87)
140(140)
963(963)
244(244)
585(585) 585(585) 61(61)
44,050
535(535)
1941(1941)
87(87)
650
23,600
25 Meridian Pkwy. & Cactus Av.
22,950
8(8) 140(140) 137(137)
4(4)
6(6)
1(1)
5(5) 366(366) 209(209)
19,000
885(885)
20(20)
364(364)
22,200
26 Meridian Pkwy. & Van Buren Blvd.
12,900
313(313) 6(6) 48(48)
422(422)
1146(1146)
2(2)
3(3) 1(1) 3(3)
33,400
131(131)
1322(1322)
46(46)
33,200
850
27 Innovation Dr. & Cactus Av.
700
2(2) 4(4)
4(4)
333(333)
15(15)
7(7) 20(20)
21,800
46(46)
1261(1261)
108(108)
19,000
1,500
28 I-215 SB Ramps & Alessandro Blvd.
8,450
299(299) 172(172)
773(773)
338(338)
37,300
143(143)
2264(2264)
44,050
3,050
29 I-215 NB Ramps & Alessandro Blvd.
2,350
68(68)
877(877)
1111(1111) 158(158)
31,600
78(78)
1296(1296)
37,150
11,550
30 I-215 SB Ramps & Cactus Av.
2,650
195(195)
332(332)
26(26)
28,850
1219(1219)
579(579)
624(624)
22,000
12,350
31 I-215 NB Ramps & Cactus Av.
7,100
113(113) 48(48)
21(21)
1258(1258)
42(42)
281(281) 292(292) 12(12)
31,650
138(138)
2362(2362)
32,000
3,600
32 I-215 SB Ramps & Van Buren Blvd.
3,050
719(719) 21(21) 21(21)
507(507)
657(657)
13,300
902(902)
2(2)
32,250
17,950
33 I-215 NB Ramps & Van Buren Blvd.
32(32)
558(558)
965(965) 5(5)
300
26(26)
13,600
13,350
34 Old 215 Frontage Rd. & Alessandro Blvd.
11,100
221(221) 43(43) 22(22)
324(324)
909(909)
42(42)
51(51) 258(258) 19(19)
26,600
110(110)
1250(1250)
10(10)
30,650
5,250
35 Day St. & Alessandro Blvd.
9,900
61(61) 39(39) 77(77)
138(138)
638(638)
9(9)
11(11) 155(155) 16(16)
27,600
123(123)
1144(1144)
9(9)
26,850
3,450
36 Elsworth St. & Cactus Av.
7,150
157(157) 58(58) 82(82)
179(179)
1360(1360)
288(288)
23(23) 10(10) 16(16)
36,000
120(120)
1660(1660)
69(69)
37,750
4,000
37 Frederick St. & Cactus Av.
10,150
91(91) 149(149)
186(186)
1199(1199)
36,000
144(144)
1660(1660)
36,450
38 Graham St./Riverside Dr. & Cactus Av.
4,800
115(115) 45(45) 84(84)
62(62)
1159(1159)
160(160)
9(9)
34,900
88(88)
1907(1907)
9(9)
38,150
4,500
##(##) AM(PM) Peak Hour Intersection Volumes
Average Daily Trips

RA-7.8 Cont.

EXHIBIT 3-18: EXISTING (2021) WEEKEND TRAFFIC VOLUMES



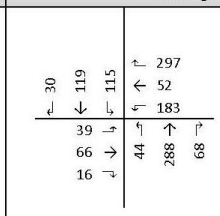
Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

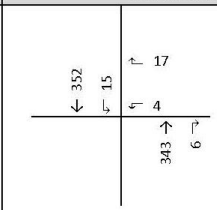
21 Brown St. & Cactus Av.

Future Intersection

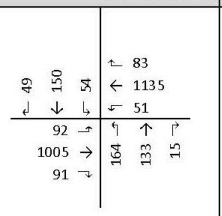
22 Sycamore Canyon Blvd. & Eastridge Av.



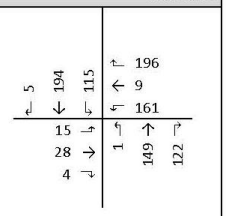
23 Sycamore Canyon Blvd. & Cottonwood Av.



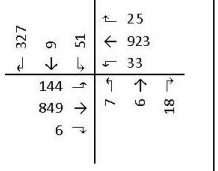
24 Meridian Pkwy. & Alessandro Blvd.



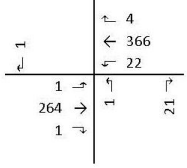
25 Meridian Pkwy. & Cactus Av.



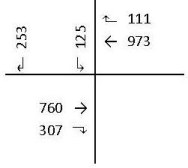
26 Meridian Pkwy. & Van Buren Blvd.



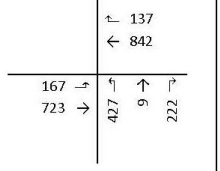
27 Innovation Dr. & Cactus Av.



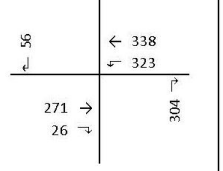
28 I-215 SB Ramps & Alessandro Blvd.



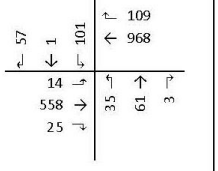
29 I-215 NB Ramps & Alessandro Blvd.



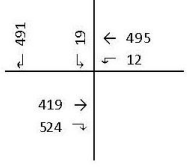
30 I-215 SB Ramps & Cactus Av.



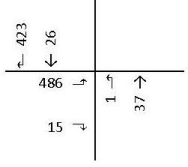
31 I-215 NB Ramps & Cactus Av.



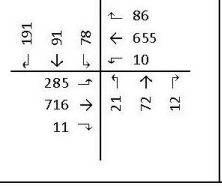
32 I-215 SB Ramps & Van Buren Blvd.



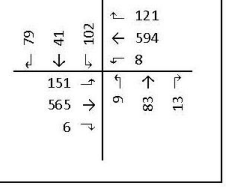
33 I-215 NB Ramps & Van Buren Blvd.



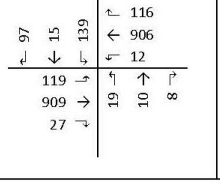
34 Old 215 Frontage Rd. & Alessandro Blvd.



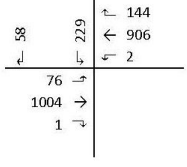
35 Day St. & Alessandro Blvd.



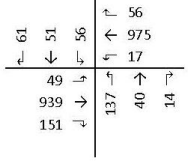
36 Elsworth St. & Cactus Av.



37 Frederick St. & Cactus Av.



38 Graham St./Riverside Dr. & Cactus Av.



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

TABLE 3-1: INTERSECTION ANALYSIS FOR EXISTING (2021) CONDITIONS

#	Intersection	Traffic Control[2]	Delay[1] (secs.) AM	PM	SAT	Level of Service AM	PM	SAT
1	Washington St. & Van Buren Blvd.	TS	40.4	39.7	22.8	D	D	C
2	Alessandro Blvd. & Arlington Av./Chicago Av.	TS	**75.0**	**82.2**	22.7	**E**	**F**	C
3	Alessandro Blvd. & Canyon Crest Dr./Overlook Pkwy.	TS	42.2	46.1	14.9	D	D	B
4	Wood Rd. & Van Buren Blvd.	TS	50.4	37.0	24.9	D	D	C
5	Trautwein Rd. & Alessandro Blvd.	TS	**89.4**	19.9	13.1	**F**	B	B
6	Trautwein Rd. & Grove Community Dr.	TS	22.1	10.4	12.4	C	B	B
7	Trautwein Rd. & Orange Terrace Pkwy.	TS	46.0	21.3	18.8	D	C	B
8	Trautwein Rd. & Van Buren Blvd.	TS	34.9	27.7	20.9	C	C	C
9	Deercreek Dr. & Grove Community Dr.	AWS	17.2	9.2	9.6	C	A	A
10	Deercreek Dr. & Orange Terrace Pkwy.	AWS	**51.8**	9.9	9.6	**F**	A	A
11	Barton St. & Alessandro Blvd.	TS	31.2	8.4	7.6	C	A	A
12	Barton St. & Grove Community Dr.	CSS	13.2	9.4	11.0	B	A	B
13	Barton St. & Orange Terrace Pkwy.	CSS	**68.8**	14.3	**45.0**	**F**	B	**E**
14	Barton St. & Van Buren Blvd.	TS	**61.2**	30.3	21.2	**E**	C	C
15	Airman Dr. & Cactus Av.	**AWS**	Future Intersection					
16	Abrams Dr. & Grove Community Dr.	AWS	10.9	8.5	8.4	B	A	A
17	Abrams Dr. & Orange Terrace Pkwy.	AWS	13.1	8.6	8.9	B	A	A
18	Linebacker Dr. & Cactus Av.	**TS**	Future Intersection					
19	Orange Terrace Pkwy. & Van Buren Blvd.	TS	18.3	17.9	17.7	B	B	B
20	Brown St. & Alessandro Blvd.	TS	9.2	13.7	5.0	A	B	A
21	Brown St. & Cactus Av.	**CSS**	Future Intersection					
22	Sycamore Canyon Blvd. & Eastridge Av.	TS	28.2	19.8	17.4	C	B	B
23	Sycamore Canyon Blvd. & Cottonwood Av.	TS	9.3	7.0	5.8	A	A	A
24	Meridian Pkwy. & Alessandro Blvd.	TS	**89.6**	41.8	19.6	**F**	D	B
25	Meridian Pkwy. & Cactus Av.	TS	29.5	30.8	16.6	C	C	B
26	Meridian Pkwy. & Van Buren Blvd.	TS	15.4	26.3	12.9	B	C	B
27	Innovation Dr. & Cactus Av.	TS	6.3	8.3	4.5	A	A	A
28	I-215 SB Ramps & Alessandro Blvd.	TS	8.5	9.4	6.3	A	A	A
29	I-215 NB Ramps & Alessandro Blvd.	TS	**81.6**	20.7	22.4	**F**	C	C
30	I-215 SB Ramps & Cactus Av.	TS	4.7	5.9	5.2	A	A	A
31	I-215 NB Ramps & Cactus Av.	TS	**59.0**	19.9	7.0	**E**	B	A
32	I-215 SB Ramps & Van Buren Blvd.	TS	21.5	16.9	10.9	C	B	B
33	I-215 NB Ramps & Van Buren Blvd.	TS	6.4	6.1	4.2	A	A	A
34	Old 215 Frontage Rd. & Alessandro Blvd.	TS	37.9	19.3	17.8	D	B	B
35	Day St. & Alessandro Blvd.	TS	15.0	17.1	12.5	B	B	B
36	Elsworth St. & Cactus Av.	TS	**94.0**	**75.0**	42.6	**F**	**E**	D
37	Frederick St. & Cactus Av.	TS	26.0	12.8	9.9	C	B	A
38	Graham St./Riverside Dr. & Cactus Av.	TS	14.7	15.0	16.8	B	B	B

* **BOLD** = Unacceptable LOS

[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

[2] CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal

RA-7.8 Cont.

The intersection operations analysis worksheets are included in Appendix 3.2 of this TA.

3.9 EXISTING (2021) CONDITIONS ROADWAY SEGMENT CAPACITY ANALYSIS

The roadway segment capacities utilized for the purposes of this analysis are approximate figures only; and are used at the General Plan level to assist in determining the roadway functional classification (number of through lanes) needed to meet traffic demand. Table 3-2 provides a summary of the Existing (2021) conditions roadway segment capacity analysis based on the applicable roadway segment capacities. As shown in Table 3-2, the following study area roadway segment is currently operating at an unacceptable LOS based on the applicable planning level daily roadway capacities:

- Meridian Pkwy. from Alessandro Bl. to Cactus Av. (#14) – LOS E

TABLE 3-2: ROADWAY SEGMENT CAPACITY ANALYSIS FOR EXISTING (2021) CONDITIONS

#	Roadway	Segment Limits	Roadway Section	LOS Capacity[1]	Existing			Acceptable LOS
					2021	V/C[2]	LOS[3]	
1	Alessandro Bl.	Trautwein Rd. to Mission Grove Pkwy.	6D	57,250	42,859	0.75	C	D
2		Mission Grove Pkwy. to Barton St.	6D	57,250	42,275	0.74	C	D
3		Barton St. to Brown St.	6D	57,250	42,360	0.74	C	D
4		Brown St. to Meridian Pkwy.	6D	57,250	41,193	0.72	C	D
5		Meridian Pkwy. to I-215 Freeway	6D	57,250	44,072	0.77	C	D
6	Cactus Av.	Airman Dr. to Linebacker Dr.	2U	13,000	0	0.00	A	D
7		Linebacker Dr. to Brown St.	4D	25,900	0	0.00	A	D
8		Brown St. to Meridian Pkwy.	4D	25,900	0	0.00	A	D
9		Meridian Pkwy. to I-215 Freeway	6D	51,150	19,011	0.37	A	D
10	Barton St.	Alessandro Bl. to Cactus Av. (EVA)	2U	13,000	1,995	0.15	A	D
11		Cactus Av. (EVA) to Grove Community Dr.	2U	13,000	775	0.06	A	D
12	Brown St.	Alessandro Bl. to Cactus Av.	2D	13,000	776	0.06	A	D
13	Sycamore Canyon Bl.	Cottonwood Av. to Alessandro Bl.	4D	33,000	13,151	0.40	A	D
14	Meridian Pkwy.	Alessandro Bl. to Cactus Av.	4D	25,900	**23,605**	**0.91**	**E**	D
15		Cactus Av. to Van Buren Bl.	4D	25,900	22,215	0.86	D	D

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

[1] These maximum roadway capacities are based on the applicable agency's thresholds.

[2] V/C = Volume to Capacity Ratio

[3] LOS = Level of Service

RA-7.8 Cont.

3.10 TRAFFIC SIGNAL WARRANTS ANALYSIS

The following unsignalized study area intersections currently meet a peak hour volume-based traffic signal warrant:

- Deercreek Dr. & Orange Terrace Pkwy. (#10)
- Barton St. & Orange Terrace Pkwy. (#13)

Existing traffic signal warrant analysis worksheets are included in Appendix 3.3.

3.11 OFF-RAMP QUEUING ANALYSIS

A queuing analysis was performed for the off-ramps at the I-215 Freeway at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard interchanges, to assess vehicle queues for the off ramps that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the I-215 Freeway mainline. Queuing analysis findings are presented in Table 3-3. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown in Table 3-3, there are no movements that are currently experiencing queuing issues during the weekday AM, weekday PM, or weekend Saturday peak 95th percentile traffic flows based on the analysis. Worksheets for Existing (2021) traffic conditions off-ramp queuing analysis are provided in Appendix 3.4.

TABLE 3-3: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR EXISTING (2021) CONDITIONS

Intersection	Movement	Available Stacking Distance (Feet)	95th Percentile Queue (Feet)[3]			Acceptable?[1]		
			AM Peak	PM Peak	SAT Peak	AM	PM	SAT
I-215 SB Ramps & Alessandro Blvd. (#28)	SBL	525	132	191	68	Yes	Yes	Yes
	SBL/R	1,540	124	178	52	Yes	Yes	Yes
	SBR	525	118	166	48	Yes	Yes	Yes
I-215 NB Ramps & Alessandro Blvd. (#29)	NBL	450	572 [2 3]	342	155	Yes	Yes	Yes
	NBL/T/R	1,345	520 [2]	403 [2]	158	Yes	Yes	Yes
	NBR	450	41	125	64	Yes	Yes	Yes
I-215 SB Ramps & Cactus Av. (#30)	SBR	1,115	155	157	0	Yes	Yes	Yes
	NBR	1,850	18	57	0	Yes	Yes	Yes
I-215 NB Ramps & Cactus Av. (#31)	NBL	145	452 [2 3]	105	34	Yes	Yes	Yes
	NBT/R	1,650	432 [2]	181	78	Yes	Yes	Yes
I-215 SB Ramps & Van Buren Blvd. (#32)	SBL/T	1,510	38	121 [2]	24	Yes	Yes	Yes
	SBR	1,450	233	34	42	Yes	Yes	Yes
I-215 NB Ramps & Van Buren Blvd. (#33)	NBL	1,560	98	62	0	Yes	Yes	Yes
	NBR	580	2	0	0	Yes	Yes	Yes

[1] Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

[2] 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

[3] Although 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent through lane has sufficient storage to accommodate any spillover without spilling back and affecting the I-215 Freeway mainline.

RA-7.8 Cont.

4 PROJECTED FUTURE TRAFFIC

This section presents the traffic volumes estimated to be generated by the Project's trip assignment onto the study area roadway network. Access to the proposed Project will be provided via three roadways: Cactus Avenue, Brown Street, and Barton Street. Cactus Avenue will serve as the primary roadway, connecting with I-215 located approximately one mile east of the Project. Brown Street will serve as a secondary access to the industrial center, connecting with Alessandro Boulevard to the north. Barton Street will be completed between the existing termini to the south of Alessandro Boulevard and north of Orange Terrace Parkway. An emergency access only connection will be maintained between Cactus Avenue's terminus at Airman Drive and Barton Street. The mixed-use land use will only take access via Cactus Avenue to the east, and will not take access via Barton Street. For the purposes of this TA, the proposed Project has been evaluated in a single phase with an anticipated Opening Year of 2029. Regional access to the Project site will be available from the I-215 Freeway via the Cactus Avenue interchange although the Project could also access the I-215 Freeway via Alessandro Boulevard and Van Buren Boulevard.

4.1 TRIP GENERATION

Trip generation represents the amount of traffic that is attracted and produced by a development and is based upon the specific land uses planned for a given project.

4.1.1 DEVELOPMENT OF TRIP GENERATION RATES

RA-7.8 Cont.

Trip generation rates for the Project are shown in Table 4-1. In order to develop the traffic characteristics of the proposed Project, trip-generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021), the High Cube Warehouse Trip Generation Study (WSP, January 2019), and the San Diego Association of Governments (SANDAG) (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002) were used to estimate the Project's trip generation. (6) (7) (8) For purposes of the Traffic Analysis, the following ITE land use code and vehicle mix will be utilized for the Industrial Area:

- High-Cube Fulfillment Center Warehouse has been used to derive site specific trip generation estimates for up to 3,012,710 square feet of the proposed Project. The ITE Trip Generation Manual (2021) has trip generation rates for high-cube fulfillment center use for both non-sort and sort facilities (ITE land use code 155). While there is sufficient data to support use of the trip generation rates for non-sort facilities, the sort-facility rate appears to be unreliable because it is based on limited data (i.e., one to two surveyed sites). The proposed Project is speculative and whether a non-sort or sort facility end-user would occupy the buildings is not known at this time. Lastly, the ITE Trip Generation Manual recommends the use of local data sources where available. As such, the best available source for high-cube fulfilment center use would be the trip-generation statistics published in the High-Cube Warehouse Trip Generation Study (WSP, January 29, 2019) which was commissioned by the Western Riverside Council of Governments (WRCOG) in support of the Transportation Uniform Mitigation Fee (TUMF) update in the County of Riverside. The WSP trip generation rates were published in January 2019 and are based on data collected at 11 local

high-cube fulfillment center sites located throughout Southern California (specifically Riverside County and San Bernardino County). However, the WSP study does not include a split for inbound and outbound vehicles, as such, the inbound and outbound splits per the ITE Trip Generation Manual for Land Use Code 154 (high-cube transload/short-term storage) have been utilized. These rates are consistent with the rates used for other similar projects through Riverside and San Bernardino Counties. The WSP trip generation rates for high-cube fulfillment center use are slightly more conservative than the latest non-sort facility rate provided in the ITE Trip Generation Manual. It should be noted, Saturday peak hour trip generation rates are not readily available in the ITE Trip Generation Manual or the High-Cube Warehouse Trip Generation Study. As such, Saturday weekend peak hour trip generation rates were developed utilizing a ratio of the Saturday and PM peak hour trip generation rates from the Warehousing land use (ITE Land Use Code 150).

- The trip generation rates for both the Active and Public Parks are based on the trip generation rates published by SANDAG in its (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002).
- Business Park has been utilized to derive site specific trip generation for up to 1,819,697 square feet of business park uses within the Project. For the Business Park use, a blended rate has been used based on the ITE description for Business Park that the average mix is 20 to 30 percent office/commercial and 70 to 80 percent industrial/warehousing. As such, 30% of the business park area has been designated as office related uses, while the remaining 70% of the business park area has been allocated to warehousing uses. As such, the trip generation rates for ITE Land Use Code 710 (General Office) and ITE Land Use Code 150 (Warehousing) as published in the ITE Trip Generation Manual (2021) have been utilized to calculate trip generation for up to 1,819,697 square feet of business park use.
- Shopping Plaza (ITE Land Use Code 821) is a new land use category from the ITE Trip Generation Manual (2021) for shopping centers between 40,000 to 150,000 square feet. The rates for "without grocery" have been utilized to calculate the trip generation for up to 106,858 square feet within the mixed-use area of the Project.

RA-7.8 Cont.

Internal capture is a percentage reduction that can be applied to the trip generation estimates for individual land uses to account for trips internal to the site. In other words, trips may be made between commercial retail use and employees of the business park/warehouse uses and can be made either by walking or using internal roadways without using external streets. For example, employees of the business park use may visit the commercial retail use without leaving the site and are therefore considered as vehicle trips that are internal to the site. The internal capture rate for the retail, office, and restaurant uses on-site are based on the NCHRP 684 Internal Trip Capture Estimation Tool. As the project is proposed to include commercial retail uses, pass-by percentages have been obtained from the ITE Trip Generation Handbook (3rd Edition, 2017). (9)

TABLE 4-1: CALCULATED TRIP GENERATION RATES

Land Use[1]	Units[2]	ITE LU Code	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Weekday Daily	Saturday Mid-day In	Saturday Mid-day Out	Saturday Mid-day Total
Warehousing[3]	TSF	150	0.115	0.020	0.135	0.317	0.903	1.220	12.440	0.032	0.018	0.050
Passenger Cars (AM = 87.0%; PM = 85.0%; Daily = 73.0%)			0.077	0.018	0.095	0.260	0.920	1.180	11.870	0.026	0.014	0.040
Trucks (AM = 13.0%; PM = 15.0%; Daily = 27.0%)			0.032	0.008	0.040	0.009	0.031	0.040	0.570	0.006	0.004	0.010
2-Axle Trucks (AM-2.17%; PM-2.51%; Daily-4.51%)			0.005	0.001	0.007	0.001	0.005	0.007	0.095	0.001	0.001	0.002
3-Axle Trucks (AM-2.69%; PM-3.11%; Daily-5.59%)			0.007	0.002	0.008	0.002	0.006	0.008	0.118	0.001	0.001	0.002
4-Axle+ Trucks (AM-8.14%; PM-9.39%; Daily-16.90%)			0.020	0.005	0.025	0.006	0.020	0.025	0.357	0.004	0.002	0.006
High-Cube Fulfillment Center Warehouse[3,6]	TSF	--	0.094	0.028	0.122	0.046	0.119	0.165	2.129	0.004	0.002	0.007
Passenger Cars (AM = 84.4%, PM = 87.3%, Daily = 82.2%)			0.079	0.024	0.103	0.040	0.104	0.144	1.750	0.004	0.002	0.006
Trucks (AM = 15.6%, PM = 12.7%, Daily = 17.8%)			0.015	0.004	0.019	0.006	0.015	0.021	0.379	0.001	0.000	0.001
2-4 Axle Trucks			0.006	0.002	0.008	0.003	0.008	0.011	0.162	0.000	0.000	0.000
5+-Axle Trucks			0.008	0.003	0.011	0.003	0.007	0.010	0.217	0.000	0.000	0.000
High-Cube Cold Storage Warehouse (With Cold Storage)[3]	TSF	157	0.085	0.025	0.110	0.034	0.086	0.120	2.120	0.003	0.002	0.005
Passenger Cars (AM-73.0%; PM-77.0%; Daily-65.0%)			0.076	0.004	0.080	0.019	0.071	0.090	1.370	0.002	0.001	0.004
2-Axle Trucks (AM-9.37%; PM-7.98%; Daily-12.15%)			0.003	0.007	0.010	0.005	0.005	0.010	0.260	0.000	0.000	0.000
3-Axle Trucks (AM-2.97%; PM-2.53%; Daily-3.85%)			0.001	0.002	0.003	0.002	0.001	0.003	0.083	0.000	0.000	0.000
4-Axle+ Trucks (AM-14.66%; PM-12.49%; Daily-19.01%)			0.005	0.011	0.016	0.008	0.008	0.016	0.407	0.000	0.000	0.001
Trucks (AM = 28.0%, PM = 23.0%, Daily = 35.0%)			0.009	0.021	0.030	0.015	0.015	0.030	0.750	0.001	0.000	0.001
Active Park	AC	--[4]	3.25	3.25	6.50	2.25	2.25	4.50	50.00	4.44	4.81	9.26
Public Park	AC	--[4]	0.33	0.32	0.65	0.23	0.22	0.45	5.00	0.44	0.48	0.93
General Office[5]	TSF	710	Based on the ITE Fitted Curve Equation									
General Office (60.000 TSF)			1.58	0.29	1.87	0.31	1.50	1.81	12.40	0.29	0.24	0.53
General Office (324.121 TSF)			1.25	0.23	1.48	0.23	1.13	1.36	9.96	0.29	0.24	0.53
General Office (144.830 TSF)			1.40	0.25	1.65	0.27	1.29	1.56	11.06	0.29	0.24	0.53
Shopping Plaza (40-150 TSF)	TSF	821	1.07	0.66	1.73	2.54	2.65	5.19	67.52	4.72	4.54	9.26

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

[2] TSF = thousand square feet; AC = Acres

[3] Vehicle Mix Source: High Cube Warehouse Trip Generation Study, WSP, January 29, 2019.
Inbound and outbound split source: ITE Trip Generation Manual, Eleventh Edition (2021) for ITE Land Use Code 154.

[4] Trip Generation Source: SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002. For Developed and Undeveloped Parks.

[5] Trip generation rates based on the regression equation are not available for the Saturday peak hour, due to limitations in the ITE Trip Generation Manual for ITE Land Use Code 710. As such, the average rate has been utilized.

[6] The ITE Trip Generation Manual, Eleventh Edition (2021), does not provide Saturday trip generation rates for industrial uses. As such, the Saturday peak hour trip generation rates are based on the breakdown of the trip rates, by vehicle type, during the PM peak hour.

4.1.2 PROPOSED PROJECT TRIP GENERATION

The trip generation summary illustrating daily, and peak hour trip generation estimates for the proposed Project are shown on Table 4-2. In order to accurately reflect the impact that heavy trucks would have on the street system, Project trips have been further broken down between passenger cars and trucks for each of the peak hours and weekday daily trip generation for the high-cube fulfillment center warehouse and business park uses. As shown on Table 4-2, the proposed land use anticipated to generate a total of 35,314 trip-ends per day with 1,761 AM peak hour trips, 3,389 PM peak hour trips, and 1,642 weekend Saturday peak hour trips.

For the purposes of this analysis, it is proposed that the actual vehicles be utilized in order to reflect the effects of heavy trucks most accurately in the analysis. Trucks will be accounted for in the analysis as a percentage of total traffic, which will be input into the analysis software (Synchro 11). As such, trip generation is reflected in actual vehicles only and not in PCE.

RA-7.8 Cont.

TABLE 4-2: PROJECT TRIP GENERATION SUMMARY

Land Use[5]	Quantity	Units[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Weekday Daily	Saturday Peak Hour In	Saturday Peak Hour Out	Saturday Peak Hour Total
Building B: High-Cube Fulfillment	1,250.000	TSF										
Passenger Cars:			99	30	129	50	130	180	2,188	5	3	8
Trucks:			18	5	23	7	19	26	474	1	0	1
Total Trips[2]			**117**	**35**	**152**	**57**	**149**	**206**	**2,662**	**6**	**3**	**9**
Building C: High-Cube Fulfillment	587.000	TSF										
Passenger Cars:			47	14	61	24	61	85	1,028	2	1	3
Trucks:			9	3	12	3	9	12	222	0	0	0
Total Trips[2]			**56**	**17**	**73**	**27**	**70**	**97**	**1,250**	**2**	**1**	**3**
High-Cube Cold Storage Warehouse	500.000	TSF										
Passenger Cars:			38	2	40	10	36	46	686	1	1	2
Trucks:			5	11	16	8	8	16	376	0	0	0
Total Trips[2]			**43**	**13**	**56**	**18**	**44**	**62**	**1,062**	**1**	**1**	**2**
Remaining Industrial: High-Cube Fulfillment	725.561	TSF										
Passenger Cars:			58	17	75	29	75	104	1,270	3	2	5
Trucks:			11	3	14	4	11	15	276	0	0	0
Total Trips[2]			**69**	**20**	**89**	**33**	**86**	**119**	**1,546**	**3**	**2**	**5**
Business Park[5]	1,280.403	TSF										
Office Passenger Cars:	324.121	TSF	405	75	480	75	366	441	3,228	93	79	172
Office Passenger Cars:	60.000	TSF	95	17	112	19	90	109	744	17	15	32
Business Park Warehouse	896.282	TSF										
Warehouse Passenger Cars:			69	16	85	233	825	1,058	10,640	23	13	36
Warehouse Trucks:			29	7	36	8	28	36	512	6	3	9
Business Park[5] (Mixed-Use, 75%)	482.765	TSF										
Office Passenger Cars:	144.830	TSF	203	36	239	39	187	226	1,602	41	35	76
Business Park Warehouse	337.936	TSF										
Warehouse Passenger Cars:			26	6	32	88	311	399	4,012	9	5	14
Warehouse Trucks:			11	3	14	3	11	14	194	2	1	3
Total Business Park Trips			**838**	**160**	**998**	**465**	**1,818**	**2,283**	**20,932**	**191**	**151**	**342**
Retail (Mixed-Use, 25%)												
Passenger Cars:	160.921	TSF	173	106	279	409	426	835	10,866	760	730	1,490
Pass-by Reduction (AM: 0%; PM/Daily: 40%)[4]			0	0	0	-164	-164	-327	-4,348	-304	-292	-596
Total Retail Trips			**173**	**106**	**279**	**245**	**262**	**508**	**6,518**	**456**	**438**	**894**
Active Park	42.20	AC	137	137	274	95	95	190	2,110	187	203	390
Public Park	18.08	AC	6	6	12	4	4	8	90	19	20	39
Total Park Trips			**143**	**143**	**286**	**99**	**99**	**198**	**2,200**	**206**	**223**	**429**
Total Passenger Cars			1,356	462	1,818	911	2,442	3,354	34,116	856	815	1,671
Internal Trip Reduction[3]			-86	-86	-172	-42	-42	-84	-856	-21	-21	-42
Total Trucks			83	32	115	33	86	119	2,054	9	4	13
Project Total Trips			**1,353**	**408**	**1,761**	**902**	**2,486**	**3,389**	**35,314**	**844**	**798**	**1,642**

[1] TSF = thousand square feet; AC = Acres

[2] Total Trips = Passenger Cars + Truck Trips.

[3] Internal trip reduction based on NCHRP 684 Internal Trip Capture Estimation Tool for the passenger car trips and commercial retail.

[4] Pass-by reduction percentage source: ITE Trip Generation Handbook, 3rd Edition (2017).

[5] 2-axle trucks have been evaluated as trucks as opposed to delivery vans or passenger cars.

RA-7.8 Cont.

4.2 PROJECT TRIP DISTRIBUTION

The Project trip distribution and assignment process represents the directional orientation of traffic to and from the Project site. The trip distribution pattern of passenger cars is heavily influenced by the geographical location of the site, the location of surrounding land uses, and the proximity to the regional freeway system. The trip distribution pattern for truck traffic is also influenced by the local truck routes approved by the March JPA, City of Moreno Valley, and City of Riverside. At the request of the March JPA, passenger car and truck trip distributions are consistent with other March JPA projects within the immediate vicinity.

Given these differences between passenger cars and trucks, separate trip distributions were generated for both passenger cars and truck trips. Exhibit 4-1 illustrates the truck trip distribution patterns. Exhibits 4-2 illustrates the trip distribution patterns for passenger cars. Each of these distribution patterns were reviewed by the March JPA, County of Riverside, City of Riverside, and City of Moreno Valley as part of the TA scoping process (see Appendix 1.1). Truck traffic will be directed to utilize Cactus Avenue to the I-215 Freeway; however, it is anticipated some trucks may use Meridian Parkway to head north or south to access the I-215 Freeway or other facilities via Alessandro Boulevard and Van Buren Boulevard. All mixed-use traffic will utilize Cactus Avenue to the east instead of utilizing Barton Street.

4.3 MODAL SPLIT

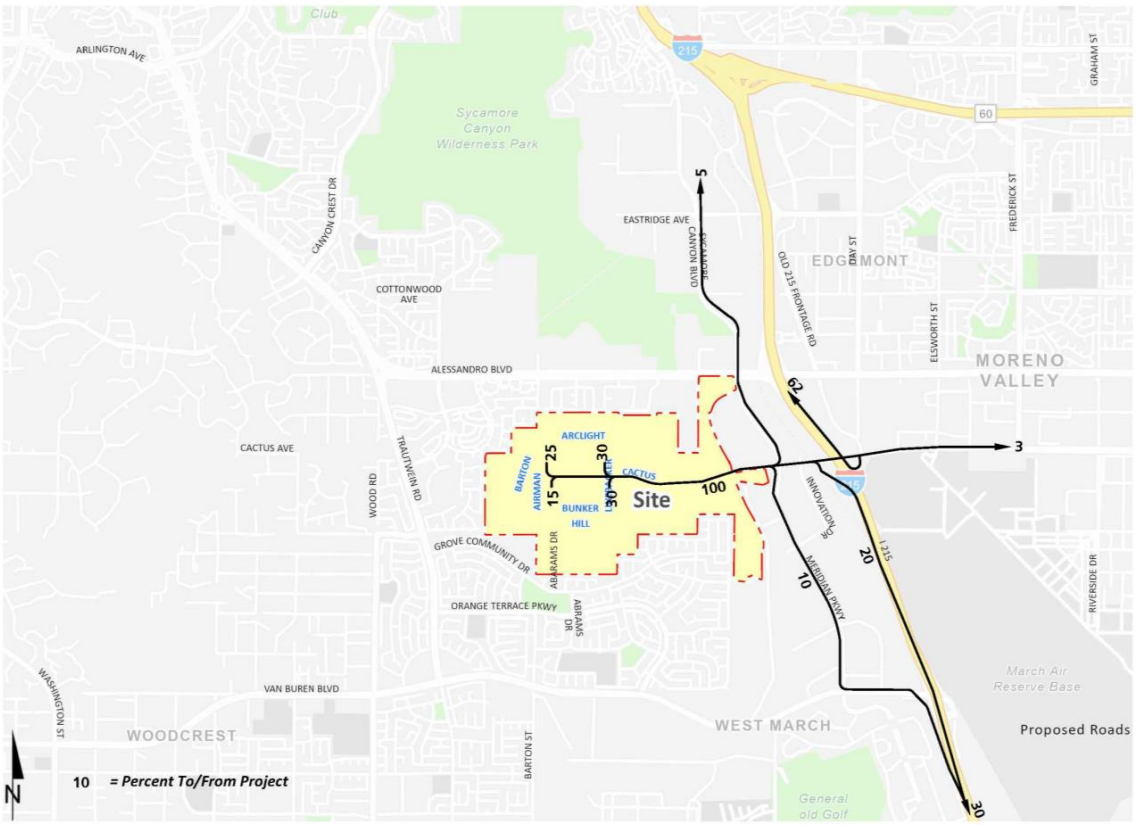
The potential for Project trips to be reduced by the use of public transit, walking or bicycling has not been included as part of the Project's estimated trip generation. Essentially, the Project's traffic projections are "conservative" in that these alternative travel modes would reduce the forecasted traffic volumes.

RA-7.8 Cont.

4.4 PROJECT TRIP ASSIGNMENT

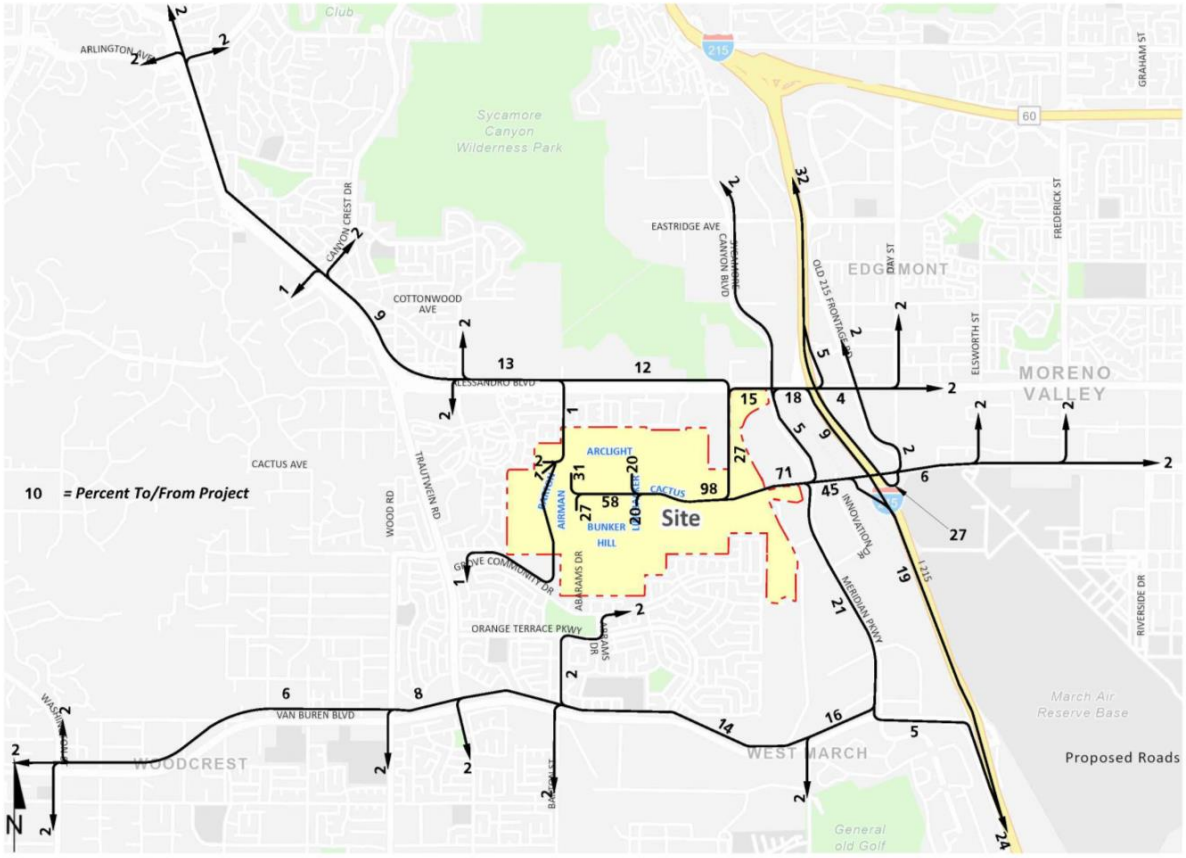
The assignment of traffic from the Project area to the adjoining roadway system is based upon the Project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of initial occupancy of the Project. Based on the identified Project traffic generation and trip distribution patterns, the Project ADT and weekday peak hour intersection turning movement volumes are shown on Exhibit 4-3. The Project weekend peak hour intersection turning movement volumes are shown on Exhibit 4-4.

EXHIBIT 4-1: PROJECT (TRUCK) TRIP DISTRIBUTION



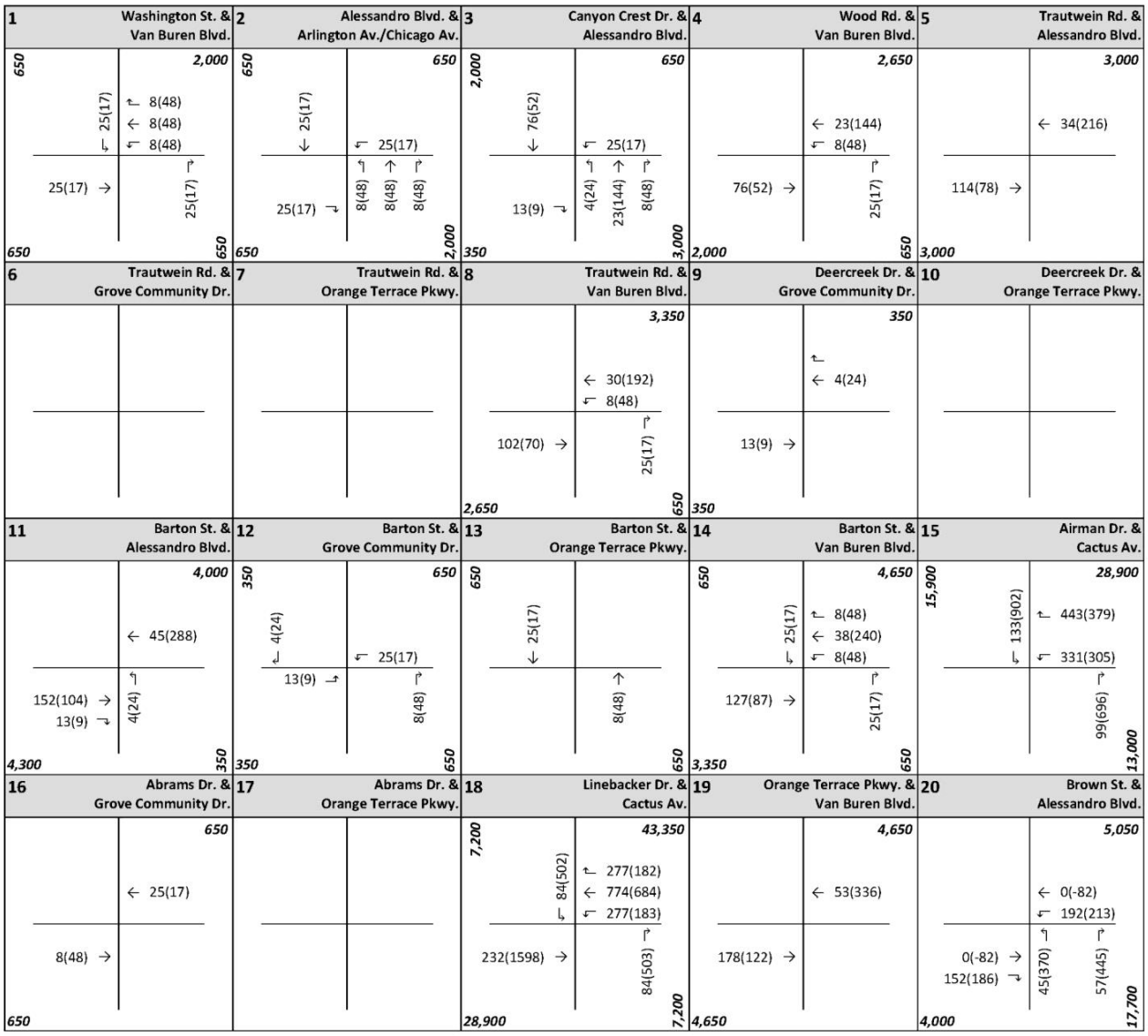
RA-7.8 Cont.

EXHIBIT 4-2: PROJECT (PASSENGER CAR) TRIP DISTRIBUTION



RA-7.8 Cont.

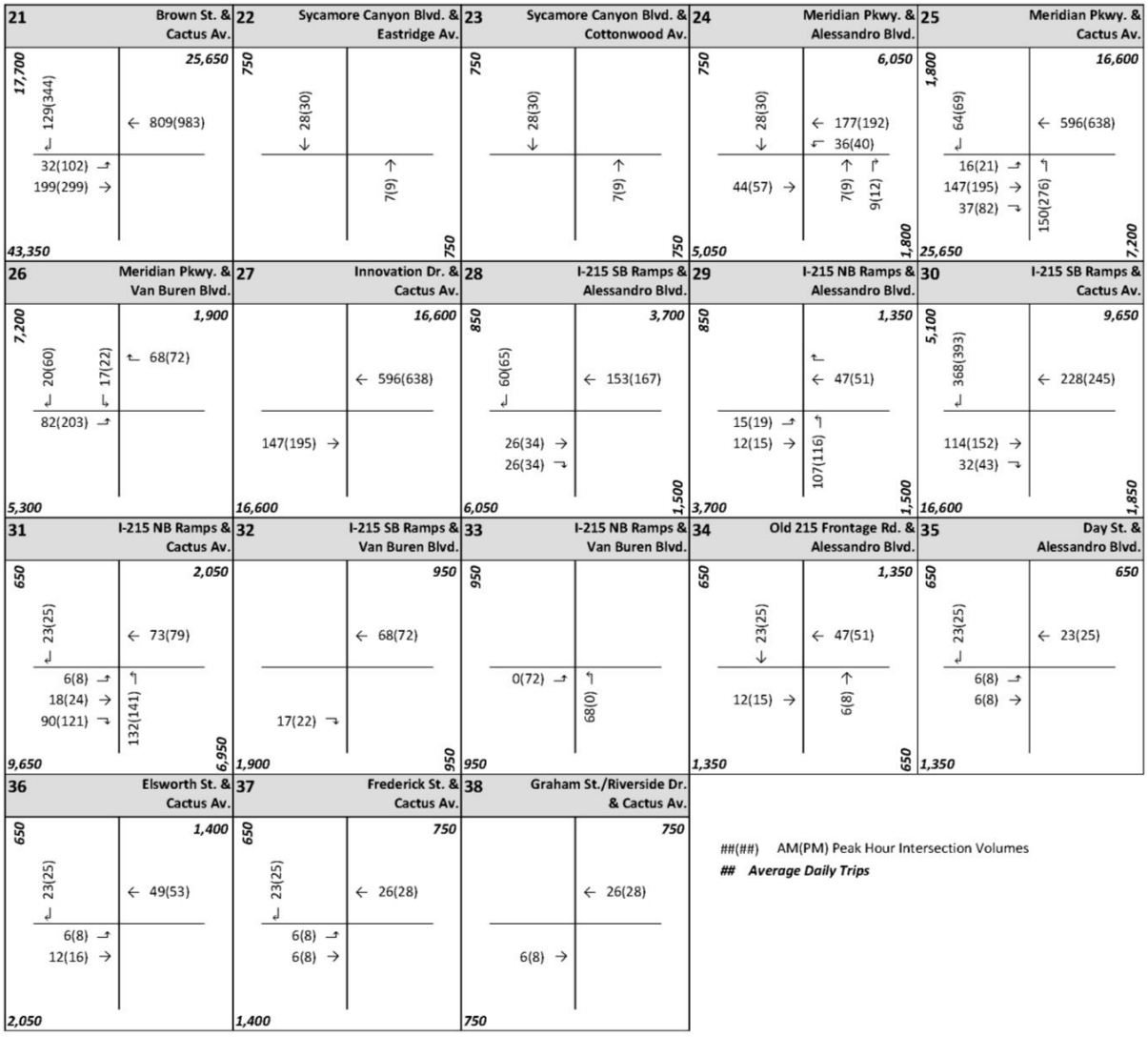
EXHIBIT 4-3: PROJECT ONLY WEEKDAY TRAFFIC VOLUMES



##(##) AM(PM) Peak Hour Intersection Volumes

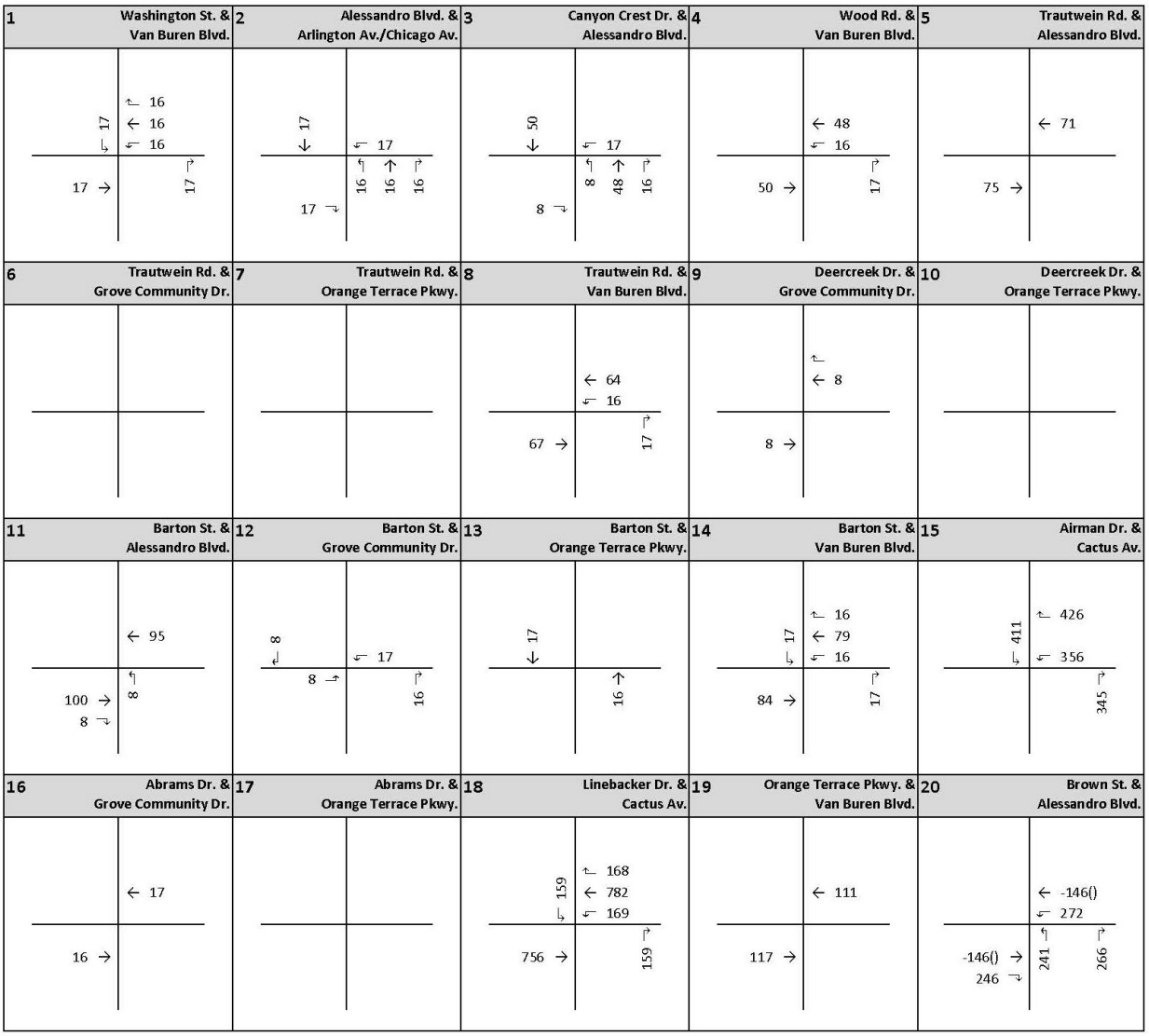
Average Daily Trips

RA-7.8 Cont.


21 Brown St. & Cactus Av.
17,700
129(344)
32(102)
199(299)
25,650
809(983)
43,350
22 Sycamore Canyon Blvd. & Eastridge Av.
750
28(30)
7(9)
750
23 Sycamore Canyon Blvd. & Cottonwood Av.
750
28(30)
7(9)
750
24 Meridian Pkwy. & Alessandro Blvd.
750
28(30)
44(57)
6,050
177(192)
36(40)
7(9)
9(12)
5,050
1,800
25 Meridian Pkwy. & Cactus Av.
1,800
64(69)
16(21)
147(195)
37(82)
16,600
596(638)
150(276)
25,650
7,200
26 Meridian Pkwy. & Van Buren Blvd.
7,200
20(60)
17(22)
82(203)
1,900
68(72)
5,300
27 Innovation Dr. & Cactus Av.
16,600
147(195)
16,600
596(638)
28 I-215 SB Ramps & Alessandro Blvd.
850
60(65)
26(34)
26(34)
3,700
153(167)
6,050
1,500
29 I-215 NB Ramps & Alessandro Blvd.
850
15(19)
12(15)
1,350
47(51)
107(116)
3,700
1,500
30 I-215 SB Ramps & Cactus Av.
5,100
368(393)
114(152)
32(43)
9,650
228(245)
16,600
1,850
31 I-215 NB Ramps & Cactus Av.
650
23(25)
6(8)
18(24)
90(121)
2,050
73(79)
132(141)
9,650
6,950
32 I-215 SB Ramps & Van Buren Blvd.
950
17(22)
950
68(72)
1,900
950
33 I-215 NB Ramps & Van Buren Blvd.
950
0(72)
68(0)
950
34 Old 215 Frontage Rd. & Alessandro Blvd.
650
23(25)
12(15)
1,350
47(51)
6(8)
1,350
650
35 Day St. & Alessandro Blvd.
650
23(25)
6(8)
6(8)
650
23(25)
1,350
36 Elsworth St. & Cactus Av.
650
23(25)
6(8)
12(16)
1,400
49(53)
2,050
37 Frederick St. & Cactus Av.
650
23(25)
6(8)
6(8)
750
26(28)
1,400
38 Graham St./Riverside Dr. & Cactus Av.
750
6(8)
750
26(28)
##(##) AM(PM) Peak Hour Intersection Volumes
Average Daily Trips

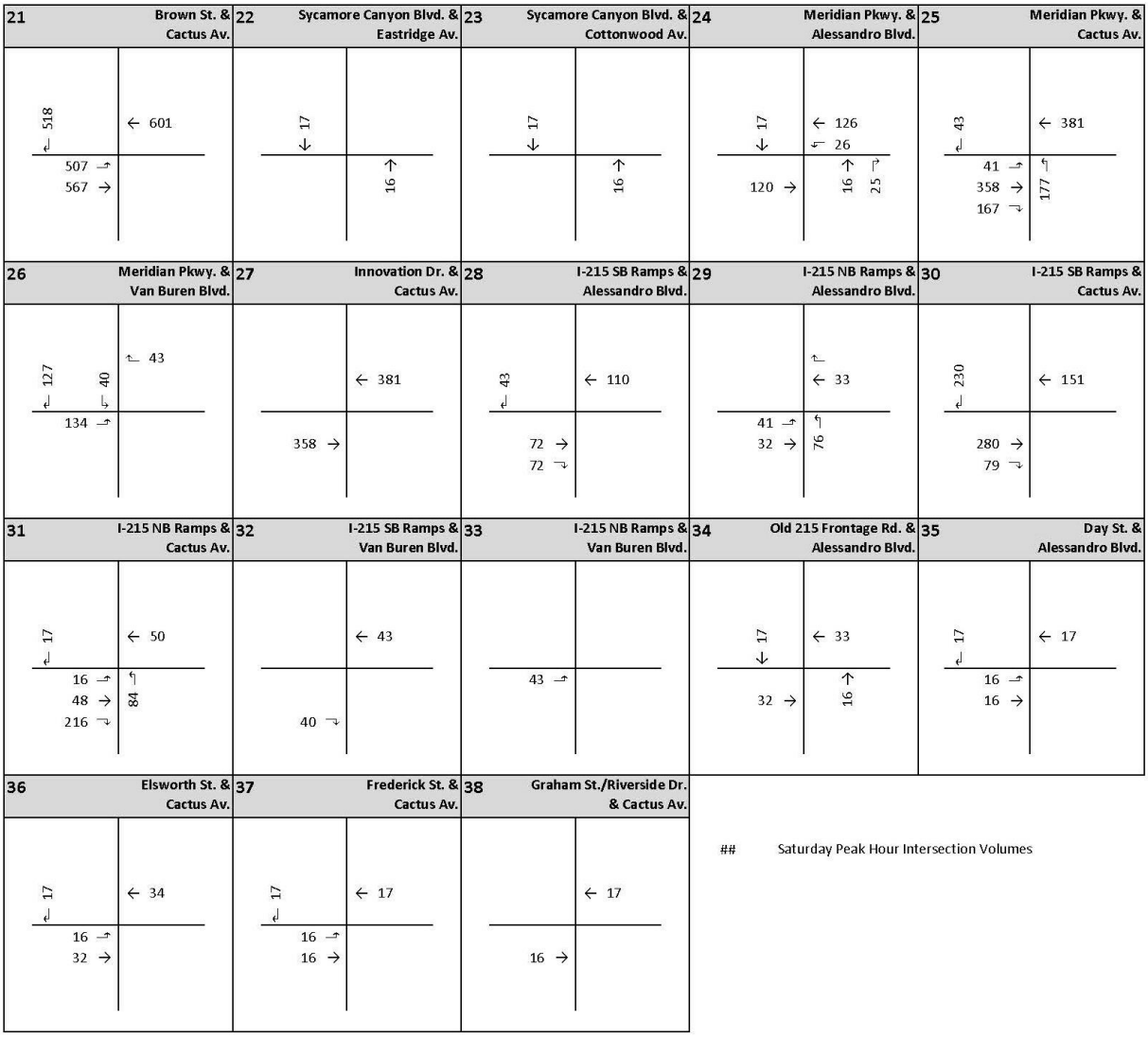
RA-7.8 Cont.

EXHIBIT 4-4: PROJECT ONLY WEEKEND TRAFFIC VOLUMES



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

4.5 BACKGROUND TRAFFIC

4.5.1 OPENING YEAR CUMULATIVE CONDITIONS

Future year traffic forecasts have been based upon background (ambient) growth at 2.0% per year. The total ambient growth is 14.87% for 2028 conditions (2.0% per year compounded over 7 years). The ambient growth factor is intended to approximate regional traffic growth. This ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by cumulative development projects. Ambient growth has been added to daily and peak hour traffic volumes on surrounding roadways, in addition to traffic generated by the development of future projects that have been approved but not yet built and/or for which development applications have been filed and are under consideration by governing agencies. Opening Year Cumulative (2028) traffic volumes are provided in Section 7 of this report. The traffic generated by the proposed Project was then manually added to the base volume to determine Opening Year Cumulative "With Project" forecasts conditions. Conservatively, this TA estimates the area ambient traffic growth and then adds traffic generated by other known or probable related projects. These related projects are at least in part already accounted for in the assumed ambient growth rates; and some of these related projects may not be implemented and operational within the 2028 Opening Year time frame assumed for the Project (see also Section 4.6 *Cumulative Development Traffic*).

4.5.2 HORIZON YEAR (2045) CONDITIONS

RA-7.8 Cont.

The Horizon Year (2045) traffic conditions were derived from the latest County of Riverside Transportation Analysis Model (RIVCOM) using accepted procedures for model forecast refinement and smoothing. The traffic forecasts reflect the area-wide growth anticipated between Existing conditions and Horizon Year conditions. See additional discussion in Section 4.7 *Horizon Year (2045) Volume Development*.

4.6 CUMULATIVE DEVELOPMENT TRAFFIC

A cumulative project list was developed for the purposes of this analysis through consultation with planning and engineering staff from the March JPA. The cumulative projects listed are those that would generate traffic and would contribute traffic to study area intersections. Cumulative projects from the neighboring jurisdictions of County of Riverside, City of Moreno Valley, and City of Riverside have also been included.

Exhibit 4-5 illustrates the cumulative development location map. A summary of cumulative development projects and their proposed land uses are shown in Table 4-3. If applicable, the traffic generated by individual cumulative projects was manually added to the Opening Year Cumulative forecasts to ensure that traffic generated by the listed cumulative development projects in Table 4-3 are reflected as part of the background traffic. In an effort to conduct a conservative analysis, the cumulative projects are added in conjunction with the ambient growth identified in Section 4.5.1 *Background Traffic: Opening Year Cumulative Conditions*. Although it is unlikely that all of these cumulative projects would be fully built and occupied by Year 2028, they have been included in an effort to conduct a conservative analysis and overstate as opposed

to understate potential traffic deficiencies. Any other cumulative projects located beyond the cumulative study area that are not expected to contribute measurable traffic to study area intersections have not been included since the traffic would dissipate due to the distance from the Project site and study area intersections. Cumulative Only ADT and weekday peak hour intersection turning movement volumes are shown on Exhibit 4-6. Cumulative Only weekend peak hour intersection turning movement volumes are shown on Exhibit 4-7.

4.7 HORIZON YEAR (2045) VOLUME DEVELOPMENT

Traffic projections for Horizon Year (2045) without Project conditions were derived from the latest RIVCOM traffic model using accepted procedures for model forecast refinement. The post processing volume worksheets are provided in Appendix 4.1 of this TA.

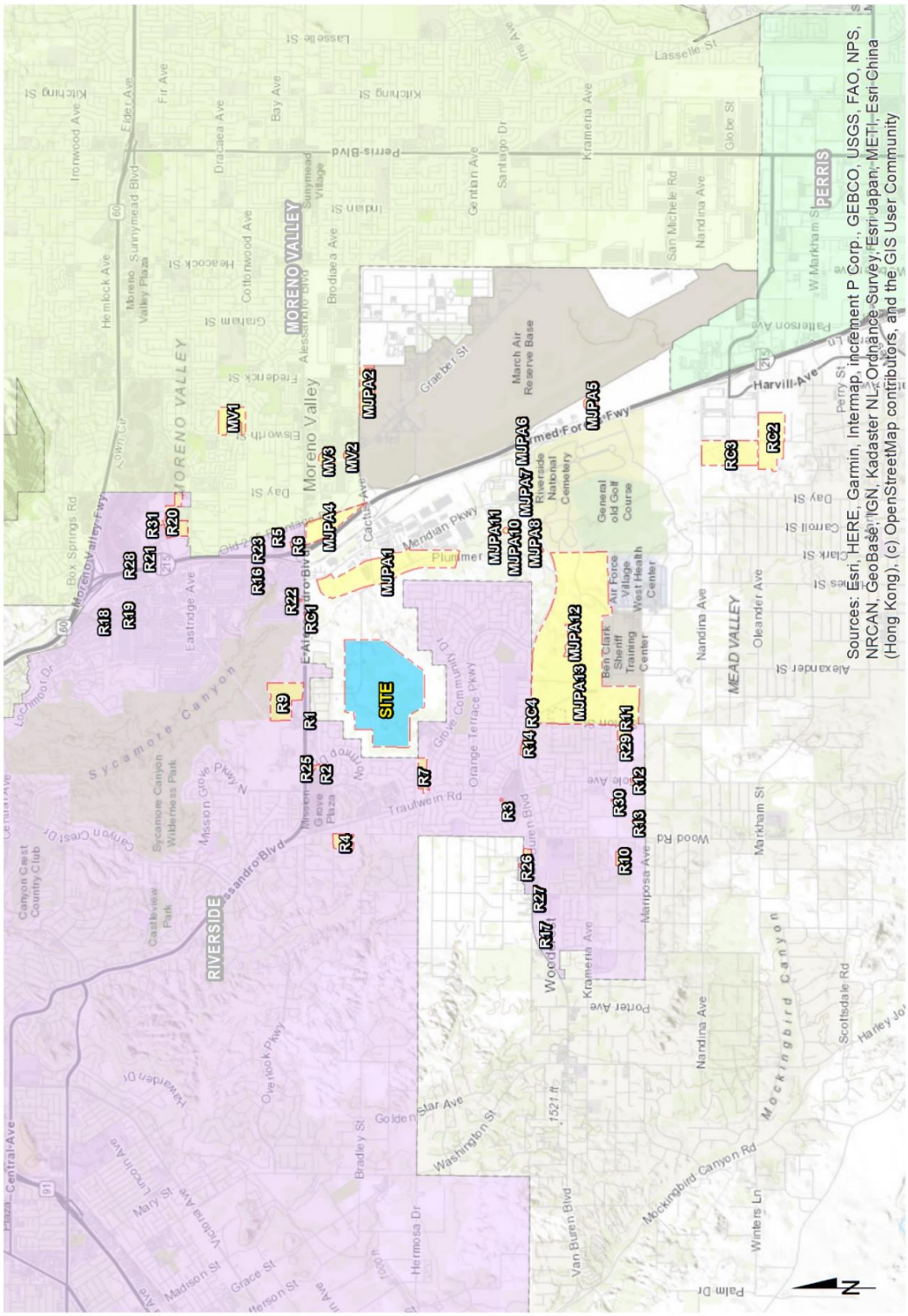
In most instances the traffic model zone structure is not designed to provide accurate turning movements along arterial roadways unless refinement and reasonableness checking is performed. Therefore, the Horizon Year peak hour forecasts were refined using the model derived long-range forecasts, along with existing peak hour traffic count data collected at each analysis location in 2021 (or adjusted historic to 2021). Future estimated peak hour traffic data was used for new intersections and intersections with an anticipated change in travel patterns to further refine the Horizon Year peak hour forecasts.

The refined future peak hour approach and departure volumes obtained from the model output data are then entered into a spreadsheet program consistent with the National Cooperative Highway Research Program (NCHRP Report 765), along with initial estimates of turning movement proportions. A linear programming algorithm is used to calculate individual turning movements which match the known directional roadway segment forecast volumes computed in the previous step. This program computes a likely set of intersection turning movements from intersection approach counts and the initial turning proportions from each approach leg.

RA-7.8 Cont.

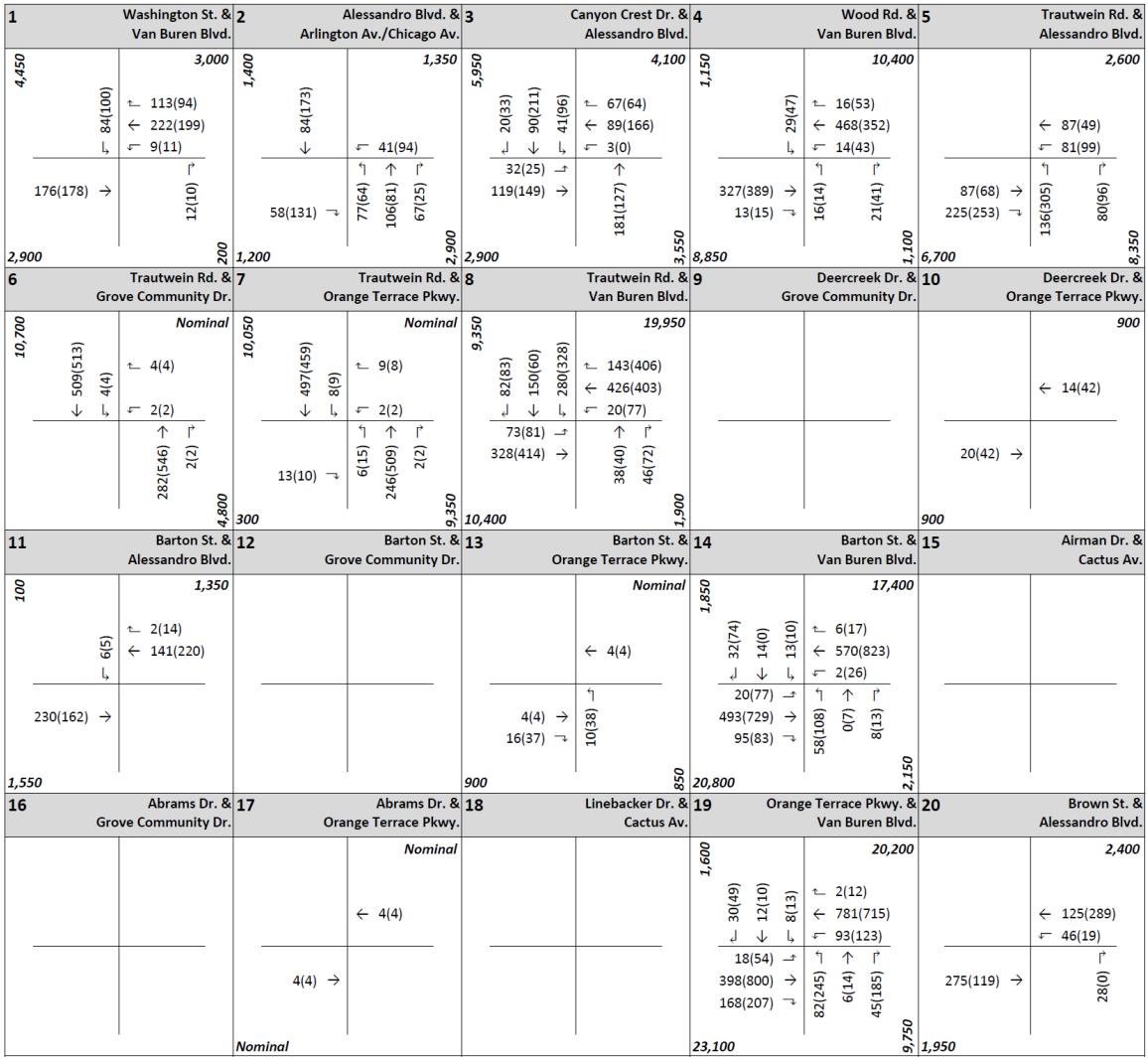
Typically, the model growth is prorated and is subsequently added to the existing (base validation) traffic volumes to represent Long Range traffic conditions. However, review of the resulting model growth indicates negative growth for several study area intersections. In an effort to conduct a conservative analysis, reductions to traffic forecasts from either Existing or Opening Year Cumulative traffic conditions were not assumed as part of this analysis. Additional growth has also been applied on a movement-by-movement basis, where applicable, to estimate reasonable Horizon Year forecasts. Horizon Year turning volumes were compared to Opening Year Cumulative volumes in order to ensure a minimum growth as a part of the refinement process. The minimum growth includes any additional growth between Opening Year Cumulative and Horizon Year traffic conditions that is not accounted for by the traffic generated by cumulative development projects and ambient growth rates assumed between Existing (2021) and Horizon Year traffic conditions. Future estimated peak hour traffic data was used for new intersections and intersections with an anticipated change in travel patterns to further refine the Horizon Year peak hour forecasts. Since the Saturday peak hour is not included within the SBTAM, future year forecast for the Saturday peak hour are based on ambient growth factors identified in the Southern California Association of Governments Demographics and Growth Forecast, May 7, 2020.

EXHIBIT 4-5: CUMULATIVE DEVELOPMENT LOCATION MAP



RA-7.8 Cont.

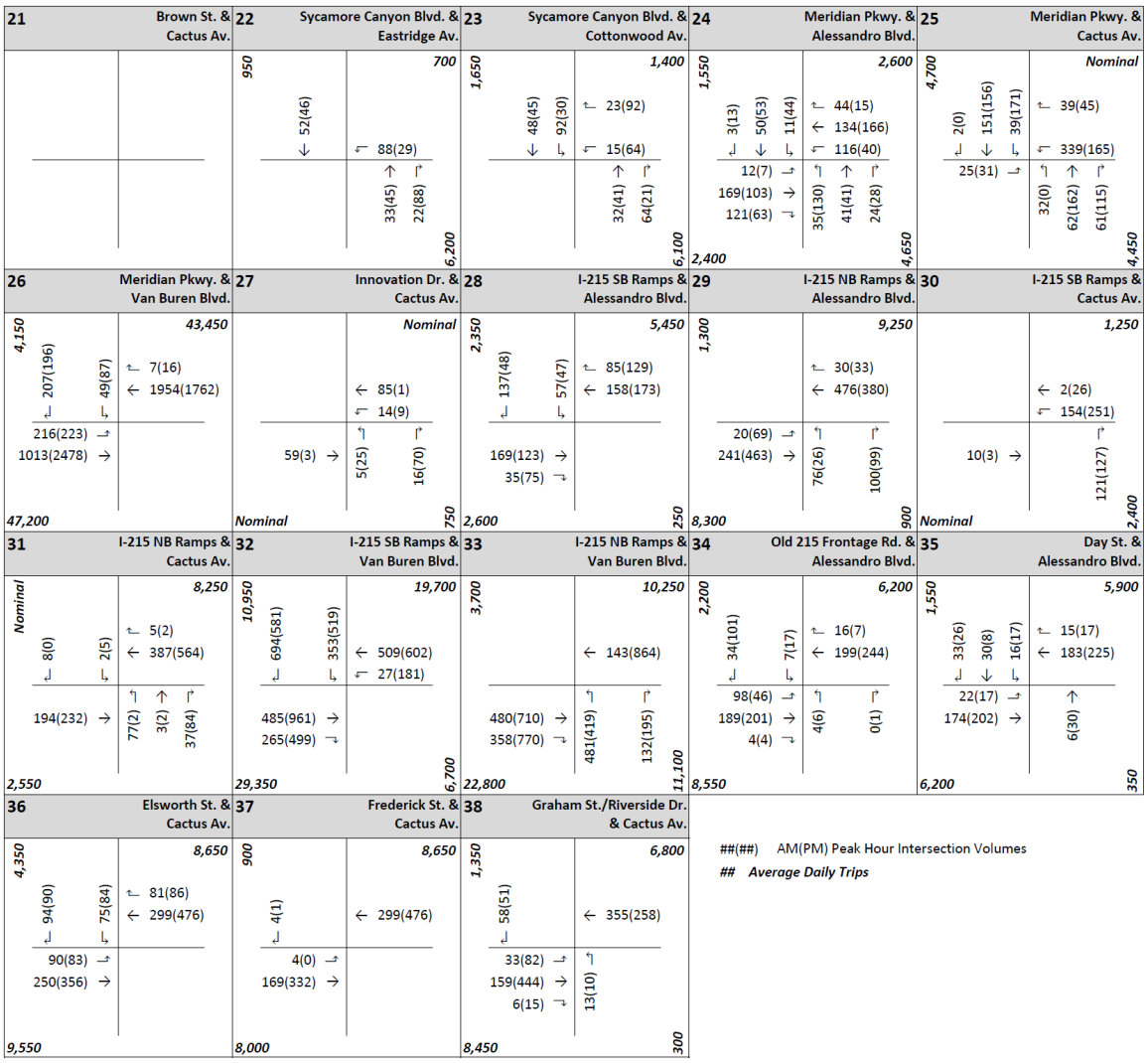
EXHIBIT 4-6: CUMULATIVE ONLY WEEKDAY TRAFFIC VOLUMES



##(##) AM(PM) Peak Hour Intersection Volumes

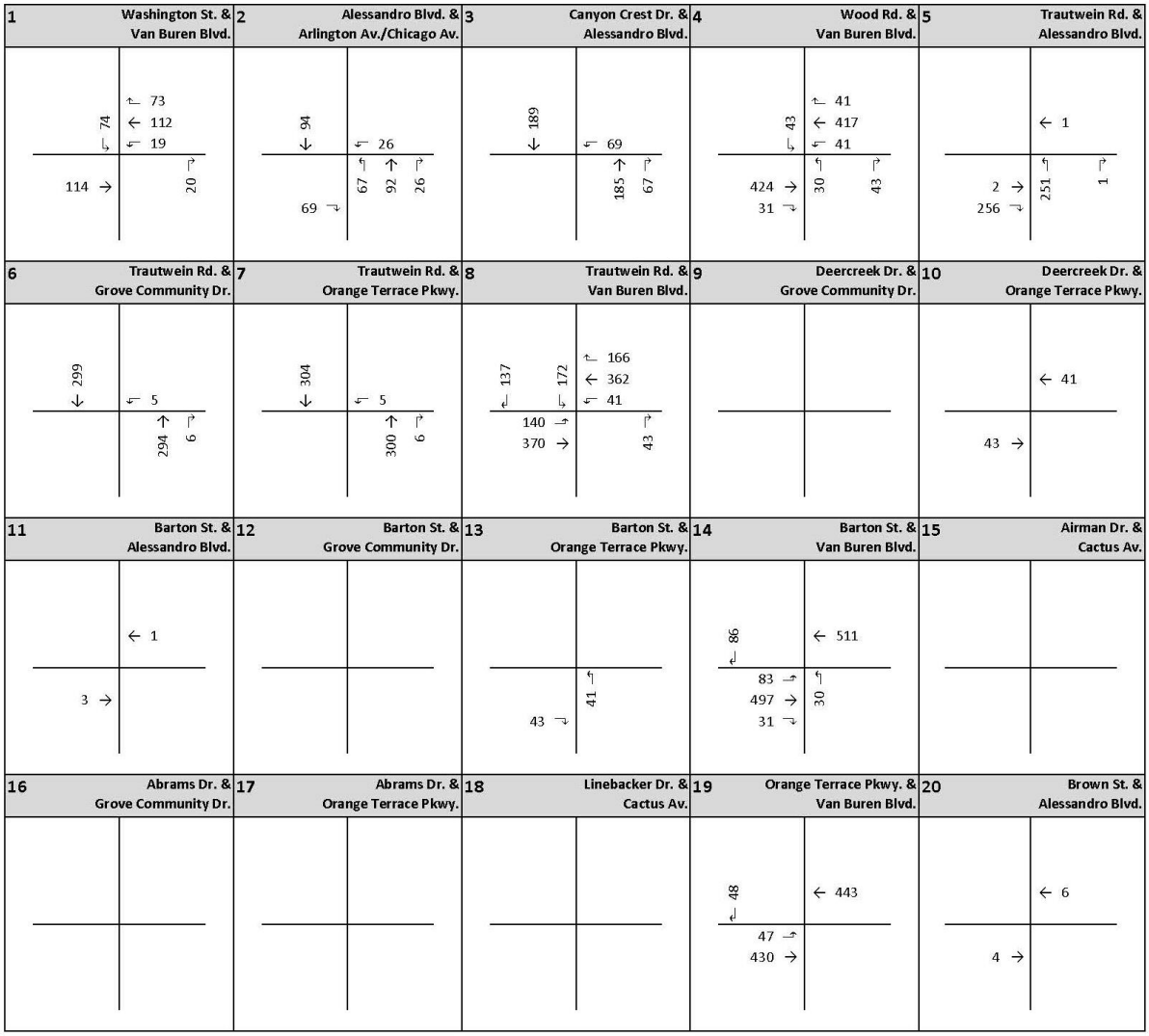
Average Daily Trips

RA-7.8 Cont.


21 Brown St. & Cactus Av.
22 Sycamore Canyon Blvd. & Eastridge Av.
950
52(46)
700
88(29)
33(45)
22(88)
6,200
23 Sycamore Canyon Blvd. & Cottonwood Av.
1,650
48(45)
92(30)
1,400
23(92)
15(64)
32(41)
64(21)
6,100
24 Meridian Pkwy. & Alessandro Blvd.
1,550
3(13)
50(53)
11(44)
2,600
44(15)
134(166)
116(40)
12(7)
169(103)
121(63)
35(130)
41(41)
24(28)
2,400
4,650
25 Meridian Pkwy. & Cactus Av.
4,700
2(0)
151(156)
39(171)
Nominal
39(45)
339(165)
25(31)
32(0)
62(162)
61(115)
4,450
26 Meridian Pkwy. & Van Buren Blvd.
4,150
207(196)
49(87)
43,450
7(16)
1954(1762)
216(223)
1013(2478)
47,200
27 Innovation Dr. & Cactus Av.
Nominal
85(1)
14(9)
59(3)
5(25)
16(70)
Nominal
750
28 I-215 SB Ramps & Alessandro Blvd.
2,350
137(48)
57(47)
5,450
85(129)
158(173)
169(123)
35(75)
2,600
250
29 I-215 NB Ramps & Alessandro Blvd.
1,300
9,250
30(33)
476(380)
20(69)
241(463)
76(26)
100(99)
8,300
900
30 I-215 SB Ramps & Cactus Av.
1,250
2(26)
154(251)
10(3)
121(127)
Nominal
2,400
31 I-215 NB Ramps & Cactus Av.
Nominal
8(0)
2(5)
8,250
5(2)
387(564)
194(232)
77(2)
3(2)
37(84)
2,550
32 I-215 SB Ramps & Van Buren Blvd.
10,950
694(581)
353(519)
19,700
509(602)
27(181)
485(961)
265(499)
29,350
6,700
33 I-215 NB Ramps & Van Buren Blvd.
3,700
10,250
143(864)
480(710)
358(770)
481(419)
132(195)
22,800
11,100
34 Old 215 Frontage Rd. & Alessandro Blvd.
2,200
34(101)
7(17)
6,200
16(7)
199(244)
98(46)
189(201)
4(4)
4(6)
0(1)
8,550
35 Day St. & Alessandro Blvd.
1,550
33(26)
30(8)
16(17)
5,900
15(17)
183(225)
22(17)
174(202)
6(30)
6,200
350
36 Elsworth St. & Cactus Av.
4,350
94(90)
75(84)
8,650
81(86)
299(476)
90(83)
250(356)
9,550
37 Frederick St. & Cactus Av.
900
4(1)
8,650
299(476)
4(0)
169(332)
8,000
38 Graham St./Riverside Dr. & Cactus Av.
1,350
58(51)
6,800
355(258)
33(82)
159(444)
6(15)
13(10)
8,450
300
##(##) AM(PM) Peak Hour Intersection Volumes
Average Daily Trips

RA-7.8 Cont.

EXHIBIT 4-7: CUMULATIVE ONLY WEEKEND TRAFFIC VOLUMES



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

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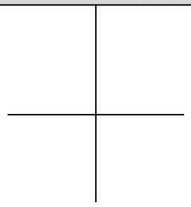
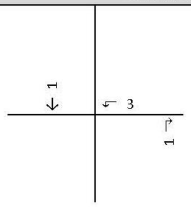
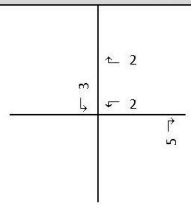
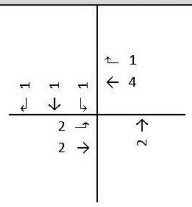
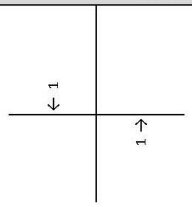
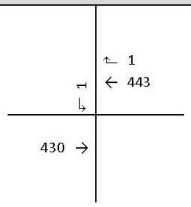
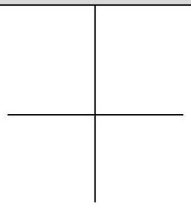
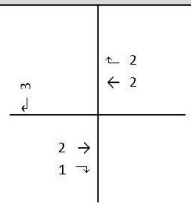
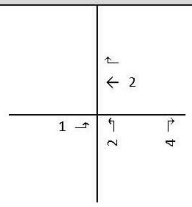
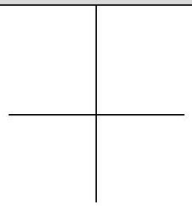
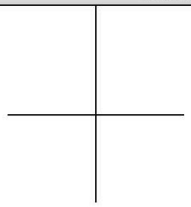
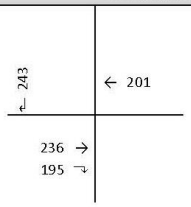
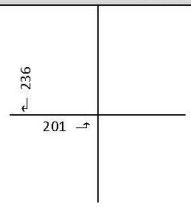
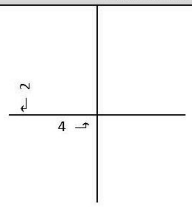
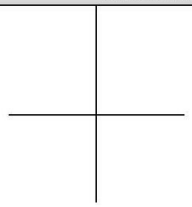
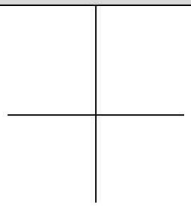
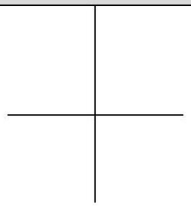
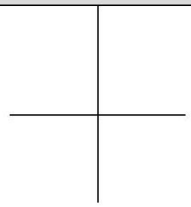
21 Brown St. & Cactus Av.	22 Sycamore Canyon Blvd. & Eastridge Av.	23 Sycamore Canyon Blvd. & Cottonwood Av.	24 Meridian Pkwy. & Alessandro Blvd.	25 Meridian Pkwy. & Cactus Av.
				
26 Meridian Pkwy. & Van Buren Blvd.	**27 Innovation Dr. & Cactus Av.**	**28 I-215 SB Ramps & Alessandro Blvd.**	**29 I-215 NB Ramps & Alessandro Blvd.**	**30 I-215 SB Ramps & Cactus Av.**
				
31 I-215 NB Ramps & Cactus Av.	**32 I-215 SB Ramps & Van Buren Blvd.**	**33 I-215 NB Ramps & Van Buren Blvd.**	**34 Old 215 Frontage Rd. & Alessandro Blvd.**	**35 Day St. & Alessandro Blvd.**
				
36 Elsworth St. & Cactus Av.	**37 Frederick St. & Cactus Av.**	**38 Graham St./Riverside Dr. & Cactus Av.**		
				

Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

The future Horizon Year peak hour turning movements were then reviewed by Urban Crossroads for reasonableness, and in some cases, were adjusted to achieve flow conservation, reasonable growth, and reasonable diversion between parallel routes. Flow conservation checks ensure that traffic flow between two closely spaced intersections, such as two freeway ramp locations, is verified in order to make certain that vehicles leaving one intersection are entering the adjacent intersection and that there is no unexplained loss of vehicles. The result of this traffic forecasting procedure is a series of traffic volumes which are suitable for traffic operations analysis.

TABLE 4-3: CUMULATIVE DEVELOPMENT LAND USE SUMMARY

ID	Project Name	Land Use[1]	Quantity	Units[2]
March Joint Powers Authority:				
MJPA1	Meridian Business Park (West Campus)	Industrial Park	2,278.852	TSF
MJPA2	K4 Parcel	Warehouse	718.000	TSF
MJPA3	Economic Business Center	Warehouse	124.523	TSF
MJPA4	Freeway Business Center	Warehouse	709	TSF
MJPA5	Veteran's Industrial Plaza/VIP 215	Warehouse	2,000.000	TSF
MJPA6	Veteran's Plaza	Commercial Retail	198.000	TSF
MJPA7	MS Van Buren I	Warehouse	176.396	TSF
MJPA8	MS Van Buren II	Warehouse	162.041	TSF
MJPA9	MS Prime Six	General Office	74.922	TSF
MJPA10	Meridian Distribution Center IV	Warehouse	90.000	TSF
MJPA11	Meridian Distribution Center III	Warehouse	262.269	TSF
MJPA12	Eagle Business Park	Business Park	390.480	TSF
MJPA13	South Campus	Office	388.011	TSF
		Commercial Retail	282.730	TSF
		Business Park	1,764.180	TSF
		Industrial Park	1,774.437	TSF
City of Riverside:				
R1	P17-0419/20/21	Fast Food w/ Drive Thru	1.857	TSF
R2	P16-0578	Warehouse	82.200	TSF
R3	P19-0151/P19-0152/P19-0153	Health and Fitness Club	21.706	TSF
R4	P13-0665	SFDR	8	DU
R5	P15-1035/P16-0556/P16-0567	Warehouse	176.149	TSF
R6	P14-0841 to P14-0848/P16-0472/P16-0474	Warehouse	73.200	TSF
		Commercial Retail	15.000	TSF
R7	P14-0472/P14-0473/P15-0321/P15-0322	SFDR	85	DU
R8	P19-0022/P19-0024/P19-0026/P19-0027/P19-0028	Fast Food w/ Drive Thru	4.319	TSF
R9	Sycamore Hills Distribution Center	Warehouse	603.100	TSF
R10	P06-0900, P08-0269, P08-0270	Single Family Detatched Housing	20	DU
R11	P06-1355	Single Family Detatched Housing	20	DU
R12	P06-1396	Single Family Detatched Housing	20	DU
R13	P03-1404	Single Family Detatched Housing	20	DU
R14	P10-0113, P10-0118, P10-0449	Free-Standing Discount Superstore	138.516	TSF
		Home Improvement Superstore	155.433	TSF
		Shopping Plaza	125.608	TSF
R15	P12-0360	Vocational School	11.505	TSF
R16	P12-0507 through P12-0510	Warehouse/Industrial	235.741	TSF

RA-7.8 Cont.

ID	Project Name	Land Use[1]	Quantity	Units[2]
R17	P13-0263, P13-0264, P13-0769	Retail	10.700	TSF
		Day Care	10.000	TSF
		Drive-Thru Restaurant	2.500	TSF
		Office	10.000	TSF
		Medical Office	8.000	TSF
R18	P13-0553, P13-0554, P13-0583, P14-0065	Multi-Family Residential	275	DU
R19	P13-0607, P13-0608, P13-0609, P13-0854	Industrial	171.616	TSF
R20	P14-0294, P14-0295, P14-0297, P16-0297 (JN:8890)			
R21	P14-0536, P14-0537	Fast Food w/ Drive Thru	3.750	TSF
R22	P14-0600, P14-0601, P14-0602, P15-044	Industrial	121.390	TSF
R23	P14-1070	Warehousing	240.080	TSF
R24	P15-0075, P15-0076, P15-0819	Auto Repair	11.738	TSF
		Fast Food w/ Drive Thru	2.200	TSF
R25	P15-0983, P15-0984	Child Care	15.000	TSF
R26	P17-0688, P17-0689	Car Wash	5.440	TSF
R27	P19-0042	Restaurant	4.300	TSF
		Office	9.920	TSF
R28	P19-0332, P19-0333	Car Wash	4.340	TSF
R29	P20-0013, P20-0014, P20-0015, P20-0016	Residential	81	DU
R30	P20-0018, P20-0019, P20-0020, P20-0021	Residential	138	DU
R31	P20-0203, P20-0281	Canyon Springs Healthcare Campus	280.800	TSF
County of Riverside:				
RC1	PP 25422	Warehouse	814.000	TSF
RC2	Knox Business Park	Warehouse	1,259.050	TSF
RC3	Oleander Business Park	Warehouse	710.736	TSF
RC4	PP25382	Commercial Office Building	10.275	TSF
City of Moreno Valley:				
MV1	Scottish Village	Multifamily	194	DU
MV2	Moreno Valley Cactus Center (PEN16-0131)	Warehouse	36.950	TSF
		Fast Food w/ Drive Thru	7.900	TSF
		Gas Station w/ Car Wash	28	VFP
MV3	PA 08-0047-0052 (Komar Cactus Plaza)	Hotel	110	Rooms
		Fast Food w/ Drive Thru	8.000	TSF
		Commercial	42.400	TSF

[1] SFDR = Single Family Detached Residential

[2] DU = Dwelling Units; TSF = Thousand Square Feet; SP = Spaces; VFP = Vehicle Fueling Positions

RA-7.8 Cont.

5 E+P TRAFFIC CONDITIONS

This section discusses the traffic forecasts for E+P conditions and the resulting intersection operations, roadway segment analysis, traffic signal warrant, and freeway off-ramp queuing analyses. This analysis scenario is not a "real-world" scenario in that there would be some growth that occurs between baseline conditions and implementation of the Project. However, this analysis scenario has been provided for informational purposes only to identify the deficiencies and improvement needs for study area intersections and roadway segments when Project traffic is added directly to the baseline condition.

5.1 ROADWAY IMPROVEMENTS

The lane configurations and traffic controls assumed to be in place for E+P conditions are consistent with those shown previously on Exhibit 3-1, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project to provide site access are also assumed to be in place for E+P conditions only (e.g., intersection and roadway improvements at the Project's frontage and driveways).

5.2 EXISTING PLUS PROJECT TRAFFIC VOLUME FORECASTS

This scenario includes Existing traffic volumes plus Project traffic. The ADT and weekday AM and PM peak hour intersection turning movement volumes which can be expected for E+P traffic conditions are shown on Exhibit 5-1. The weekend Saturday peak hour intersection turning movement volumes for E+P conditions are shown on Exhibit 5-2.

RA-7.8 Cont.

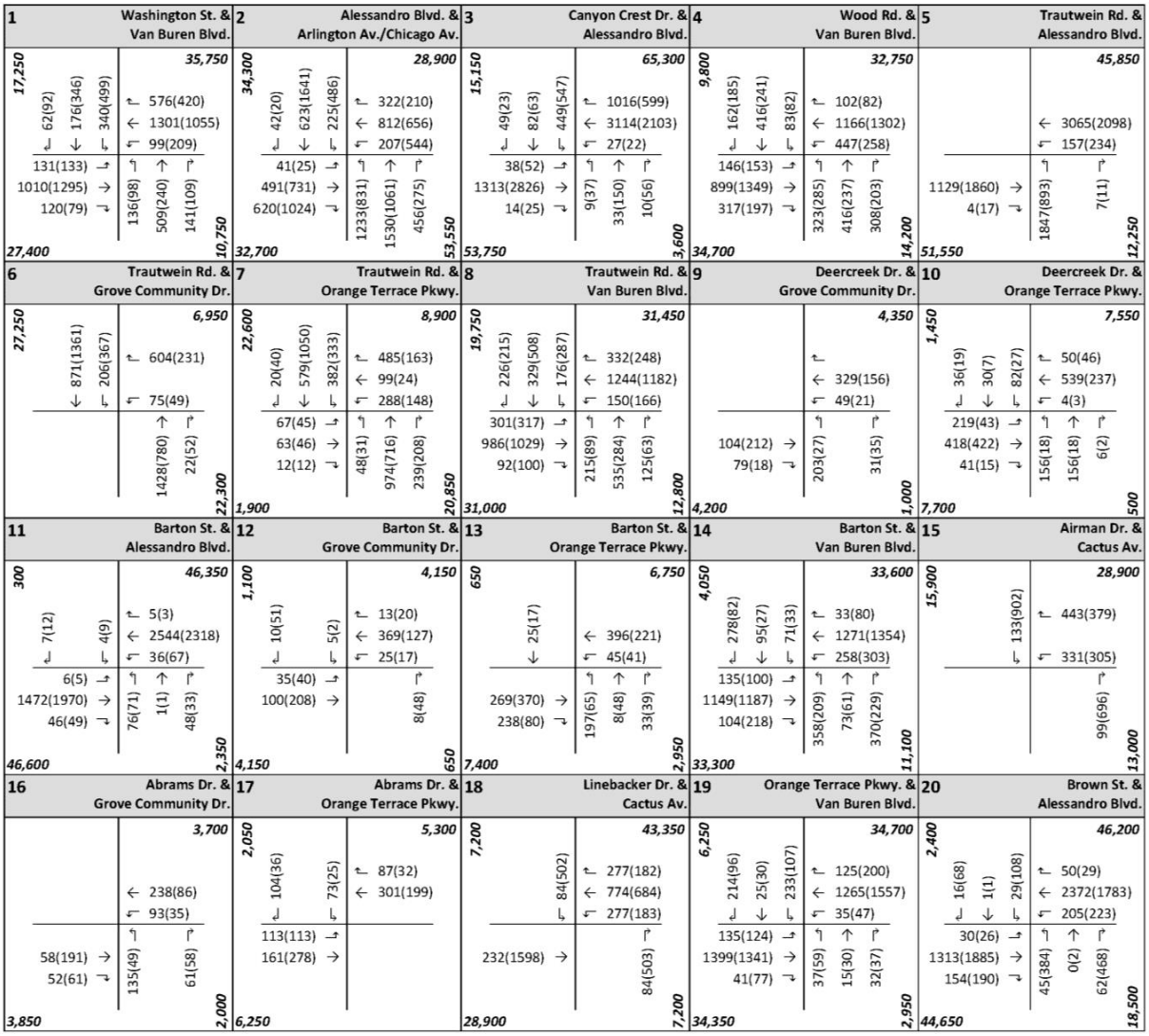
5.3 INTERSECTION OPERATIONS ANALYSIS

E+P peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2 *Methodologies* of this TA. The intersection analysis results are summarized in Table 5-1 for E+P traffic conditions, which indicates that the following additional study area intersections are anticipated to operate at an unacceptable LOS during the peak hours, in addition to intersections previously identified under Existing (2021) conditions:

- Canyon Crest Dr./Overlook Pkwy. & Alessandro Bl. (#3) – LOS E AM peak hour; LOS F PM peak hour
- Brown St. & Alessandro Bl. (#20) – LOS F PM and Saturday peak hours
- Meridian Pkwy. & Cactus Av. (#25) – LOS F PM peak hour only

The intersection operations analysis worksheets for E+P traffic conditions are included in Appendix 5.1.

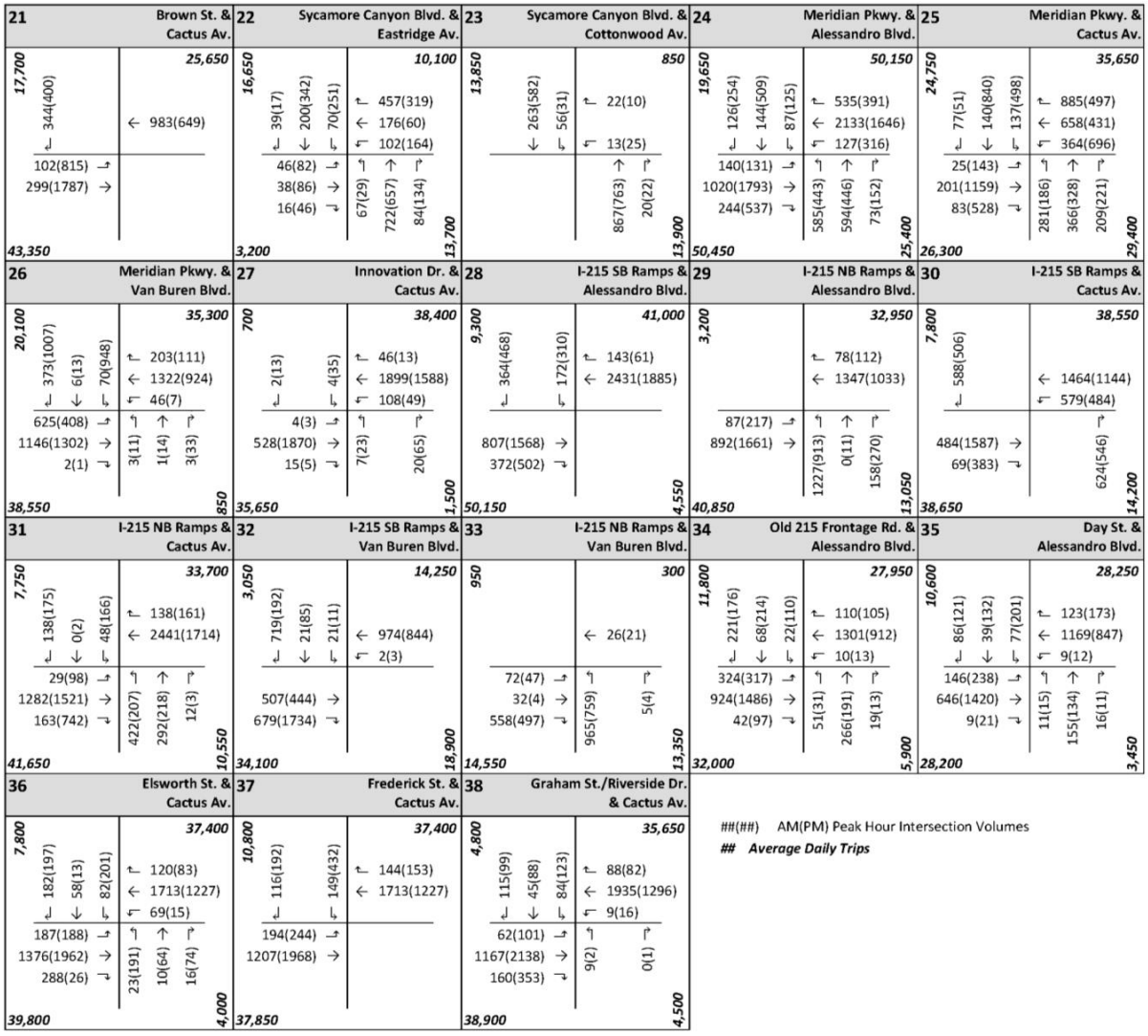
EXHIBIT 5-1: E+P WEEKDAY TRAFFIC VOLUMES



##(##) AM(PM) Peak Hour Intersection Volumes

Average Daily Trips

RA-7.8 Cont.



RA-7.8 Cont.

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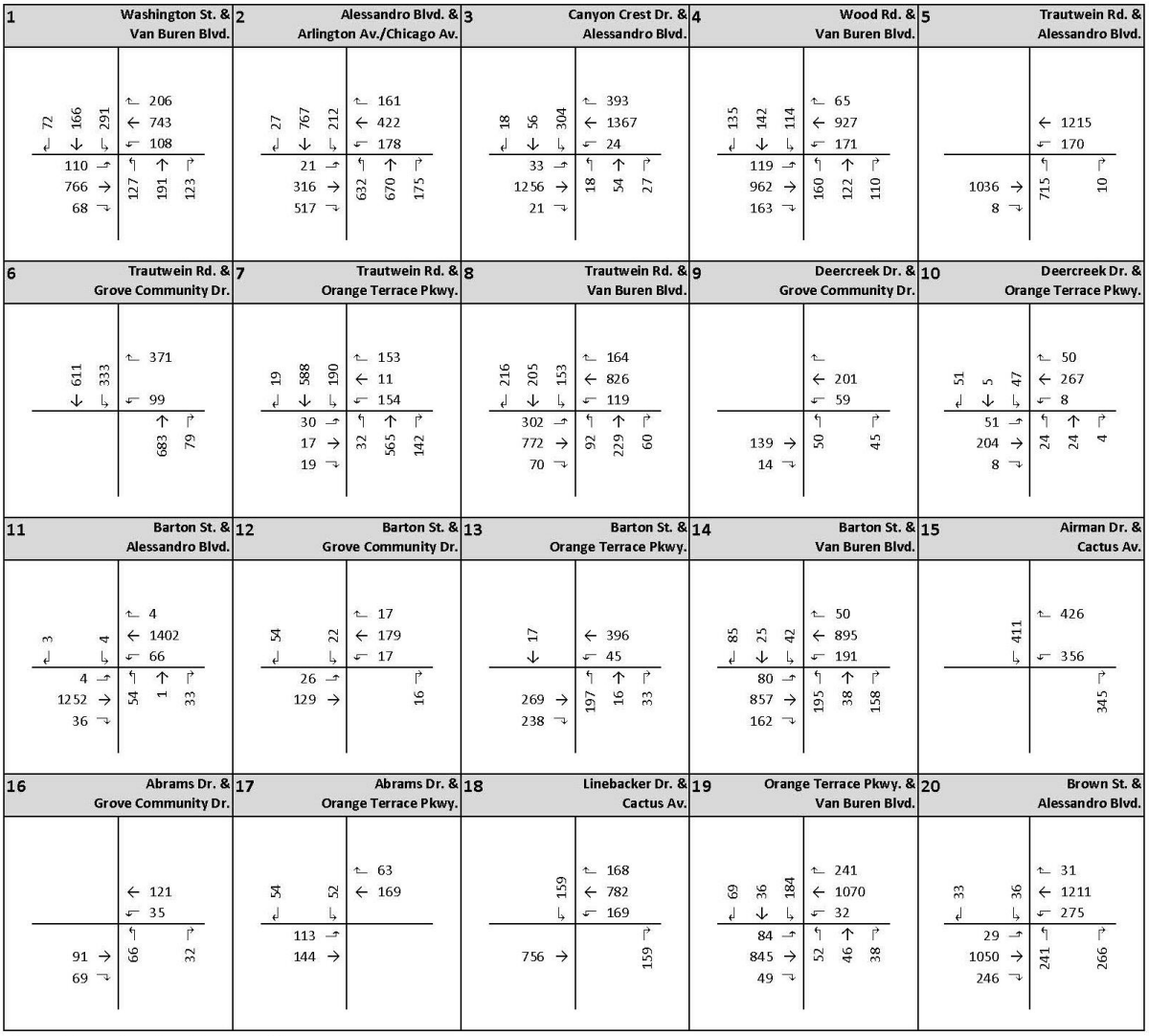
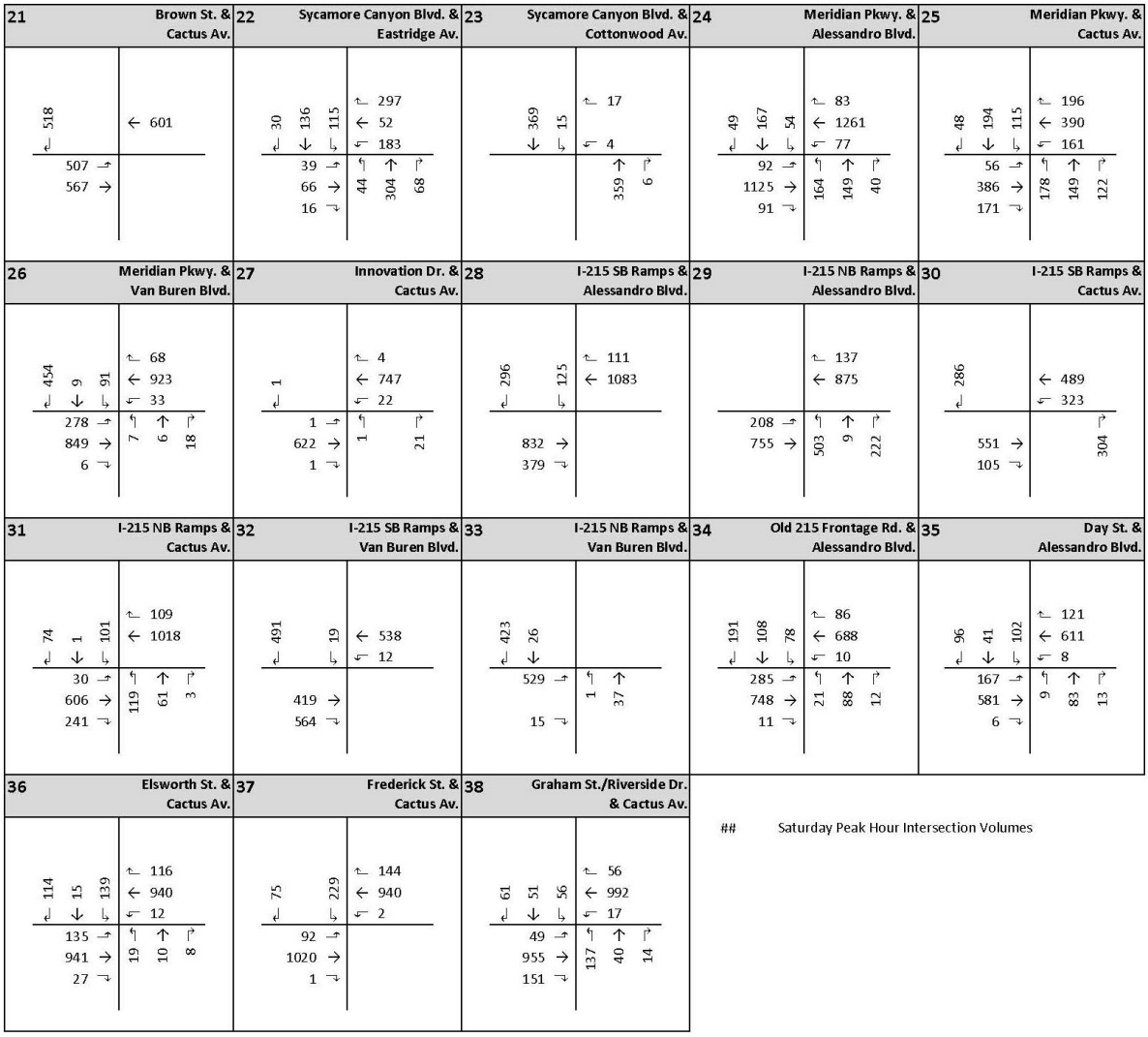
EXHIBIT 5-2: E+P WEEKEND TRAFFIC VOLUMES



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

TABLE 5-1: INTERSECTION ANALYSIS FOR E+P CONDITIONS

#	Intersection	Traffic Control[1]	Existing (2021) Delay[2 3 4 5] (secs.) AM	PM	SAT	Existing (2021) Level of Service AM	PM	SAT	E+P Delay[2 3 4 5] (secs.) AM	PM	SAT	E+P Level of Service AM	PM	SAT
1	Washington St. & Van Buren Blvd.	TS	40.4	39.7	22.8	D	D	C	41.8	45.0	23.5	D	D	C
2	Alessandro Blvd. & Arlington Av./Chicago Av.	TS	**75.0**	**82.2**	22.7	**E**	**F**	C	**76.7**	**87.7**	23.1	**E**	**F**	C
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.	TS	42.2	46.1	14.9	D	D	B	**67.3**	**94.7**	18.9	**E**	**F**	B
4	Wood Rd. & Van Buren Blvd.	TS	50.4	37.0	24.9	D	D	C	52.0	41.9	25.6	D	D	C
5	Trautwein Rd. & Alessandro Blvd.	TS	**89.4**	19.9	13.1	**F**	B	B	**91.3**	20.3	13.3	**F**	C	B
6	Trautwein Rd. & Grove Community Dr.	TS	22.1	10.4	12.4	C	B	B	22.1	10.4	12.4	C	B	B
7	Trautwein Rd. & Orange Terrace Pkwy.	TS	46.0	21.3	18.8	D	C	B	46.1	21.3	18.8	D	C	B
8	Trautwein Rd. & Van Buren Blvd.	TS	34.9	27.7	20.9	C	C	C	38.2	31.8	21.5	D	C	C
9	Deercreek Dr. & Grove Community Dr.	AWS	17.2	9.2	9.6	C	A	A	17.7	9.4	9.8	C	A	A
10	Deercreek Dr. & Orange Terrace Pkwy.	AWS	**51.8**	9.9	9.6	**F**	A	A	**51.8**	9.9	9.6	**F**	A	A
11	Barton St. & Alessandro Blvd.	TS	31.2	8.4	7.6	C	A	A	32.8	15.0	7.9	C	B	A
12	Barton St. & Grove Community Dr.	CSS	13.2	9.4	11.0	B	A	B	13.1	9.4	11.1	C	A	B
13	Barton St. & Orange Terrace Pkwy.	CSS	**68.8**	14.3	**45.0**	**F**	B	**E**	**68.8**	14.3	**45.0**	**F**	B	**E**
14	Barton St. & Van Buren Blvd.	TS	**61.2**	30.3	21.2	**E**	C	C	**72.6**	34.2	22.3	**E**	C	C
15	Airman Dr. & Cactus Av.	**TS**	Future Intersection						13.9	33.6	21.5	B	C	C
16	Abrams Dr. & Grove Community Dr.	AWS	10.9	8.5	8.4	B	A	A	11.4	8.9	8.5	B	A	A
17	Abrams Dr. & Orange Terrace Pkwy.	AWS	13.1	8.6	8.9	B	A	A	13.1	8.6	8.9	B	A	A
18	Linebacker Dr. & Cactus Av.	**TS**	Future Intersection						22.4	54.1	23.8	C	D	C
19	Orange Terrace Pkwy. & Van Buren Blvd.	TS	18.3	17.9	17.7	B	B	B	18.3	17.6	17.6	B	B	B
20	Brown St. & Alessandro Blvd.	TS	9.2	13.7	5.0	A	B	A	40.8	**>200.0**	**>200.0**	D	**F**	**F**
21	Brown St. & Cactus Av.	**TS**	Future Intersection						18.7	33.5	33.4	D	C	C
22	Sycamore Canyon Blvd. & Eastridge Av.	TS	28.2	19.8	17.4	C	B	B	28.0	20.1	17.4	C	C	B
23	Sycamore Canyon Blvd. & Cottonwood Av.	TS	9.3	7.0	5.8	A	A	A	8.8	7.0	5.8	A	A	A
24	Meridian Pkwy. & Alessandro Blvd.	TS	**89.6**	41.8	19.6	**F**	D	B	**89.6**	46.1	19.9	**F**	D	B
25	Meridian Pkwy. & Cactus Av.	TS	29.5	30.8	16.6	C	C	B	49.2	**176.5**	19.7	C	**F**	B
26	Meridian Pkwy. & Van Buren Blvd.	TS	15.4	26.3	12.9	B	C	B	19.1	33.3	14.8	B	C	B
27	Innovation Dr. & Cactus Av.	TS	6.3	8.3	4.5	A	A	A	6.3	8.7	4.1	A	A	A
28	I-215 SB Ramps & Alessandro Blvd.	TS	8.5	9.4	6.3	A	A	A	9.7	10.1	6.7	A	B	A
29	I-215 NB Ramps & Alessandro Blvd.	TS	**81.6**	20.7	22.4	**F**	C	C	**104.1**	29.4	28.2	**F**	C	C
30	I-215 SB Ramps & Cactus Av.	TS	4.7	5.9	5.2	A	A	A	5.2	16.3	5.6	A	B	A
31	I-215 NB Ramps & Cactus Av.	TS	**59.0**	19.9	7.0	**E**	B	A	**90.3**	**59.1**	7.9	**F**	**E**	A
32	I-215 SB Ramps & Van Buren Blvd.	TS	21.5	16.9	10.9	C	B	B	21.8	25.3	10.8	C	C	B
33	I-215 NB Ramps & Van Buren Blvd.	TS	6.4	6.1	4.2	A	A	A	6.4	6.1	4.2	A	A	A
34	Old 215 Frontage Rd. & Alessandro Blvd.	TS	37.9	19.3	17.8	D	B	B	38.5	19.6	18.0	D	B	B
35	Day St. & Alessandro Blvd.	TS	15.0	17.1	12.5	B	B	B	15.6	18.4	12.8	B	B	B
36	Elsworth St. & Cactus Av.	TS	**94.0**	**75.0**	42.6	**F**	**E**	D	**100.5**	**90.4**	43.5	**F**	**F**	D
37	Frederick St. & Cactus Av.	TS	26.0	12.8	9.9	C	B	A	26.9	13.6	10.1	C	B	B
38	Graham St./Riverside Dr. & Cactus Av.	TS	14.7	15.0	16.8	B	B	B	14.8	15.1	16.8	B	B	B

* **BOLD** = Significant Impact

[1] CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal; **TS** = Improvement

[2] For intersections within the jurisdiction of March JPA, deficient occurs (improvements needed) if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels. However, if the pre-project condition is already below LOS D (or acceptable LOS), provide improvements if the Project contributes more than 2% of the total traffic.

[3] For intersections within the jurisdiction of the City of Riverside, deficient occurs (improvements needed) when the addition of project related trips causes either peak hour LOS to degrade from acceptable (LOS A through D) to unacceptable levels (LOS E/F) or the peak hour delay to increase as follows:
- LOS A/B = By 10.0 seconds
- LOS C = By 8.0 seconds
- LOS D = By 5.0 seconds
- LOS E = By 2.0 seconds
- LOS F = By 1.0 seconds

[4] For intersections within the jurisdiction of Caltrans, or the County of Riverside, deficient occurs (improvements needed) if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels.

[5] For intersections within the City of Moreno Valley, provide improvements if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels. If the pre-project condition is at unacceptable LOS and Project increases delay by 5.0 or more, provide improvements to offset the increase in delay.

RA-7.8 Cont.

5.4 ROADWAY SEGMENT ANALYSIS

The roadway segment capacities are approximate figures only and are used at the General Plan level to assist in determining the roadway functional classification (number of through lanes) needed to meet traffic demand. Table 5-2 provides a summary of the E+P conditions roadway segment capacity analysis based on the applicable roadway segment capacity thresholds. As shown on Table 5-2, the following additional study area roadway segments are anticipated to operate at an unacceptable LOS based on the applicable planning level daily roadway capacity thresholds, in addition to the segment identified under Existing (2021) traffic conditions:

- Cactus Av., from Airman Dr. to Linebacker Dr. (#6) – LOS F
- Cactus Av. from Linebacker Dr. to Brown St. (#7) – LOS E
- Cactus Av., from Brown St. to Meridian Pkwy. (#8) – LOS E
- Barton Rd. from Alessandro Bl. to Cactus Av. (#10) – LOS E
- Brown St., from Alessandro Bl. to Cactus Av. (#12) – LOS F
- Meridian Pkwy. from Cactus Av. to Van Buren Bl. (#15) – LOS F

TABLE 5-2: ROADWAY SEGMENT ANALYSIS FOR E+P CONDITIONS

#	Roadway	Segment Limits	Roadway Section	LOS Capacity[1]	Existing			E+P			Acceptable LOS
					2021	V/C[2]	LOS[3]	2021	V/C[2]	LOS[3]	
1	Alessandro Bl.	Trautwein Rd. to Mission Grove Pkwy.	6D	57,250	42,859	0.75	C	45,853	0.80	C	D
2		Mission Grove Pkwy. to Barton St.	6D	57,250	42,275	0.74	C	46,599	0.81	D	D
3		Barton St. to Brown St.	6D	57,250	42,360	0.74	C	46,352	0.81	D	D
4		Brown St. to Meridian Pkwy.	6D	57,250	41,193	0.72	C	46,221	0.81	D	D
5		Meridian Pkwy. to I-215 Freeway	6D	57,250	44,072	0.77	C	50,139	0.88	D	D
6	Cactus Av.	Airman Dr. to Linebacker Dr.	2U	13,000	0	0.00	A	**28,912**	**2.22**	**F**	D
7		Linebacker Dr. to Brown St.	4D	25,900	0	0.00	A	**43,346**	**1.67**	**F**	D
8		Brown St. to Meridian Pkwy.	4D	25,900	0	0.00	A	**25,630**	**0.99**	**E**	D
9		Meridian Pkwy. to I-215 Freeway	6D	51,150	19,011	0.37	A	35,627	0.70	B	D
10	Barton St.	Alessandro Bl. to Cactus Av. (EVA)	2U	13,000	1,995	0.15	A	**12,227**	**0.94**	**E**	D
11		Cactus Av. (EVA) to Grove Community Dr.	2U	13,000	775	0.06	A	1,107	0.09	A	D
12	Brown St.	Alessandro Bl. to Cactus Av.	2D	13,000	776	0.06	A	**18,492**	**1.42**	**F**	D
13	Sycamore Canyon Bl.	Cottonwood Av. to Alessandro Bl.	4D	33,000	13,151	0.40	A	13,919	0.42	A	D
14	Meridian Pkwy.	Alessandro Bl. to Cactus Av.	4D	25,900	**23,605**	**0.91**	**E**	**25,411**	**0.98**	**E**	D
15		Cactus Av. to Van Buren Bl.	4D	25,900	22,215	0.86	D	**29,423**	**1.14**	**F**	D

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

[1] These maximum roadway capacities are based on the applicable agency's thresholds.

[2] V/C = Volume to Capacity Ratio

[3] LOS = Level of Service

RA-7.8 Cont.

5.5 TRAFFIC SIGNAL WARRANTS ANALYSIS

Based on the traffic signal warrant analysis for E+P traffic conditions, the following study area intersections are anticipated to meet planning level (ADT) volume-based traffic signal warrants in addition to the locations previously warranted under Existing traffic conditions (see Appendix 5.2):

- Airman Dr. & Cactus Av. (#15)
- Linebacker Dr. & Cactus Av. (#18)

5.6 OFF-RAMP QUEUING ANALYSIS

A queuing analysis was performed for the off-ramps at the I-215 Freeway at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard interchanges, to assess vehicle queues for the off ramps that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the I-215 Freeway mainline. Queuing analysis findings are presented in Table 5-3. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown in Table 5-3, there are no movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95th percentile traffic flows for E+P traffic conditions, consistent with Existing (2021) traffic conditions. Worksheets for E+P traffic conditions off-ramp queuing analysis are provided in Appendix 5.3.

5.7 DEFICIENCIES AND IMPROVEMENTS

5.7.1 IMPROVEMENTS TO ADDRESS DEFICIENCIES AT INTERSECTIONS

This section provides a summary of Project deficiencies and identified improvements. Based on the deficiency criteria discussed in Section 2.7 *Deficiency Criteria*, study area intersections were found to be deficient. The effectiveness of the improvement strategies presented in Table 5-4 address the E+P deficiencies as the recommendations improve the operations back to pre-project conditions (or better) or within the allowable net change in delay per the applicable deficiency criteria for each agency. Analysis worksheets, with improvements, for E+P traffic conditions are provided in Appendix 5.4.

RA-7.8 Cont.

5.7.2 IMPROVEMENTS TO ADDRESS DEFICIENCIES AT ROADWAY SEGMENT

Additional roadway widening for the deficient roadway segments has not been recommended as acceptable or improved peak hour traffic operations can be achieved with the existing lanes or with the improvements shown on Table 5-4.

5.7.3 IMPROVEMENTS TO ADDRESS DEFICIENCIES ON OFF-RAMP QUEUES

As shown previously in Table 5-3, there are no anticipated peak hour queuing issues at the I-215 Freeway off-ramps for E+P traffic conditions, consistent with Existing (2021) traffic conditions. As such, no improvements have been recommended.

TABLE 5-3: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR E+P CONDITIONS

Intersection	Movement[3]	Available Stacking Distance (Feet)[3]	Existing (2021) 95th Percentile Queue (Feet)			Existing (2021) Acceptable?[1]			E+P 95th Percentile Queue (Feet)			E+P Acceptable?[1]		
			AM Peak Hour	PM Peak Hour	SAT Peak Hour	AM	PM	SAT	AM Peak Hour	PM Peak Hour	PM Peak Hour	AM	PM	PM
I-215 SB Ramps & Alessandro Blvd. (#28)	SBL	525	132	191	68	Yes	Yes	Yes	126	204	68	Yes	Yes	Yes
	SBL/R	1,540	124	178	52	Yes	Yes	Yes	146	191	71	Yes	Yes	Yes
	SBR	525	118	166	48	Yes	Yes	Yes	136	177	66	Yes	Yes	Yes
I-215 NB Ramps & Alessandro Blvd. (#29)	NBL	450	572 [2 3]	342	155	Yes	Yes	Yes	735 [2 3]	420 [2]	180	Yes	Yes	Yes
	NBL/T/R	1,345	520 [2]	403 [2]	158	Yes	Yes	Yes	687 [2]	457 [2]	189	Yes	Yes	Yes
	NBR	450	41	125	64	Yes	Yes	Yes	47	131	70	Yes	Yes	Yes
I-215 SB Ramps & Cactus Av. (#30)	SBR	1,115	155	157	0	Yes	Yes	Yes	842 [2]	617 [2]	0	Yes	Yes	Yes
	NBR	1,850	18	57	0	Yes	Yes	Yes	20 [2]	58	38	Yes	Yes	Yes
I-215 NB Ramps & Cactus Av. (#31)	NBL	145	452 [2 3]	105	34	Yes	Yes	Yes	739 [2 3]	229 [2 3]	90	Yes	Yes	Yes
	NBT/R	1,650	432 [2]	181	78	Yes	Yes	Yes	417 [2]	181	51	Yes	Yes	Yes
I-215 SB Ramps & Van Buren Blvd.(#32)	SBL/T	1,510	38	121 [2]	24	Yes	Yes	Yes	38	121 [2]	24	Yes	Yes	Yes
	SBR	1,450	233	34	42	Yes	Yes	Yes	241	34	42	Yes	Yes	Yes
I-215 NB Ramps & Van Buren Blvd. (#33)	NBL	1,560	98	62	0	Yes	Yes	Yes	97	62	0	Yes	Yes	Yes
	NBR	580	2	0	0	Yes	Yes	Yes	2	2	0	Yes	Yes	Yes

[1] Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

[2] 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

[3] Although 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent lane has sufficient storage to accommodate any spillover without spilling back and affecting the I-215 Freeway mainline.

RA-7.8
Cont.

TABLE 5-4: INTERSECTION ANALYSIS FOR E+P CONDITIONS WITH IMPROVEMENTS

#	Intersection	Traffic Control[3]	Intersection Approach Lanes[1] Northbound L	T	R	Southbound L	T	R	Eastbound L	T	R	Westbound L	T	R	Delay[2] (secs.) AM	PM	SAT	Level of Service AM	PM	SAT
2	Alessandro Blvd. & Arlington Av./Chicago Av.[5]																			
	- Without Improvements	TS	2	2	1>	2	3	0	1	2	2>	2	2	1>	**76.7**	**87.7**	23.1	**E**	**F**	C
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.																			
	- Without Improvements	TS	1	2	1	2	1	1	1	3	0	1	3	1>	67.3	**94.7**	18.9	E	**F**	B
	- With Improvements	TS	1	2	1	**3**	1	**0**	1	3	0	1	3	1>	52.6	40.9	18.4	D	D	B
14	Barton St. & Van Buren Blvd.																			
	- Without Improvements	TS	2	1	1	1	1	0	1	2	0	1	3	0	**72.6**	34.2	22.3	**E**	C	C
	- With Improvements	TS	2	1	1	1	1	0	1	2	**1>**	1	3	0	52.1	30.4	21.1	D	C	C
20	Brown St. & Alessandro Blvd.[7]																			
	- Without Improvements	TS	1	1	1>	1	1	1>	1	3	0	1	3	1	40.8	**>200.0**	**>200.0**	D	**F**	F
25	Meridian Pkwy. & Cactus Av.																			
	- Without Improvements	TS	2	2	1	2	2	1	1	2	1	2	2	1	49.2	**176.5**	19.7	C	**F**	B
	- With Improvements[6]	TS	2	2	1	2	2	1	1	**3**	**0**	2	2	**1>**	33.2	**71.2**	22.7	C	**E**	C
29	I-215 NB Ramps & Alessandro Blvd.																			
	- Without Improvements	TS	1	1	1	0	0	0	1	3	0	0	3	1	**104.1**	29.4	28.2	**F**	C	C
	- With Improvements	TS	**2**	1	0	0	0	0	1	3	0	0	3	1	23.2	25.7	23.8	C	C	C
31	I-215 NB Ramps & Cactus Av.																			
	- Without Improvements	TS	1	1	1	1	1	0	1	2	0	0	2	0	**90.3**	**59.1**	7.9	**F**	**E**	A
	- With Improvements	TS	**2**	1	1	1	1	0	1	2	**1**	0	**3**	0	25.8	20.8	10.5	C	C	B
36	Elsworth St. & Cactus Av.																			
	- Without Improvements	TS	1	1	0	1	1	1>	1	3	1>>	1	3	1	**100.5**	**90.4**	43.5	**F**	**F**	D
	- With Improvements[7]	TS	1	1	0	1	1	1>	1	3	1>>	1	3	1	34.7	27.8	18.1	C	C	B

* **BOLD** = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

[1] When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; >> = Free Right Turn Lane; **1** = Improvement

[2] Per the Highway Capacity Manual 6th Edition, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

[3] AWS = All-Way Stop; CSS = Cross-street Stop; TS = Traffic Signal

[4] The two intersecting roadways are built to their ultimate width as designated in the General Plan. Based on recent comments and the jurisdiction's traffic study guidelines, infeasible improvements have not been recommended.

[5] There are no feasible intersection improvements. As such, improvements have not been identified.

[6] Recommended improvement is for a southbound shared left-through lane which can be accommodated through restriping (no additional pavement required).

[7] Recommended improvements can be accommodated through implementing N/S from split phasing to protected left turn phasing. Lead-lag operations should be implemented for the northbound and southbound approaches to avoid conflicting left turns. Additionally, the northbound approach should be restriped to provide one left turn lane and one shared through-right turn lane; the southbound approach should be restriped to provide one left turn lane, one through lane, and one right turn lane.

RA-7.8 Cont.

6 EAP (2028) TRAFFIC CONDITIONS

This section discusses the traffic forecasts for EAP conditions and the resulting intersection operations, roadway segment analysis, traffic signal warrant, and freeway off-ramp queuing analyses.

6.1 ROADWAY IMPROVEMENTS

The lane configurations and traffic controls assumed to be in place for EAP conditions are consistent with those shown previously on Exhibit 3-1, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project to provide site access are also assumed to be in place for EAP conditions only (e.g., intersection and roadway improvements at the Project's frontage and driveways).

6.2 EXISTING PLUS AMBIENT GROWTH PLUS PROJECT (EAP) TRAFFIC VOLUME FORECASTS

This scenario includes Existing traffic volumes plus ambient growth (14.87%) plus Project traffic. The ADT and weekday AM and PM peak hour intersection turning movement volumes which can be expected for EAP traffic conditions are shown on Exhibit 6-1. The weekend Saturday peak hour intersection turning movement volumes for EAP traffic conditions are shown on Exhibit 6-2.

6.3 INTERSECTION OPERATIONS ANALYSIS

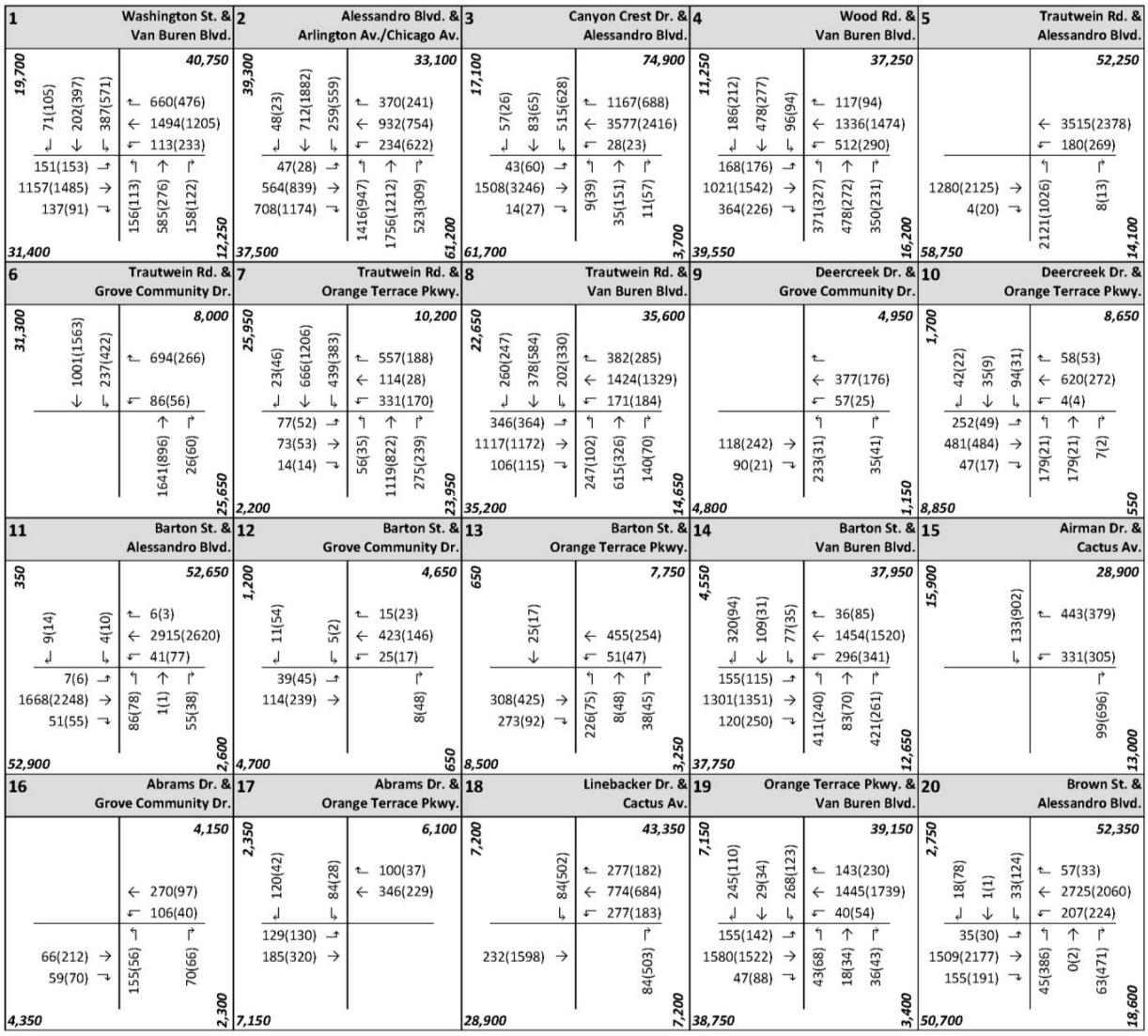
RA-7.8 Cont.

EAP peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2 *Methodologies* of this TA. The intersection analysis results are summarized in Table 6-1 for EAP traffic conditions, which indicates that the following additional study area intersections are anticipated to operate at an unacceptable LOS during the peak hours, in addition to intersections previously identified under Existing (2021) conditions:

- Washington St. & Van Buren Bl. (#1) – LOS E AM and PM peak hours
- Canyon Crest Dr./Overlook Pkwy. & Alessandro Bl. (#3) – LOS E AM peak hour; LOS F PM peak hour
- Wood Rd. & Van Buren Bl. (#4) – LOS E AM and PM peak hours
- Trautwein Rd. & Orange Terrace Pkwy. (#7) – LOS E AM peak hour only
- Trautwein Rd. & Van Buren Bl. (#8) – LOS E AM peak hour only
- Brown St. & Alessandro Bl. (#20) – LOS F PM and Saturday peak hours
- Meridian Pkwy. & Cactus Av. (#25) – LOE E AM peak hour; LOS F PM peak hour

The intersection operations analysis worksheets for EAP traffic conditions are included in Appendix 6.1.

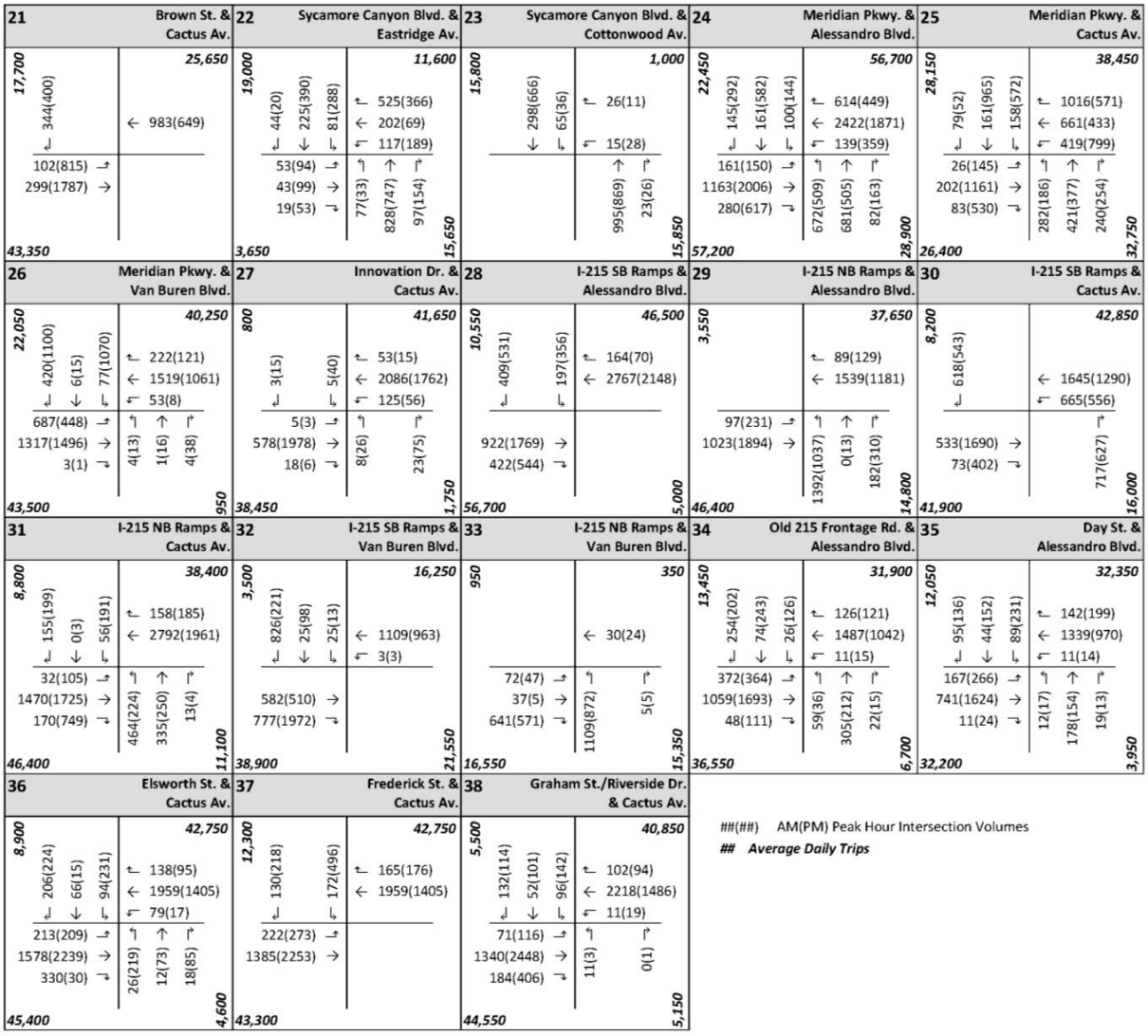
EXHIBIT 6-1: EAP (2028) WEEKDAY TRAFFIC VOLUMES



##(##) AM(PM) Peak Hour Intersection Volumes

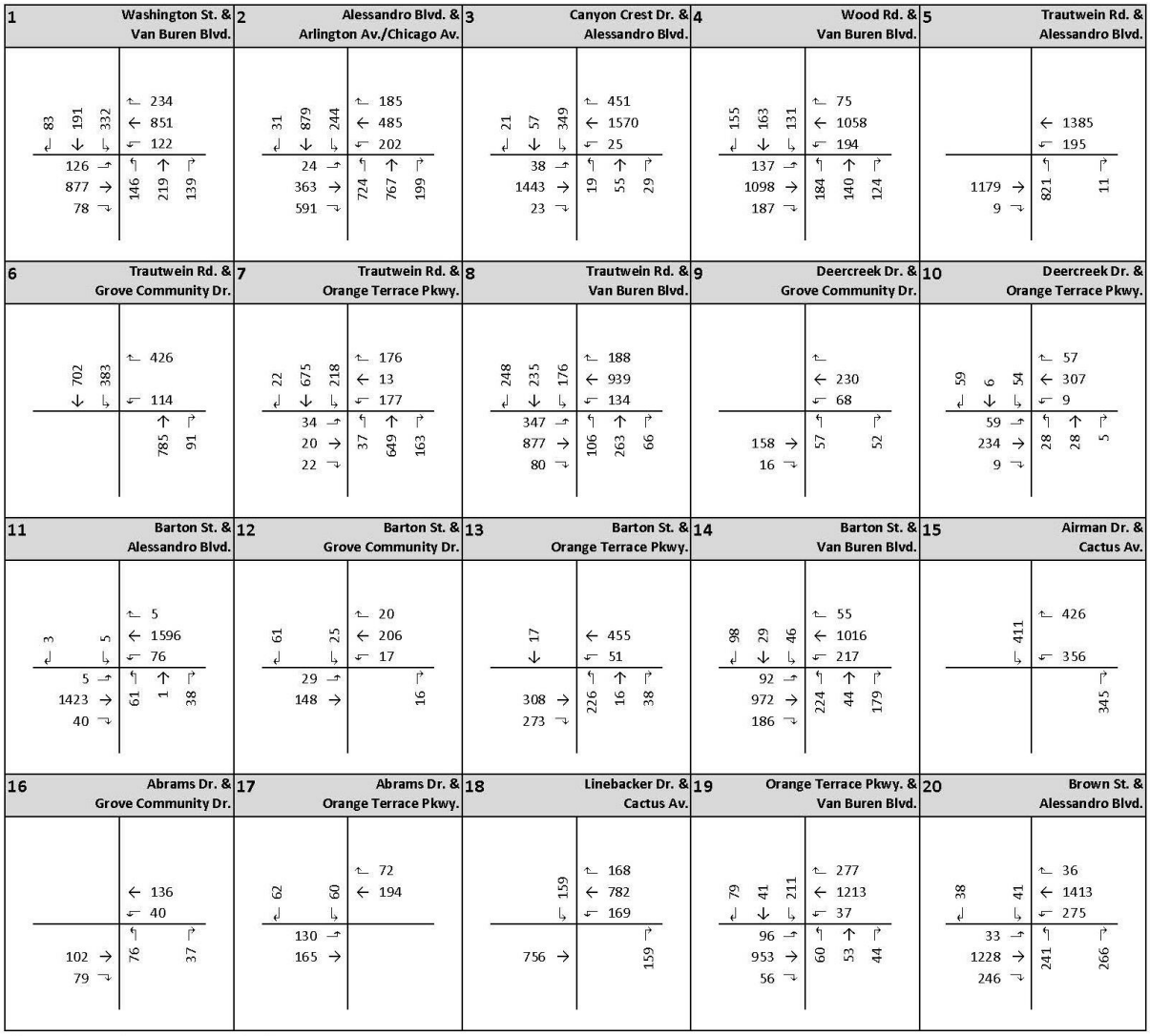
Average Daily Trips

RA-7.8 Cont.


21 Brown St. & Cactus Av.
17,700
344(400)
25,650
983(649)
102(815)
299(1787)
43,350
22 Sycamore Canyon Blvd. & Eastridge Av.
19,000
44(20)
225(390)
81(288)
11,600
525(366)
202(69)
117(189)
53(94)
43(99)
19(53)
77(33)
828(747)
97(154)
3,650
15,650
23 Sycamore Canyon Blvd. & Cottonwood Av.
15,800
298(666)
65(36)
1,000
26(11)
15(28)
995(869)
23(26)
15,850
24 Meridian Pkwy. & Alessandro Blvd.
22,450
145(292)
161(582)
100(144)
56,700
614(449)
2422(1871)
139(359)
161(150)
1163(2006)
280(617)
672(509)
681(505)
82(163)
57,200
28,900
25 Meridian Pkwy. & Cactus Av.
28,150
79(52)
161(965)
158(572)
38,450
1016(571)
661(433)
419(799)
26(145)
202(1161)
83(530)
282(186)
421(377)
240(254)
26,400
32,750
26 Meridian Pkwy. & Van Buren Blvd.
22,050
420(1100)
6(15)
77(1070)
40,250
222(121)
1519(1061)
53(8)
687(448)
1317(1496)
3(1)
4(13)
1(16)
4(38)
43,500
950
27 Innovation Dr. & Cactus Av.
800
3(15)
5(40)
41,650
53(15)
2086(1762)
125(56)
5(3)
578(1978)
18(6)
8(26)
23(75)
38,450
1,750
28 I-215 SB Ramps & Alessandro Blvd.
10,550
409(531)
197(356)
46,500
164(70)
2767(2148)
922(1769)
422(544)
56,700
5,000
29 I-215 NB Ramps & Alessandro Blvd.
3,550
37,650
89(129)
1539(1181)
97(231)
1023(1894)
1392(1037)
0(13)
182(310)
46,400
14,800
30 I-215 SB Ramps & Cactus Av.
8,200
618(543)
42,850
1645(1290)
665(556)
533(1690)
73(402)
717(627)
41,900
16,000
31 I-215 NB Ramps & Cactus Av.
8,800
155(199)
0(3)
56(191)
38,400
158(185)
2792(1961)
32(105)
1470(1725)
170(749)
464(224)
335(250)
13(4)
46,400
11,100
32 I-215 SB Ramps & Van Buren Blvd.
3,500
826(221)
25(98)
25(13)
16,250
1109(963)
3(3)
582(510)
777(1972)
38,900
21,550
33 I-215 NB Ramps & Van Buren Blvd.
950
350
30(24)
72(47)
37(5)
641(571)
1109(872)
5(5)
16,550
15,350
34 Old 215 Frontage Rd. & Alessandro Blvd.
13,450
254(202)
74(243)
26(126)
31,900
126(121)
1487(1042)
11(15)
372(364)
1059(1693)
48(111)
59(36)
305(212)
22(15)
36,550
6,700
35 Day St. & Alessandro Blvd.
12,050
95(136)
44(152)
89(231)
32,350
142(199)
1339(970)
11(14)
167(266)
741(1624)
11(24)
12(17)
178(154)
19(13)
32,200
3,950
36 Elsworth St. & Cactus Av.
8,900
206(224)
66(15)
94(231)
42,750
138(95)
1959(1405)
79(17)
213(209)
1578(2239)
330(30)
26(219)
12(73)
18(85)
45,400
4,600
37 Frederick St. & Cactus Av.
12,300
130(218)
172(496)
42,750
165(176)
1959(1405)
222(273)
1385(2253)
43,300
38 Graham St./Riverside Dr. & Cactus Av.
5,500
132(114)
52(101)
96(142)
40,850
102(94)
2218(1486)
11(19)
71(116)
1340(2448)
184(406)
11(3)
0(1)
44,550
5,150
##(##) AM(PM) Peak Hour Intersection Volumes
Average Daily Trips

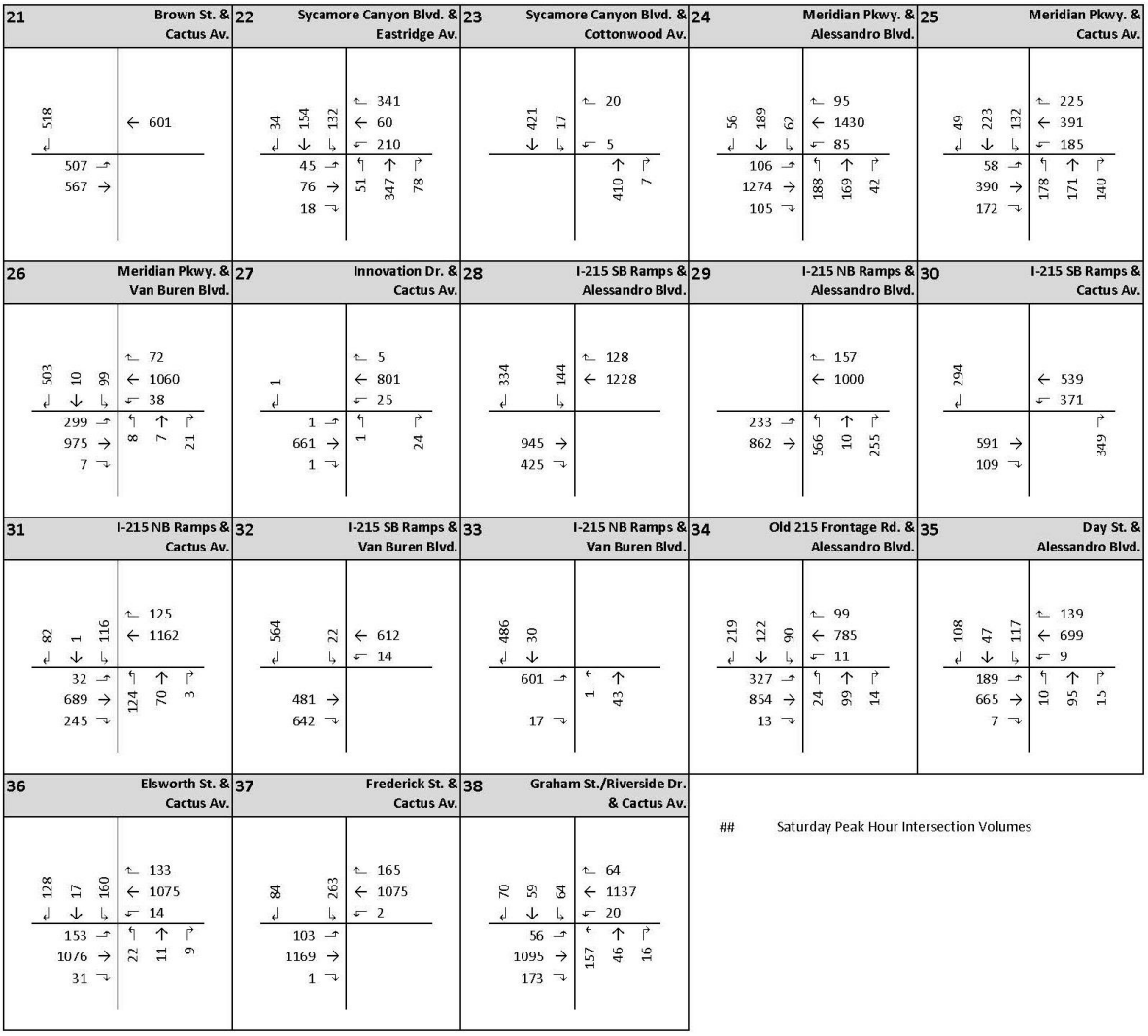
RA-7.8 Cont.

EXHIBIT 6-2: EAP (2028) WEEKEND TRAFFIC VOLUMES



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

TABLE 6-1: INTERSECTION ANALYSIS FOR EAP (2028) CONDITIONS

#	Intersection	Traffic Control[1]	Existing (2021) Delay[2 3 4 5] (secs.) AM	PM	SAT	Existing (2021) Level of Service AM	PM	SAT	EAP Delay[2 3 4 5] (secs.) AM	PM	SAT	EAP Level of Service AM	PM	SAT
1	Washington St. & Van Buren Blvd.	TS	40.4	39.7	22.8	D	D	C	**64.6**	**65.7**	26.1	**E**	**E**	C
2	Alessandro Blvd. & Arlington Av./Chicago Av.	TS	**75.0**	**82.2**	22.7	**E**	**F**	C	**115.4**	**128.1**	27.1	**F**	**F**	C
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.	TS	42.2	46.1	14.9	D	D	B	**118.8**	**164.5**	20.1	**E**	**F**	C
4	Wood Rd. & Van Buren Blvd.	TS	50.4	37.0	24.9	D	D	C	**70.9**	**57.9**	30.2	**E**	**E**	C
5	Trautwein Rd. & Alessandro Blvd.	TS	**89.4**	19.9	13.1	**F**	B	B	**150.6**	26.3	15.0	**F**	C	B
6	Trautwein Rd. & Grove Community Dr.	TS	22.1	10.4	12.4	C	B	B	38.0	11.6	13.1	D	B	B
7	Trautwein Rd. & Orange Terrace Pkwy.	TS	46.0	21.3	18.8	D	C	B	**61.4**	25.4	20.6	**E**	C	C
8	Trautwein Rd. & Van Buren Blvd.	TS	34.9	27.7	20.9	C	C	C	**61.9**	41.0	23.4	**E**	D	C
9	Deercreek Dr. & Grove Community Dr.	AWS	17.2	9.2	9.6	C	A	A	25.2	9.9	10.3	D	A	B
10	Deercreek Dr. & Orange Terrace Pkwy.	AWS	**51.8**	9.9	9.6	**F**	A	A	**95.4**	10.7	10.3	**F**	B	B
11	Barton St. & Alessandro Blvd.	TS	31.2	8.4	7.6	C	A	A	53.5	25.3	8.5	D	C	A
12	Barton St. & Grove Community Dr.	CSS	13.2	9.4	11.0	B	A	B	14.2	9.6	11.7	B	A	B
13	Barton St. & Orange Terrace Pkwy.	CSS	**68.8**	14.3	**45.0**	**F**	B	**E**	**>100.0**	16.5	**>100.0**	**F**	C	**F**
14	Barton St. & Van Buren Blvd.	TS	**61.2**	30.3	21.2	**E**	C	C	**117.0**	50.4	27.9	**F**	D	C
15	Airman Dr. & Cactus Av.	**TS**	Future Intersection						13.3	37.2	21.5	B	D	C
16	Abrams Dr. & Grove Community Dr.	AWS	10.9	8.5	8.4	B	A	A	13.0	9.3	8.8	B	A	A
17	Abrams Dr. & Orange Terrace Pkwy.	AWS	13.1	8.6	8.9	B	A	A	15.7	8.9	9.4	C	A	A
18	Linebacker Dr. & Cactus Av.	**TS**	Future Intersection						22.4	53.1	23.8	C	D	C
19	Orange Terrace Pkwy. & Van Buren Blvd.	TS	18.3	17.9	17.7	B	B	B	19.0	18.4	18.0	B	B	B
20	Brown St. & Alessandro Blvd.	TS	9.2	13.7	5.0	A	B	A	47.2	**>200.0**	**184.1**	D	**F**	**F**
21	Brown St. & Cactus Av.	**TS**	Future Intersection						18.7	36.0	33.4	B	D	C
22	Sycamore Canyon Blvd. & Eastridge Av.	TS	28.2	19.8	17.4	C	B	B	36.2	21.6	17.8	D	C	B
23	Sycamore Canyon Blvd. & Cottonwood Av.	TS	9.3	7.0	5.8	A	A	A	9.7	7.3	6.1	A	A	A
24	Meridian Pkwy. & Alessandro Blvd.	TS	**89.6**	41.8	19.6	**F**	D	B	**108.1**	**70.2**	21.2	**F**	**E**	C
25	Meridian Pkwy. & Cactus Av.	TS	29.5	30.8	16.6	C	C	B	**70.6**	**>200.0**	19.5	**E**	**F**	B
26	Meridian Pkwy. & Van Buren Blvd.	TS	15.4	26.3	12.9	B	C	B	21.7	43.5	15.7	C	D	B
27	Innovation Dr. & Cactus Av.	TS	6.3	8.3	4.5	A	A	A	6.7	9.6	4.1	A	A	A
28	I-215 SB Ramps & Alessandro Blvd.	TS	8.5	9.4	6.3	A	A	A	16.3	12.3	7.2	B	B	A
29	I-215 NB Ramps & Alessandro Blvd.	TS	**81.6**	20.7	22.4	**F**	C	C	**135.6**	34.2	33.8	**F**	C	C
30	I-215 SB Ramps & Cactus Av.	TS	4.7	5.9	5.2	A	A	A	5.9	33.6	6.0	A	C	A
31	I-215 NB Ramps & Cactus Av.	TS	**59.0**	19.9	7.0	**E**	B	A	**138.8**	**90.6**	8.5	**F**	**E**	A
32	I-215 SB Ramps & Van Buren Blvd.	TS	21.5	16.9	10.9	C	B	B	23.1	54.7	10.7	C	D	B
33	I-215 NB Ramps & Van Buren Blvd.	TS	6.4	6.1	4.2	A	A	A	6.6	6.3	4.2	A	A	A
34	Old 215 Frontage Rd. & Alessandro Blvd.	TS	37.9	19.3	17.8	D	B	B	54.9	21.5	19.0	D	C	B
35	Day St. & Alessandro Blvd.	TS	15.0	17.1	12.5	B	B	B	20.0	23.8	13.3	B	C	B
36	Elsworth St. & Cactus Av.	TS	**94.0**	**75.0**	42.6	**F**	**E**	D	**146.5**	**132.5**	47.1	**F**	**F**	D
37	Frederick St. & Cactus Av.	TS	26.0	12.8	9.9	C	B	A	41.2	16.6	10.3	D	B	B
38	Graham St./Riverside Dr. & Cactus Av.	TS	14.7	15.0	16.8	B	B	B	14.9	15.3	17.3	B	B	B

* **BOLD** = Significant Impact

[1] CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal; **TS** = Improvement

[2] For intersections within the jurisdiction of March JPA, deficient occurs (improvements needed) if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels. However, if the pre-project condition is already below LOS D (or acceptable LOS), provide improvements if the Project contributes more than 2% of the total traffic.

[3] For intersections within the jurisdiction of the City of Riverside, deficient occurs (improvements needed) when the addition of project related trips causes either peak hour LOS to degrade from acceptable (LOS A through D) to unacceptable levels (LOS E/F) or the peak hour delay to increase as follows:
- LOS A/B = By 10.0 seconds
- LOS C = By 8.0 seconds
- LOS D = By 5.0 seconds
- LOS E = By 2.0 seconds
- LOS F = By 1.0 seconds

[4] For intersections within the jurisdiction of Caltrans, or the County of Riverside, deficient occurs (improvements needed) if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels.

[5] For intersections within the City of Moreno Valley, provide improvements if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels. If the pre-project condition is at unacceptable LOS and Project increases delay by 5.0 or more, provide improvements to offset the increase in delay.

RA-7.8 Cont.

6.4 ROADWAY SEGMENT ANALYSIS

The roadway segment capacities are approximate figures only and are used at the General Plan level to assist in determining the roadway functional classification (number of through lanes) needed to meet traffic demand. Table 6-2 provides a summary of the EAP conditions roadway segment capacity analysis based on the applicable roadway segment capacity thresholds. As shown on Table 6-2, the following additional study area roadway segments are anticipated to operate at an unacceptable LOS based on the applicable planning level daily roadway capacity thresholds, in addition to the segment identified under Existing (2021) traffic conditions:

- Cactus Av., from Airman Dr. to Linebacker Dr. (#6) – LOS F
- Cactus Av. from Linebacker Dr. to Brown St. (#7) – LOS E
- Cactus Av., from Brown St. to Meridian Pkwy. (#8) – LOS E
- Barton Rd. from Alessandro Bl. to Cactus Av. (#10) – LOS E
- Brown St., from Alessandro Bl. to Cactus Av. (#12) – LOS F
- Meridian Pkwy. from Cactus Av. to Van Buren Bl. (#15) – LOS F

TABLE 6-2: ROADWAY SEGMENT ANALYSIS FOR EAP (2028) CONDITIONS

#	Roadway	Segment Limits	Roadway Section	LOS Capacity[1]	Existing			EAP			Acceptable LOS
					2021	V/C[2]	LOS[3]	2025	V/C[2]	LOS[3]	
1	Alessandro Bl.	Trautwein Rd. to Mission Grove Pkwy.	6D	57,250	42,859	0.75	C	49,190	0.86	D	D
2		Mission Grove Pkwy. to Barton St.	6D	57,250	42,275	0.74	C	49,802	0.87	D	D
3		Barton St. to Brown St.	6D	57,250	42,360	0.74	C	50,242	0.88	D	D
4		Brown St. to Meridian Pkwy.	6D	57,250	41,193	0.72	C	49,291	0.86	D	D
5		Meridian Pkwy. to I-215 Freeway	6D	57,250	44,072	0.77	C	**53,377**	**0.93**	**E**	D
6	Cactus Av.	Airman Dr. to Linebacker Dr.	2U	13,000	0	0.00	A	11,066	0.85	D	D
7		Linebacker Dr. to Brown St.	4D	25,900	0	0.00	A	**24,532**	**0.95**	**E**	D
8		Brown St. to Meridian Pkwy.	4D	25,900	0	0.00	A	21,110	0.82	D	D
9		Meridian Pkwy. to I-215 Freeway	6D	51,150	19,011	0.37	A	36,068	0.71	B	D
10	Barton St.	Alessandro Bl. to Cactus Av. (EVA)	2U	13,000	1,995	0.15	A	**12,392**	**0.95**	**E**	D
11		Cactus Av. (EVA) to Grove Community Dr.	2U	13,000	775	0.06	A	3,949	0.30	A	D
12	Brown St.	Alessandro Bl. to Cactus Av.	2D	13,000	776	0.06	A	4,260	0.33	A	D
13	Sycamore Canyon Bl.	Cottonwood Av. to Alessandro Bl.	4D	33,000	13,151	0.40	A	14,951	0.45	A	D
14	Meridian Pkwy.	Alessandro Bl. to Cactus Av.	4D	25,900	**23,605**	**0.91**	**E**	**27,237**	**1.05**	**F**	D
15		Cactus Av. to Van Buren Bl.	4D	25,900	22,215	0.86	D	**27,980**	**1.08**	**F**	D

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

[1] These maximum roadway capacities are based on the applicable agency's thresholds.

[2] V/C = Volume to Capacity Ratio

[3] LOS = Level of Service

6.5 TRAFFIC SIGNAL WARRANTS ANALYSIS

There are no additional unsignalized study area intersections anticipated to meet either peak hour volume-based or planning level (ADT) volume-based traffic signal warrants for EAP (2028) traffic conditions in addition to the intersections warranted under Existing and E+P traffic conditions (see Appendix 6.2).

RA-7.8 Cont.

6.6 OFF-RAMP QUEUING ANALYSIS

A queuing analysis was performed for the off-ramps at the I-215 Freeway at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard interchanges, to assess vehicle queues for the off ramps that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the I-215 Freeway mainline. Queuing analysis findings are presented in Table 6-3 for EAP traffic conditions. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown in Table 6-3, there are no movements that are anticipated to experience queuing issues during the weekday AM, weekday PM, or weekend Saturday peak 95th percentile traffic flows for EAP traffic conditions, consistent with Existing (2021) traffic conditions. Worksheets for EAP traffic conditions off-ramp queuing analysis are provided in Appendix 6.3.

6.7 DEFICIENCIES AND IMPROVEMENTS

6.7.1 IMPROVEMENTS TO ADDRESS DEFICIENCIES AT INTERSECTIONS

This section provides a summary of Project deficiencies and identified improvements. Based on the deficiency criteria discussed in Section 2.7 *Deficiency Criteria*, study area intersections were found to be deficient. The effectiveness of the improvement strategies presented in Table 6-4 address the EAP deficiencies as the recommendations improve the operations back to pre-project conditions (or better) or within the allowable net change in delay per the applicable deficiency criteria for each agency. Analysis worksheets, with improvements, for EAP traffic conditions are provided in Appendix 6.4.

RA-7.8 Cont.

6.7.2 IMPROVEMENTS TO ADDRESS DEFICIENCIES AT ROADWAY SEGMENT

Additional roadway widening for the deficient roadway segments has not been recommended as acceptable or improved peak hour traffic operations can be achieved with the existing lanes or with the improvements shown on Table 6-4.

6.7.3 IMPROVEMENTS TO ADDRESS DEFICIENCIES ON OFF-RAMP QUEUES

As shown previously in Table 6-3, there are no anticipated peak hour queuing issues at the I-215 Freeway off-ramps for EAP traffic conditions, consistent with Existing (2021) traffic conditions. As such, no improvements have been recommended.

TABLE 6-3: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR EAP (2028) CONDITIONS

Intersection	Movement[3]	Available Stacking Distance (Feet)[3]	Existing (2021) 95th Percentile Queue (Feet)			Existing (2021) Acceptable?[1]			EAP 95th Percentile Queue (Feet)			EAP Acceptable?[1]		
			AM Peak Hour	PM Peak Hour	PM Peak Hour	AM	PM		AM Peak Hour	PM Peak Hour	SAT Peak Hour	AM	PM	SAT
I-215 SB Ramps & Alessandro Blvd. (#28)	SBL	525	132	191	68	Yes	Yes	Yes	136	237	82	Yes	Yes	Yes
	SBL/R	1,540	124	178	52	Yes	Yes	Yes	159	224	96	Yes	Yes	Yes
	SBR	525	118	166	48	Yes	Yes	Yes	148	207	90	Yes	Yes	Yes
I-215 NB Ramps & Alessandro Blvd. (#29)	NBL	450	572 [2 3]	342	155	Yes	Yes	Yes	845 [2 3]	510 [2 3]	210	Yes	Yes	Yes
	NBL/T/R	1,345	520 [2]	403 [2]	158	Yes	Yes	Yes	806 [2]	554 [2]	220	Yes	Yes	Yes
	NBR	450	41	125	64	Yes	Yes	Yes	72	160	111	Yes	Yes	Yes
I-215 SB Ramps & Cactus Av. (#30)	SBR	1,115	155	157	0	Yes	Yes	Yes	894 [2]	712 [2]	0	Yes	Yes	Yes
	NBR	1,850	18	57	0	Yes	Yes	Yes	124	164	67	Yes	Yes	Yes
I-215 NB Ramps & Cactus Av. (#31)	NBL	145	452 [2 3]	105	34	Yes	Yes	Yes	830 [2 3]	261 [2 3]	100	Yes	Yes	Yes
	NBT/R	1,650	432 [2]	181	78	Yes	Yes	Yes	139 [2]	208	61	Yes	Yes	Yes
I-215 SB Ramps & Van Buren Blvd.(#32)	SBL/T	1,510	38	121 [2]	24	Yes	Yes	Yes	44	145 [2]	26	Yes	Yes	Yes
	SBR	1,450	233	34	42	Yes	Yes	Yes	334	36	44	Yes	Yes	Yes
I-215 NB Ramps & Van Buren Blvd. (#33)	NBL	1,560	98	62	0	Yes	Yes	Yes	122	75	0	Yes	Yes	Yes
	NBR	580	2	0	0	Yes	Yes	Yes	2	2	0	Yes	Yes	Yes

[1] Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

[2] 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

[3] Although 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent lane has sufficient storage to accommodate any spillover without spilling back and affecting the I-215 Freeway mainline.

RA-7.8 Cont.

TABLE 6-4: INTERSECTION ANALYSIS FOR EAP (2028) CONDITIONS WITH IMPROVEMENTS

#	Intersection	Traffic Control[3]	Intersection Approach Lanes[1] Northbound L	T	R	Southbound L	T	R	Eastbound L	T	R	Westbound L	T	R	Delay[2] (secs.) AM	PM	SAT	Level of Service AM	PM	SAT
1	Washington St. & Van Buren Blvd.																			
	- Without Improvements	TS	2	2	1	2	2	0	1	2	0	1	2	1	**64.6**	**65.7**	26.1	**E**	**E**	C
	- With Improvements	TS	2	2	1	2	2	0	1	**3**	0	1	**3**	1	41.5	38.6	24.2	D	D	C
2	Alessandro Blvd. & Arlington Av./Chicago Av.[4]																			
	- Without Improvements	TS	2	2	1>	2	3	0	1	2	2>	2	2	1>	**115.4**	**128.1**	27.1	**F**	**F**	C
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.																			
	- Without Improvements	TS	1	2	1	2	1	1	1	3	0	1	3	1>	**118.8**	**164.5**	20.1	**E**	**F**	C
	- With Improvements	TS	1	2	1	**3**	1	**0**	1	3	0	1	3	1>	**100.2**	**70.2**	19.1	**F**	**E**	B
4	Wood Rd. & Van Buren Blvd.																			
	- Without Improvements	TS	2	2	0	1	2	0	1	2	1>	2	2	1	**70.9**	57.9	30.2	**E**	E	C
	- With Improvements	TS	2	2	0	1	2	0	1	**3**	1>	2	**3**	1	47.2	38.2	21.9	D	D	C
5	Trautwein Rd. & Alessandro Blvd.[4]																			
	- Without Improvements	TS	2	1	0	0	0	0	0	3	0	2	3	0	**150.6**	26.3	15.0	**F**	C	B
7	Trautwein Rd. & Orange Terrace Pkwy.																			
	- Without Improvements	TS	1	2	1	2	2	1	1	1	0	1	1	2>	**61.4**	25.4	20.6	**E**	C	C
	- With Improvements	TS	1	2	1	2	2	1	1	1	0	**2**	1	**1>**	51.7	20.8	18.5	D	C	B
8	Trautwein Rd. & Van Buren Blvd.																			
	- Without Improvements	TS	1	2	0	2	2	1>	2	2	1>	1	3	1>	**61.9**	41.0	23.4	**E**	D	C
	- With Improvements	TS	1	2	0	2	2	1>	2	**3**	1>	1	3	1>	50.4	34.7	22.5	D	C	C
10	Deercreek Dr. & Orange Terrace Pkwy.																			
	- Without Improvements	AWS	0	1	0	0	1	0	1	2	0	1	2	0	**95.4**	10.7	10.3	**F**	B	B
	- With Improvements	**TS**	0	1	0	0	1	0	1	2	0	1	2	0	16.2	5.5	5.5	B	A	A
13	Barton St. & Orange Terrace Pkwy.																			
	- Without Improvements	CSS	1	0	0	0	0	0	0	2	0	1	2	0	**>100.0**	16.5	**>100.0**	**F**	C	**F**
	- With Improvements	**TS**	1	0	0	0	0	0	0	2	0	1	2	0	8.1	5.9	7.9	A	A	A
14	Barton St. & Van Buren Blvd.																			
	- Without Improvements	TS	2	1	1	1	1	0	1	2	0	1	3	0	**117.0**	50.4	27.9	**F**	D	C
	- With Improvements	TS	2	1	1	1	1	0	1	**3**	**1>**	1	3	0	**60.9**	25.1	20.9	**E**	C	C
20	Brown St. & Alessandro Blvd.[4]																			
	- Without Improvements	TS	1	1	1>	1	1	1>	1	3	0	1	3	1	47.2	**>200.0**	**184.1**	D	**F**	**F**
24	Meridian Pkwy. & Alessandro Blvd.[4]																			
	- Without Improvements	TS	2	2	2>	2	2	1	1	3	1	2	3	1	**108.1**	**70.2**	21.2	**F**	**E**	C
25	Meridian Pkwy. & Cactus Av.																			
	- Without Improvements	TS	2	2	1	2	2	1	1	2	1	2	2	1	70.6	**>200.0**	19.5	E	**F**	B
	- With Improvements	TS	2	2	1	2	2	1	1	2	1	2	2	**1>**	39.6	**148.9**	23.7	D	**F**	C
29	I-215 NB Ramps & Alessandro Blvd.																			
	- Without Improvements	TS	1	1	1	0	0	0	1	3	0	0	3	1	**135.6**	34.2	33.8	**F**	C	C
	- With Improvements	TS	**2**	1	0	0	0	0	1	3	0	0	3	1	25.1	28.4	25.4	C	C	C
31	I-215 NB Ramps & Cactus Av.																			
	- Without Improvements	TS	1	1	1	1	1	0	1	2	0	0	2	0	**138.8**	**90.6**	8.5	**F**	**E**	A
	- With Improvements	TS	**2**	1	1	1	1	0	1	2	**1**	0	**3**	0	36.5	25.2	11.1	D	C	B
36	Elsworth St. & Cactus Av.																			
	- Without Improvements	TS	1	1	0	1	1	1>	1	3	1>>	1	3	1	**146.5**	**132.5**	47.1	**F**	**F**	D
	- With Improvements[5]	TS	1	1	0	1	1	1>	1	3	1>>	1	3	1	46.6	35.6	20.5	D	D	C

* **BOLD** = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

[1] When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; >> = Free Right Turn Lane; **1** = Improvement

[2] Per the Highway Capacity Manual 6th Edition, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

[3] AWS = All-Way Stop; CSS = Cross-street Stop; TS = Traffic Signal

[4] There are no feasible intersection improvements. As such, improvements have not been identified.

[5] Recommended improvements can be accommodated through implementing N/S from split phasing to protected left turn phasing. Lead-lag operations should be implemented for the northbound and southbound approaches to avoid conflicting left turns. Additionally, the northbound approach should be restriped to provide one left turn lane and one shared through-right turn lane; the southbound approach should be restriped to provide one left turn lane, one through lane, and one right turn lane.

RA-7.8 Cont.

7 OPENING YEAR CUMULATIVE (2028) TRAFFIC CONDITIONS

This section discusses the methods used to develop Opening Year Cumulative (2028) Without and With Project traffic forecasts, and the resulting intersection operations, roadway segment, traffic signal warrant, and freeway off-ramp queuing analyses.

7.1 ROADWAY IMPROVEMENTS

The lane configurations and traffic controls assumed to be in place for Opening Year Cumulative (2028) conditions are consistent with those shown previously on Exhibit 3-1, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project to provide site access are also assumed to be in place for Opening Year Cumulative conditions only (e.g., intersection and roadway improvements along the Project's frontage and driveways).
- Driveways and those facilities assumed to be constructed by cumulative developments to provide site access are also assumed to be in place for Opening Year Cumulative conditions only.

7.2 OPENING YEAR CUMULATIVE (2028) WITHOUT PROJECT TRAFFIC VOLUME FORECASTS

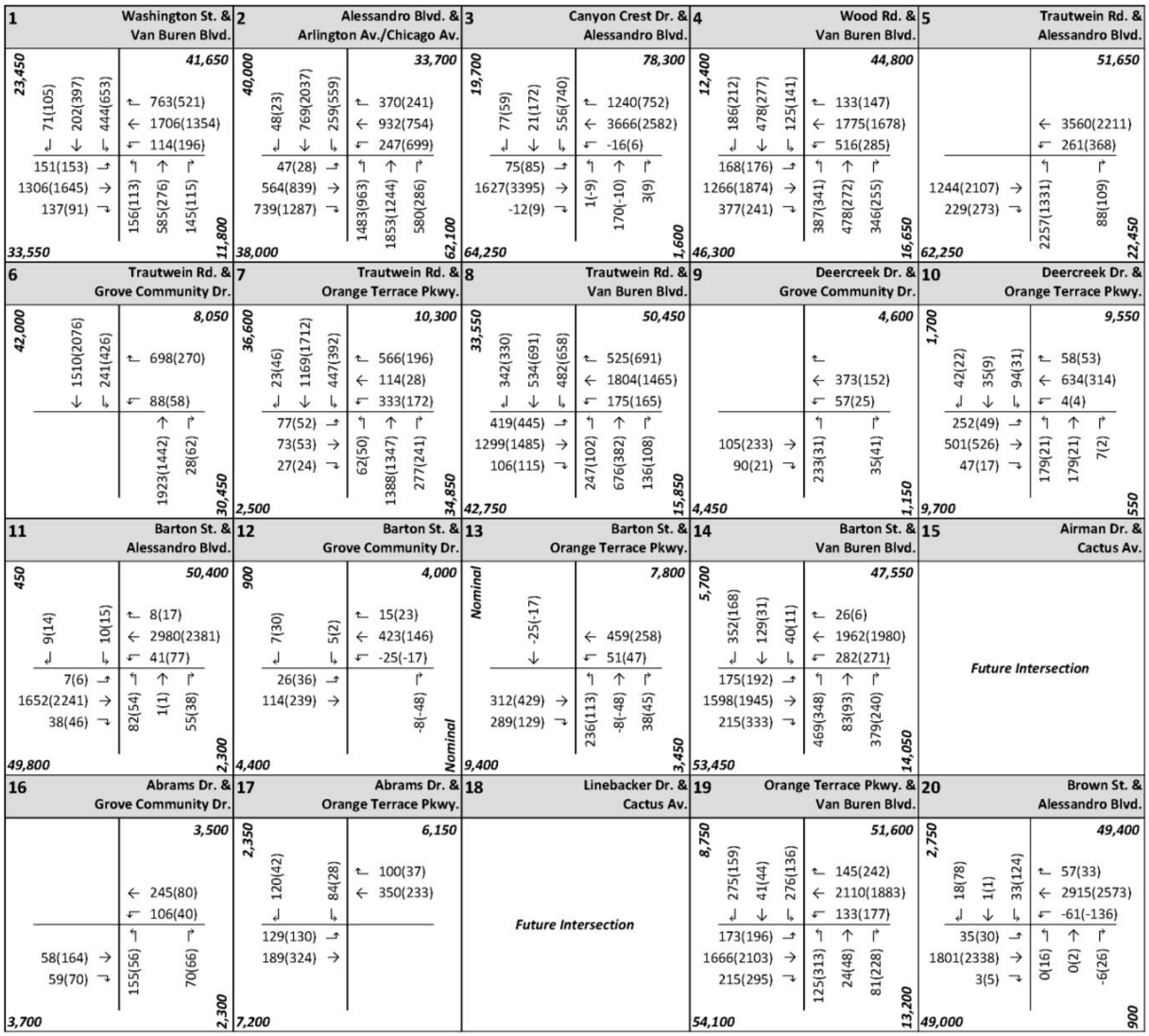
This scenario includes Existing traffic volumes plus an ambient growth factor of 14.87% plus traffic from pending and approved but not yet constructed known development projects in the area. The weekday ADT and weekday AM and PM peak hour volumes which can be expected for Opening Year Cumulative (2028) Without Project traffic conditions are shown on Exhibit 7-1. The weekend Saturday peak hour volumes for Opening Year Cumulative (2028) Without Project traffic conditions are shown on Exhibit 7-2.

RA-7.8 Cont.

7.3 OPENING YEAR CUMULATIVE (2028) WITH PROJECT TRAFFIC VOLUME FORECASTS

This scenario includes Opening Year Cumulative (2028) Without Project traffic in conjunction with the addition of Project traffic. The weekday ADT and weekday AM and PM peak hour volumes which can be expected for Opening Year Cumulative (2028) With Project traffic conditions are shown on Exhibit 7-3. The weekend Saturday peak hour volumes for Opening Year Cumulative (2028) With Project traffic conditions are shown on Exhibit 7-4.

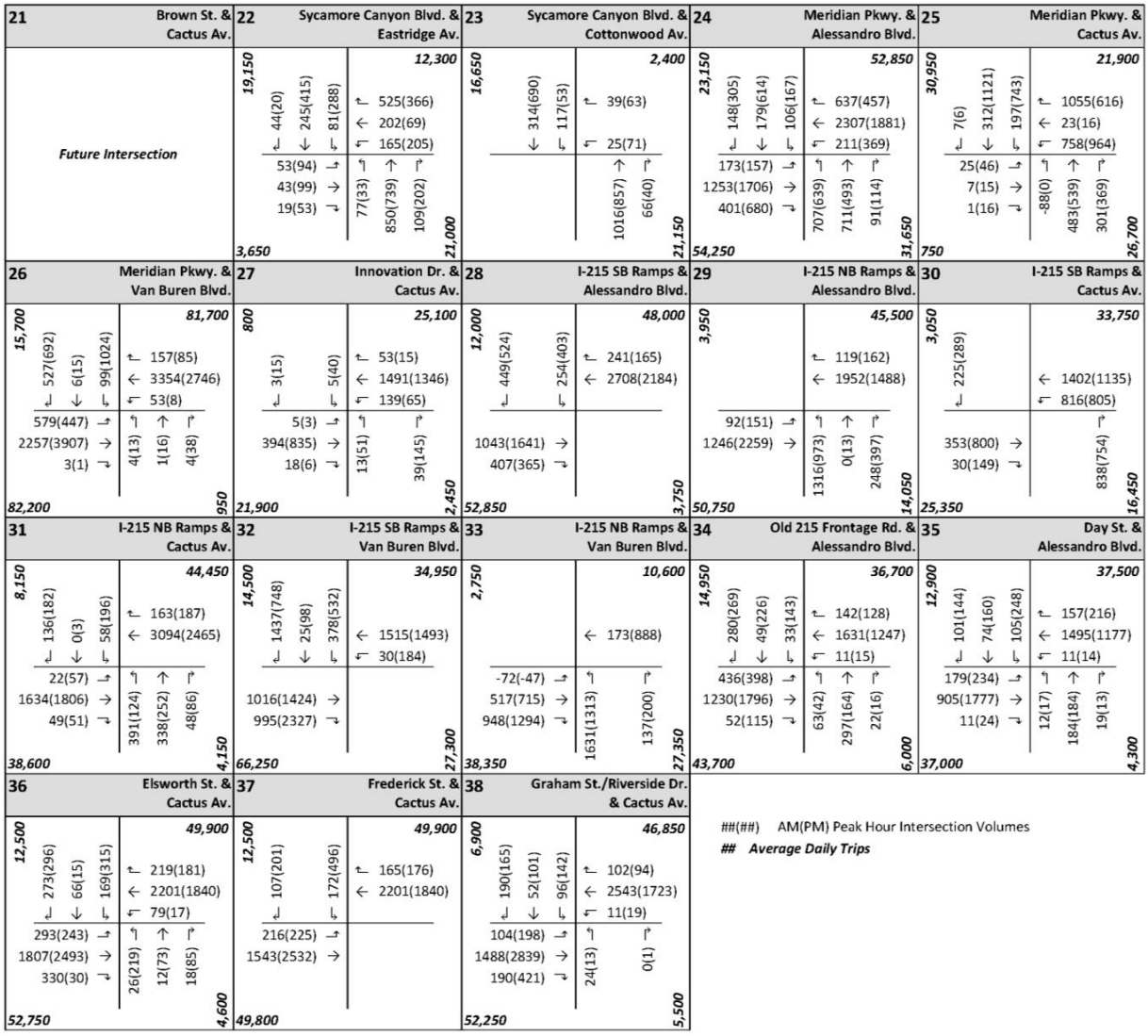
EXHIBIT 7-1: OPENING YEAR CUMULATIVE (2028) WITHOUT PROJECT WEEKDAY TRAFFIC VOLUMES



##(##) AM(PM) Peak Hour Intersection Volumes

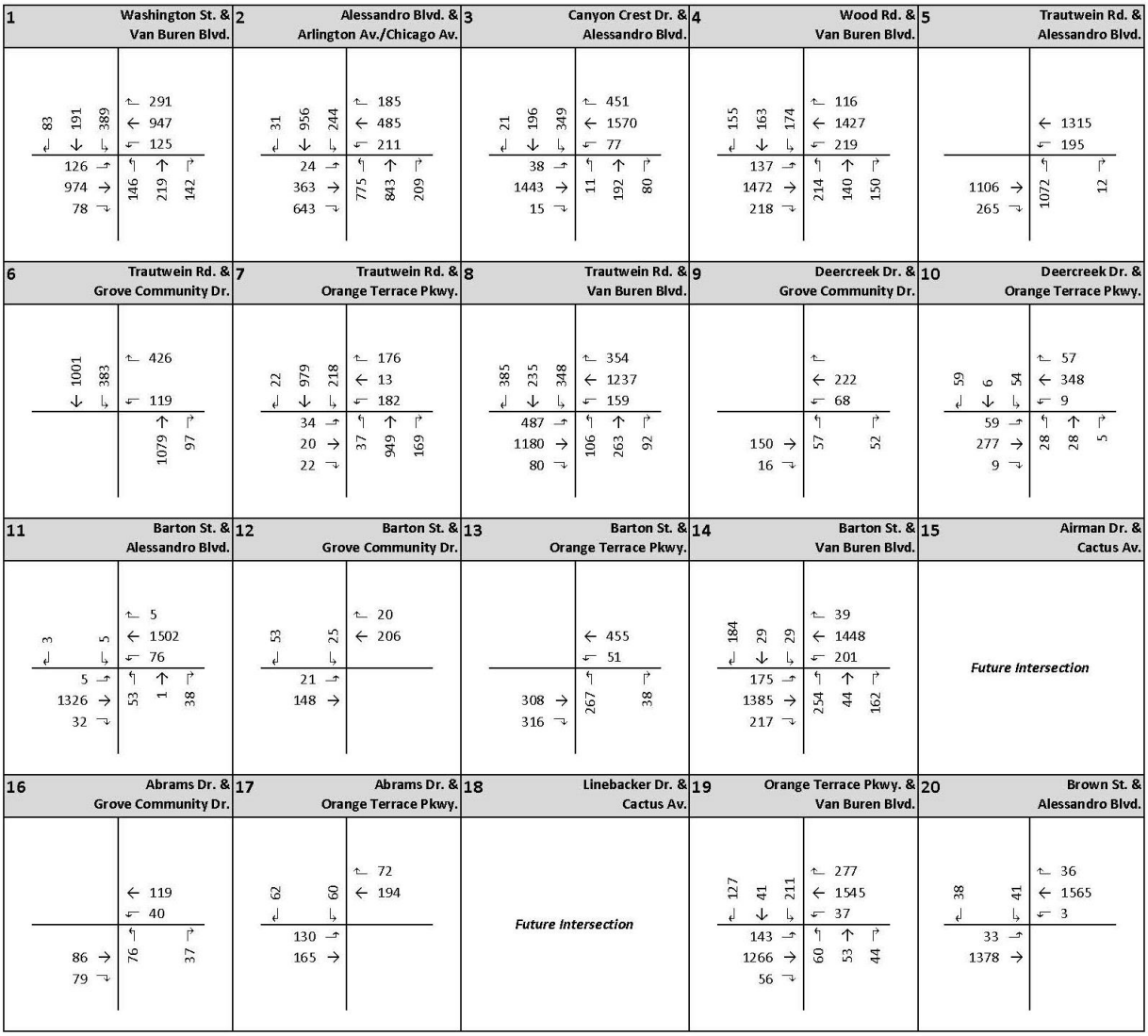
Average Daily Trips

RA-7.8 Cont.


21 Brown St. & Cactus Av.
Future Intersection
22 Sycamore Canyon Blvd. & Eastridge Av.
19,150 12,300
44(20) 245(415) 81(288)
53(94) 43(99) 19(53)
525(366) 202(69) 165(205)
77(33) 850(739) 109(202)
3,650 21,000
23 Sycamore Canyon Blvd. & Cottonwood Av.
16,650 2,400
314(690) 117(53)
39(63) 25(71)
1016(857) 66(40)
21,150
24 Meridian Pkwy. & Alessandro Blvd.
23,150 52,850
148(305) 179(614) 106(167)
173(157) 1253(1706) 401(680)
637(457) 2307(1881) 211(369)
707(639) 711(493) 91(114)
54,250 31,650
25 Meridian Pkwy. & Cactus Av.
30,950 21,900
7(6) 312(1121) 197(743)
25(46) 7(15) 1(16)
1055(616) 23(16) 758(964)
-88(0) 483(539) 301(369)
750 26,700
26 Meridian Pkwy. & Van Buren Blvd.
15,700 81,700
527(692) 6(15) 99(1024)
579(447) 2257(3907) 3(1)
157(85) 3354(2746) 53(8)
4(13) 1(16) 4(38)
82,200 950
27 Innovation Dr. & Cactus Av.
800 25,100
3(15) 5(40)
5(3) 394(835) 18(6)
53(15) 1491(1346) 139(65)
13(51) 39(145)
21,900 2,450
28 I-215 SB Ramps & Alessandro Blvd.
12,000 48,000
449(524) 254(403)
1043(1641) 407(365)
241(165) 2708(2184)
52,850 3,750
29 I-215 NB Ramps & Alessandro Blvd.
3,950 45,500
92(151) 1246(2259)
119(162) 1952(1488)
1316(973) 0(13) 248(397)
50,750 14,050
30 I-215 SB Ramps & Cactus Av.
3,050 33,750
225(289)
353(800) 30(149)
1402(1135) 816(805)
838(754)
25,350 16,450
31 I-215 NB Ramps & Cactus Av.
8,150 44,450
136(182) 0(3) 58(196)
22(57) 1634(1806) 49(51)
163(187) 3094(2465)
391(124) 338(252) 48(86)
38,600 4,150
32 I-215 SB Ramps & Van Buren Blvd.
14,500 34,950
1437(748) 25(98) 378(532)
1016(1424) 995(2327)
1515(1493) 30(184)
66,250 27,300
33 I-215 NB Ramps & Van Buren Blvd.
2,750 10,600
-72(-47) 517(715) 948(1294)
173(888)
1631(1313) 137(200)
38,350 27,350
34 Old 215 Frontage Rd. & Alessandro Blvd.
14,950 36,700
280(269) 49(226) 33(143)
436(398) 1230(1796) 52(115)
142(128) 1631(1247) 11(15)
63(42) 297(164) 22(16)
43,700 6,000
35 Day St. & Alessandro Blvd.
12,900 37,500
101(144) 74(160) 105(248)
179(234) 905(1777) 11(24)
157(216) 1495(1177) 11(14)
12(17) 184(184) 19(13)
37,000 4,300
36 Elsworth St. & Cactus Av.
12,500 49,900
273(296) 66(15) 169(315)
293(243) 1807(2493) 330(30)
219(181) 2201(1840) 79(17)
26(219) 12(73) 18(85)
52,750 4,600
37 Frederick St. & Cactus Av.
12,500 49,900
107(201) 172(496)
216(225) 1543(2532)
165(176) 2201(1840)
49,800
38 Graham St./Riverside Dr. & Cactus Av.
6,900 46,850
190(165) 52(101) 96(142)
104(198) 1488(2839) 190(421)
102(94) 2543(1723) 11(19)
24(13) 0(1)
52,250 5,500
##(##) AM(PM) Peak Hour Intersection Volumes
Average Daily Trips

RA-7.8 Cont.

EXHIBIT 7-2: OPENING YEAR CUMULATIVE (2028) WITHOUT PROJECT WEEKEND TRAFFIC VOLUMES



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

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21 Brown St. & Cactus Av.

Future Intersection

22 Sycamore Canyon Blvd. & Eastridge Av.

	138 ↓	132 ↳
34 ↲		↰ 213
45 ↳		
76 →		
18 ↲		

		↱ 341
		← 60
↰ 51	↑ 331	↱ 79

23 Sycamore Canyon Blvd. & Cottonwood Av.

	20 ↳	
404 ←		↰ 7
		↑ 394

		↱ 22
		↱ 12

24 Meridian Pkwy. & Alessandro Blvd.

	173 ↓	63 ↳
57 ↲		↰ 59
108 ↳		
1156 →		
105 ↲		

		↱ 96
		← 1308
↰ 188	↑ 155	↱ 17

25 Meridian Pkwy. & Cactus Av.

	224 ↓	132 ↳
6 ↲		↰ 185
17 ↳		
32 →		
5 ↲		

		↱ 225
		← 10
↰ 1	↑ 172	↱ 140

26 Meridian Pkwy. & Van Buren Blvd.

376 ↲	10 ↓	60 ↳
165 ↳		↰ 38
1405 →		
7 ↲		

		↱ 30
		← 1503
↰ 8	↑ 7	↱ 21

27 Innovation Dr. & Cactus Av.

1 ↲		
1 ↳		↰ 25
303 →		
1 ↲		

		↱ 5
		← 420
↰ 1	↑	↱ 24

28 I-215 SB Ramps & Alessandro Blvd.

294 ↲		144 ↳
		↰ 130
875 →		← 1120
354 ↲		

29 I-215 NB Ramps & Alessandro Blvd.

		↱ 157
		← 969
193 ↳		
830 →		

↰ 492	↑ 10	↱ 259

30 I-215 SB Ramps & Cactus Av.

64 ↲		
		↰ 371
311 →		← 388
30 ↲		

		↱
		349

31 I-215 NB Ramps & Cactus Av.

65 ↲	1 ↓	116 ↳
16 ↳		↰ 40
641 →		
29 ↲		

		↱ 125
		← 1112
	↑ 70	↱ 3

32 I-215 SB Ramps & Van Buren Blvd.

807 ↲		22 ↳
		↰ 14
717 →		
797 ↲		

		← 770

33 I-215 NB Ramps & Van Buren Blvd.

722 ↲	30 ↓	
759 ↳		
		↰ 1
17 ↲		↑ 43

34 Old 215 Frontage Rd. & Alessandro Blvd.

221 ↲	105 ↓	90 ↳
331 ↳		↰ 24
822 →		
13 ↲		

		↱ 99
		← 752
	↑ 83	↱ 14

35 Day St. & Alessandro Blvd.

91 ↲	47 ↓	117 ↳
173 ↳		↰ 10
649 →		
7 ↲		

		↱ 139
		← 682
	↑ 95	↱ 15

36 Elsworth St. & Cactus Av.

111 ↲	17 ↓	160 ↳
137 ↳		↰ 22
1044 →		
31 ↲		

		↱ 133
		← 1041
	↑ 11	↱ 9

37 Frederick St. & Cactus Av.

67 ↲		263 ↳
87 ↳		↰ 2
1153 →		
1 ↲		

		↱ 165
		← 1041

38 Graham St./Riverside Dr. & Cactus Av.

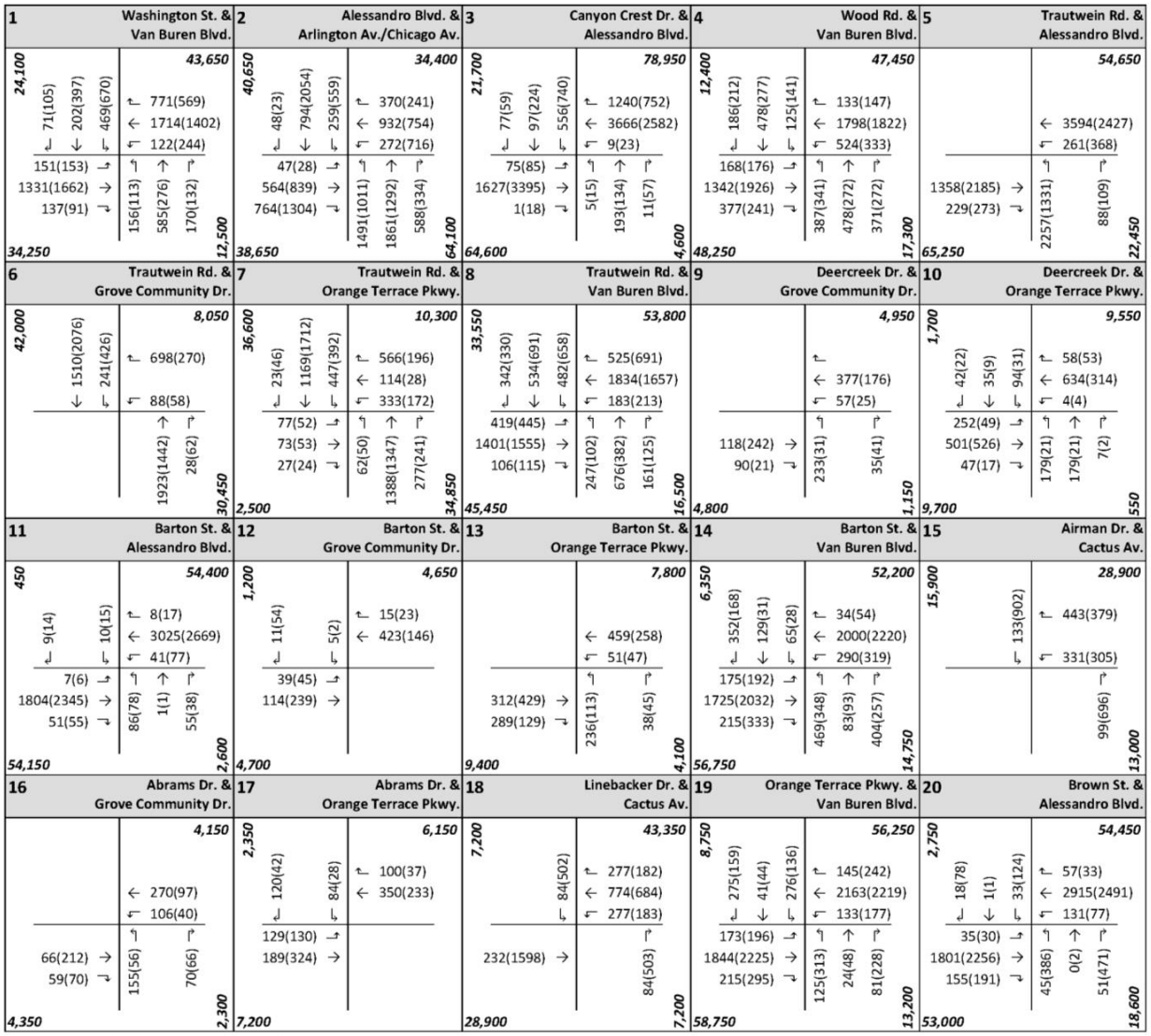
70 ↲	59 ↓	64 ↳
56 ↳		↰ 157
1079 →		
173 ↲		

		↱ 64
		← 1120
	↑ 46	↱ 16

Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

EXHIBIT 7-3: OPENING YEAR CUMULATIVE (2028) WITH PROJECT WEEKDAY TRAFFIC VOLUMES



RA-7.8 Cont.

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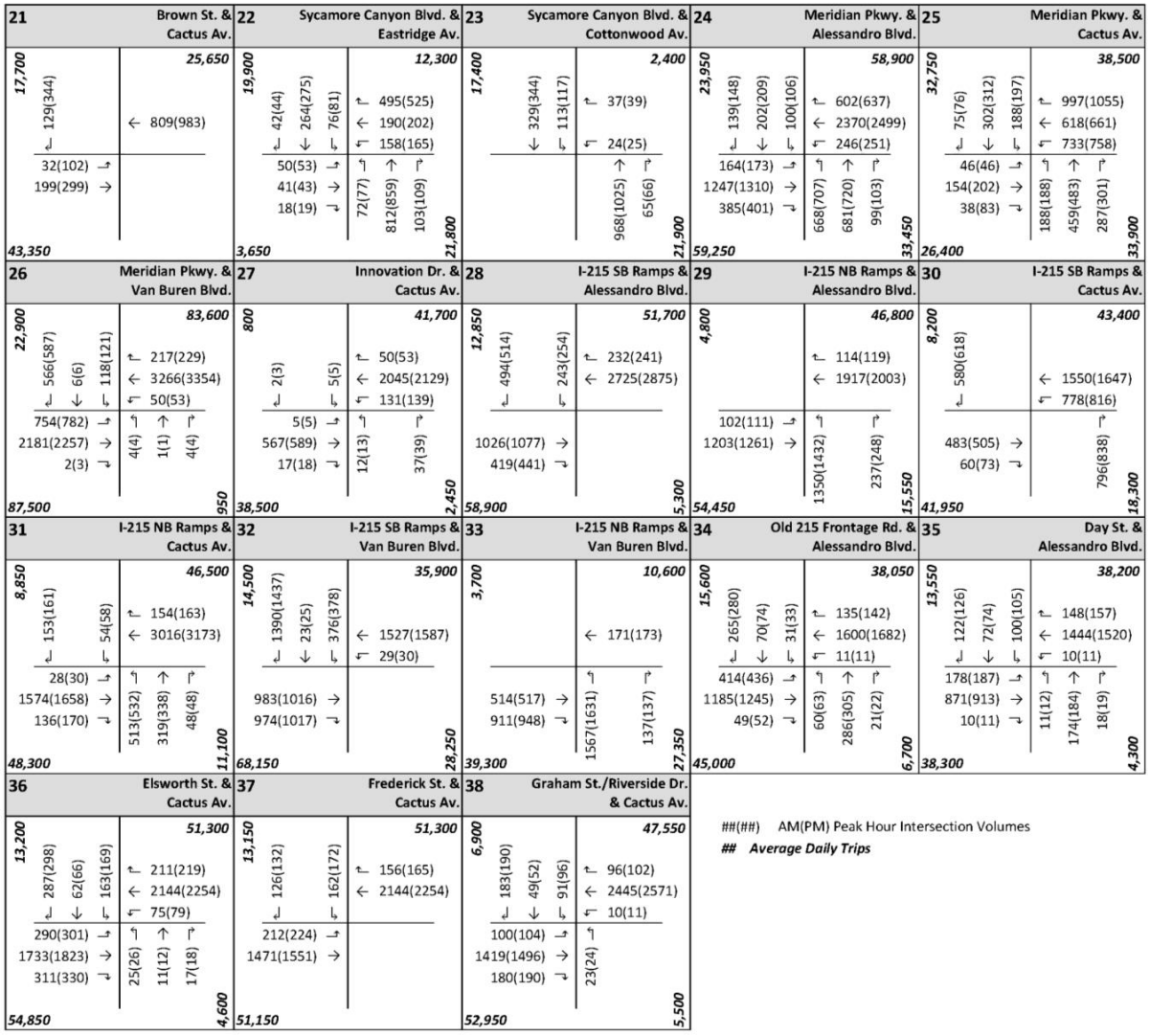
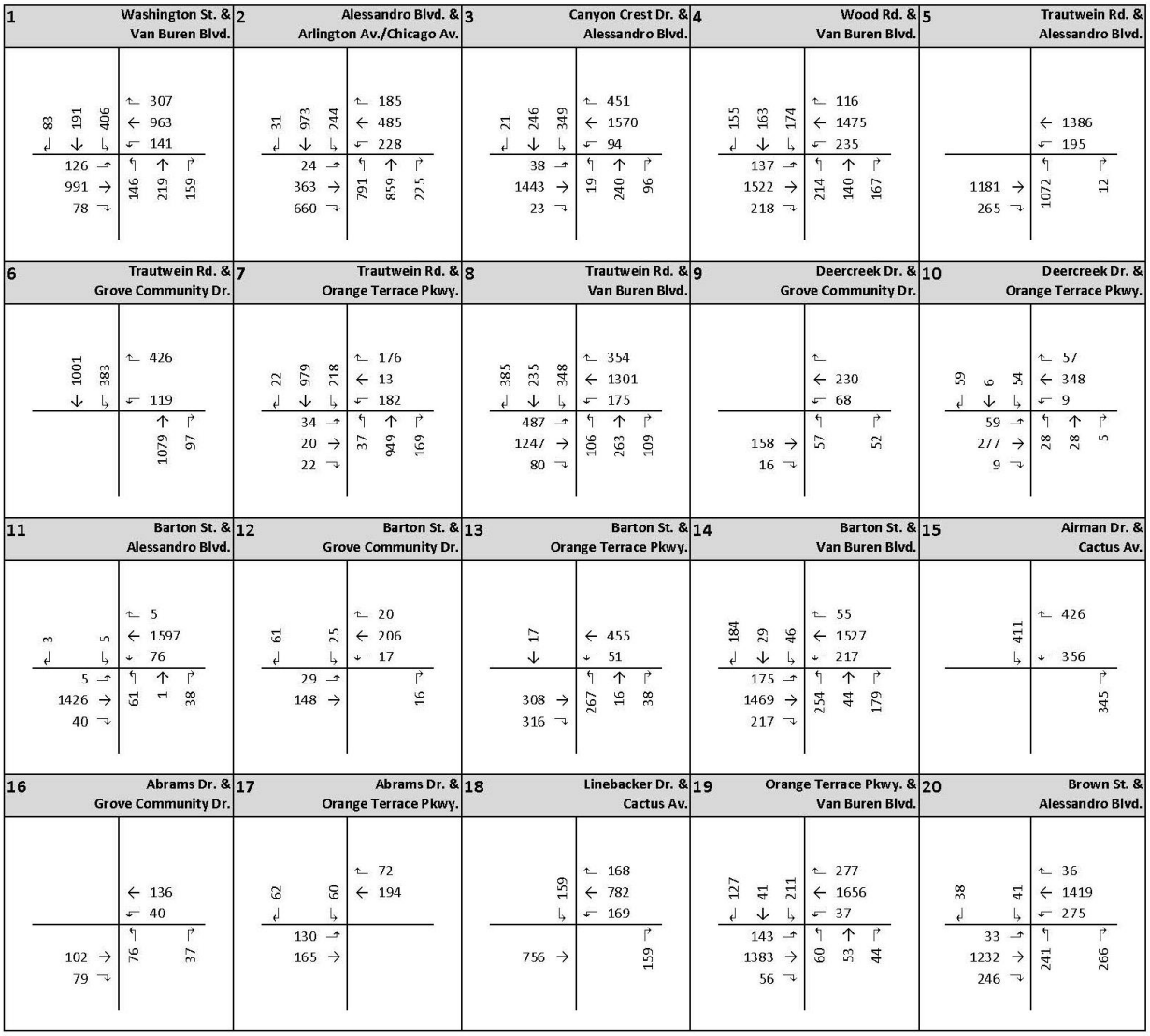

21 Brown St. & Cactus Av.
17,700
129(344)
809(983)
25,650
32(102)
199(299)
43,350
22 Sycamore Canyon Blvd. & Eastridge Av.
19,900
42(44)
264(275)
76(81)
495(525)
190(202)
158(165)
12,300
50(53)
41(43)
18(19)
72(77)
812(859)
103(109)
3,650
21,800
23 Sycamore Canyon Blvd. & Cottonwood Av.
17,400
329(344)
113(117)
37(39)
24(25)
2,400
968(1025)
65(66)
21,900
24 Meridian Pkwy. & Alessandro Blvd.
23,950
139(148)
202(209)
100(106)
602(637)
2370(2499)
246(251)
58,900
164(173)
1247(1310)
385(401)
668(707)
681(720)
99(103)
59,250
33,450
25 Meridian Pkwy. & Cactus Av.
32,750
75(76)
302(312)
188(197)
997(1055)
618(661)
733(758)
38,500
46(46)
154(202)
38(83)
188(188)
459(483)
287(301)
26,400
33,900
26 Meridian Pkwy. & Van Buren Blvd.
22,900
566(587)
6(6)
118(121)
217(229)
3266(3354)
50(53)
83,600
754(782)
2181(2257)
2(3)
4(4)
1(1)
4(4)
87,500
950
27 Innovation Dr. & Cactus Av.
800
2(3)
5(5)
50(53)
2045(2129)
131(139)
41,700
5(5)
567(589)
17(18)
12(13)
37(39)
38,500
2,450
28 I-215 SB Ramps & Alessandro Blvd.
12,850
494(514)
243(254)
232(241)
2725(2875)
51,700
1026(1077)
419(441)
58,900
5,300
29 I-215 NB Ramps & Alessandro Blvd.
4,800
114(119)
1917(2003)
46,800
102(111)
1203(1261)
1350(1432)
237(248)
54,450
15,550
30 I-215 SB Ramps & Cactus Av.
8,200
580(618)
1550(1647)
778(816)
43,400
483(505)
60(73)
796(838)
41,950
18,300
31 I-215 NB Ramps & Cactus Av.
8,850
153(161)
54(58)
154(163)
3016(3173)
46,500
28(30)
1574(1658)
136(170)
513(532)
319(338)
48(48)
48,300
11,100
32 I-215 SB Ramps & Van Buren Blvd.
14,500
1390(1437)
23(25)
376(378)
1527(1587)
29(30)
35,900
983(1016)
974(1017)
68,150
28,250
33 I-215 NB Ramps & Van Buren Blvd.
3,700
171(173)
10,600
514(517)
911(948)
1567(1631)
137(137)
39,300
27,350
34 Old 215 Frontage Rd. & Alessandro Blvd.
15,600
265(280)
70(74)
31(33)
135(142)
1600(1682)
11(11)
38,050
414(436)
1185(1245)
49(52)
60(63)
286(305)
21(22)
45,000
6,700
35 Day St. & Alessandro Blvd.
13,550
122(126)
72(74)
100(105)
148(157)
1444(1520)
10(11)
38,200
178(187)
871(913)
10(11)
11(12)
174(184)
18(19)
38,300
4,300
36 Elsworth St. & Cactus Av.
13,200
287(298)
62(66)
163(169)
211(219)
2144(2254)
75(79)
51,300
290(301)
1733(1823)
311(330)
25(26)
11(12)
17(18)
54,850
4,600
37 Frederick St. & Cactus Av.
13,150
126(132)
162(172)
156(165)
2144(2254)
51,300
212(224)
1471(1551)
51,150
38 Graham St./Riverside Dr. & Cactus Av.
6,900
183(190)
49(52)
91(96)
96(102)
2445(2571)
10(11)
47,550
100(104)
1419(1496)
180(190)
23(24)
52,950
5,500
##(##) AM(PM) Peak Hour Intersection Volumes
Average Daily Trips

RA-7.8 Cont.

EXHIBIT 7-3: OPENING YEAR CUMULATIVE (2028) WITH PROJECT WEEKEND TRAFFIC VOLUMES



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

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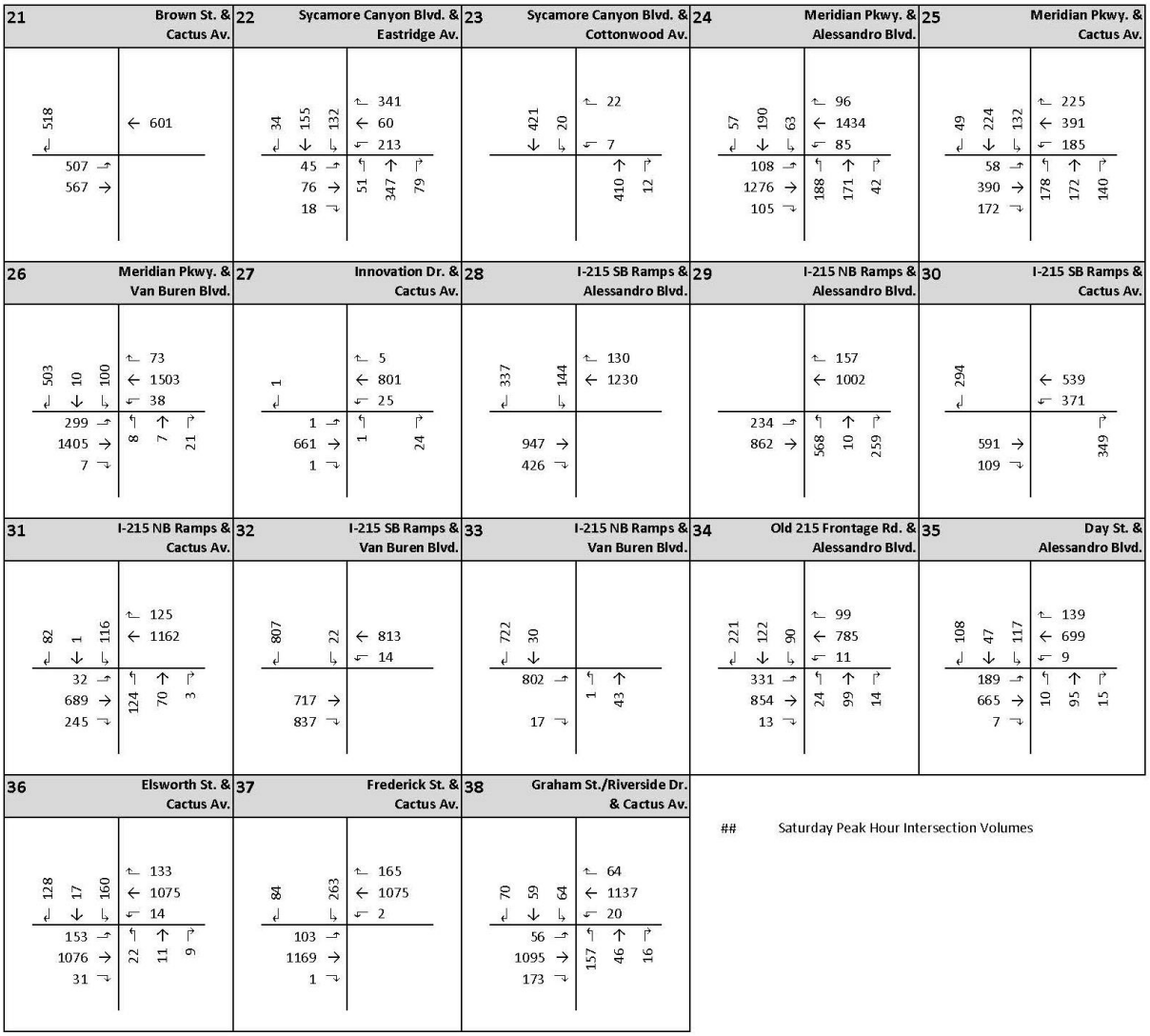

Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

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7.4 INTERSECTION OPERATIONS ANALYSIS

7.4.1 OPENING YEAR CUMULATIVE (2028) WITHOUT PROJECT TRAFFIC CONDITIONS

Opening Year Cumulative (2028) peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2.2 *Intersection Capacity Analysis* of this report. The intersection analysis results are summarized in Table 7-1, which indicates that the following study area intersections are anticipated to continue to operate at an unacceptable LOS during the peak hours under Opening Year Cumulative (2028) Without Project traffic conditions:

- Washington St. & Van Buren Bl. (#1) – LOS F AM and PM peak hours
- Alessandro Bl. & Arlington Av./Chicago Av. (#2) – LOS F AM and PM peak hours
- Canyon Crest Dr./Overlook Pkwy. & Alessandro Bl. (#3) – LOS F AM and PM peak hours
- Wood Rd. & Van Buren Bl. (#4) – LOS F AM and PM peak hours
- Trautwein Rd. & Alessandro Bl. (#5) – LOS F AM peak hour only
- Trautwein Rd. & Grove Community Dr. (#6) – LOS E AM peak hour only
- Trautwein Rd. & Orange Terrace Pkwy. (#7) – LOS F AM peak hour only
- Trautwein Rd. & Van Buren Bl. (#8) – LOS F AM and PM peak hours
- Deercreek Dr. & Orange Terrace Pkwy. (#10) – LOS F AM peak hour only
- Barton St. & Alessandro Bl. (#11) – LOS E AM peak hour only
- Barton St. & Orange Terrace Pkwy. (#13) – LOS F AM and Saturday peak hours
- Barton St. & Van Buren Bl. (#14) – LOS F AM and PM peak hours; LOS E Saturday peak hour
- Meridian Pkwy. & Alessandro Bl. (#24) – LOS F AM and PM peak hours
- Meridian Pkwy. & Cactus Av. (#25) – LOS E AM peak hour; LOS F PM peak hour
- Meridian Pkwy. & Van Buren Bl. (#26) – LOS F AM and PM peak hours
- I-215 NB Ramps & Alessandro Bl. (#29) – LOS F AM peak hour only
- I-215 NB Ramps & Cactus Av. (#31) – LOS F AM and PM peak hours
- I-215 SB Ramps & Van Buren Bl. (#32) – LOS F PM peak hour only
- Old 215 Frontage Rd. & Alessandro Bl. (#34) – LOS E AM peak hour only
- Elsworth St. & Cactus Av. (#36) – LOS F AM and PM peak hours
- Frederick St. & Cactus Av. (#37) – LOS E AM peak hour only

RA-7.8 Cont.

The intersection operations analysis worksheets for Opening Year Cumulative (2028) Without Project traffic conditions are included in Appendix 7.1 of this TA.

TABLE 7-1: INTERSECTION ANALYSIS FOR OPENING YEAR CUMULATIVE (2028) CONDITIONS

#	Intersection	Traffic Control[1]	OY (2028) NP Delay[2 3 4 5] (secs.) AM	PM	SAT	OY (2028) NP Level of Service AM	PM	SAT	OY (2028) WP Delay[2 3 4 5] (secs.) AM	PM	SAT	OY (2028) WP Level of Service AM	PM	SAT
1	Washington St. & Van Buren Blvd.	TS	**97.2**	**82.6**	29.0	**F**	**F**	C	**102.7**	**91.2**	31.1	**F**	**F**	C
2	Alessandro Blvd. & Arlington Av./Chicago Av.	TS	**128.9**	**148.3**	29.3	**F**	**F**	C	**131.5**	**156.6**	30.3	**F**	**F**	C
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.	TS	**129.5**	**133.8**	24.6	**F**	**F**	C	**143.0**	**>200.0**	27.6	**F**	**F**	C
4	Wood Rd. & Van Buren Blvd.	TS	**147.5**	**124.7**	45.8	**F**	**F**	D	**159.2**	**148.6**	49.6	**F**	**F**	D
5	Trautwein Rd. & Alessandro Blvd.	TS	**167.6**	51.3	19.4	**F**	D	B	**169.1**	54.5	19.9	**F**	D	B
6	Trautwein Rd. & Grove Community Dr.	TS	**65.3**	13.9	13.8	**E**	B	B	**65.3**	13.9	13.8	**E**	B	B
7	Trautwein Rd. & Orange Terrace Pkwy.	TS	**93.4**	37.3	22.7	**F**	D	C	**93.9**	37.3	22.7	**F**	D	C
8	Trautwein Rd. & Van Buren Blvd.	TS	**159.3**	**94.0**	37.0	**F**	**F**	D	**179.3**	**109.5**	40.4	**F**	**F**	D
9	Deercreek Dr. & Grove Community Dr.	AWS	24.2	9.7	10.2	C	A	B	25.2	9.9	10.3	D	A	B
10	Deercreek Dr. & Orange Terrace Pkwy.	AWS	**>100.0**	11.4	10.9	**F**	B	B	**>100.0**	11.4	10.9	**F**	B	B
11	Barton St. & Alessandro Blvd.	TS	**58.1**	15.2	8.2	**E**	B	A	**62.0**	29.6	8.5	**E**	C	A
12	Barton St. & Grove Community Dr.	CSS	14.2	9.5	11.6	B	A	B	14.2	9.6	11.7	B	A	B
13	Barton St. & Orange Terrace Pkwy.	CSS	**>100.0**	20.2	**>100.0**	**F**	C	**F**	**>100.0**	20.2	**>100.0**	**F**	C	**F**
14	Barton St. & Van Buren Blvd.	TS	**>200.0**	**137.1**	**60.1**	**F**	**F**	**E**	**>200.0**	**147.0**	**72.2**	**F**	**F**	**E**
15	Airman Dr. & Cactus Av.	**AWS**	Future Intersection						14.8	52.9	21.5	B	D	C
16	Abrams Dr. & Grove Community Dr.	AWS	12.3	8.8	8.7	B	A	A	13.0	9.3	8.8	B	A	A
17	Abrams Dr. & Orange Terrace Pkwy.	AWS	15.9	8.9	9.4	C	A	A	15.9	8.9	9.4	C	A	A
18	Linebacker Dr. & Cactus Av.	**TS**	Future Intersection						22.4	54.4	23.8	C	D	C
19	Orange Terrace Pkwy. & Van Buren Blvd.	TS	22.9	40.6	18.5	C	D	B	23.3	44.2	18.6	C	D	B
20	Brown St. & Alessandro Blvd.	TS	11.1	19.4	5.1	B	B	A	43.7	**>200.0**	**184.0**	D	**F**	**F**
21	Brown St. & Cactus Av.	**CSS**	Future Intersection						9.5	33.5	33.4	A	C	C
22	Sycamore Canyon Blvd. & Eastridge Av.	TS	42.4	21.6	17.8	D	C	B	42.7	22.1	17.8	D	C	B
23	Sycamore Canyon Blvd. & Cottonwood Av.	TS	14.6	11.5	6.4	B	B	A	17.9	11.6	6.4	B	B	A
24	Meridian Pkwy. & Alessandro Blvd.	TS	**120.7**	**86.5**	20.8	**F**	**F**	C	**128.2**	**103.3**	21.3	**F**	**F**	C
25	Meridian Pkwy. & Cactus Av.	TS	**73.3**	**102.9**	16.4	**E**	**F**	B	**143.2**	**>200.0**	19.5	**E**	**F**	B
26	Meridian Pkwy. & Van Buren Blvd.	TS	**123.6**	**>200.0**	13.9	**F**	**F**	B	**139.2**	**>200.0**	16.1	**F**	**F**	B
27	Innovation Dr. & Cactus Av.	TS	7.8	10.0	4.6	A	A	A	8.5	10.8	4.1	A	B	A
28	I-215 SB Ramps & Alessandro Blvd.	TS	17.9	13.6	6.8	B	B	A	19.9	15.3	7.2	B	B	A
29	I-215 NB Ramps & Alessandro Blvd.	TS	**114.4**	33.4	26.2	**F**	C	C	**137.9**	53.5	34.0	**F**	D	C
30	I-215 SB Ramps & Cactus Av.	TS	6.0	12.4	5.4	A	B	A	7.7	52.1	6.0	A	D	A
31	I-215 NB Ramps & Cactus Av.	TS	**150.0**	**83.1**	7.7	**F**	**F**	A	**194.5**	**151.7**	8.5	**F**	**F**	A
32	I-215 SB Ramps & Van Buren Blvd.	TS	38.6	**>200.0**	10.6	D	**F**	B	44.5	**>200.0**	10.4	D	**F**	B
33	I-215 NB Ramps & Van Buren Blvd.	TS	12.4	33.7	4.2	B	C	A	12.4	33.7	4.2	B	C	A
34	Old 215 Frontage Rd. & Alessandro Blvd.	TS	**82.8**	24.6	18.8	**E**	C	B	**83.4**	25.3	19.0	**F**	C	B
35	Day St. & Alessandro Blvd.	TS	25.6	29.9	13.0	C	C	B	27.5	34.5	13.3	C	C	B
36	Elsworth St. & Cactus Av.	TS	**>200.0**	**>200.0**	44.8	**F**	**F**	D	**>200.0**	**>200.0**	47.1	**F**	**F**	D
37	Frederick St. & Cactus Av.	TS	**67.7**	17.5	10.1	**E**	B	B	**68.9**	19.0	10.3	**E**	B	B
38	Graham St./Riverside Dr. & Cactus Av.	TS	27.6	31.0	17.3	C	C	B	28.7	34.3	17.3	C	C	B

* **BOLD** = Significant Impact

-- = Not applicable for this jurisdiction

[1] CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal; **TS** = Improvement

[2] For intersections within the jurisdiction of March JPA, deficient occurs (improvements needed) if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels. However, if the pre-project condition is already below LOS D (or acceptable LOS), provide improvements if the Project contributes more than 2% of the total traffic.

[3] For intersections within the jurisdiction of the City of Riverside, deficient occurs (improvements needed) when the addition of project related trips causes either peak hour LOS to degrade from acceptable (LOS A through D) to unacceptable levels (LOS E/F) or the peak hour delay to increase as follows:
- LOS A/B = By 10.0 seconds
- LOS C = By 8.0 seconds
- LOS D = By 5.0 seconds
- LOS E = By 2.0 seconds
- LOS F = By 1.0 seconds

[4] For intersections within the jurisdiction of Caltrans, or the County of Riverside, deficient occurs (improvements needed) if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels.

[5] For intersections within the City of Moreno Valley, provide improvements if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels. If the pre-project condition is at unacceptable LOS and Project increases delay by 5.0 or more, provide improvements to offset the increase in delay.

RA-7.8 Cont.

7.4.2 OPENING YEAR CUMULATIVE (2028) WITH PROJECT TRAFFIC CONDITIONS

As shown in Table 7-1, the following additional study area intersection is anticipated to operate at an unacceptable LOS during the peak hours with the addition of Project traffic, in addition to the intersections identified under Opening Year Cumulative (2028) Without Project traffic conditions:

- Brown St. & Alessandro Bl. (#20) – LOS F PM and Saturday peak hours

The intersection operations analysis worksheets for Opening Year Cumulative (2028) With Project traffic conditions are included in Appendix 7.2.

7.5 ROADWAY SEGMENT ANALYSIS

The roadway segment capacities are approximate figures only and are used at the General Plan level to assist in determining the roadway functional classification (number of through lanes) needed to meet traffic demand. Table 7-2 provides a summary of the Opening Year Cumulative (2028) Without Project conditions roadway segment capacity analysis based on the applicable roadway segment capacity thresholds. As shown on Table 7-2, the following additional study area roadway segments are anticipated to operate at an unacceptable LOS based on the applicable planning level daily roadway capacity thresholds:

- Meridian Pkwy. from Alessandro Bl. to Cactus Av. (#14) – LOS F
- Meridian Pkwy. from Cactus Av. to Van Buren Bl. (#15) – LOS F

RA-7.8 Cont.

With the addition of Project traffic, the following additional study area roadway segments are anticipated to operate at a deficient LOS for Opening Year Cumulative (2028) With Project traffic conditions:

- Alessandro Bl., from Meridian Pkwy. to I-215 Freeway (#5) – LOS E
- Cactus Av., from Airman Dr. to Linebacker Dr. (#6) – LOS F
- Cactus Av. from Linebacker Dr. to Brown St. (#7) – LOS E
- Cactus Av., from Brown St. to Meridian Pkwy. (#8) – LOS E
- Barton Rd. from Alessandro Bl. to Cactus Av. (#10) – LOS E
- Brown St., from Alessandro Bl. to Cactus Av. (#12) – LOS F

TABLE 7-2: ROADWAY SEGMENT ANALYSIS FOR OPENING YEAR CUMULATIVE (2028) CONDITIONS

#	Roadway	Segment Limits	Roadway Section	LOS Capacity[1]	2028 Without Project			2028 With Project			Acceptable LOS
					2025	V/C[2]	LOS[3]	2025	V/C[2]	LOS[3]	
1	Alessandro Bl.	Trautwein Rd. to Mission Grove Pkwy.	6D	57,250	46,634	0.81	D	49,628	0.87	D	D
2		Mission Grove Pkwy. to Barton St.	6D	57,250	44,942	0.79	C	49,266	0.86	D	D
3		Barton St. to Brown St.	6D	57,250	44,846	0.78	C	48,838	0.85	D	D
4		Brown St. to Meridian Pkwy.	6D	57,250	44,721	0.78	C	49,749	0.87	D	D
5		Meridian Pkwy. to I-215 Freeway	6D	57,250	47,865	0.84	D	**53,932**	**0.94**	**E**	D
6	Cactus Av.	Airman Dr. to Linebacker Dr.	2U	13,000	0	0.00	A	**28,912**	**2.22**	**F**	D
7		Linebacker Dr. to Brown St.	4D	25,900	0	0.00	A	**43,346**	**1.67**	**F**	D
8		Brown St. to Meridian Pkwy.	4D	25,900	0	0.00	A	**25,630**	**0.99**	**E**	D
9		Meridian Pkwy. to I-215 Freeway	6D	51,150	19,574	0.38	A	36,190	0.71	C	D
10	Barton St.	Alessandro Bl. to Cactus Av. (EVA)	2U	13,000	2,049	0.16	A	**12,392**	**0.95**	**E**	D
11		Cactus Av. (EVA) to Grove Community Dr.	2U	13,000	796	0.06	A	1,128	0.09	A	D
12	Brown St.	Alessandro Bl. to Cactus Av.	2D	13,000	797	0.06	A	**18,513**	**1.42**	**F**	D
13	Sycamore Canyon Bl.	Cottonwood Av. to Alessandro Bl.	4D	33,000	19,589	0.59	A	20,357	0.62	B	D
14	Meridian Pkwy.	Alessandro Bl. to Cactus Av.	4D	25,900	**28,913**	**1.12**	**F**	**30,719**	**1.19**	**F**	D
15		Cactus Av. to Van Buren Bl.	4D	25,900	**27,252**	**1.05**	**F**	**34,460**	**1.33**	**F**	D

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

[1] These maximum roadway capacities are based on the applicable agency's thresholds.

[2] V/C = Volume to Capacity Ratio

[3] LOS = Level of Service

7.6 TRAFFIC SIGNAL WARRANTS ANALYSIS

There are no additional unsignalized study area intersections anticipated to meet either peak hour volume-based or planning level (ADT) volume-based traffic signal warrants for Opening Year Cumulative (2028) Without and With Project traffic conditions in addition to those previously warranted under Existing and E+P traffic conditions (see Appendix 7.3 and Appendix 7.4).

7.7 OFF-RAMP QUEUING ANALYSIS

RA-7.8 Cont.

A queuing analysis was performed for the off-ramps at the I-215 Freeway at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard interchanges, to assess vehicle queues for the off ramps that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the I-215 Freeway mainline. Queuing analysis findings are presented in Table 7-3 for Opening Year Cumulative (2028) traffic conditions. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown in Table 7-3, there are no movements that are anticipated to experience queuing issues during the weekday AM, weekday PM, or weekend Saturday peak 95th percentile traffic flows for Opening Year Cumulative (2028) Without and With Project traffic conditions, consistent with Existing (2021) traffic conditions. Worksheets for Opening Year Cumulative (2028) Without and With Project traffic conditions off-ramp queuing analysis are provided in Appendix 7.5 and Appendix 7.6, respectively

TABLE 7-3: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR OPENING YEAR CUMULATIVE (2028) CONDITIONS

Intersection	Movement[3]	Available Stacking Distance (Feet)[3]	OYC (2028) Without Project						OYC (2028) With Project					
			95th Percentile Queue (Feet)			Acceptable?[1]			95th Percentile Queue (Feet)			Acceptable?[1]		
			AM Peak Hour	PM Peak Hour	SAT Peak Hour	AM	PM	SAT	AM Peak Hour	PM Peak Hour	SAT Peak Hour	AM	PM	SAT
I-215 SB Ramps & Alessandro Blvd. (#28)	SBL	525	164	247	76	Yes	Yes	Yes	162	262	82	Yes	Yes	Yes
	SBL/R	1,540	170	236	72	Yes	Yes	Yes	196	252	97	Yes	Yes	Yes
	SBR	525	162	221	67	Yes	Yes	Yes	181	231	92	Yes	Yes	Yes
I-215 NB Ramps & Alessandro Blvd. (#29)	NBL	450	802 [2]	485 [2,3]	184	Yes	Yes	Yes	877 [2 3]	540 [2 3]	211	Yes	Yes	Yes
	NBL/T/R	1,345	772 [2]	517 [2]	187	Yes	Yes	Yes	850 [2]	569 [2]	223	Yes	Yes	Yes
	NBR	450	149	231	108	Yes	Yes	Yes	149	231	112	Yes	Yes	Yes
I-215 SB Ramps & Cactus Av. (#30)	SBR	1,115	208 [2]	256	0	Yes	Yes	Yes	894 [2]	809 [2]	0	Yes	Yes	Yes
	NBR	1,850	398 [2]	407 [2]	0	Yes	Yes	Yes	409 [2]	612 [2]	67	Yes	Yes	Yes
I-215 NB Ramps & Cactus Av. (#31)	NBL	145	674 [2 3]	115	37	Yes	Yes	Yes	957 [2 3]	251 [2 3]	100	Yes	Yes	Yes
	NBT/R	1,650	520 [2]	217	56	Yes	Yes	Yes	520 [2]	250	61	Yes	Yes	Yes
I-215 SB Ramps & Van Buren Blvd.(#32)	SBL/T	1,510	298	873 [2]	26	Yes	Yes	Yes	298	873 [2]	26	Yes	Yes	Yes
	SBR	1,450	790 [2]	502 [2]	238 [2]	Yes	Yes	Yes	790 [2]	502 [2]	253 [2]	Yes	Yes	Yes
I-215 NB Ramps & Van Buren Blvd. (#33)	NBL	1,560	284	179	0	Yes	Yes	Yes	284	179	0	Yes	Yes	Yes
	NBR	580	33	47	0	Yes	Yes	Yes	33	47	0	Yes	Yes	Yes

[1] Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

[2] 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

[3] Although 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent lane has sufficient storage to accommodate any spillover without spilling back and affecting the I-215 Freeway mainline.

RA-7.8 Cont.

7.8 DEFICIENCIES AND IMPROVEMENTS

7.8.1 IMPROVEMENTS TO ADDRESS DEFICIENCIES AT INTERSECTIONS

This section provides a summary of Project deficiencies and identified improvements. Based on the deficiency criteria discussed in Section 2.7 *Deficiency Criteria*, study area intersections were found to be deficient. The effectiveness of the improvement strategies presented in Table 7-4 address the Opening Year Cumulative (2028) deficiencies as the recommendations improve the operations back to pre-project conditions (or better) or within the allowable net change in delay per the applicable deficiency criteria for each agency. It should be noted, the following study area intersections fall below the applicable agency's deficiency criteria. As such, no improvements have been recommended at these locations:

- Trautwein Rd. & Grove Community Dr. (#6)
- Trautwein Rd. & Orange Terrace Pkwy. (#7)
- Old 215 Frontage Rd. at Alessandro Bl. (#34)
- Frederick St. & Cactus Av. (#37)

If not constructed by the Project, the Project Applicant should contribute to these improvements through payment of fair share or TUMF fees. Worksheets for Opening Year Cumulative (2028) with improvements HCM calculation worksheets are provided in Appendix 7.7.

7.8.2 IMPROVEMENTS TO ADDRESS DEFICIENCIES AT ROADWAY SEGMENT

RA-7.8 Cont.

Additional roadway widening for the deficient roadway segments has not been recommended as acceptable or improved peak hour traffic operations can be achieved with the existing lanes or with the improvements shown on Table 7-4.

7.8.3 IMPROVEMENTS TO ADDRESS DEFICIENCIES ON OFF-RAMP QUEUES

As shown previously in Table 7-3, there are no anticipated peak hour queuing issues at the I-215 Freeway off-ramps for Opening Year Cumulative (2028) traffic conditions, consistent with Existing (2021) traffic conditions. As such, no improvements have been recommended.

TABLE 7-4: INTERSECTION ANALYSIS FOR OPENING YEAR CUMULATIVE (2028) CONDITIONS WITH IMPROVEMENTS

#	Intersection	Traffic Control[3]	Intersection Approach Lanes[1]												Delay[2] (secs.)			Level of Service		
			Northbound			Southbound			Eastbound			Westbound								
			L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	SAT	AM	PM	SAT
1	Washington St. & Van Buren Blvd.																			
	- Without Improvements	TS	2	2	1	2	2	0	1	2	0	1	2	1	**102.7**	**91.2**	31.1	**F**	**F**	C
	- With Improvements	TS	2	2	1	2	2	0	1	**3**	0	1	**3**	1	53.2	47.1	26.0	D	D	C
2	Alessandro Blvd. & Arlington Av./Chicago Av.[7]																			
	- Without Improvements	TS	2	2	1>	2	3	0	1	2	2>	2	2	1>	**131.5**	**156.6**	30.3	**F**	**F**	C
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.																			
	- Without Improvements	TS	1	2	1	2	1	1	1	3	0	1	3	1>	**143.0**	**>200.0**	27.6	**F**	**F**	C
	- With Improvements	TS	1	2	1	**3**	1	**0**	1	3	0	1	3	1>	**132.3**	**190.1**	27.4	**F**	**F**	C
4	Wood Rd. & Van Buren Blvd.																			
	- Without Improvements	TS	2	2	0	1	2	0	1	2	1>	2	2	1	**159.2**	**148.6**	49.6	**F**	**F**	D
	- With Improvements	TS	2	2	0	1	2	0	1	**3**	1>	2	**3**	1	**70.2**	53.7	28.9	**E**	D	C
5	Trautwein Rd. & Alessandro Blvd.[7]																			
	- Without Improvements	TS	2	1	0	0	0	0	0	3	0	2	3	0	**169.1**	54.5	19.9	**F**	D	B
8	Trautwein Rd. & Van Buren Blvd.																			
	- Without Improvements	TS	1	2	0	2	2	1>	2	2	1>	1	3	1>	**179.3**	**109.5**	40.4	**F**	**F**	D
	- With Improvements	TS	1	2	0	2	2	1>	2	**3**	1	1	3	1>	**122.5**	**73.8**	41.7	**F**	**E**	D
10	Deercreek Dr. & Orange Terrace Pkwy.																			
	- Without Improvements	AWS	0	1	0	0	1	0	1	2	0	1	2	0	**>100.0**	11.4	10.9	**F**	B	B
	- With Improvements	**TS**	0	1	0	0	1	0	1	2	0	1	2	0	16.6	5.5	5.5	B	A	A
11	Barton St. & Alessandro Blvd.																			
	- Without Improvements	TS	0	1	1	0	1	1	1	3	0	1	3	0	**62.0**	29.6	8.5	**E**	C	A
	- With Improvements[5]	TS	**1**	1	**0**	**1**	1	**0**	1	3	0	1	3	0	**56.7**	12.0	8.6	**E**	B	A
13	Barton St. & Orange Terrace Pkwy.																			
	- Without Improvements	CSS	1	0	0	0	0	0	0	2	0	1	2	0	**>100.0**	20.2	**>100.0**	**F**	C	**F**
	- With Improvements	**TS**	1	0	0	0	0	0	0	2	0	1	2	0	13.8	11.9	13.6	B	B	B
14	Barton St. & Van Buren Blvd.																			
	- Without Improvements	TS	2	1	1	1	1	0	1	2	0	1	3	0	**>200.0**	**147.0**	**72.2**	**F**	**F**	**E**
	- With Improvements	TS	2	1	1	1	1	0	1	**3**	**1>**	**2**	3	0	**86.5**	36.2	25.0	**F**	D	C
20	Brown St. & Alessandro Blvd.[7]																			
	- Without Improvements	TS	1	1	1>	1	1	1>	1	3	0	1	3	1	43.7	**>200.0**	**184.0**	D	**F**	**F**
24	Meridian Pkwy. & Alessandro Blvd.[7]																			
	- Without Improvements	TS	2	2	2>	2	2	1	1	3	1	2	3	1	**128.2**	**103.3**	21.3	**F**	**F**	C
25	Meridian Pkwy. & Cactus Av.																			
	- Without Improvements	TS	2	2	1	2	2	1	1	2	1	2	2	1	**143.2**	**>200.0**	19.5	**E**	**F**	B
	- With Improvements[5]	TS	2	2	1	2	2	1	1	**3**	**0**	2	2	**1>**	51.9	**183.5**	21.9	D	**F**	C
26	Meridian Pkwy. & Van Buren Blvd.																			
	- Without Improvements	TS	0	2	0	2	1	1>	2	4	1	1	4	1	**139.2**	**>200.0**	16.1	**F**	**F**	B
	- With Improvements[10]	TS	0	2	0	2	**1**	1>	2	4	1	1	4	1	**88.1**	**196.8**	10.5	**F**	**F**	B
29	I-215 NB Ramps & Alessandro Blvd.																			
	- Without Improvements	TS	1	1	1	0	0	0	1	3	0	0	3	1	**137.9**	53.5	34.0	**F**	D	C
	- With Improvements	TS	**2**	1	0	0	0	0	1	3	0	0	3	1	37.8	38.8	26.4	D	D	C
31	I-215 NB Ramps & Cactus Av.																			
	- Without Improvements	TS	1	1	1	1	1	0	1	2	0	0	2	0	**194.5**	**151.7**	8.5	**F**	**F**	A
	- With Improvements	TS	**2**	1	1	1	1	0	1	2	**1**	0	**3**	0	52.4	36.1	11.1	D	D	B
32	I-215 SB Ramps & Van Buren Blvd.																			
	- Without Improvements	TS	0	0	0	0	1	2>>	0	2	2	1	2	0	44.5	**>200.0**	10.4	D	**F**	B
	- With Improvements	TS	0	0	0	**1**	1	**1>>**	0	2	**1>>**	1	2	0	13.0	35.3	6.7	B	D	A

RA-7.8 Cont.

#	Intersection	Traffic Control[3]	Intersection Approach Lanes[1] Northbound L	T	R	Southbound L	T	R	Eastbound L	T	R	Westbound L	T	R	Delay[2] (secs.) AM	PM	SAT	Level of Service AM	PM	SAT
34	Old 215 Frontage Rd. & Alessandro Blvd.																			
	- Without Improvements	TS	2	2	1	1	2	1	2	3	1	1	2	1	**83.4**	25.3	19.0	**F**	C	B
	- With Improvements	TS	2	2	1	1	2	1	2	3	1	1	**3**	1	21.8	22.2	18.2	C	C	B
36	Elsworth St. & Cactus Av.																			
	- Without Improvements	TS	1	1	0	1	1	1>	1	3	1>>	1	3	1	**>200.0**	**>200.0**	47.1	**F**	**F**	D
	- With Improvements[9]	TS	1	1	0	1	1	1>	1	**4**	1>>	1	3	1	53.0	50.5	20.8	D	D	C

* **BOLD** = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

[1] When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; >> = Free Right Turn Lane; **1** = Improvement

[2] Per the Highway Capacity Manual 6th Edition, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

[3] AWS = All-Way Stop; CSS = Cross-street Stop; TS = Traffic Signal

[4] The two intersecting roadways are built to their ultimate width as designated in the General Plan. Based on recent comments and the jurisdiction's traffic study guidelines, infeasible improvements have not been recommended.

[5] Recommended improvements shown can be accommodated through restriping (no additional pavement required).

[6] Recommended improvement includes modifying the traffic signal from protected left turn phasing to permissive left turn phasing on the northbound and southbound

[7] There are no feasible intersection improvements. As such, improvements have not been identified.

[8] Recommended improvement is for a southbound shared left-through lane which can be accommodated through restriping (no additional pavement required).

[9] Recommended improvements can be accommodated through implementing N/S from split phasing to protected left turn phasing. Lead-lag operations should be implemented for the northbound and southbound approaches to avoid conflicting left turns. Additionally, the northbound approach should be restriped to provide one left turn lane and one shared through-right turn lane; the southbound approach should be restriped to provide one left turn lane, one through lane, and one right turn lane.

[10] Improvement consists of restriping the southbound through lane to provide a shared left-through-right turn lane.

RA-7.8 Cont.

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RA-7.8
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8 HORIZON YEAR (2045) TRAFFIC CONDITIONS

This section discusses the methods used to develop Horizon Year (2045) Without and With Project traffic forecasts, and the resulting intersection operations, roadway segment, traffic signal warrant, and freeway off-ramp queuing analyses.

8.1 ROADWAY IMPROVEMENTS

The lane configurations and traffic controls assumed to be in place for Horizon Year (2045) conditions are consistent with those shown previously on Exhibit 3-1, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project to provide site access are also assumed to be in place for Horizon Year conditions only (e.g., intersection and roadway improvements along the Project's frontage and driveways).
- Driveways and those facilities assumed to be constructed by cumulative developments to provide site access are also assumed to be in place for Horizon Year conditions only (e.g., intersection and roadway improvements along the cumulative development's frontages and driveways).
- Other parallel facilities, that although not evaluated for the purposes of this analysis, are anticipated to be in place for Horizon Year traffic conditions and would affect the travel patterns within the study area.

8.2 HORIZON YEAR (2045) WITHOUT PROJECT TRAFFIC VOLUME FORECASTS

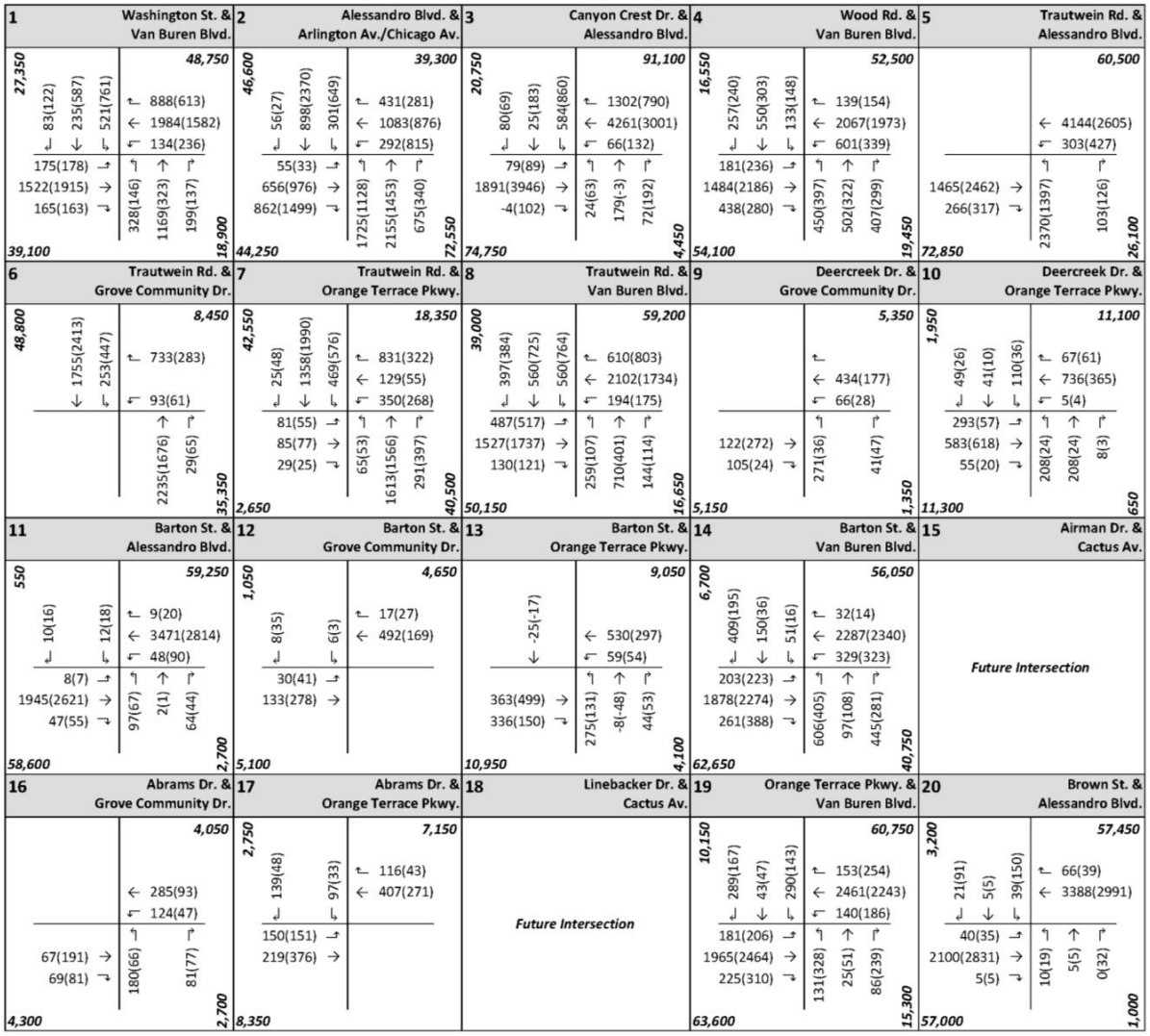
RA-7.8 Cont.

This scenario includes the refined post-processed volumes developed from the RIVCOM (see Section 4.7 *Horizon Year (2045) Volume Development* of this TA for a detailed discussion on the post-processing methodology). The weekday ADT and weekday AM and PM peak hour volumes which can be expected for Horizon Year (2045) Without Project traffic conditions are shown on Exhibit 8-1. The weekend Saturday peak hour volumes for Horizon Year (2045) Without Project traffic conditions are shown on Exhibit 8-2.

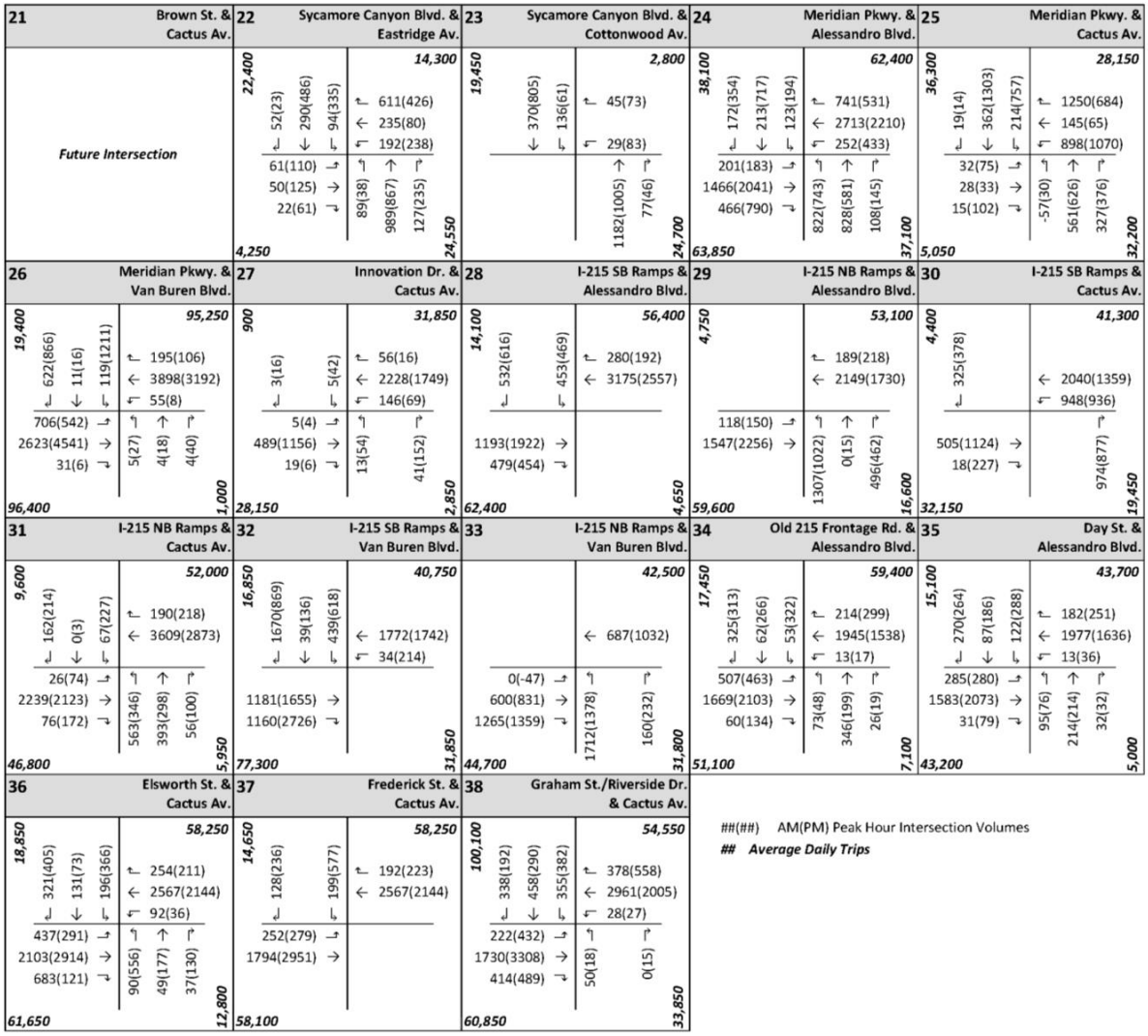
8.3 HORIZON YEAR (2045) WITH PROJECT TRAFFIC VOLUME FORECASTS

This scenario includes the refined post-processed volumes developed from the RIVCOM pus Project traffic. The weekday ADT and weekday AM and PM peak hour volumes which can be expected for Horizon Year (2045) With Project traffic conditions are shown on Exhibit 8-3. The weekend Saturday peak hour volumes for Horizon Year (2045) Without Project traffic conditions are shown on Exhibit 8-4.

EXHIBIT 8-1: HORIZON YEAR (2045) WITHOUT PROJECT WEEKDAY TRAFFIC VOLUMES

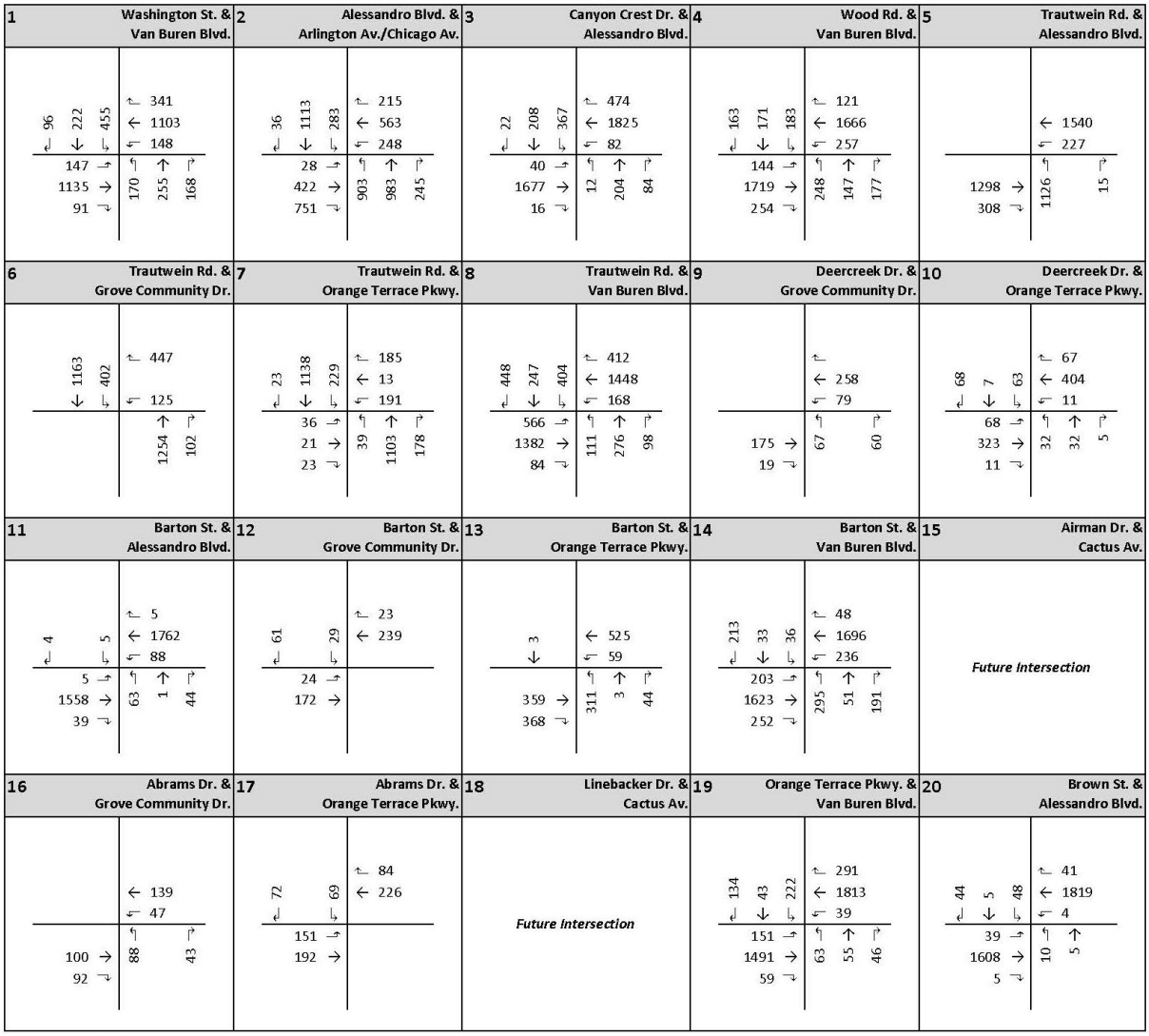


RA-7.8 Cont.


21 Brown St. & Cactus Av.
Future Intersection
22 Sycamore Canyon Blvd. & Eastridge Av.
22,400
52(23) 290(486) 94(335)
611(426) 235(80) 192(238)
61(110) 50(125) 22(61)
89(38) 989(867) 127(235)
14,300
4,250
24,550
23 Sycamore Canyon Blvd. & Cottonwood Av.
19,450
370(805) 136(61)
45(73) 29(83)
1182(1005) 77(46)
2,800
24,700
24 Meridian Pkwy. & Alessandro Blvd.
38,100
172(354) 213(717) 123(194)
741(531) 2713(2210) 252(433)
201(183) 1466(2041) 466(790)
822(743) 828(581) 108(145)
62,400
63,850
37,100
25 Meridian Pkwy. & Cactus Av.
36,300
19(14) 362(1303) 214(757)
1250(684) 145(65) 898(1070)
32(75) 28(33) 15(102)
-57(30) 561(626) 327(376)
28,150
5,050
32,200
26 Meridian Pkwy. & Van Buren Blvd.
19,400
622(866) 11(16) 119(1211)
195(106) 3898(3192) 55(8)
706(542) 2623(4541) 31(6)
5(27) 4(18) 4(40)
95,250
96,400
1,000
27 Innovation Dr. & Cactus Av.
900
3(16) 5(42)
56(16) 2228(1749) 146(69)
5(4) 489(1156) 19(6)
13(54) 41(152)
31,850
28,150
2,850
28 I-215 SB Ramps & Alessandro Blvd.
14,100
532(616) 453(469)
280(192) 3175(2557)
1193(1922) 479(454)
56,400
62,400
4,650
29 I-215 NB Ramps & Alessandro Blvd.
4,750
189(218) 2149(1730)
118(150) 1547(2256)
1307(1022) 0(15) 496(462)
53,100
59,600
16,600
30 I-215 SB Ramps & Cactus Av.
4,400
325(378)
2040(1359) 948(936)
505(1124) 18(227)
974(877)
41,300
32,150
19,450
31 I-215 NB Ramps & Cactus Av.
9,600
162(214) 0(3) 67(227)
190(218) 3609(2873)
26(74) 2239(2123) 76(172)
563(346) 393(298) 56(100)
52,000
46,800
5,950
32 I-215 SB Ramps & Van Buren Blvd.
16,850
1670(869) 39(136) 439(618)
1772(1742) 34(214)
1181(1655) 1160(2726)
40,750
77,300
31,850
33 I-215 NB Ramps & Van Buren Blvd.
687(1032)
0(-47) 600(831) 1265(1359)
1712(1378) 160(232)
42,500
44,700
31,800
34 Old 215 Frontage Rd. & Alessandro Blvd.
17,450
325(313) 62(266) 53(322)
214(299) 1945(1538) 13(17)
507(463) 1669(2103) 60(134)
73(48) 346(199) 26(19)
59,400
51,100
7,100
35 Day St. & Alessandro Blvd.
15,100
270(264) 87(186) 122(288)
182(251) 1977(1636) 13(36)
285(280) 1583(2073) 31(79)
95(76) 214(214) 32(32)
43,700
43,200
5,000
36 Elsworth St. & Cactus Av.
18,850
321(405) 131(73) 196(366)
254(211) 2567(2144) 92(36)
437(291) 2103(2914) 683(121)
90(556) 49(177) 37(130)
58,250
61,650
12,800
37 Frederick St. & Cactus Av.
14,650
128(236) 199(577)
192(223) 2567(2144)
252(279) 1794(2951)
58,250
58,100
38 Graham St./Riverside Dr. & Cactus Av.
100,100
338(192) 458(290) 355(382)
378(558) 2961(2005) 28(27)
222(432) 1730(3308) 414(489)
50(18) 0(15)
54,550
60,850
33,850
##(##) AM(PM) Peak Hour Intersection Volumes
Average Daily Trips

RA-7.8 Cont.

EXHIBIT 8-2: HORIZON YEAR (2045) WITHOUT PROJECT WEEKEND TRAFFIC VOLUMES



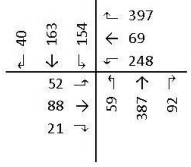
Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

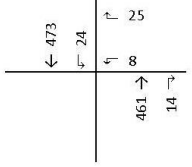
21 Brown St. & Cactus Av.

Future Intersection

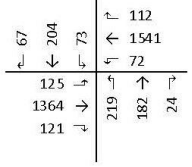
22 Sycamore Canyon Blvd. & Eastridge Av.



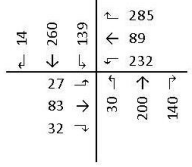
23 Sycamore Canyon Blvd. & Cottonwood Av.



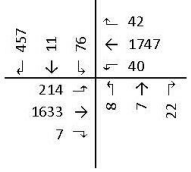
24 Meridian Pkwy. & Alessandro Blvd.



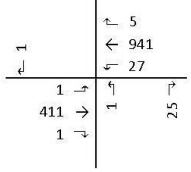
25 Meridian Pkwy. & Cactus Av.



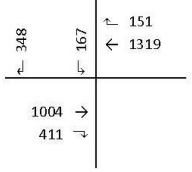
26 Meridian Pkwy. & Van Buren Blvd.



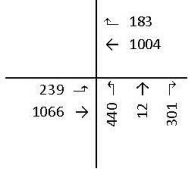
27 Innovation Dr. & Cactus Av.



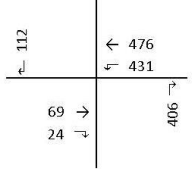
28 I-215 SB Ramps & Alessandro Blvd.



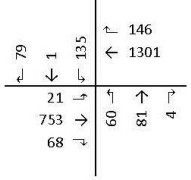
29 I-215 NB Ramps & Alessandro Blvd.



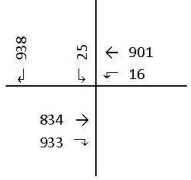
30 I-215 SB Ramps & Cactus Av.



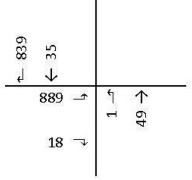
31 I-215 NB Ramps & Cactus Av.



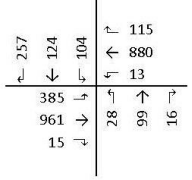
32 I-215 SB Ramps & Van Buren Blvd.



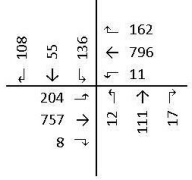
33 I-215 NB Ramps & Van Buren Blvd.



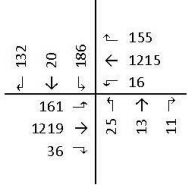
34 Old 215 Frontage Rd. & Alessandro Blvd.



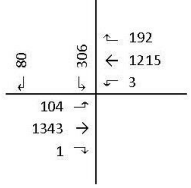
35 Day St. & Alessandro Blvd.



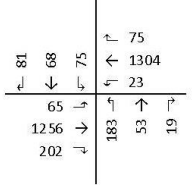
36 Elsworth St. & Cactus Av.



37 Frederick St. & Cactus Av.



38 Graham St./Riverside Dr. & Cactus Av.



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

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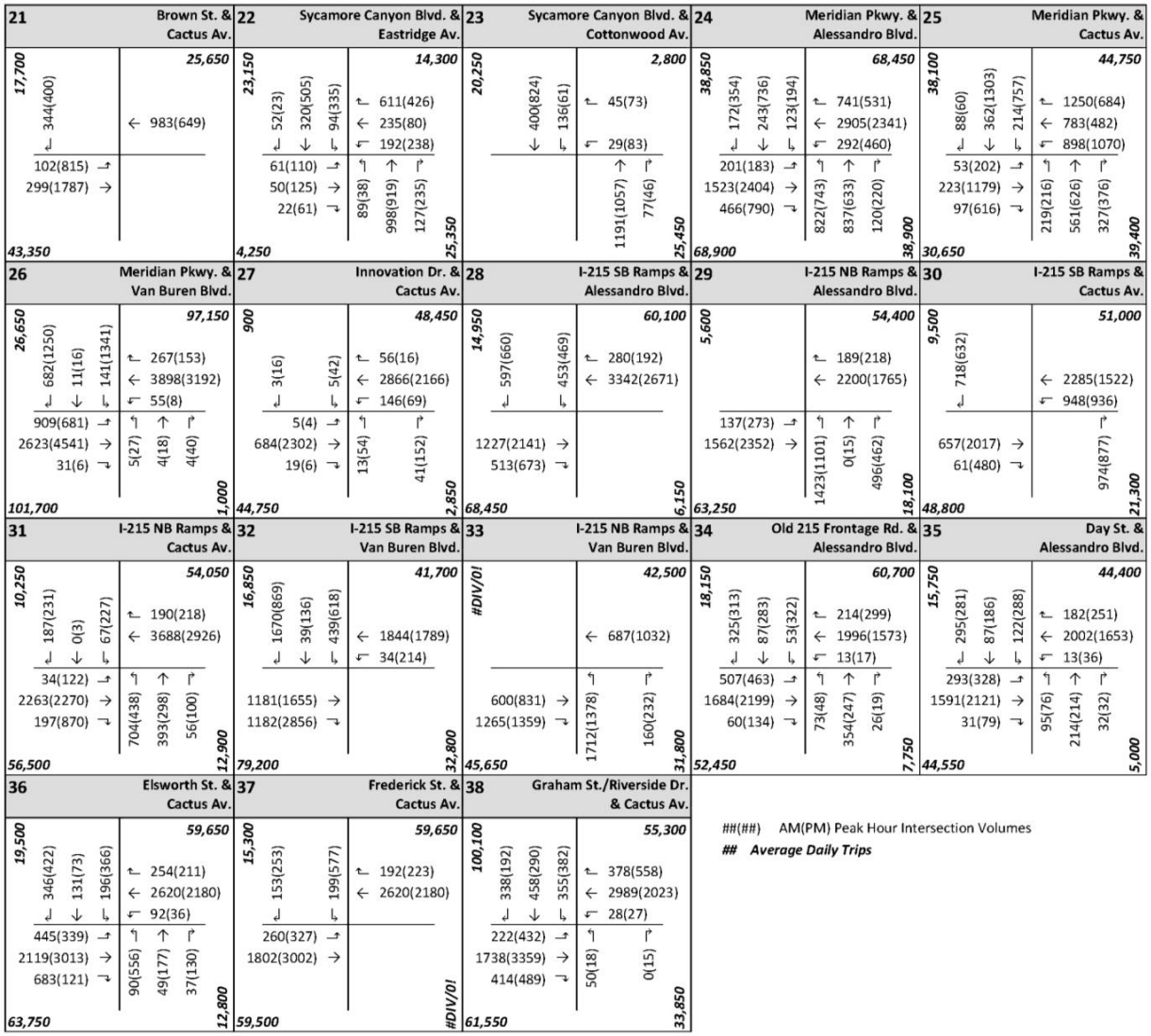
EXHIBIT 8-3: HORIZON YEAR (2045) WITH PROJECT WEEKDAY TRAFFIC VOLUMES

##(##) AM(PM) Peak Hour Intersection Volumes

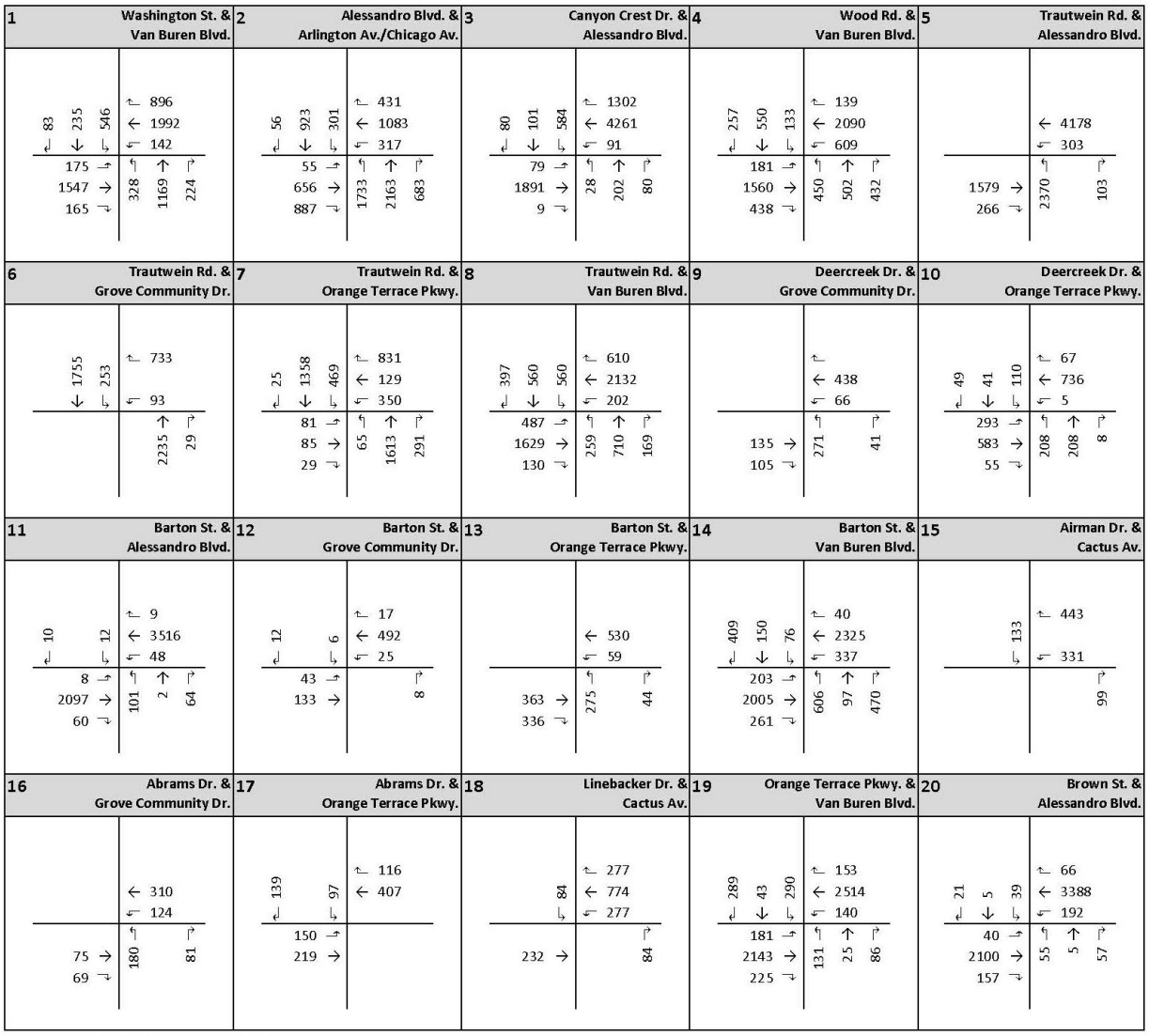
Average Daily Trips

RA-7.8 Cont.


21 Brown St. & Cactus Av.
17,700
344(400)
983(649)
102(815)
299(1787)
25,650
43,350
22 Sycamore Canyon Blvd. & Eastridge Av.
23,150
52(23)
320(505)
94(335)
611(426)
235(80)
192(238)
61(110)
50(125)
22(61)
89(38)
998(919)
127(235)
14,300
4,250
25,350
23 Sycamore Canyon Blvd. & Cottonwood Av.
20,250
400(824)
136(61)
45(73)
29(83)
1191(1057)
77(46)
2,800
25,450
24 Meridian Pkwy. & Alessandro Blvd.
38,850
172(354)
243(736)
123(194)
741(531)
2905(2341)
292(460)
201(183)
1523(2404)
466(790)
822(743)
837(633)
120(220)
68,450
68,900
38,900
25 Meridian Pkwy. & Cactus Av.
38,100
88(60)
362(1303)
214(757)
1250(684)
783(482)
898(1070)
53(202)
223(1179)
97(616)
219(216)
561(626)
327(376)
44,750
30,650
39,400
26 Meridian Pkwy. & Van Buren Blvd.
26,650
682(1250)
11(16)
141(1341)
267(153)
3898(3192)
55(8)
909(681)
2623(4541)
31(6)
5(27)
4(18)
4(40)
97,150
101,700
1,000
27 Innovation Dr. & Cactus Av.
900
3(16)
5(42)
56(16)
2866(2166)
146(69)
5(4)
684(2302)
19(6)
13(54)
41(152)
48,450
44,750
2,850
28 I-215 SB Ramps & Alessandro Blvd.
14,950
597(660)
453(469)
280(192)
3342(2671)
1227(2141)
513(673)
60,100
68,450
6,150
29 I-215 NB Ramps & Alessandro Blvd.
5,600
189(218)
2200(1765)
137(273)
1562(2352)
1423(1101)
0(15)
496(462)
54,400
63,250
18,100
30 I-215 SB Ramps & Cactus Av.
9,500
718(632)
2285(1522)
948(936)
657(2017)
61(480)
974(877)
51,000
48,800
21,300
31 I-215 NB Ramps & Cactus Av.
10,250
187(231)
0(3)
67(227)
190(218)
3688(2926)
34(122)
2263(2270)
197(870)
704(438)
393(298)
56(100)
54,050
56,500
12,900
32 I-215 SB Ramps & Van Buren Blvd.
16,850
1670(869)
39(136)
439(618)
1844(1789)
34(214)
1181(1655)
1182(2856)
41,700
79,200
32,800
33 I-215 NB Ramps & Van Buren Blvd.
#DIV/0!
687(1032)
600(831)
1265(1359)
1712(1378)
160(232)
42,500
45,650
31,800
34 Old 215 Frontage Rd. & Alessandro Blvd.
18,150
325(313)
87(283)
53(322)
214(299)
1996(1573)
13(17)
507(463)
1684(2199)
60(134)
73(48)
354(247)
26(19)
60,700
52,450
7,750
35 Day St. & Alessandro Blvd.
15,750
295(281)
87(186)
122(288)
182(251)
2002(1653)
13(36)
293(328)
1591(2121)
31(79)
95(76)
214(214)
32(32)
44,400
44,550
5,000
36 Elsworth St. & Cactus Av.
19,500
346(422)
131(73)
196(366)
254(211)
2620(2180)
92(36)
445(339)
2119(3013)
683(121)
90(556)
49(177)
37(130)
59,650
63,750
12,800
37 Frederick St. & Cactus Av.
15,300
153(253)
199(577)
192(223)
2620(2180)
260(327)
1802(3002)
59,650
59,500
#DIV/0!
38 Graham St./Riverside Dr. & Cactus Av.
100,100
338(192)
458(290)
355(382)
378(558)
2989(2023)
28(27)
222(432)
1738(3359)
414(489)
50(18)
0(15)
55,300
61,550
33,850
##(##) AM(PM) Peak Hour Intersection Volumes
Average Daily Trips

RA-7.8 Cont.

EXHIBIT 8-4: HORIZON YEAR (2045) WITH PROJECT WEEKEND TRAFFIC VOLUMES



Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

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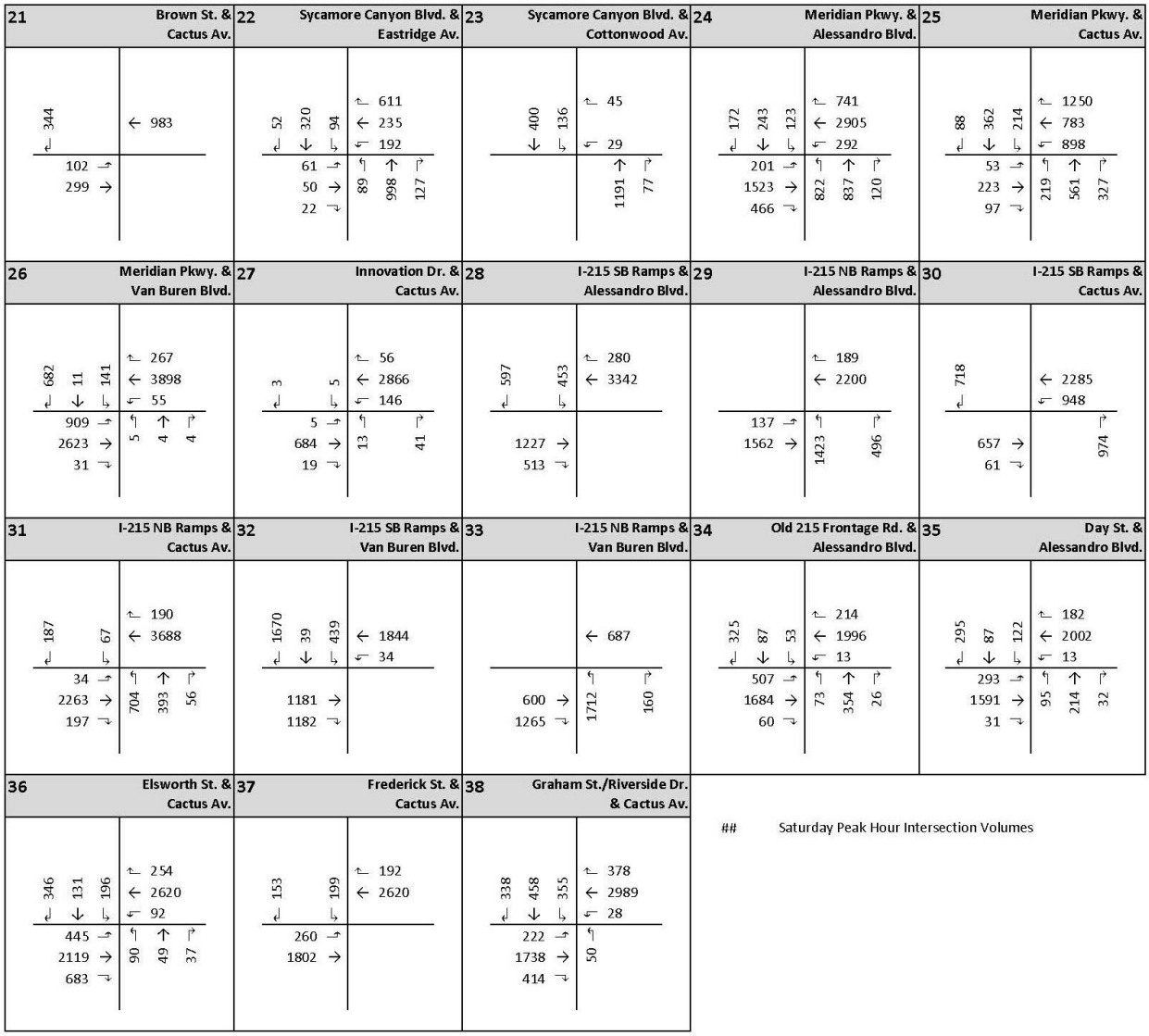

Saturday Peak Hour Intersection Volumes

RA-7.8 Cont.

8.4 INTERSECTION OPERATIONS ANALYSIS

8.4.1 HORIZON YEAR (2045) WITHOUT PROJECT TRAFFIC CONDITIONS

Horizon Year (2045) peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2.2 *Intersection Capacity Analysis* of this report. The intersection analysis results are summarized in Table 8-1, which indicates that the following study area intersections are anticipated to operate at an unacceptable LOS during the peak hours under Horizon Year (2045) Without Project traffic conditions:

- Washington St. & Van Buren Bl. (#1) – LOS F AM and PM peak hours
- Alessandro Bl. & Arlington Av./Chicago Av. (#2) – LOS F AM and PM peak hours
- Canyon Crest Dr./Overlook Pkwy. & Alessandro Bl. (#3) – LOS F AM and PM peak hours
- Wood Rd. & Van Buren Bl. (#4) – LOS F AM and PM peak hours; LOS E Saturday peak hour
- Trautwein Rd. & Alessandro Bl. (#5) – LOS F AM and PM peak hours
- Trautwein Rd. & Grove Community Dr. (#6) – LOS E AM peak hour only
- Trautwein Rd. & Orange Terrace Pkwy. (#7) – LOS F AM and PM peak hours
- Trautwein Rd. & Van Buren Bl. (#8) – LOS F AM and PM peak hours; LOS E Saturday peak hour
- Deercreek Dr. & Orange Terrace Pkwy. (#10) – LOS F AM peak hour only
- Barton St. & Alessandro Bl. (#11) – LOS F AM and PM peak hours
- Barton St. & Orange Terrace Pkwy. (#13) – LOS F AM and Saturday peak hours
- Barton St. & Van Buren Bl. (#14) – LOS F AM, PM, and Saturday peak hours
- Brown St. & Alessandro Bl. (#20) – LOS E AM peak hour only
- Meridian Pkwy. & Alessandro Bl. (#24) – LOS F AM and PM peak hours
- Meridian Pkwy. & Cactus Av. (#25) – LOS F AM and PM peak hours
- Meridian Pkwy. & Van Buren Bl. (#26) – LOS F AM and PM peak hours
- I-215 NB Ramps & Alessandro Bl. (#29) – LOS F AM peak hour only
- I-215 NB Ramps & Cactus Av. (#31) – LOS F AM and PM peak hours
- I-215 SB Ramps & Van Buren Bl. (#32) – LOS F AM and PM peak hours
- Old 215 Frontage Rd. & Alessandro Bl. (#34) – LOS F AM peak hour only
- Day St. & Alessandro Bl. (#35) – LOS F AM peak hour; LOS E PM peak hour
- Elsworth St. & Cactus Av. (#36) – LOS F AM and PM peak hours
- Frederick St. & Cactus Av. (#37) – LOS F AM peak hour only
- Graham St./Riverside Dr. & Cactus Av. (#38) – LOS F AM and PM peak hours

RA-7.8 Cont.

The intersection operations analysis worksheets for Horizon Year (2045) Without Project traffic conditions are included in Appendix 8.1 of this TA.

TABLE 8-1: INTERSECTION ANALYSIS FOR HORIZON YEAR (2045) CONDITIONS

#	Intersection	Traffic Control[1]	HY (2045) NP Delay[2 3 4 5] (secs.) AM	PM	SAT	HY (2045) NP Level of Service AM	PM	SAT	HY (2045) WP Delay[2 3 4 5] (secs.) AM	PM	SAT	HY (2045) WP Level of Service AM	PM	SAT
1	Washington St. & Van Buren Blvd.	TS	**>200.0**	**152.5**	39.2	**F**	**F**	D	**>200.0**	**164.3**	43.2	**F**	**F**	D
2	Alessandro Blvd. & Arlington Av./Chicago Av.	TS	**187.6**	**>200.0**	40.5	**F**	**F**	D	**190.3**	**>200.0**	42.9	**F**	**F**	D
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.	TS	**191.1**	**>200.0**	28.2	**F**	**F**	C	**>200.0**	**>200.0**	32.4	**F**	**F**	C
4	Wood Rd. & Van Buren Blvd.	TS	**196.7**	**>200.0**	**75.7**	**F**	**F**	**E**	**>200.0**	**>200.0**	**86.8**	**F**	**F**	**F**
5	Trautwein Rd. & Alessandro Blvd.	TS	**>200.0**	**82.5**	22.6	**F**	**F**	C	**>200.0**	**87.8**	23.2	**F**	**F**	C
6	Trautwein Rd. & Grove Community Dr.	TS	**74.0**	17.2	14.9	**E**	B	B	**74.7**	17.2	14.9	**E**	B	B
7	Trautwein Rd. & Orange Terrace Pkwy.	TS	**102.6**	**86.4**	25.1	**F**	**F**	C	**102.6**	**86.2**	25.1	**F**	**F**	C
8	Trautwein Rd. & Van Buren Blvd.	TS	**>200.0**	**155.0**	**61.6**	**F**	**F**	**E**	**>200.0**	**177.0**	**68.8**	**F**	**F**	**E**
9	Deercreek Dr. & Grove Community Dr.	AWS	21.5	10.3	11.1	C	B	B	22.2	10.6	11.3	C	B	B
10	Deercreek Dr. & Orange Terrace Pkwy.	AWS	**81.7**	13.4	12.2	**F**	B	B	**81.6**	13.4	12.2	**F**	B	B
11	Barton St. & Alessandro Blvd.	TS	**106.4**	37.9	9.0	**F**	D	A	**110.2**	**86.4**	9.2	**F**	**F**	A
12	Barton St. & Grove Community Dr.	CSS	13.4	9.8	12.5	B	A	B	13.3	9.9	12.7	B	A	B
13	Barton St. & Orange Terrace Pkwy.	CSS	**>100.0**	28.7	**>100.0**	**F**	D	**F**	**>100.0**	28.7	**>100.0**	**F**	D	**F**
14	Barton St. & Van Buren Blvd.	TS	**>200.0**	**>200.0**	**116.4**	**F**	**F**	**F**	**>200.0**	**>200.0**	**129.3**	**F**	**F**	**F**
15	Airman Dr. & Cactus Av.	**AWS**	Future Intersection						16.9	53.8	21.5	B	D	C
16	Abrams Dr. & Grove Community Dr.	AWS	11.7	9.3	9.1	B	A	A	12.3	9.9	9.3	B	A	A
17	Abrams Dr. & Orange Terrace Pkwy.	AWS	13.6	9.4	10.1	B	A	B	13.6	9.4	10.1	B	A	B
18	Linebacker Dr. & Cactus Av.	**TS**	Future Intersection						22.4	54.5	23.8	C	D	C
19	Orange Terrace Pkwy. & Van Buren Blvd.	TS	28.5	54.4	19.1	C	D	B	30.4	**75.0**	19.5	C	**E**	B
20	Brown St. & Alessandro Blvd.	TS	**63.8**	54.0	10.6	**E**	D	B	**98.0**	**>200.0**	**187.4**	**E**	**F**	**F**
21	Brown St. & Cactus Av.	**CSS**	Future Intersection						18.7	36.5	33.4	B	D	C
22	Sycamore Canyon Blvd. & Eastridge Av.	TS	54.5	25.2	18.3	D	C	B	54.8	26.1	18.4	D	C	B
23	Sycamore Canyon Blvd. & Cottonwood Av.	TS	16.7	11.8	6.8	B	B	A	16.8	11.8	6.8	B	B	A
24	Meridian Pkwy. & Alessandro Blvd.	TS	**183.3**	**148.6**	23.0	**F**	**F**	C	**198.5**	**180.3**	23.8	**F**	**F**	C
25	Meridian Pkwy. & Cactus Av.	TS	**134.8**	**141.0**	18.5	**F**	**F**	B	**146.1**	**>200.0**	20.6	**F**	**F**	C
26	Meridian Pkwy. & Van Buren Blvd.	TS	**>200.0**	**>200.0**	15.5	**F**	**F**	B	**>200.0**	**>200.0**	17.5	**F**	**F**	B
27	Innovation Dr. & Cactus Av.	TS	8.3	9.9	3.6	A	A	A	10.4	12.0	2.7	B	B	A
28	I-215 SB Ramps & Alessandro Blvd.	TS	49.5	21.0	7.5	C	C	A	53.8	25.9	8.1	D	C	A
29	I-215 NB Ramps & Alessandro Blvd.	TS	**119.9**	44.1	34.4	**F**	D	C	**140.8**	**65.6**	44.9	**F**	**E**	D
30	I-215 SB Ramps & Cactus Av.	TS	11.0	32.7	4.5	B	C	A	15.7	**149.8**	5.2	B	**F**	A
31	I-215 NB Ramps & Cactus Av.	TS	**>200.0**	**158.3**	8.9	**F**	**F**	A	**>200.0**	**>200.0**	10.1	**F**	**F**	B
32	I-215 SB Ramps & Van Buren Blvd.	TS	**80.3**	**>200.0**	10.3	**F**	**F**	B	**91.7**	**>200.0**	10.2	**F**	**F**	B
33	I-215 NB Ramps & Van Buren Blvd.	TS	43.4	39.0	4.2	D	D	A	43.4	46.9	4.2	D	D	A
34	Old 215 Frontage Rd. & Alessandro Blvd.	TS	**128.8**	53.8	20.4	**F**	D	C	**135.3**	**57.7**	20.6	**F**	**E**	C
35	Day St. & Alessandro Blvd.	TS	**114.1**	**79.5**	14.6	**F**	**E**	B	**118.9**	**88.2**	15.2	**F**	**F**	B
36	Elsworth St. & Cactus Av.	TS	**>200.0**	**>200.0**	50.9	**F**	**F**	D	**>200.0**	**>200.0**	54.5	**F**	**F**	D
37	Frederick St. & Cactus Av.	TS	**117.5**	25.1	10.6	**F**	C	B	**120.9**	27.7	10.8	**F**	C	B
38	Graham St./Riverside Dr. & Cactus Av.	TS	**>200.0**	**>200.0**	18.3	**F**	**F**	B	**>200.0**	**>200.0**	18.3	**F**	**F**	C

* **BOLD** = Significant Impact

-- = Not applicable for this jurisdiction

[1] CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal; **TS** = Improvement

[2] For intersections within the jurisdiction of March JPA, deficient occurs (improvements needed) if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels. However, if the pre-project condition is already below LOS D (or acceptable LOS), provide improvements if the Project contributes more than 2% of the total traffic.

[3] For intersections within the jurisdiction of the City of Riverside, deficient occurs (improvements needed) when the addition of project related trips causes either peak hour LOS to degrade from acceptable (LOS A through D) to unacceptable levels (LOS E/F) or the peak hour delay to increase as follows:
- LOS A/B = By 10.0 seconds
- LOS C = By 8.0 seconds
- LOS D = By 5.0 seconds
- LOS E = By 2.0 seconds
- LOS F = By 1.0 seconds

[4] For intersections within the jurisdiction of Caltrans, or the County of Riverside, deficient occurs (improvements needed) if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels.

[5] For intersections within the City of Moreno Valley, provide improvements if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels. If the pre-project condition is at unacceptable LOS and Project increases delay by 5.0 or more, provide improvements to offset the increase in delay.

RA-7.8 Cont.

8.4.2 HORIZON YEAR (2045) WITH PROJECT TRAFFIC CONDITIONS

As shown in Table 8-1, the following additional study area intersections are anticipated to operate at a deficient LOS during one or both peak hours for Horizon Year (2045) With Project traffic conditions, in addition to the locations identified above for Horizon Year (2045) Without Project traffic conditions:

- Orange Terrace Pkwy. & Van Buren Bl. (#19) – LOS E PM peak hour only
- I-215 SB Ramps & Cactus Av. (#30) – LOS F PM peak hour only

The intersection operations analysis worksheets for Horizon Year (2045) With Project traffic conditions are included in Appendix 8.2.

8.5 ROADWAY SEGMENT ANALYSIS

The roadway segment capacities are approximate figures only and are used at the General Plan level to assist in determining the roadway functional classification (number of through lanes) needed to meet traffic demand. Table 8-2 provides a summary of the Horizon Year (2045) Without Project conditions roadway segment capacity analysis based on the applicable roadway segment capacity thresholds. As shown on Table 8-2, the following additional study area roadway segments are anticipated to operate at an unacceptable LOS based on the applicable planning level daily roadway capacity thresholds:

- Alessandro Bl. from Trautwein Rd. to Mission Grove Pkwy. (#1) – LOS F
- Alessandro Bl. from Mission Grove Pkwy. to Barton St. (#2) – LOS E
- Alessandro Bl. from Barton St. to Brown St. (#3) – LOS E
- Alessandro Bl. from Brown St. to Meridian Pkwy. (#4) – LOS E
- Alessandro Bl. from Meridian Pkwy. to I-215 Freeway (#5) – LOS F
- Meridian Pkwy. from Alessandro Bl. to Cactus Av. (#14) – LOS F
- Meridian Pkwy. from Cactus Av. to Van Buren Bl. (#15) – LOS F

RA-7.8 Cont.

With the addition of Project traffic, the following additional study area roadway segments are anticipated to operate at a deficient LOS for Horizon Year (2045) With Project traffic conditions:

- Cactus Av., from Airman Dr. to Linebacker Dr. (#6) – LOE F
- Cactus Av. from Linebacker Dr. to Brown St. (#7) – LOS E
- Cactus Av., from Brown St. to Meridian Pkwy. (#8) – LOS F
- Barton Rd. from Alessandro Bl. to Cactus Av. (#10) – LOS F
- Brown St., from Alessandro Bl. to Cactus Av. (#12) – LOS F

TABLE 8-2: ROADWAY SEGMENT ANALYSIS FOR HORIZON YEAR (2045) CONDITIONS

#	Roadway	Segment Limits	Roadway Section	LOS Capacity[1]	2040 Without Project 2045	2040 Without Project V/C[2]	2040 Without Project LOS[3]	2040 With Project 2045	2040 With Project V/C[2]	2040 With Project LOS[3]	Acceptable LOS
1	Alessandro Bl.	Trautwein Rd. to Mission Grove Pkwy.	6D	57,250	**60,523**	**1.06**	**F**	**63,517**	**1.11**	**F**	D
2		Mission Grove Pkwy. to Barton St.	6D	57,250	**58,590**	**1.02**	**F**	**62,914**	**1.10**	**F**	D
3		Barton St. to Brown St.	6D	57,250	**59,226**	**1.03**	**F**	**63,218**	**1.10**	**F**	D
4		Brown St. to Meridian Pkwy.	6D	57,250	**63,866**	**1.12**	**F**	**68,894**	**1.20**	**F**	D
5		Meridian Pkwy. to I-215 Freeway	6D	57,250	**52,393**	**0.92**	**E**	**58,460**	**1.02**	**F**	D
6	Cactus Av.	Airman Dr. to Linebacker Dr.	2U	13,000	0	0.00	A	**28,912**	**2.22**	**F**	D
7		Linebacker Dr. to Brown St.	4D	25,900	0	0.00	A	**43,346**	**1.67**	**F**	D
8		Brown St. to Meridian Pkwy.	4D	25,900	0	0.00	A	**25,630**	**0.99**	**E**	D
9		Meridian Pkwy. to I-215 Freeway	6D	51,150	28,137	0.55	A	44,753	0.87	D	D
10	Barton St.	Alessandro Bl. to Cactus Av. (EVA)	2U	13,000	2,718	0.21	A	**14,403**	**1.11**	**F**	D
11		Cactus Av. (EVA) to Grove Community Dr.	2U	13,000	1,034	0.08	A	1,366	0.11	A	D
12	Brown St.	Alessandro Bl. to Cactus Av.	2D	13,000	1,023	0.08	A	**18,739**	**1.44**	**F**	D
13	Sycamore Canyon Bl.	Cottonwood Av. to Alessandro Bl.	4D	33,000	24,692	0.75	C	25,460	0.77	C	D
14	Meridian Pkwy.	Alessandro Bl. to Cactus Av.	4D	25,900	**37,099**	**1.43**	**F**	**38,905**	**1.50**	**F**	D
15		Cactus Av. to Van Buren Bl.	4D	25,900	**32,181**	**1.24**	**F**	**39,389**	**1.52**	**F**	D

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

[1] These maximum roadway capacities are based on the applicable agency's thresholds.

[2] V/C = Volume to Capacity Ratio

[3] LOS = Level of Service

8.6 TRAFFIC SIGNAL WARRANTS ANALYSIS

There are no additional unsignalized study area intersection anticipated to meet either peak hour volume-based or planning level (ADT) volume-based traffic signal warrants for Horizon Year (2045) Without Project traffic conditions in addition to those previously warranted under Existing and E+P conditions (see Appendix 8.3). The intersection of Deercreek Drive and Grove Community Drive (#9) is anticipated to meet a planning level (ADT) volume-based traffic signal warrant under Horizon Year (2045) With Project traffic conditions (see Appendix 8.4).

RA-7.8 Cont.

8.7 OFF-RAMP QUEUING ANALYSIS

A queuing analysis was performed for the off-ramps at the I-215 Freeway at Alessandro Boulevard, Cactus Avenue, and Van Buren Boulevard interchanges, to assess vehicle queues for the off ramps that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the I-215 Freeway mainline. Queuing analysis findings are presented in Table 8-3 for Horizon Year (2045) traffic conditions. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown in Table 8-3, there are no movements that are anticipated to experience queuing issues during the weekday AM, weekday PM, or weekend Saturday peak 95th percentile traffic flows for Horizon Year (2045) Without and With Project traffic conditions, consistent with Existing (2021) traffic conditions. Worksheets for Horizon Year (2045) Without and With Project traffic conditions off-ramp queuing analysis are provided in Appendix 8.5 and Appendix 8.6, respectively.

TABLE 8-3: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR HORIZON YEAR (2045) CONDITIONS

Intersection	Movement[3]	Available Stacking Distance (Feet)[3]	HY (2045) Without Project 95th Percentile Queue (Feet)			HY (2045) Without Project Acceptable?[1]			HY (2045) With Project 95th Percentile Queue (Feet)			HY (2045) With Project Acceptable?[1]		
			AM Peak Hour	PM Peak Hour	SAT Peak Hour	AM	PM	SAT	AM Peak Hour	PM Peak Hour	SAT Peak Hour	AM	PM	SAT
I-215 SB Ramps & Alessandro Blvd. (#28)	SBL	525	249	305	102	Yes	Yes	Yes	265	346 [2]	113	Yes	Yes	Yes
	SBL/R	1,540	242	324 [2]	116	Yes	Yes	Yes	264	345 [2]	147	Yes	Yes	Yes
	SBR	525	223	298 [2]	108	Yes	Yes	Yes	247	312 [2]	140	Yes	Yes	Yes
I-215 NB Ramps & Alessandro Blvd. (#29)	NBL	450	814 [2 3]	521 [2 3]	180	Yes	Yes	Yes	890 [1 2]	578 [1 2]	202	Yes	Yes	Yes
	NBL/T/R	1,345	784 [2]	565 [2]	178	Yes	Yes	Yes	861 [2]	618 [2]	203	Yes	Yes	Yes
	NBR	450	458 [2 3]	290	121	Yes	Yes	Yes	458 [2]	290	135	Yes	Yes	Yes
I-215 SB Ramps & Cactus Av. (#30)	SBR	1,115	382 [2]	443 [2]	0	Yes	Yes	Yes	1,035 [2]	855 [2]	0	Yes	Yes	Yes
	NBR	1,850	596 [2]	609 [2]	0	Yes	Yes	Yes	599 [2]	610 [2]	39	Yes	Yes	Yes
I-215 NB Ramps & Cactus Av. (#31)	NBL	145	1,010 [2 3]	433 [2 3]	61	Yes	Yes	Yes	1,166 [2]	566 [2]	131	Yes	Yes	Yes
	NBT/R	1,650	633 [2]	265 [2]	77	Yes	Yes	Yes	633 [2]	265 [2]	76	Yes	Yes	Yes
I-215 SB Ramps & Van Buren Blvd.(#32)	SBL/T	1,510	408 [2]	1,035 [2]	30	Yes	Yes	Yes	408 [2]	1,035 [2]	30	Yes	Yes	Yes
	SBR	1,450	958 [2]	593 [2]	363 [2]	Yes	Yes	Yes	958 [2]	593 [2]	375 [2]	Yes	Yes	Yes
I-215 NB Ramps & Van Buren Blvd. (#33)	NBL	1,560	324	230	0	Yes	Yes	Yes	324	218	0	Yes	Yes	Yes
	NBR	580	38	63	0	Yes	Yes	Yes	38	60	0	Yes	Yes	Yes

[1] Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

[2] 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

[3] Although 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent lane has sufficient storage to accommodate any spillover without spilling back and affecting the I-215 Freeway mainline.

RA-7.8 Cont.

8.8 DEFICIENCIES AND IMPROVEMENTS

8.8.1 IMPROVEMENTS TO ADDRESS DEFICIENCIES AT INTERSECTIONS

This section provides a summary of Project deficiencies and identified improvements. Based on the deficiency criteria discussed in Section 2.7 *Deficiency Criteria*, study area intersections were found to be deficient. The effectiveness of the improvement strategies presented in Table 8-5 address the Horizon Year (2045) deficiencies as the recommendations improve the operations back to pre-project conditions (or better) or within the allowable net change in delay per the applicable deficiency criteria for each agency. It should be noted the following study area intersections fall below the applicable agency's deficiency criteria. As such, no improvements have been recommended at these locations:

- Trautwein Rd. & Grove Community Rd. (#6)
- Trauwein Rd. & Orange Terrace Pkwy. (#7)
- Deercreek Rd. & Orange Terrace Pkwy. (#10)
- Frederick Street at Cactus Avenue (#37)

If not constructed by the Project, the Project Applicant should contribute to these improvements through payment of fair share or TUMF fees. Worksheets for Horizon Year (2045) With Project, with improvements, HCM calculation worksheets are provided in Appendix 8.7.

8.8.2 IMPROVEMENTS TO ADDRESS DEFICIENCIES AT ROADWAY SEGMENT

RA-7.8 Cont.

Additional roadway widening for the deficient roadway segments has not been recommended as acceptable or improved peak hour traffic operations can be achieved with the existing lanes or with the improvements shown on Table 8-4. Most roadway segments are already constructed to their ultimate or assume the ultimate lanes.

8.8.3 IMPROVEMENTS TO ADDRESS DEFICIENCIES ON OFF-RAMP QUEUES

As shown previously in Table 8-3, there are no anticipated peak hour queuing issues at the I-215 Freeway off-ramps for Horizon Year (2045) traffic conditions, consistent with Existing (2021) traffic conditions. As such, no improvements have been recommended.

TABLE 8-4: INTERSECTION ANALYSIS FOR HORIZON YEAR (2045) CONDITIONS WITH IMPROVEMENTS

#	Intersection	Traffic Control[3]	Intersection Approach Lanes[1] Northbound L	T	R	Southbound L	T	R	Eastbound L	T	R	Westbound L	T	R	Delay[2] (secs.) AM	PM	SAT	Level of Service AM	PM	SAT
1	Washington St. & Van Buren Blvd.																			
	- Without Improvements	TS	2	2	1	2	2	0	1	2	0	1	2	1	**>200.0**	**164.3**	43.2	**F**	**F**	D
	- With Improvements	TS	2	2	1	2	2	0	1	**3**	0	1	**3**	1	**123.2**	**76.4**	31.6	**F**	**E**	C
2	Alessandro Blvd. & Arlington Av./Chicago Av.[7]																			
	- Without Improvements	TS	2	2	1>	2	3	0	1	2	2>	2	2	1>	**190.3**	**>200.0**	42.9	**F**	**F**	D
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.																			
	- Without Improvements	TS	1	2	1	2	1	1	1	3	0	1	3	1>	**>200.0**	**>200.0**	32.4	**F**	**F**	C
	- With Improvements	TS	1	2	1	**3**	1	**0**	1	3	0	1	3	1>	**193.0**	**>200.0**	31.0	**F**	**F**	C
4	Wood Rd. & Van Buren Blvd.																			
	- Without Improvements	TS	2	2	0	1	2	0	1	2	1>	2	2	1	**>200.0**	**>200.0**	**86.8**	**F**	**F**	**F**
	- With Improvements	TS	2	2	0	1	2	0	1	**3**	1>	2	**3**	1	**101.6**	**106.3**	34.5	**F**	**F**	C
5	Trautwein Rd. & Alessandro Blvd.[4]																			
	- Without Improvements	TS	2	1	0	0	0	0	0	3	0	2	3	0	**>200.0**	**87.8**	23.2	**F**	**F**	C
8	Trautwein Rd. & Van Buren Blvd.																			
	- Without Improvements	TS	1	2	0	2	2	1>	2	2	1>	1	3	1>	**>200.0**	**177.0**	**68.8**	**F**	**F**	**E**
	- With Improvements	TS	1	2	0	2	2	1>	2	**3**	1	1	3	1>	**165.9**	**116.2**	**61.3**	**F**	**F**	**E**
11	Barton St. & Alessandro Blvd.																			
	- Without Improvements	TS	0	1	1	0	1	1	1	3	0	1	3	0	**110.2**	**86.4**	9.2	**F**	**F**	A
	- With Improvements[5]	TS	**1**	1	**0**	**1**	1	**0**	1	3	0	1	3	0	**103.0**	17.3	9.4	**F**	B	A
13	Barton St. & Orange Terrace Pkwy.																			
	- Without Improvements	CSS	1	0	0	0	0	0	0	2	0	1	2	0	**>100.0**	28.7	**>100.0**	**F**	D	**F**
	- With Improvements	**TS**	1	0	0	0	0	0	0	2	0	1	2	0	13.9	12.5	14.2	B	B	B
14	Barton St. & Van Buren Blvd.																			
	- Without Improvements	TS	2	1	1	1	1	0	1	2	0	1	3	0	**>200.0**	**>200.0**	**129.3**	**F**	**F**	**F**
	- With Improvements	TS	2	1	1	1	1	0	1	**3**	**1>**	**2**	3	0	**128.1**	**64.2**	33.6	**F**	**E**	C
19	Orange Terrace Pkwy. & Van Buren Blvd.																			
	- Without Improvements	TS	2	2	1	2	1	1>	2	3	1	2	3	1	30.4	75.0	19.5	C	**E**	B
	- With Improvements[10]	TS	2	2	**1>**	2	1	1>	2	3	**1>**	2	3	**1>**	29.2	52.8	18.9	C	C	B
20	Brown St. & Alessandro Blvd.[7]																			
	- Without Improvements	TS	1	1	1>	1	1	1>	1	3	0	1	3	1	**98.0**	**>200.0**	**187.4**	**E**	**F**	**F**
24	Meridian Pkwy. & Alessandro Blvd.[7]																			
	- Without Improvements	TS	2	2	2>	2	2	1	1	3	1	2	3	1	**198.5**	**180.3**	23.8	**F**	**F**	C
25	Meridian Pkwy. & Cactus Av.																			
	- Without Improvements	TS	2	2	1	2	2	1	1	2	1	2	2	1	**146.1**	**>200.0**	20.6	**F**	**F**	C
	- With Improvements	TS	2	2	1	2	**3**	**0**	1	**3**	**0**	2	2	**1>**	**79.5**	**178.6**	23.1	**E**	**F**	C
26	Meridian Pkwy. & Van Buren Blvd.																			
	- Without Improvements	TS	0	2	0	2	1	1>	2	4	1	1	4	1	**>200.0**	**>200.0**	17.5	**F**	**F**	B
	- With Improvements[8]	TS	0	2	0	2	**1**	1>	2	4	1	1	4	1	**148.4**	**>200.0**	16.2	**F**	**F**	B

RA-7.8 Cont.

#	Intersection	Traffic Control[3]	Intersection Approach Lanes[1] Northbound L	T	R	Southbound L	T	R	Eastbound L	T	R	Westbound L	T	R	Delay[2] (secs.) AM	PM		Level of Service AM	PM	SAT
29	I-215 NB Ramps & Alessandro Blvd.																			
	- Without Improvements	TS	1	1	1	0	0	0	1	3	0	0	3	1	**140.8**	**65.6**	44.9	**F**	**E**	D
	- With Improvements	TS	**2**	1	0	0	0	0	1	3	0	0	3	1	54.6	50.5	29.7	D	D	C
30	I-215 SB Ramps & Cactus Av.																			
	- Without Improvements	TS	0	0	1	0	0	1	0	2	1	1	2	0	15.7	**149.8**	5.2	B	**F**	A
	- With Improvements	TS	0	0	1	0	0	1	0	**3**	1	1	**3**	0	10.0	48.1	4.9	A	D	A
31	I-215 NB Ramps & Cactus Av.																			
	- Without Improvements	TS	1	1	1	1	1	0	1	2	0	0	2	0	**>200.0**	**>200.0**	10.1	**F**	**F**	B
	- With Improvements	TS	**2**	1	1	1	1	0	1	**3**	**1**	0	**4**	0	52.9	47.4	11.3	D	D	B
32	I-215 SB Ramps & Van Buren Blvd.																			
	- Without Improvements	TS	0	0	0	0	1	2>>	0	2	2	1	2	0	**91.7**	**>200.0**	10.2	**F**	**F**	B
	- With Improvements	TS	0	0	0	**1**	1	**1>>**	0	2	**1>>**	1	**3**	0	12.6	35.9	6.5	B	D	A
34	Old 215 Frontage Rd. & Alessandro Blvd.																			
	- Without Improvements	TS	2	2	1	1	2	1	2	3	1	1	2	1	**135.3**	**57.7**	20.6	**F**	**E**	C
	- With Improvements	TS	2	2	1	1	2	1	2	3	1	1	**3**	1	28.4	36.4	19.3	C	D	B
35	Day St. & Alessandro Blvd.																			
	- Without Improvements	TS	1	1	1	1	1	0	1	3	1	1	2	1	**118.9**	**88.2**	15.2	**F**	**F**	B
	- With Improvements	TS	1	1	1	1	1	**1**	1	3	1	1	**3**	1	51.1	41.8	13.9	B	D	B
36	Elsworth St. & Cactus Av.																			
	- Without Improvements	TS	1	1	0	1	1	1>	1	3	1>>	1	3	1	**>200.0**	**>200.0**	54.5	**F**	**F**	D
	- With Improvements[9]	TS	**2**	1	0	1	1	1>	1	**4**	1>>	1	**4**	1	52.5	49.9	18.4	D	D	B
38	Graham St./Riverside Dr. & Cactus Av.																			
	- Without Improvements	TS	2	2	0	1	2	1	1	3	1	1	3	0	**>200.0**	**>200.0**	10.8	**F**	**F**	B
	- With Improvements	TS	2	2	0	**2**	2	1	1	3	1	1	3	0	**174.6**	**149.5**	18.2	**F**	**F**	B

* **BOLD** = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

[1] When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; >> = Free Right Turn Lane; **1** = Improvement

[2] Per the Highway Capacity Manual 6th Edition, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

[3] AWS = All-Way Stop; CSS = Cross-street Stop; TS = Traffic Signal

[4] The two intersecting roadways are built to their ultimate width as designated in the General Plan. Based on recent comments and the jurisdiction's traffic study guidelines, infeasible improvements have not been recommended.

[5] Recommended improvements shown can be accommodated through restriping (no additional pavement required). Improvement includes modifying the traffic signal to implement lead-lag phasing for the eastbound and westbound left turns.

[6] Recommended improvement includes modifying the traffic signal from protected left turn phasing to permissive left turn phasing on the northbound and southbound

[7] There are no feasible intersection improvements. As such, improvements have not been identified.

[8] Improvement consists of restriping the southbound through lane to provide a shared left-through-right turn lane.

[9] Recommended improvements can be accommodated through implementing N/S from split phasing to protected left turn phasing. Lead-lag operations should be implemented for the northbound and southbound approaches to avoid conflicting left turns. Additionally, the northbound approach should be restriped to provide one left turn lane and one shared through-right turn lane; the southbound approach should be restriped to provide one left turn lane, one through lane, and one right turn lane.

RA-7.8 Cont.

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RA-7.8
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Page 236 of 250 in Comment Letter RA-7

9 LOCAL AND REGIONAL FUNDING MECHANISMS

Transportation improvements within the March JPA are funded through a combination of improvements constructed by the Project, fee programs or fair share contributions. Fee programs applicable to the Project are described below.

9.1 RIVERSIDE COUNTY TRANSPORTATION UNIFORM MITIGATION FEE (TUMF)

The TUMF program is administered by the WRCOG based upon a regional Nexus Study most recently updated in 2016 to address major changes in right of way acquisition and improvement cost factors. (10) This regional program was put into place to ensure that development pays its fair share and that funding is in place for construction of facilities needed to maintain the requisite level of service and critical to mobility in the region. TUMF is a truly regional mitigation fee program and is imposed and implemented in every jurisdiction in Western Riverside County.

9.2 MEASURE A

Measure A, Riverside County's half-cent sales tax for transportation, was adopted by voters in 1988 and extended in 2002. It will continue to fund transportation improvements through 2039. Measure A funds a wide variety of transportation projects and services throughout the County. RCTC is responsible for administering the program. Measure A dollars are spent in accordance with a voter-approved expenditure plan that was adopted as part of the 1988 election.

RA-7.8 Cont.

9.3 FAIR SHARE CONTRIBUTION

Project improvements may include a combination of fee payments to established programs, construction of specific improvements, payment of a fair share contribution toward future improvements or a combination of these approaches. Improvements constructed by development may be eligible for a fee credit or reimbursement through the program where appropriate (to be determined at the JPA's discretion). When off-site improvements are identified with a minor share of responsibility assigned to proposed development, the approving jurisdiction may elect to collect a fair share contribution or require the development to construct improvements. Detailed fair share calculations, for each peak hour, for the applicable deficient study area intersection are provided in Table 9-1. These fees are collected with the proceeds solely used as part of a funding mechanism aimed at ensuring that regional highways and arterial expansions keep pace with the projected population increases. It should be noted, at the time this traffic study was prepared, the City of Riverside does not have a program to collect fair share payments.

TABLE 9-1: PROJECT FAIR SHARE CALCULATIONS FOR INTERSECTIONS

#	Intersection		Existing	Project	2045 With Project	Total New Traffic	Project % of New Traffic[1]
1	Washington St. & Van Buren Blvd.						
		AM:	4,503	99	7,501	2,998	3.3%
		PM:	4,380	195	6,958	2,578	**7.6%**
		SAT:	2,872	99	4,428	1,556	6.4%
3	Canyon Crest Dr./Overlook Pkwy. & Alessandro Blvd.						
		AM:	6,005	149	8,710	2,705	5.5%
		PM:	6,209	294	9,718	3,509	8.4%
		SAT:	3,424	147	5,158	1,734	**8.5%**
7	Trautwein Rd. & Orange Terrace Pkwy.						
		AM:	3,259	0	5,326	2,067	**0.0%**
		PM:	2,817	0	5,432	2,615	0.0%
		SAT:	1,920	0	3,178	1,258	0.0%
10	Deercreek Dr. & Orange Terrace Pkwy.						
		AM:	1,622	0	2,206	584	**0.0%**
		PM:	843	0	1,229	386	0.0%
		SAT:	723	0	1,064	341	0.0%
11	Barton St. & Alessandro Blvd.						
		AM:	4,032	214	5,927	1,895	11.3%
		PM:	4,114	425	6,178	2,064	**20.6%**
		SAT:	2,648	211	3,785	1,137	18.6%
13	Barton St. & Orange Terrace Pkwy.						
		AM:	1,177	33	1,607	430	7.7%
		PM:	817	65	1,184	367	**17.7%**
		SAT:	637	33	1,704	1,067	3.1%
14	Barton St. & Van Buren Blvd.						
		AM:	3,963	231	6,978	3,015	7.7%
		PM:	3,426	457	7,060	3,634	**12.6%**
		SAT:	2,549	229	5,108	2,559	8.9%
19	Orange Terrace Pkwy. & Van Buren Blvd.						
		AM:	3,324	231	6,220	2,896	8.0%
		PM:	3,247	458	7,096	3,849	**11.9%**
		SAT:	2,518	228	4,634	2,116	10.8%
25	Meridian Pkwy. & Cactus Av.						
		AM:	2,147	1,281	5,074	2,927	43.8%
		PM:	3,142	2,436	7,571	4,429	55.0%
		SAT:	999	1,167	2,698	1,699	**68.7%**
26	Meridian Pkwy. & Van Buren Blvd.						
		AM:	3,444	357	8,630	5,186	6.9%
		PM:	4,079	700	11,273	7,194	9.7%
		SAT:	2,398	344	4,608	2,210	**15.6%**
29	I-215 NB Ramps & Alessandro Blvd.						
		AM:	3,588	201	6,006	2,418	8.3%
		PM:	3,884	333	6,185	2,301	14.5%
		SAT:	2,527	182	3,427	900	**20.2%**
32	I-215 SB Ramps & Van Buren Blvd.						
		AM:	2,831	85	94	6,390	1.3%
		PM:	3,136	177	8,138	5,002	3.5%
		SAT:	1,960	83	3,730	1,770	**4.7%**

RA-7.8 Cont.

#	Intersection		Existing	Project	2045 With Project	Total New Traffic	Project % of New Traffic[1]
35	Day St. & Alessandro Blvd.						
		AM:	2,422	66	4,956	2,534	2.6%
		PM:	3,195	130	5,544	2,349	5.5%
		SAT:	1,772	66	2,443	671	**9.8%**
36	Elsworth St. & Cactus Av.						
		AM:	4,020	102	7,063	3,043	3.4%
		PM:	4,042	200	7,623	3,581	5.6%
		SAT:	2,377	99	3,289	912	**10.9%**
38	Graham St./Riverside Dr. & Cactus Av.						
		AM:	3,639	36	6,970	3,331	1.1%
		PM:	4,231	69	7,785	3,554	1.9%
		SAT:	2,546	33	3,438	892	**3.7%**

[1] **BOLD =** Highest fair share percentage is highlighted.

RA-7.8 Cont.

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Cont.

10 REFERENCES

1. **March JPA.** *Final Traffic Impact Study Preparation Guide.* March JPA : s.n., February 2020.
2. **VRPA Technologies, Inc. for Riverside County Transportation Commission.** *Riverside County Long Range Transportation Study.* County of Riverside : VRPA Technologies, Inc., December 2019.
3. **Transportation Research Board.** *Highway Capacity Manual (HCM).* 6th Edition. s.l. : National Academy of Sciences, 2016.
4. **California Department of Transportation.** California Manual on Uniform Traffic Control Devices (CA MUTCD). [book auth.] California Department of Transportation. *California Manual on Uniform Traffic Control Devices (CA MUTCD).* 2014.
5. **Institute of Transportation Engineers (ITE).** *Trip Generation Manual.* 11th Edition. September 2021.
6. **WSP.** *TUMF High-Cube Warehouse Trip Generation Study.* County of Riverside : s.n., January 29, 2019.
7. **San Diego Association of Governments (SANDAG).** *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region.* April 2002.
8. **Institute of Transportation Engineers (ITE).** *Trip Generation Handbook.* 3rd Edition. 2017.
9. **Western Riverside Council of Governments.** *TUMF Nexus Study, 2016 Program Update.* July 2017.

RA-7.8
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RA-7.8
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URBAN CROSSROADS

urbanxroads.com

October 11, 2022

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

SUBJECT: WEST CAMPUS UPPER PLATEAU VEHICLE MILES TRAVELED (VMT) ANALYSIS

Dear Mr. Dan Fairbanks:

The following vehicle miles traveled (VMT) analysis has been prepared for the proposed West Campus Upper Plateau (**Project**) which is located on either side of Barton Street and Cactus Avenue in the March Joint Powers Authority (March JPA) and unincorporated Riverside County. (See Attachment A)

PROJECT OVERVIEW

The proposed Project (see Attachment A) consists of the following uses:

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1,280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 42.2 Acre Active Park (with sports fields)
- 35.8 Acres of Park/Open Space (trails)
- 2.84 acres of Public Facilities for future sewer lift station and electrical substation

Mixed Use Areas include a variety of complimentary land uses; including commercial, business park, office, medical, educational and vocational, research and development, and services. Residential and outdoor storage is prohibited.

BACKGROUND

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018) (**Technical Advisory**) (1). Based on OPR's Technical Advisory, the Western

RA-7.9

Riverside Council of Governments (WRCOG) prepared a WRCOG SB 743 Implementation Pathway Document Package (March 2019) to assist its member agencies with implementation tools necessary to adopt analysis methodology, impact thresholds and mitigation approaches for VMT. To add to the previous work effort, WRCOG in February 2020 released its Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (**WRCOG Guidelines**), which provides specific procedures for complying with the new CEQA requirements for VMT analysis (2). Through consultation with March JPA staff, it is our understanding that the March JPA has yet to adopt its own VMT analysis guidelines and thresholds. For the purposes of this analysis, the recommended VMT analysis methodology and thresholds identified within the Technical Advisory and WRCOG Guidelines have been used.

VMT ANALYSIS

VMT MODELING

WRCOG Guidelines identifies RIVCOM as the appropriate tool for conducting VMT analysis for land development projects in the March JPA. WRCOG is the developer/owner of RIVCOM and recently launched the new modeling tool for use by its member agencies in August 2021. At the time this analysis was prepared, the RIVCOM tool was in its 4th update (also referred to as version 3.0). It has been determined that this analysis would be prepared based on version 3.0 of RIVCOM.

RA-7.9
Cont.

VMT METRIC AND SIGNIFICANCE THRESHOLD

As stated in the Technical Advisory, "Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential and retail)."[1] Consistent with OPR's direction in the Technical Advisory, the VMT metric for retail projects greater than 50,000 sf of gross leasable area is to utilize the metric of net change in total VMT. Therefore, for purposes of this analysis a significant impact to VMT would occur if the addition of the Project's retail component would result in a **net increase in total VMT for the region.** For purposes of this evaluation the region is defined as a 15-mile service area from the Project site. A 15-mile service area is a conservatively estimated distance from the Project as the retail component is not anticipated as a regional shopping destination but instead is anticipated to serve the surrounding communities of Riverside, Moreno Valley, Perris, etc. Additionally, large boundaries such as Riverside County or WRCOG tend to be too large of an area to accurately measure an individual project's effect on VMT without model noise (i.e., convergence criteria) influencing the results.

For projects that are not residential nor retail land use types, the Technical Advisory identifies VMT per employee as the appropriate VMT metric for analysis. Therefore, the Project's industrial, business park,

[1] Technical Advisory; Page 17.

and non-retail mixed use land uses should be evaluated based on the metric of VMT per employee. A significant impact to VMT would occur if the addition of the Project's industrial/business park/non-retail mixed use components would result in Project-generated **VMT per employee to exceed 15% below the WRCOG's baseline of 29.97 VMT per employee for a regional average significance threshold of 25.47 VMT per employee**.

PROJECT LAND USE CONVERSION

In order to evaluate Project VMT, standard land use information must first be converted into a RIVCOM compatible input data. The RIVCOM model utilizes socio-economic data (SED) (e.g., population, households, employment, etc.) instead of land use information for the purposes of vehicle trip estimation. Project land use information such as building square footage must first be converted to SED for input into RIVCOM. The employment estimates are consistent with those used by the Project's Water Supply Assessment (WSA). Table 1 presents the estimated number of Project employees by land use type used to populate the RIVCOM model.

TABLE 1: EMPLOYMENT ESTIMATES

Land Use	Building Area	Estimated Employees
Industrial	3,062,561 SF	2,000 Industrial Employees
Business Park[2]	1,763,168 SF	340 Service Employees
Retail	160,921 SF	255 Retail Employees

The RIVCOM model was then run inclusive of the Project's SED inputs.

PROJECT RETAIL VMT CALCULATION AND COMPARISON TO SIGNIFICANCE THRESHOLD

As described previously, retail land uses are evaluated utilizing the VMT metric of total VMT[3]. RIVCOM was used to calculate the baseline total link-level VMT for both "No Project" and "With Project" model runs. This calculation is commonly referred to as the "boundary method" and includes the total VMT for all vehicle trips with one or both trip ends within a specific geographic area – in this case 15-mile service area surrounding the Project site. As shown in Table 2, the addition of the Project results in a net decrease to total VMT, which falls below the OPR significance threshold.

RA-7.9
Cont.

[2] Includes 75% of "Business Park" Mixed Use Area.
[3] Technical Advisory; Page 16.

TABLE 2: NET CHANGE IN TOTAL VMT FOR THE REGION

	15-mile Region
Total VMT for No Project	43,167,218
Total VMT for With Project	43,039,938
+/- to VMT	-127,280
Percent Change	-0.29%
Potentially Significant	No

PROJECT NON-RETAIL VMT CALCULATION AND COMPARISON TO IMPACT THRESHOLD

The Technical Advisory identifies that for land uses other than residential and retail, the measure of VMT should be VMT per employee. RIVCOM was utilized to calculate Project-generated VMT for the non-retail land uses and that value was then divided by the Project's employment estimate to derive Project-generated VMT per employee. Project-generated home-based work (HBW) VMT was then calculated for both the base year model (2018) and cumulative year model (2045), and linear interpolation was used to determine the Project's baseline (2022) HBW VMT. Table 3 HBW VMT as calculated from RIVCOM for the Project's non-retail land uses, the number of Project non-retail employees and Project non-retail VMT per employee.

RA-7.9
Cont.

TABLE 3: NON-RETAIL VMT PER EMPLOYEE

	Project Non-Retail
VMT	58,874
Non-Retail Employment	2,340
VMT per Employee[4]	24.12

Table 4 provides a comparison between Project VMT per employee to the WRCOG significance threshold of 25.47. The Project's non-retail VMT per employee was found to be below the WRCOG significance threshold by 5.3%. Therefore, the Project's impact on VMT is less than significant.

[4] HBW VMT per Employee is a measure of all auto trips between home and work and does not include heavy duty truck trips or freight, which is consistent with OPR guidance.

TABLE 4: PROJECT NON-RETAIL VMT PER EMPLOYEE COMPARISON

	VMT per Employee
WRCOG Threshold	25.47
Project	24.12
Difference	-1.35
Percent Change	-5.30%
Potentially Significant	No

CONCLUSION

Based on the results of this analysis the following findings are made:

- The Project's retail land uses were found to decrease total VMT in the 15-mile service area by 127,280 or about 0.29%. The Project's retail land uses are determined to have a less than significant transportation impact for the retail uses.
- The Project's non-retail land uses were found to be below the WRCOG region VMT per employee threshold by 5.30%. The Project's non-retail employment uses are determined to also have a less than significant impact.
- The Project's impact on VMT is considered less than significant.

RA-7.9 Cont.

If you have any questions, please contact me directly at aso@urbanxroads.com.

Respectfully submitted,

URBAN CROSSROADS, INC.

Alex So
Senior Associate

REFERENCES

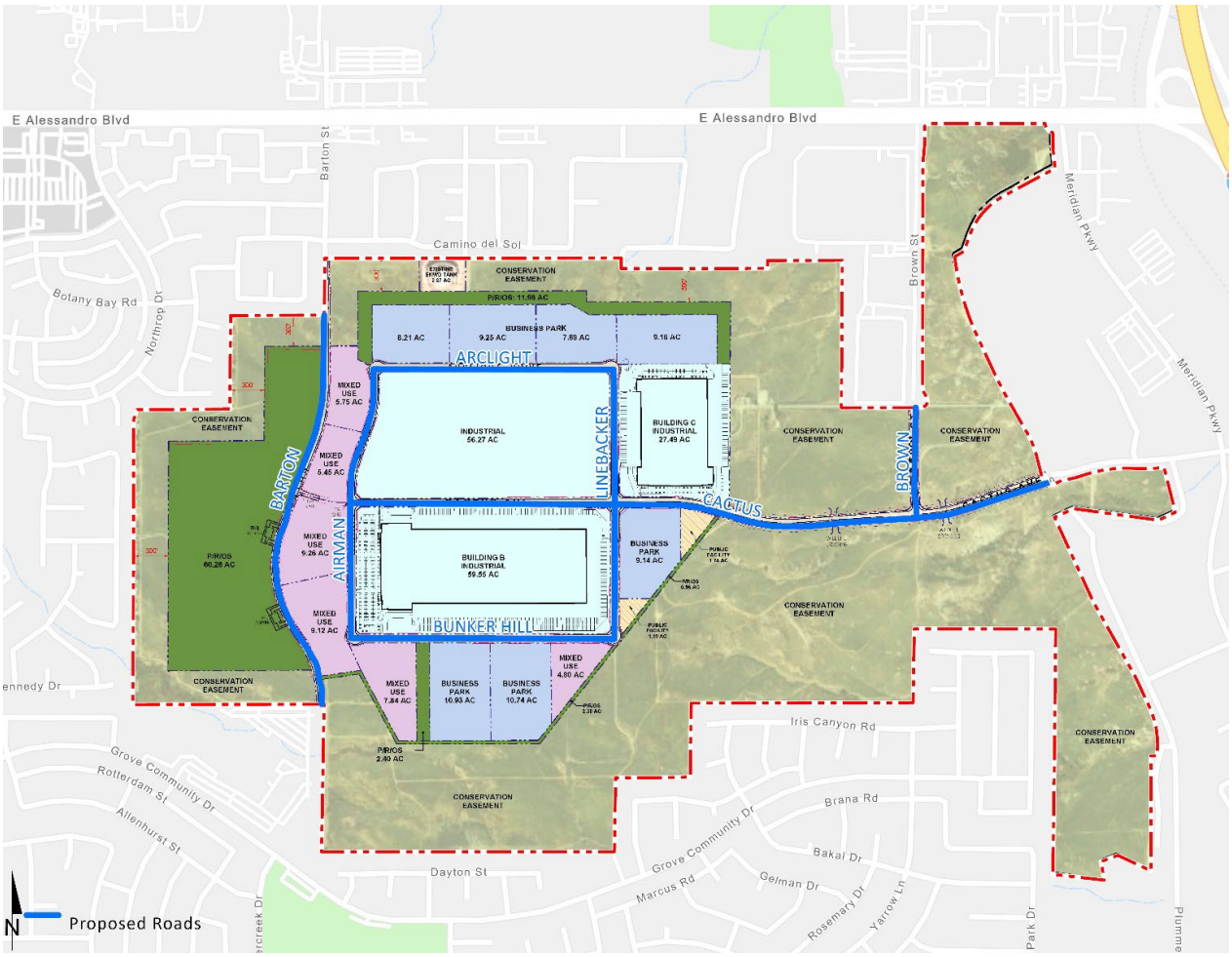
1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.

2. **Western Riverside Council of Governments (WRCOG).** *Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment.* February 13, 2020.

RA-7.9
Cont.

ATTACHMENT A
PROJECT SITE PLAN

RA-7.9
Cont.


E Alessandro Blvd
E Alessandro Blvd
Barton St
Camino del Sol
Botany Bay Rd
Northrop Dr
Brown St
Meridian Pkwy
Meridian Pkwy
ARCLIGHT
BARTON
AIRMAN
LINEBACKER
BUNKER HILL
CACTUS
BROWN
CONSERVATION EASEMENT
P/R/OS 11.98 AC
BUSINESS PARK 8.21 AC
BUSINESS PARK 9.25 AC
BUSINESS PARK 7.89 AC
9.16 AC
MIXED USE 5.75 AC
MIXED USE 5.46 AC
INDUSTRIAL 56.27 AC
BUILDING C INDUSTRIAL 27.49 AC
P/R/OS 60.28 AC
MIXED USE 9.26 AC
MIXED USE 9.12 AC
BUILDING B INDUSTRIAL 59.55 AC
BUSINESS PARK 9.14 AC
MIXED USE 7.84 AC
BUSINESS PARK 10.93 AC
BUSINESS PARK 10.74 AC
MIXED USE 4.60 AC
P/R/OS 2.40 AC
Iris Canyon Rd
Brana Rd
Bakal Dr
Grove Community Dr
Rotterdam St
Allenhurst St
Dayton St
Marcus Rd
Gelman Dr
Rosemary Dr
Yarrow Ln
Park Dr
N
Proposed Roads

RA-7.9
Cont.

RA-7

City of Riverside
February 26, 2024

RA-7.1 This comment is an email transmittal and references enclosed files. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-7.2 This comment is introductory and summarizes the proposed Project. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-7.3 This comment states that no changes to the VMT analysis or Level of Service Study were made in the Recirculated Draft EIR sections, and as such, the comments remain the same. Comments received on the Draft EIR from the City of Riverside on March 10, 2023, are addressed in Responses A-9.1 through A-9.46. As explained in these Responses, the VMT and LOS analyses are accurate, and no changes are required.

RA-7.4 This comment requests that utility lines, and specifically sewer lines, storm drain lines, and natural gas, should be routed away from park land to provide flexibility for future improvements. As noted on the figures cited by the comment (Figures 3-7A, 3-7D, and 3-7H), the location and capacity of facilities are preliminary This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-7.5 This comment notes that the Recirculated Draft EIR sections did not include responses to previously provided comments from the City, in their letter dated March 10, 2023. This letter is included as Letter A-9 in this Final EIR. Please see Responses A-9.1 through A-9.46.

RA-7.6 This comment is a concluding statement. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-7.7 This comment is Letter A-9, received on March 10, 2023, and responded to within this Final EIR. Please see Responses A-9.1 through A-9.46.

RA-7.8 This comment includes PDF comments from November 2022 on the Project Traffic Analysis. These comments were addressed with the commenting agency and reflected in Appendix N-2 of this EIR. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-7.9 This comment includes PDF comments from November 2022 on the Project VMT Analysis. These comments were addressed with the commenting agency and reflected in Appendix N-1 of this EIR. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

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From: Tsang, Kevin <KTSANG@RIVCO.ORG>
Sent: Monday, February 26, 2024 11:58 PM
To: Dan Fairbanks
Cc: Williams, Russell; Ketcham, Thomas; Hildebrand, John
Subject: March JPA: West Campus Upper Plateau Recirculated DEIR

Hello Dan,

Thank you for the opportunity to review the Recirculated Draft EIR for the Meridian West Campus - Upper Plateau project. The following are comments I have on the DEIR: RA-8.1

The referenced technical study contained in Appendix N, West Campus Upper Plateau Traffic Analysis, prepared by Urban Crossroads, dated October 18, 2022 indicates the Intersection of Brown Street and Alessandro Blvd. (#20) will fall to a deficient level of service as a direct result of the project. Table 5-1 illustrates existing conditions (2021) has having acceptable LOS A/B and falling to LOS D/F with the addition of project traffic. Neither the Project Design Features nor Mitigation Measures proposed within the Recirculated DEIR provide a measure to address this deficiency. RA-8.2

The comments made on the previous Draft EIR appear to remain unanswered.

From my March 9, 2023 e-mail:

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

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

The Project Design Features and Mitigation Measures included in the Recirculated DEIR do not appear to include implement any measures that would restrict westward travel by trucks on Alessandro Blvd. PDF-TRA-3 aims to address enforcement by provide funding for a period of 2-years. How are these funds utilized to conduct enforcement? Is Riverside PD, Sheriff, and CHP involved with the enforcement of truck routes? What will occur after the two-year period? RA-8.3

Please feel free to contact me questions regarding the comments above.

Thanks,

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

RA-8

Riverside County Transportation and Land Management Agency
February 26, 2024

RA-8.1 This comment is introductory and does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-8.2 This comment indicates that the intersection of Brown Street and Alessandro Boulevard (#20) would fall to a deficient level of service due to the Project. The comment notes that neither the Project Design Features nor Mitigation Measures in the Recirculated Draft EIR provide a measure to address this stated deficiency. As noted in Section 4.15, Transportation, of the EIR, no feasible intersection improvements are available to address the level of service deficiencies at the intersection of Brown Street and Alessandro Boulevard. The Project Traffic Analysis (Appendix N-2) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

RA-8.3 This comment notes that the Recirculated Draft EIR did not include responses to previously provided comments, in their letter dated March 9, 2023 and provides excerpts therefrom. This letter is included as Letter A-7 in this Final EIR. Please see Responses A-7.1 through A-7.5.

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From: Adame, Gaby <GabyAdame@Rivco.org>
Sent: Monday, February 26, 2024 8:53 PM
To: Dan Fairbanks
Cc: Brown, Kyla; Adam.Collier@lewismc.com
Subject: West Campus Upper Plateau Project DEIR Comment Letter - Riverside County Regional Parks and Open-Space District
Attachments: RivCoParks Comment Letter to March JPA Feb 2024.pdf

Mr. Fairbanks:

Please find attached Riverside County Regional Park and Open-Space District's comment letter on the West Campus Upper Plateau Project Recirculated DEIR. We thank you for the opportunity to review and comment.

RA-9.1

Please feel free to reach out to me if you have any questions or comments.

Respectfully,

Gaby Adame
Bureau Chief | Planning, Development, & Interpretation
gabyadame@rivco.org | C: (951) 505-3805 | O: (951) 955-1395

RivCoParks (Riverside County Regional Park and Open-Space District)
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www.RivCoParks.org
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County of Riverside California

Riverside County
Regional Park and Open-Space District

Kyla Brown, Parks Director / General Manager

February 26, 2024

Dan Fairbanks, Planning Director
Planning Department
March Joint Powers Authority
14205 Meridian Parkway #140
Riverside, CA 92518

Nicole Cobleigh
Dudek
605 Third Street
Encinitas, CA 92024

RE: West Campus Upper Plateau Project Recirculated Draft Environmental Impact Report (December 2023)/ State Clearinghouse No. 2021110304

Dear Mr. Fairbanks and Ms. Cobleigh:

Riverside County Regional Park and Open-Space District (RivCoParks) would like to thank you for the opportunity to review the March Joint Powers Authority West Campus Upper Plateau Project (Project) Recirculated Draft Environmental Impact Report (DEIR).

Based on our review of the published documents we understand the Project consists of a proposed buildout of a 359.62-acre Specific Plan Area which includes 42.22 acres of mixed use (business park and retail), 65.32 acres of business park use, 143.31 acres of industrial use, 37.91 acres of streets, 2.84 acres of public facilities, and 78 acres for park/recreation/open space use (Attachment No. 1: Figure 3-5 Site Plan of West Campus Upper Plateau EIR). In addition to the specific plan, this project proposes the establishment of a 445.43-acre conservation easement in accordance with Center for Biological Diversity Settlement Agreement.

Riverside County Regional Park and Open-Space District has reviewed the Draft Environmental Impact Report and submit the following comments for your review and consideration:

RA-9.2

Comment 1: Land Use Breakdown

The proposed Specific Plan for this project includes 78-acres of park/recreation/open space. The DEIR analyzes the proposed use as a 60.28-acre park with passive and active uses such as sports fields, playground, and trails (*see* Section 2.2 Purpose and Scope *and* Section 4.14 Recreation of DEIR)

RA-9.3

Comment 1A: It should be noted that the 60.28-acre park needs to be unencumbered from detention basins or other development-related features that would decrease its functional park space.

Comment 1B: The cumulative 60.28-acre park should be contiguous to ensure a functional park space.

RA-9.3

Comment 2: Parks Feasibility Study

A Parks Feasibility Study (Needs Assessment Report) is included in the 2004 Development Agreement as a Public Benefit finalize the design and amenities, including the mix of active use and open space/recreation (*see section* 3.1.5.4 of 2004 Development Agreement). Because RivCoParks would be the likely entity overseeing construction and operation of the park upon transfer of land use authority to the County after July 2025, RivCoParks requests take the lead in preparing the Parks Feasibility Study if funding is provided. The Parks Feasibility Study is expected to take approximately one year to complete and cost approximately $400,000. It would include a robust public outreach component and close consultation with the City of Riverside during its preparation.

RA-9.4

Comment 2A: RivCoParks proposes to enter into an agreement with the March JPA to initiate the Parks Feasibility Study as soon as possible so that it can be adopted prior to the transfer of land use authority to the County in July 2025.

Comment 2B: Upon completion of the Parks Feasibility Study, RivCoParks is proposing to enter into a funding agreement with the March JPA to identify the phasing and expected deliverable time frame for each phase.

Comment 3: Cost of Park Development

Depending on the final design and mix of active and recreational open space, construction of the 60.28-acre park is estimated to cost in the range of $30- $50 million in today's costs. The DEIR identifies that this project will be required to contribute grading of a minimum of 60.28 acres of the park site, funding and preparation of a Park Feasibility Study, and construction of Park improvements up to $3,500,000 (*see DEIR section* 3.5.6 Requested Approvals and Entitlements: Development Agreement 21-01). As such, there is a significant funding gap that would need to be closed to achieve build-out of the 60.28- acre park. While RivCoParks is willing to pursue grants and other external funding sources to reduce this gap, additional funding will need to be provided by the March JPA and/or potentially an additional contribution from this project developer to achieve park build-out.

RA-9.5

Comment 4: Grading

No grading for the park site should be done before the Parks Feasibility Study is completed, as the study will identify the areas that will remain as natural open space for recreational trails. The savings in the costs of grading those portions that will remain for open space can be applied to reduce the gap in funding for the active use areas.

RA-9.6

Comment 5: Funding Future Maintenance and Operation Needs

An on-going maintenance mechanism for the park needs to be provided. Based on today's numbers, a high intensity 60.28-acre park will have an estimated yearly maintenance and operation cost of approximately $400-500K per year. It is our understanding that maintenance for the park will be funded through a CFD that will be part of this project, and/or a similar special funding district. RivCoParks requests to be included in the special funding district formation process to assure that it be appropriately sized for the expected level of park maintenance.

RA-9.7

Riverside County Regional Park and Open-Space District appreciates the opportunity to comment on the West Campus Upper Plateau Project Recirculated Draft Environmental Impact Report (December 2023). Should you have any questions or comments, please do not hesitate to contact me at kylabrown@rivco.org. We look forward to working with you and your team.

RA-9.8

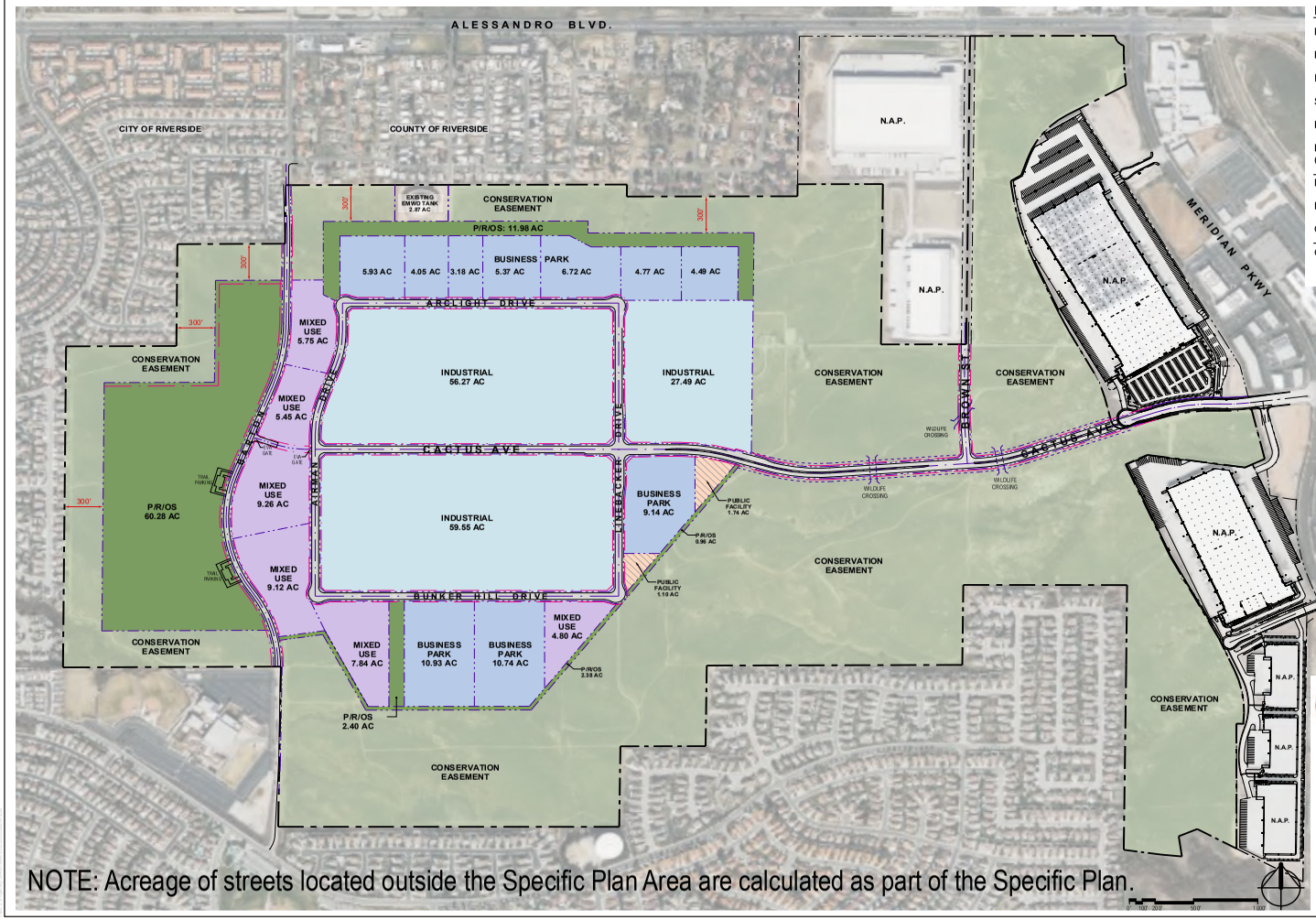
Respectfully,

Kyla Brown
General Manager/Park Director
Riverside County Regional Park and Open-Space District

Attachments:
No. 1: Figure 3-5 Site Plan of West Campus Upper Plateau EIR

Cc:

Jeff Van Wagenen, County Executive Officer, County of Riverside
Juan Perez, Chief Operating Officer, County of Riverside
Aaron Gettis, Chief Deputy Counsel, County of Riverside
Gaby Adame, Bureau Chief, RivCoParks, County of Riverside



SOURCE: RGA 2022

DUDEK

FIGURE 3-5
Site Plan
West Campus Upper Plateau EIR

RA-9

Riverside County Regional Park and Open-Space District
February 26, 2024

RA-9.1 This comment is an email transmittal and does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-9.2 This comment is introductory and summarizes that the proposed Project. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-9.3 This comment requests that the 60.28-acre park be unencumbered from detention basins or other development-related features that would decrease its functional park space and that the land should be contiguous to ensure a functional park space. This comment is noted and will be considered as part of the Park Feasibility Study. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-9.4 This comment discusses the Park Feasibility Study, requests that the Feasibility Study be completed as soon as possible and adopted prior to the transfer of land to the County of Riverside, and requests that Riverside County Regional Parks and Open-Space District take the lead in reviewing the Park Feasibility Study and enter into a funding agreement with March JPA. Regarding Park development, please see Response RA-9.5, below. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-9.5 This comment discusses the cost associated with constructing a park. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with off-site utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete. The comment does not raise any specific questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-9.6 This comment requests that no grading for the park site be completed until the Parks Feasibility Study is complete. As discussed in Response RA-9.5, above, the applicant is required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The Park would be constructed within 36 months of completion of the Park Feasibility Study and site grading. This comment does not raise any questions or concerns on the Recirculated Draft EIR sections.

RA-9.7 This comment is about on-going maintenance costs associated with the proposed Park. As discussed in Response RA-9.5, above, the LLMD will be responsible for the maintenance of the Park once complete. The comment does not raise any specific questions or concerns about the analysis in the Recirculated Draft EIR sections.

RA-9.8 This comment is a concluding statement and does not raise any specific questions or concerns about the analysis in the Recirculated Draft EIR sections.

10.2 Recirculated Organization Responses to Comments

Comment Letter	Name	Date Received
RO-1	League of United Latin American Citizens (LULAC) of Riverside, Council #3190 of Riverside	01/23/24
RO-2	Friends of Riverside Hills	02/08/24
RO-3	World Be Well Organization	02/08/24
RO-4	Riverside Neighborhood Partnership	02/11/24
RO-5	League of Women Voters	02/12/24
RO-6	Center for Biological Diversity	02/23/24
RO-7	Center for Biological Diversity	02/26/24
RO-8	California Environmental Voters - Inland Empire Region	02/26/24
RO-9	Mission Grove Neighborhood Association	02/26/24

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From: LULAC OF RIVERSIDE <lulac3190@gmail.com>
Sent: Tuesday, January 23, 2024 2:31 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: LULAC REIR letter PDF.pdf

Attached is the PDF file of our community group letter.

RO-1.1

Sira Uribe
President
Chair, Health Fair Committee
(She/Her)
LULAC of Riverside
Council #3190

LEAGUE OF UNITED LATIN AMERICAN CITIZENS
LULAC of Riverside, COUNCIL #3190

January 17, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

On behalf of LULAC Council #3190, I am writing to submit comments on the recirculated draft Environmental Impact Report (REIR) for the proposed West Campus Upper Plateau. Our council is a volunteer-led community service organization focused on advocacy for our community in terms of environment, labor, health, and education. Our members reside in Riverside area, many of whom are directly effected by this project.

The West Campus Upper Plateau (the "Project") would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.

RO-1.2

After reviewing the REIR, it continues to be clear that the March Joint Powers Authority (JPA) is scrambling to push through an unpopular project before it sunsets July 1, 2025. Changes to the project itself from the original EIR are negligible if not even more upsetting to the residents and communities surrounding the March JPA territory. Specifically, the following areas of the recirculated draft EIR appear to be unstable, dismissive, and predatory in nature.

RO-1.3

The yet-to-be adopted draft Environmental Justice (EJ) element is included extensively throughout the EIR, and the existing specific plan is assumed a priority to fit its objectives. Your process of adopting an EJ element and the REIR simultaneously and stating that one fulfills the other undermines the credibility of the community's ability to meaningfully impact either of them. The EJ should follow proper CEQA noticing and environmental review.
I, along with many community members, implore you to follow a CEQA process while adopting your EJ element.
We also ask that you put a warehouse moratorium in place until the EJ element process is complete.

RO-1.4

Page 3-24 of the REIR refers to community benefits, including a park. Simply put, this park is a work of fiction. The Developer has made clear they will only fund a "park feasibility study" and that neither they nor the County will be funding a park. The soonest the community might expect a park is in the year 2042 when the City of Riverside can annex this land. In other words, there is no park; and therefore, no community benefit.

RO-1.5

Page 3-24 of the recirculated EIR also mentions the need for the JPA and applicant to agree to a 15-year development agreement with two potential five-year options. Not only do we object to you giving this unresponsive developer another 25-year license to build more warehouses surrounding March ARB, the federal government objects to such contracting practices. Federal Acquisition Regulations (FAR) Subpart 6.1 and 6.3 clearly identify how agencies are to grant contracts. This applicant does not offer the JPA best practices, lowest price, best value, or is the only source of a product or service that are required to offer a non-competitive contract like the proposed 15-year Development Agreement. This is especially disturbing and irresponsible considering the JPA will sunset July 1, 2025 yet will have agreed to a 15–25-year contract with a profit-driven business.

RO-1.6

The lack of non-industrial alternative plans in the REIR is dismissive of clear and overwhelming public opposition to this project. For two years, residents have tried to understand why the JPA and applicant have been unwilling to discuss and plan for non-industrial land uses for the Upper Plateau, and the answer we keep returning to is greed. Without public notice, the JPA and applicant pushed through an agreement to transmit the land based on the construction of four large warehouses on October 26, 2022. This demonstrates a predetermined use for this land despite your continued insistence that the JPA and applicant have engaged with the public throughout this process. Your actions prioritize the pocketbooks of the applicant and the JPA member agencies instead of job growth and community development as you advertise on your website and within your public presentations.

RO-1.7

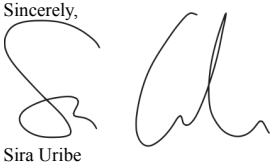
By signing my name to this letter, I respectfully request that the elected representatives of the JPA commission and the JPA staff be accountable to the community surrounding the West Campus Upper Plateau. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document, not to amend it 18 months before sunsetting to push through one last warehouse project. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission.

RO-1.8

The REIR for the West Campus Upper Plateau project is deficient and unstable and should be reconsidered. Reasonable alternative land uses must be developed consistent with the County and City of Riverside's overall land use planning and Good Neighbor Guidelines. Please don't allow this predatory project to be your lasting legacy. I await your detailed response.

RO-1.9

Sincerely,



Sira Uribe
President, LULAC of Riverside, Council #3190

RO-1

League of United Latin American Citizens (LULAC) of Riverside, Council #3190
January 17, 2024

RO-1.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-1.2 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-1.3 This comment expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RO-1.4 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, requests a CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RO-1.5 This comment questions the funding of the Park, citing the text on page 3-24 of Recirculated Chapter 3, Project Description. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with off-site utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete.

RO-1.6 This comment objects to the Development Agreement and references federal acquisition regulations. March JPA and the proposed Development Agreement are not subject to the referenced federal acquisition regulations. California Planning and Zoning Law and specifically, Government Code section 65864 et seq. governs the authority and contents of development agreements such as that proposed here. As explained in Topical Response 9, Long-Term Project Implementation and Enforcement, the County of Riverside will be implementing and enforcing the proposed Development Agreement after July 1, 2025.

RO-1.7 This comment raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. With regard to the October 26, 2022, agreement referenced in the comment, please see Topical Response 10, Development and Disposition Agreement.

RO-1.8 This comment states that March JPA and the Applicant have a duty to adhere to the March ARB General Plan and engage the local communities and municipalities. It should be noted that the March Air Reserve Base does not have an adopted General Plan. The Project's consistency with the March JPA General Plan goals and policies is included in Recirculated Section 4.10, Land Use and Planning. March JPA and the Applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation. Using a radius of 1,200 feet around the perimeter of the Project site, March JPA distributed 2,172 public notices. March JPA engaged with local jurisdictions and service providers (see, e.g., the traffic scoping agreement in

Appendix N-2). With regard to the timing and development of the Environmental Justice Element, please see response to Comment RO-1.4, above. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-1.9 This comment states that the Recirculated EIR is deficient and unstable. As discussed in response to Comment RO-1.3, above, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections. The comment also requests alternative land uses consistent with the County and City of Riverside's Good Neighbor Guidelines. As discussed in Recirculated Section 4.10, Land Use and Planning, and Topical Response 4, Project Consistency, the Project is consistent with the Good Neighbor Guidelines of the County and City of Riverside. Regarding alternative land uses, please see Topical Response 8, Alternatives, for a discussion of alternatives, including an analysis of Alternative 5 – Non-Industrial Alternative.

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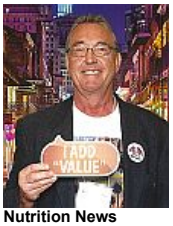
From: Gurumantra <gm@nutritionnews.com>
Sent: Thursday, February 8, 2024 12:42 PM
To: Dan Fairbanks
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304.pdf

Good Day Mr Fairbanks,

Please accept the attached comment letter for the record. Thanks. RO-2.1

Yours in good health,

Gurumantra Khalsa
Publisher



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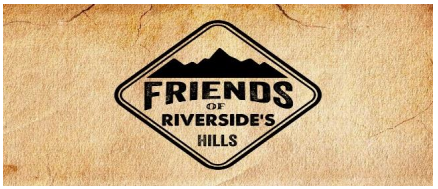

February 9, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

On behalf of the Friends of Riverside's Hills, I am writing to submit comments on the recirculated draft Environmental Impact Report (REIR) for the proposed West Campus Upper Plateau. I serve as president of the board of FRH. RO-2.2

The West Campus Upper Plateau (the "Project") would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.

After reviewing the REIR, it continues to be clear that the March Joint Powers Authority (JPA) is scrambling to push through an unpopular project before it sunsets July 1, 2025. Changes to the project itself from the original EIR are negligible if not even more upsetting to the residents and communities surrounding the March JPA territory. Specifically, the following areas of the recirculated draft EIR appear to be unstable, dismissive, and predatory in nature. RO-2.3

1. The yet-to-be adopted draft Environmental Justice (EJ) element is included extensively throughout the EIR, and the existing specific plan is assumed a priority to fit its objectives. Your process of adopting an EJ element and the REIR simultaneously and stating that one fulfills the other undermines the credibility of the community's ability to meaningfully impact either of them. The EJ should follow proper CEQA noticing and environmental review. RO-2.4
2. I, along with many community members, implore you to follow a CEQA process while adopting your EJ element. We also ask that you put a warehouse moratorium in place until the EJ element process is complete.
3. Page 3-24 of the REIR refers to community benefits, including a park. Simply put, this park is a work of fiction. The Developer has made clear they will only fund a "park feasibility study" and that neither they nor the County will be funding a park. The soonest the community might expect a park is in the year 2042 when the City of Riverside can annex this land. In other words, there is no park; and therefore, no community benefit. RO-2.5
4. Page 3-24 of the recirculated EIR also mentions the need for the JPA and applicant to agree to a 15-year development agreement with two potential five-year options. Not only do we object to you giving this unresponsive developer another 25-year license to build RO-2.6

https://friendsofriversideshills.org
4477 Picacho Dr.
Riverside, CA 92507-4873

more warehouses surrounding March ARB, the federal government objects to such contracting practices. Federal Acquisition Regulations (FAR) Subpart 6.1 and 6.3 clearly identify how agencies are to grant contracts. This applicant does not offer the JPA best practices, lowest price, best value, or is the only source of a product or service that are required to offer a non-competitive contract like the proposed 15-year Development Agreement. This is especially disturbing and irresponsible considering the JPA will sunset July 1, 2025 yet will have agreed to a 15–25-year contract with a profit-driven business.

RO-2.6 Cont.

5. The lack of non-industrial alternative plans in the REIR is dismissive of clear and overwhelming public opposition to this project. For two years, residents have tried to understand why the JPA and applicant have been unwilling to discuss and plan for non-industrial land uses for the Upper Plateau, and the answer we keep returning to is greed. Without public notice, the JPA and applicant pushed through an agreement to transmit the land based on the construction of four large warehouses on October 26, 2022. This demonstrates a predetermined use for this land despite your continued insistence that the JPA and applicant have engaged with the public throughout this process. Your actions prioritize the pocketbooks of the applicant and the JPA member agencies instead of job growth and community development as you advertise on your website and within your public presentations.

RO-2.7

By signing my name to this letter, I respectfully request that the elected representatives of the JPA commission and the JPA staff be accountable to the community surrounding the West Campus Upper Plateau. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document, not to amend it 18 months before sunsetting to push through one last warehouse project. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission.

RO-2.8

The REIR for the West Campus Upper Plateau project is deficient and unstable and should be reconsidered. Reasonable alternative land uses must be developed consistent with the County and City of Riverside's overall land use planning and Good Neighbor Guidelines. Please don't allow this predatory project to be your lasting legacy. I await your detailed response.

RO-2.9

Sincerely,

Gurumantra Khalsa

President, Friends of Riverside's Hills

https://friendsofriversideshills.org
4477 Picacho Dr.
Riverside, CA 92507-4873

RO-2

Friends of Riverside's Hills
February 9, 2024

RO-2.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-2.2 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-2.3 This comment expresses concern that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RO-2.4 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, requests a CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

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RO-2.5 This comment questions the funding of the Park, citing the text on page 3-24 of Recirculated Chapter 3, Project Description. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with off-site utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete.

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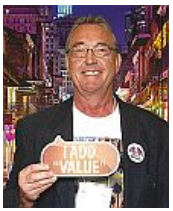
From: Gurumantra <gm@nutritionnews.com>
Sent: Thursday, February 8, 2024 12:42 PM
To: Dan Fairbanks
Subject: RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304.pdf

Good Day Mr Fairbanks,

Please accept the attached comment letter for the record. Thanks. RO-3.1

Yours in good health,

Gurumantra Khalsa
Publisher



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Home of the "Is It Healthy?" Game

World Be Well Organization

February 9, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

On behalf of the World Be Well Organization, I am writing to submit comments on the recirculated draft Environmental Impact Report (REIR) for the proposed West Campus Upper Plateau. I serve as executive director of WBW, a conservation development non-profit organization

The West Campus Upper Plateau (the "Project") would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.

RO-3.2

After reviewing the REIR, it continues to be clear that the March Joint Powers Authority (JPA) is scrambling to push through an unpopular project before it sunsets July 1, 2025. Changes to the project itself from the original EIR are negligible if not even more upsetting to the residents and communities surrounding the March JPA territory. Specifically, the following areas of the recirculated draft EIR appear to be unstable, dismissive, and predatory in nature.

RO-3.3

1. The yet-to-be adopted draft Environmental Justice (EJ) element is included extensively throughout the EIR, and the existing specific plan is assumed a priority to fit its objectives. Your process of adopting an EJ element and the REIR simultaneously and stating that one fulfills the other undermines the credibility of the community's ability to meaningfully impact either of them. The EJ should follow proper CEQA noticing and environmental review.
2. I, along with many community members, implore you to follow a CEQA process while adopting your EJ element. We also ask that you put a warehouse moratorium in place until the EJ element process is complete.
3. Page 3-24 of the REIR refers to community benefits, including a park. Simply put, this park is a work of fiction. The Developer has made clear they will only fund a "park feasibility study" and that neither they

RO-3.4

RO-3.5

4108 Watkins Dr. Riverside CA 92507-4701 * 951-640-3868

gkhalsa@WorldBeWell.org

www.WorldBeWell.org

nor the County will be funding a park. The soonest the community might expect a park is in the year 2042 when the City of Riverside can annex this land. In other words, there is no park; and therefore, no community benefit.

4. Page 3-24 of the recirculated EIR also mentions the need for the JPA and applicant to agree to a 15-year development agreement with two potential five-year options. Not only do we object to you giving this unresponsive developer another 25-year license to build more warehouses surrounding March ARB, the federal government objects to such contracting practices. Federal Acquisition Regulations (FAR) Subpart 6.1 and 6.3 clearly identify how agencies are to grant contracts. This applicant does not offer the JPA best practices, lowest price, best value, or is the only source of a product or service that are required to offer a non-competitive contract like the proposed 15-year Development Agreement. This is especially disturbing and irresponsible considering the JPA will sunset July 1, 2025 yet will have agreed to a 15–25-year contract with a profit-driven business.
5. The lack of non-industrial alternative plans in the REIR is dismissive of clear and overwhelming public opposition to this project. For two years, residents have tried to understand why the JPA and applicant have been unwilling to discuss and plan for non-industrial land uses for the Upper Plateau, and the answer we keep returning to is greed. Without public notice, the JPA and applicant pushed through an agreement to transmit the land based on the construction of four large warehouses on October 26, 2022. This demonstrates a predetermined use for this land despite your continued insistence that the JPA and applicant have engaged with the public throughout this process. Your actions prioritize the pocketbooks of the applicant and the JPA member agencies instead of job growth and community development as you advertise on your website and within your public presentations.

RO-3.5 Cont.

RO-3.6

RO-3.7

By signing my name to this letter, I respectfully request that the elected representatives of the JPA commission and the JPA staff be accountable to the community surrounding the West Campus Upper Plateau. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document, not to amend it 18 months before sunsetting to push through one last warehouse project. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission.

RO-3.8

The REIR for the West Campus Upper Plateau project is deficient and unstable and should be reconsidered. Reasonable alternative land uses must be developed consistent with the County and City of Riverside's overall land use planning and Good Neighbor Guidelines. Please don't allow this predatory project to be your lasting legacy. I await your detailed response.

RO-3.9

Sincerely,

Gurumantra Khalsa

Executive Director, World Be Well Organization

4108 Watkins Dr. Riverside CA 92507-4701 * 951-640-3868

gkhalsa@WorldBeWell.org

www.WorldBeWell.org

RO-3

World Be Well Organization
February 9, 2024

RO-3.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-3.2 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Riverside Neighborhood Partnership <rivneighbors@gmail.com>
Sent: Sunday, February 11, 2024 7:46 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report,
Attachments: REIR RNP Letter.docx

Dear Mr. Fairbanks,

On behalf of the *Riverside Neighborhood Partnership*, I am writing to submit Public Comment on record for the West Campus Upper Plateau Project - Recirculated Draft Environmental Report. Our letter is attached below. RO-4.1

Thank you for allowing us to provide comments on this project. We hope you will take the time to listen and consider the community's stance on this matter.

Sincerely,

Aram Ayra
Chairman/CEO
Riverside Neighborhood Partnership
www.rnpinfo.com

February 8th, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

We, the Riverside Neighborhood Partnership, are writing to submit comments on the recirculated draft Environmental Impact Report (REIR) for the proposed West Campus Upper Plateau. The West Campus Upper Plateau (the "Project") would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. RO-4.2

After reviewing the REIR, it continues to be clear that the March Joint Powers Authority (JPA) is scrambling to push through an unpopular project before it sunsets on July 1, 2025. Changes to the project itself from the original EIR are negligible if not even more upsetting to the residents and communities surrounding the March JPA territory. Specifically, the following areas of the recirculated draft EIR appear to be unstable, dismissive, and predatory in nature. RO-4.3

1. The yet-to-be adopted draft Environmental Justice (EJ) element is included extensively throughout the EIR, and the existing specific plan is assumed a priority to fit its objectives. Your process of adopting an EJ element and the REIR simultaneously and stating that one fulfills the other undermines the credibility of the community's ability to meaningfully impact either of them. The EJ should follow proper CEQA noticing and environmental review.
2. We, along with many community members, implore you to follow a CEQA process while adopting your EJ element. We also ask that you put a warehouse moratorium in place until the EJ element process is complete. RO-4.4
3. Page 3-24 of the REIR refers to community benefits, including a park. Simply put, this park is a work of fiction. The Developer has made clear they will only fund a "park feasibility study" and that neither they nor the County will be funding a park. The soonest the community might expect a park is in the year 2042 when the City of Riverside can annex this land. In other words, there is no park; and therefore, no community benefit. RO-4.5

4. Page 3-24 of the recirculated EIR also mentions the need for the JPA and applicant to agree to a 15-year development agreement with two potential five-year options. Not only do we object to you giving this unresponsive developer another 25-year license to build more warehouses surrounding March ARB, the federal government objects to such contracting practices. Federal Acquisition Regulations (FAR) Subpart 6.1 and 6.3 clearly identify how agencies are to grant contracts. This applicant does not offer the JPA: best practices, lowest price, best value, or the only source of a product or service that are required to offer a non-competitive contract like the proposed 15-year Development Agreement. This is especially disturbing and irresponsible considering the JPA will sunset July 1, 2025 yet will have agreed to a 15–25-year contract with a profit-driven business. RO-4.6
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By signing our name to this letter, we respectfully request that the elected representatives of the JPA commission and the JPA staff be accountable to the neighborhoods surrounding the West Campus Upper Plateau. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document, not to amend it 18 months before sunsetting to push through one last warehouse project. You also have a duty to work with local communities and neighborhood leadership to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. RO-4.8

The REIR for the West Campus Upper Plateau project is deficient, unstable and should be reconsidered. Reasonable alternative land uses must be developed consistent with the County and City of Riverside's overall land use planning and Good Neighbor Guidelines. Please don't allow this predatory project to be your lasting legacy. We await your detailed response. RO-4.9

Sincerely,

Board of Directors
Riverside Neighborhood Partnership

RO-4

Riverside Neighborhood Partnership
February 8, 2024

RO-4.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-4.2 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Joan Donahue <donahue.joan@att.net>
Sent: Monday, February 12, 2024 2:01 PM
To: Dan Fairbanks
Subject: REIR - West Campus Upper Plateau Project

League of Women Voters Riverside

Serving the cities of Riverside, Murrieta, Menifee, Temecula, Perris, Corona and Norco

February 12, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Mr. Fairbanks,

The League of Women Voters Riverside writes in support of Riverside Neighbors Opposing Warehouses' objections to the Recirculated Environmental Impact Report.

The League of Women Voters (LWV) supports climate goals and policies that are consistent with the best available climate science and that will ensure a stable climate system for future generations. Given this position, the League of Women Voters Riverside has been an enthusiastic supporter of Riverside Neighbors Opposing Warehouses. They have made us aware that the addition of another warehouse in our region, dangerously close to sensitive receptors, only serves to increase the heat island effect, higher energy usage, premature births and deaths, serious respiratory illnesses, and weakened immune systems.

RO-5.1

The goal of an Environmental Impact Report is to identify and describe significant environmental effects, feasible alternatives, and mitigation measures of a proposed project. Like the original Environmental Impact Report, the recirculated draft fails to fulfill these basic requirements.

We strongly support these points made by R-NOW concerning the REIR.

- The Environmental Justice policy should have been in place before any policy proposals were considered. Instead, the policy is introduced in this report to justify the proposal. Proposals should advance the goals of a policy. In this case, a policy was written to advance a proposal. This is a classic example of bureaucratic behavior that breeds distrust and cynicism among residents and voters.

RO-5.2

- The Environmental Justice policy was not subject to community review. Environmental justice policies are designed to promote community involvement in environmental decisions and enhance a neighborhood's environmental quality. Without citizen's involvement, they are hollow policies designed by public officials to advance their priorities, not necessarily those of the electorate. RO-5.3
- There are no substantive changes in the REIR. For the past two years, the JPA has never considered non-industrial alternatives and has refused a Community Advisory Board in spite of persistent requests, thousands of signatures on petitions, and thousands of emails. RO-5.4

Our overarching criticism of the original EIR and its recirculated draft remains the same. Without a thorough and honest assessment of the proposal's repercussions, officials are failing to address a basic tenet of democracy – a citizen's right to know. The purpose of the EIR process is to provide facts and analysis to the public about a proposed project and alert them to possible issues before the project begins. In this case, the purpose of the REIR is not just to ensure a well-informed discussion, but to make the public aware of life-threatening health impacts and environmental degradation that the project may produce in the future. RO-5.5

LWV Riverside requests that the elected representatives of the JPA commission and the JPA staff be accountable to the community surrounding the West Campus Upper Plateau. You have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission.

We look forward to a reconsidered REIR that includes a thoroughly vetted Environmental Justice policy, reasonable alternative land uses, and an honest assessment of the proposal's public safety issues that emphasizes the community's well-documented concerns. RO-5.6

Thank you,
Joan Donahue, President
League of Women Voters Riverside
951-479-2090
Donahue.joan@att.net

RO-5

League of Women Voters Riverside
February 12, 2024

RO-5.1 This comment is introductory in nature. This comment states that the League of Women Voters Riverside supports the Riverside Neighbors Opposing Warehouses and its comments. The comment also states that warehouses increase heat island effect, require higher energy uses, and resulting in adverse health effects. The comment asserts generally that the Recirculated Draft EIR sections are deficient but does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The commenter is referred to Recirculated Section 4.2, Air Quality, which includes discussions about the health effects of air pollution and the Project's air quality impacts.

RO-5.2 This comment states that the Environmental Justice policy should have been in place before any proposals are considered and appears to question the timing of the Draft Environmental Justice Element in relation to the Project. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RO-5.3 This comment states that the Environmental Justice policy was not subject to community review. While this comment is not on the contents of the Recirculated EIR sections, it should be noted that March JPA released the Draft Environmental Justice Element in November 2023 and held two public

workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RO-5.4 This comment states that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

The comment raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Regarding the comment's request for a community advisory board, creation of an advisory committee is within the scope of the March Joint Powers Commission's authority. However, whether the Commission establishes an advisory committee or not, the creation of an advisory committee is not germane to the CEQA analysis for the Project. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

RO-5.5 This comment states that the purpose of the EIR process is to provide facts and analysis to the public about a proposed project and alert them to possible issues and impacts. The comment makes a general criticism of the EIR but does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-5.6 This comment requests that the JPA Commission and JPA staff be accountable to the community and requests that a reconsidered Recirculated EIR be provided with a vetted Environmental Justice policy, alternative land uses, and an assessment of the proposal's public safety issues. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The commenter is referred also to Response RO-5.4 above.

From: Jonathan Evans <JEvans@biologicaldiversity.org>
Sent: Friday, February 23, 2024 9:53 AM
To: Charity.Schiller; Thomas.rice; Dan Fairbanks
Subject: West March Upper Plateau settlement and SB 994 (Roth)
Attachments: March JPA Legislation Presentation February 14 2024.pdf

Good morning Charity, Thomas, and Dan,

I'm reaching out about SB 994 (Roth) (summary attached) introduced this legislative session, which would "set forth various authorizations and land use requirements for purposes of streamlining the return of land use authority from the March Joint Powers Authority to the County of Riverside and ensuring the continued maintenance of public infrastructure." RO-6.1

As you know the Center for Biological Diversity and San Bernardino Valley Audubon Society have a settlement agreement with the March JPA protecting several hundred acres of habitat and open space on the West March Upper Plateau. SB 994 specifically authorizes that the March JPA "may assign contractual obligations that are set forth in written agreements, which include, but are not limited to, settlement and development agreements." The attached presentation from the County specifically mentions our settlement agreement ("Settlement Agreement (Center for Biological Diversity, et al v Bartel, et al.) - September 12, 2012"). And the current Meridian West Campus development project under review at the March JPA appears to conform with the major provisions of our settlement agreement, including a reference to the settlement agreement in the Recirculated EIR ("Through a recorded Conservation Easement of approximately 445.43 acres, the undisturbed land surrounding the Specific Plan Area would be preserved in perpetuity, consistent with prior determinations made as part of the CBD Settlement Agreement.") RO-6.2

We appreciate the work by the March JPA team to follow the terms of the settlement agreement. That being said, we obviously want to ensure that the settlement remains binding on the future land use agency, if that becomes the County, and Riverside County isn't currently named as a party to the settlement. RO-6.3

I was hoping we could schedule a time to discuss the issue at your convenience to provide some additional assurances that the settlement agreement continue to be fulfilled if SB 994 passes. We also recognize that there is an upcoming Recirculated Environmental Impact Report commend period ending Monday and wanted to let you know that we are planning to submit a brief comment letter into the record asking for assurances that the settlement agreement will be adhered to regardless of the passage of SB 994. RO-6.4

Thank you in advance for your time,

Jonathan Evans
Environmental Health Legal Director and Senior Attorney
Center for Biological Diversity
1212 Broadway
Suite 800
Oakland, CA 94612
tel: (510) 844-7100 x318
cell: (213) 598-1466

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SB 994

February 14, 2024

RO-6.5

Background

- March JPA (JPA) Created by Cities of Moreno Valley, Perris, Riverside and the County of Riverside in 1993
  - Regional approach in planning the reuse of property and surplus facilities
  - Land use authority beginning 1997
  - Numerous legislative actions and agreements approved by the JPA Commission since 1997.

- 14th Amendment executed April 18, 2023
  - Land use authority under County of Riverside jurisdiction as of July 1, 2025

RO-6.5 Cont.

Disposition and Development Agreements

- **Disposition and Development Agreements**
  - West March DDA
    - West March DDA between March JPA and LNR Riverside, LLC - December 27, 2001
    - First Amendment (Regarding D-3 West Property) - May 1, 2006
    - Assignment and Assumptions from March JPA Redevelopment to March JPA - March 2, 2011
    - Memorandum of Assignment of West March DDA - March 2, 2011
    - Assignment from LNR Riverside, LLC to Meridian Park, LLC. (Two Recorded Documents) - August 7, 2015
    - Second Amendment to West March DDA - October 26, 2022
    - Memorandum of Second Amendment to West March DDA - December 6, 2022
    - Partial Assignment of Disposition and Development Agreement - April 6, 2023
  - March LifeCare Campus DDA
    - DDA between March JPA Redevelopment Agency and March HealthCare Development, LLC - April 7, 2010
    - Assignment and Assumption from March JPA Redevelopment Agency, March JPA and March HealthCare LLC - March 2, 2011
    - First Amendment to Agency Note modifying purchase price and closing dates - March 7, 2012
    - Partial Assignment and Assumption and Amendment of DDA - August 4, 2018
    - Second Amendment, modifying the Schedule of Performance - September 29, 2018
    - 3rd Amendment, granting extension for development - January 25, 2022
    - Fourth Amendment, granting an extension for development - May 2, 2023

RO-6.5 Cont.

Statutory, Settlement Agreements, and Other Actions

- **Statutory Development Agreement**
  - LNR (Meridian)
    - March JPA and LNR Riverside, LLC - June 18, 2004
    - Assignment of Agreement for Lots K-4, 1A, U1-8 and Meridian South Campus between LNR Riverside, LLC and Meridian Park, LLC - August 7, 2015
    - Extension of the DA for two additional 5-year terms - June 30, 2016
- **Settlement Agreements**
  - Settlement and General Release Agreement for Development of March Business Center within the March Joint Powers Authority - September 22, 2003
  - Settlement Agreement (Center for Biological Diversity, et al v Bartel, et al.) - September 12, 2012
- **Special Tax Districts**
  - Meridian LLMD #1
  - CFD 2010-1
- **Ordinances and Resolutions**
  - Approximately 80 ordinances and 640 resolutions
  - Ordinance examples: Truck Route, Landscape Ordinance Amendment.
  - Resolution examples: Approval of CFD rates and levy and assessments for LLMD #1

RO-6.5 Cont.

Why the Need for Legislation

- To provide clarity and alleviate ambiguity and ensure continuity of services through existing land use approvals, landscape maintenance districts, community facilities districts, and other laws (ordinances and resolutions).
- To transfer zoning and planning regulations.
- No alternative procedures outlined in law
  - Generally, orderly transfer of boundaries occurs through LAFCO.
  - JPAs not regulated by LAFCO
  - Similar to a city disincorporation, which occurs through a LAFCO process or can be done through legislation.
- Implementation Strategy
  - Level of complexity of legislative actions over nearly three decades. Over 20 years for some of the agreements.

RO-6.5 Cont.

Proposed Legislation SB 994

- Streamlines transfer of land use authority to County of Riverside
  - Transfer contractual rights and obligations
    - Developer agreements, settlement agreements
  - Ensures land use laws stay in effect until the County updates zoning and planning regulations in the future.
- Ensures continued maintenance of public infrastructure
  - LLMD
  - CFD
- All regulatory ordinances and resolutions will remain in place until the County updates these through an appropriate process.
  - Approximately 80 Ordinances (including original and updates)
  - Approximately 640 Resolutions

RO-6.5 Cont.

RO-6

Center for Biological Diversity
February 23, 2024

RO-6.1 This comment is introductory and discusses Senate Bill (SB) 994. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-6.2 This comment discusses the 2012 Settlement Agreement with Center for Biological Diversity and San Bernardino Valley Audubon Society with March JPA as it relates to a prior version of SB 994. SB 994, as amended on March 19, 2024, is limited to clarifying the process by which March JPA can transfer jurisdiction over any landscaping and lighting maintenance districts (LLMD) and community facilities districts (CFD) to the County of Riverside. This may include a LLMD or CFD applicable to the Project. The comment states that the Project appears to conform with the major provisions of the settlement agreement. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-6.3 This comment states that CBD wants to ensure that the 2012 CBD Settlement Agreement remains in effect, regardless of whether March JPA transfers authority of the Project site and/or the CBD Settlement Agreement to the County. In response, please see Topical Response 9 – Long Term Implementation and Enforcement. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-6.4 This comment requests a meeting to discuss the settlement agreement and it continuing to be fulfilled if SB 994 passes. SB 994, as amended on March 19, 2024, is limited to clarifying the process by which March JPA can transfer jurisdiction over any landscaping and lighting maintenance districts (LLMD) and community facilities districts (CFD) to the County of Riverside. This may include a LLMD or CFD applicable to the Project. The comment also states that CBD will be submitting a brief comment letter on the Recirculated EIR asking for assurances that the settlement agreement will be adhered to regardless of the passage of SB 994. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-6.5 This comment is an attachment to the comment letter that consists of a series of slides from a presentation made on February 14, 2024 by the County of Riverside about SB 994. SB 994, as amended on March 19, 2024, is limited to clarifying the process by which March JPA can transfer jurisdiction over any landscaping and lighting maintenance districts (LLMD) and community facilities districts (CFD) to the County of Riverside. This may include a LLMD or CFD applicable to the Project. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Jonathan Evans <JEvans@biologicaldiversity.org>
Sent: Monday, February 26, 2024 10:33 AM
To: Dan Fairbanks
Cc: Charity.Schiller; Thomas.rice; Gilbert.Martinez@sen.ca.gov; Mikaila.Kruse@sen.ca.gov; Elizabeth.Balistreri@sen.ca.gov; district1@rivco.org
Subject: West Campus Upper Plateau (SCH# 2021110304), Settlement Agreement (CBD v Bartel), & SB 994 (Roth)
Attachments: 2024-2-26_West Campus Upper Plateau (SCH 2021110304)_SB 994.pdf

Dear Mr. Fairbanks,

Please find the attached letter and comments. RO-7.1

Thank you in advance for your attention to this matter,

Jonathan Evans
Environmental Health Legal Director and Senior Attorney
Center for Biological Diversity
1212 Broadway
Suite 800
Oakland, CA 94612
tel: (510) 844-7100 x318
cell: (213) 598-1466

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via email

February 26, 2024

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

Re: West Campus Upper Plateau (SCH# 2021110304), Settlement Agreement (Center for Biological Diversity, et al v Bartel, et al., September 12, 2012), & SB 994 (Roth)

Mr. Fairbanks:

These comments are provided for purposes of ensuring the ongoing fulfillment of the settlement agreement related to the West Campus Plateau project site related to the case *Center for Biological Diversity, et al v Bartel, et al*. in light of Senate Bill 994 introduced by Senator Richard Roth. RO-7.2

The Center for Biological Diversity and San Bernardino Valley Audubon Society have a settlement agreement with the March Joint Powers Authority ("March JPA") that, among other things, protects several hundred acres of habitat and open space on the West March Upper Plateau ("Settlement Agreement").[1] Pursuant to paragraph A.1. of that Settlement Agreement plaintiffs reserved their rights to enforce the terms of that agreement and seek to do so here to ensure that the Settlement Agreement will remain in effect, with all terms and conditions related to the West March Upper Plateau project site, regardless of whether the March JPA transfers authority of the project site and/or Settlement Agreement to the County of Riverside. RO-7.3

Senate Bill 994 (Roth) introduced this legislative session would "set forth various authorizations and land use requirements for purposes of streamlining the return of land use authority from the March Joint Powers Authority to the County of Riverside and ensuring the continued maintenance of public infrastructure."[2] SB 994 specifically authorizes that the March JPA "may assign contractual obligations that are set forth in written agreements, which include, but are not limited to, settlement and development agreements." The summary of SB 994 from the County of Riverside specifically mentions the parties Settlement Agreement here ("Settlement Agreement (Center for Biological Diversity, et al v Bartel, et al.) - September 12, RO-7.4

[1] Settlement Agreement, *Center for Biological Diversity et al. v. Bartel et al.,* S.D. Cal. Case No. 09-cv-1864-JAH-POR (September 2012) (attached)
[2] https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240SB994#99INT; County of Riverside, RivCoNow, Summary - SB 994, February 14, 2024 (attached).

2012").[3] The current Meridian West Campus development project under review at the March JPA[4] appears to conform with the major provisions of the Settlement Agreement, including a reference to the settlement agreement in the Recirculated Environmental Impact Report ("Through a recorded Conservation Easement of approximately 445.43 acres, the undisturbed land surrounding the Specific Plan Area would be preserved in perpetuity, consistent with prior determinations made as part of the CBD Settlement Agreement.")[5]

RO-7.4 Cont.

Given the introduction of SB 994, which could affect the administration of the Settlement Agreement, its obligations related to the West March Upper Plateau, and the scope of the proposed project, project description, and its environmental impacts, the Center for Biological Diversity and San Bernardino Valley Audubon Society seek to ensure that the Settlement Agreement is upheld regardless of whether it, and the underlying land use authority, are administered by the March JPA or the county of Riverside.

RO-7.5

Thank you in advance for your response,

Jonathan Evans
Environmental Health Legal Director
Center for Biological Diversity
1212 Broadway
Suite 800
Oakland, CA. 94612
jevans@biologicaldiversity.org
(213) 598-1466

cc:
Charity Schiller, March JPA Legal Counsel, Charity.Schiller@bbklaw.com
Thomas Rice, March JPA Legal Counsel, Thomas.Rice@bbklaw.com
Gilbert Martinez, Chief of Staff, Senator Roth, Gilbert.Martinez@sen.ca.gov
Mikaila Kruse, Legislative Director, Senator Roth, Mikaila.Kruse@sen.ca.gov
Elizabeth Balistreri, District Director, Senator Roth, Elizabeth.Balistreri@sen.ca.gov
Supervisor Kevin Jeffries, Riverside County Supervisor, district1@rivco.org

[3] County of Riverside, RivCoNow, Summary - SB 994, February 14, 2024 (attached).
[4] https://marchjpa.com/mjpa-meridian-west-campus/ (attached).
[5] https://marchjpa.com/wp-content/uploads/2024/01/Revised-NOA_WCUP-RDEIR_1.12.24.pdf (attached).

SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") dated and made effective as of September 12, 2012, is entered into by, between, and among the following, sometimes referred to as Parties: Plaintiffs Center for Biological Diversity and San Bernardino Valley Audubon Society (together, "Plaintiffs"); and Defendant-Intervenors March Joint Powers Authority and LNR Riverside LLC (together, "Defendant-Intervenors"). It is the intent of the Parties that this Agreement shall establish the terms of a full and complete settlement of all claims and actions raised in *Center for Biological Diversity v. Jim Bartel, et. al.* (S.D. Cal. No. 09-cv-1864-JAH-POR) ("Lawsuit"). The terms of this Agreement are intended to be the limit of the Parties' obligations.

RECITALS

A. WHEREAS, Center for Biological Diversity ("CBD") and San Bernardino Valley Audubon Society ("Audubon") are non-profit organizations established, in part, for purposes of pursuing compliance with environmental laws and advocating for wildlife protection and education;

B. WHEREAS, Jim Bartel is the Field Supervisor for the Carlsbad Office of the United States Fish and Wildlife Service, and is the federal official charged with implementation of the Endangered Species Act ("ESA") within the Carlsbad Office's area of responsibility, including the former March Stephens' Kangaroo Rat Management Area on the west campus of the former March Air Force Base ("March SKR Management Area/March Air Force Base west campus");

C. WHEREAS, the United States Fish and Wildlife Service ("Service") is an agency within the Department of Interior that has been delegated responsibility for implementing the ESA, including proposed and final listing and critical habitat decisions, the handling of petitions for such listings, and consultations with federal action agencies related to impacts to threatened and endangered species;

D. WHEREAS, Ken Salazar is the Secretary of the Interior ("Secretary"), and is the federal official charged with listing species as endangered or threatened and supervising the consultation requirements under the ESA;

E. WHEREAS, the March Joint Powers Authority ("March JPA") is a Joint Powers Authority created pursuant to Article 1, Chapter 5, Division 7, Title 1 commencing with Section 6500 of the California Government Code, created for the purpose of addressing the use, reuse, and joint use of realigned March Air Force Base;

F. WHEREAS, LNR Riverside LLC ("LNR Riverside") is a real estate and land development company that is the master developer for portions of the realigned March Air Force Base;

RO-7.6

G. WHEREAS, a March Stephens' Kangaroo Rat reserve was first established in June of 1990 as preserved habitat for the Stephens' kangaroo rat ("SKR") in a Biological Opinion ("BiOp") regarding proposed improvements to State Route 15 between Van Buren Boulevard and State Route 60;

H. WHEREAS, in October 1990, an interim Stephens' kangaroo rat Habitat Conservation Plan was adopted that identified portions of the March SKR reserve as one of the Study Areas for potential protection under the longer term SKR HCP established later in 1996;

I. WHEREAS, the February 1996 Disposal of Portions of March Air Force Base Environmental Impact Statement ("EIS") addressed the disposal and reuse of March Air Force Base lands;

J. WHEREAS, The Long-Term SKR HCP was adopted in 1996 that designated areas on the March Air Force Base as the Sycamore Canyon–March Core Reserve to be managed for the conservation and recovery of the species, and also contemplated the release of some of those lands for development under certain conditions;

K. WHEREAS, a BiOp completed in 1999 states that the Service will consider suitable trade criteria for development that affects the function and value of the March SKR Management Area/March Air Force Base west campus, that the area known as Potrero Valley—located on the eastern edge of the San Jacinto Valley and containing some of the largest known contiguous population of SKR ("Potrero Preserve")—was identified as potentially suitable land for the trade-out, and that if more than 105 acres of occupied SKR habitat was impacted then the Air Force would reinitiate consultation;

RO-7.6 Cont.

L. WHEREAS, on December 29, 2003 and May 22, 2006, Defendants and the California Department of Fish and Game ("CDFG") determined that the trade out criteria identified in the BiOp had been satisfied, authorized the trade-out of the March SKR Management Area for the Potrero Preserve, and authorized incidental take of SKR on March Air Force Base;

M. WHEREAS, on August 27, 2009, Plaintiffs initiated the Lawsuit against Defendants Bartel, the Service, and the Secretary (collectively, the "Federal Defendants"), alleging a failure to reinitiate consultation by preparing a new biological opinion under the ESA, 16 U.S.C. § 1536, a failure to conduct environmental analysis under the National Environmental Policy Act, 42 U.S.C. §§ 4321 et seq. ("NEPA"), and a failure to properly amend the SKR HCP, prior to authorizing the release of the March SKR Management Area/ March Air Force Base west campus for development;

N. WHEREAS, Defendant-Intervenors successfully intervened in the Lawsuit to defend their significant, protectable interest in the outcome of the Lawsuit; and

M. WHEREAS, the Parties, based upon extensive settlement negotiations, have agreed to a settlement that would allow conservation of portions of the March SKR Management Area/March Air Force Base west campus while also allowing development of other portions of the site;

N. WHEREAS, the Parties have agreed to use this Agreement to achieve a full and complete resolution of all claims asserted by Plaintiffs in the Lawsuit and to eliminate, to the fullest extent possible, any further impediments to both the conservation of habitat and the development of portions of the March SKR Management Area/March Air Force Base west campus; and

O. WHEREAS, Plaintiffs and Federal Defendants Jim Bartel, the Service, and Ken Salazar have agreed, subject to Plaintiffs and Defendant-Intervenors reaching agreement on the terms of this Agreement, to a consent decree to reach a full and complete resolution of all claims asserted by Plaintiffs against the Federal Defendants in the Lawsuit.

TERMS

NOW THEREFORE, in consideration of the mutual covenants, agreements, representations, and warranties contained in this Agreement, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

A. **Plaintiffs' Obligations.** Plaintiffs, and their current and future members, representatives, employees, officers, agents, attorneys, experts and designees both individually and/or collectively hereby agree to the following:

1. Plaintiffs shall dismiss all counts of Plaintiffs' complaint with prejudice via stipulation of the Parties within three business days of the execution of this Agreement.

2. Plaintiffs agree not to fund, sponsor, initiate, participate in, or file any petition, complaint, motion, proceeding or action, whether legal or administrative, of any kind that: (i) asserts any claims, rights or causes of action that were alleged in *Center for Biological Diversity v. Jim Bartel, et. al.* (S.D. Cal. No. 09-cv-1864-JAH-POR); (ii) asserts, in any way, that any further take authorization is required for take of SKR on the March SKR Management Area/March Air Force Base west campus within the footprint depicted in the map attached hereto as Exhibit A ("the Project" or "Developable Area"); and/or (iii) challenges, opposes or tries to prevent in any way the issuance of any other discretionary, ministerial, or other approvals or processes of any kind for the development of the March SKR Management Area/March Air Force Base west campus within the Project or Developable Area, specifically including any further public meetings, public hearings, actions, revisions, phases, environmental review, and/or approvals issued by March JPA. Plaintiffs will not submit or provide verbal or written comments to any decision-making body or public agency that are critical of the Project or that object to, oppose, delay, impede, or disrupt the process for the approval of the Project, subject to the terms and conditions of this Agreement. Notwithstanding the provisions of this paragraph, the Parties retain the right to enforce the terms of the Agreement in legal and administrative proceedings.

RO-7.6 Cont.

3. If any person purporting to act as a representative of, or otherwise on behalf of, Plaintiffs takes any action that if taken by such Plaintiffs would constitute a breach of the obligations under this Agreement, including without limitation their obligation that they will not object to, oppose, delay, impede, or disrupt the process for the Project approvals, including without limitation Plaintiffs' obligation that they will not provide verbal or written comments that are critical of the Project or intended to delay or oppose the approval of the Project,

Defendants and/or Defendant-Intervenors may request a sworn statement of repudiation from the Plaintiff alleged to be in breach of this Agreement as a result of any action purported to be taken on its behalf. Within fifteen (15) days of receipt of such request, the Plaintiff alleged to be in breach of this Agreement shall provide Defendants and/or Defendant-Intervenors with a sworn statement, duly authorized and executed on its letterhead, providing that (a) such person has not been authorized by the Plaintiff to take such action; (b) such action does not represent the position of Plaintiff; and (c) that the Plaintiff alleged to be in breach determined that the Agreement was in its best interest and is committed to carrying out the purpose and intent of the Agreement.

B. **Defendant-Intervenors' Obligations.**

1. Defendant-Intervenors agree to place into conservation those portions of the March SKR Management Area/March Air Force Base west campus depicted as "Conservation Easement" or "Water Quality Open Space Area" on the map attached hereto as Exhibit A. The latter areas are referred to in this Agreement as SKR Conservation Area, least Bell's vireo Conservation Area ("LBV Conservation Area"), or collectively "Conservation Areas." These areas will be managed for their wildlife habitat value for sensitive species. A conservation easement, with wildlife trustee agencies as third party beneficiaries, shall be established for areas identified as the Conservation Areas. The Parties agree that the following entities have the necessary professional standards and criteria to hold the conservation easement for the Conservation Areas: the Western Riverside County Regional Conservation Authority, the Center for Natural Lands Management, the Riverside Land Conservancy, the Riverside-Corona Resource Conservation District, and the CDFG. The terms and standards of that conservation easement shall be agreed to by the Service, the CDFG, and Defendant-Intervenors. The Parties agree that the conservation easement holder/grantee will be chosen by the Defendant-Intervenors.

RO-7.6 Cont.

a. The Parties acknowledge that there are many existing service roads within the Conservation Areas. The Parties agree that any currently existing service roads within the Conservation Areas, as depicted by the red lines in Exhibit A, can continue to be utilized by the public for passive recreation. Passive recreation means recreational uses where very minimum alteration of vegetation, topography or other native features are necessary for the enjoyment of the site amenities, such as hiking, nature observation, picnicking, non-motorized recreation, and archaeological or historic preservation.

b. Vehicular access on the existing service roads shall not be open to the general public. Vehicular access on existing service roads will be limited to the necessary maintenance and operations of the area by authorized personnel of the Defendant-Intervenors, the land management entity for the Conservation Areas, regulatory authorities, or individuals authorized by these groups to access existing service roads. The March JPA, at its sole discretion, is authorized to decommission existing service roads or trails and eliminate public access to those service roads in order to benefit the conservation value or public safety in the Conservation Area, so long as they do not interfere with the value of the easements held by LNR Riverside or its successor.

c. Public Access shall be limited to reduce the impacts to sensitive species and habitat in the Conservation Areas. Mechanisms to reduce the impacts of passive recreation and public access in the Conservation Area include, but are not limited to, fencing, signage to prevent off-road or off-trail use and night access, and leash requirements for any dogs allowed in the Conservation Area. The Parties acknowledge that all currently existing service roads also function as fire breaks for the purpose of fighting wild fires in the area.

2. Portions of the March SKR Management Area/March Air Force Base west campus can be developed by the Defendant-Intervenors, as depicted in the Developable Area in Exhibit A. The Developable Area includes the roadways depicted on Exhibit A. Any temporary impact to areas adjacent to the Developable Area shall be restored by LNR Riverside to provide habitat for sensitive species.

3. Portions of the March SKR Management Area/March Air Force Base west campus will be dedicated as parkland or open space for active recreational use, as depicted in Exhibit A ("Proposed Park Area"). These areas are not set aside as part of this Agreement to be managed as wildlife habitat; any wildlife habitat value will be secondary to human recreational use.

a. Within the Conservation Areas located within the Proposed Park Area located west of Barton Street, and as depicted on Exhibit A, March JPA may move these service roads and/or trails as it deems necessary.

4. Defendant-Intervenors shall, at their sole discretion, select an appropriate land management entity or entities to manage the SKR Conservation Area ("Management Entity"), with input from the Plaintiffs. The Defendant-Intervenors will work with the Management Entity, the Service and the CDFG to develop appropriate management requirements and guidelines. All activities undertaken by the Management Entity related to the Conservation Area, as approved by March JPA, shall be funded from the Endowment described in Section B. 7 below.

RO-7.6 Cont.

a. Notwithstanding the above, the Management Entity shall meet the following criteria to assure minimum professional standards and criteria are achieved in managing the Conservation Area:

(i) The Management Entity has qualifications and experience to work with listed species including appropriate permits for employees and subcontractors under federal and state Endangered Species Acts;

(ii) The Management Entity has a demonstrated background in active wildlife management;

(iii) The Management Entity has the necessary organizational and fiscal capacity to manage the area in perpetuity;

(iv) The Parties agree that the following management entities have the necessary professional standards and criteria to manage the Conservation Area: the Western Riverside County Regional Conservation Authority, the Center for Natural Lands

Management, the Riverside Land Conservancy, the Riverside-Corona Resource Conservation District, and the CDFG.

(v) Should the Riverside County Habitat Conservation Authority be chosen as the management entity the Parties agree that the conservation easement for the Conservation Areas shall be held by the Service, the CDFG, the Center for Natural Lands Management, the Riverside Land Conservancy, the Western Riverside County Regional Conservation Authority, or the Riverside-Corona Resource Conservation District. Any other party that would hold the conservation easement, other than those listed in the previous sentence if the Riverside County Habitat Conservation Authority is the management entity, would require the agreement of the Parties.

5. The Parties acknowledge there are certain "blanket" easements across the Conservation Areas for items such as utilities that were retained or granted by the United States government which are not affected by this Agreement. The Defendant-Intervenors will work cooperatively with the easement holder and management entity to minimize any long-term habitat disturbance in the Conservation Areas resulting from construction or maintenance related to those easements, including using reasonable efforts to cause easement holders to restore the surface area.

6. March JPA agrees that all mitigation measures attached as Exhibit B shall be required for any development in the Developable Area.

7. LNR Riverside agrees to make an initial contribution by December 31, 2012, of $500,000 toward a total non-wasting endowment of $2 million to be used for management and monitoring activities undertaken by the Management Entity in the Conservation Areas ("Endowment"). The Endowment may be composed of more than one endowment account in the discretion of Defendant Intervenors, so long as each endowment account complies with the terms of this Agreement. The Defendant-Intervenors anticipate that the remaining $1.5 million of the Endowment will be obtained from the existing endowment for the management of the March SKR Management Area. However, in the event the $1,500,000 is not obtained from the existing endowment, prior to any grading LNR Riverside shall contribute to the Endowment the amount of $4,717.00 per acre to be graded (the "Endowment Fee"). The $500,000 shall be deemed the first Endowment Fee and shall be credited against payment of future Endowment Fees until fully exhausted. Upon payment of the initial $500,000 Endowment contribution, LNR Riverside may proceed with the mitigation and enhancement required under its Section 404 Permit (No. SPL-2006-1995) and 1602 Agreement (No. 6-2009-291). Amounts deposited into the Endowment pursuant to either of the foregoing permits shall be credited against the total amount of $2,000,000. Each subsequent Endowment Fee payment shall be deposited before the time of commencement of grading of the acre(s) associated with that payment. Notwithstanding the foregoing, LNR Riverside agrees that the non-wasting Endowment will be fully funded at a level of $2 million before the last grading permit for the Development Area is issued or April 1, 2027, whichever is earlier.

RO-7.6 Cont.

a. The Endowment will be used to generate revenue for management and monitoring activities on the Conservation Area, including but not limited to the species management for the least Bell's vireo and SKR. March JPA shall at its sole discretion select an

entity to manage the Endowment for the benefit of wildlife within the Conservation Area and will agree on standards for management of the Endowment. The entity managing the Endowment shall use prudent financial management practices for the purpose of maintaining the Endowment and maximizing funds for habitat management in the Conservation Areas in perpetuity. The entity managing the Endowment shall not be the Riverside County Habitat Conservation Authority.

b. The Parties may modify this Agreement, after consultation and agreement with the CDFG, to permit the Endowment referenced in this section to be used for SKR management at the Potrero reserve managed by the CDFG for the benefit of SKR and other wildlife species so long as an adequate non-wasting endowment remains for the management in perpetuity of the Conservation Area discussed in this Agreement. Such modification will be in writing and signed by the Parties to this Agreement.

c. Upon agreement of the Parties, a portion of any proceeds generated from the Endowment may be used for other purposes related to the conservation of the SKR or other native species associated with SKR habitat.

8. Defendant-Intervenors agree not to develop, grade, de-vegetate, or destroy a riparian area of approximately 2-3 acres located on the Conservation Areas or Proposed Park Area as depicted in Exhibit A ("Riparian Area"). The Parties agree, however, that the Riparian Area may be physically contained within the boundaries of a park to be developed as long as the Riparian Area retains its primary function as natural habitat for wildlife while supporting passive recreation. It is understood by the Parties that this area is the historic drainage channel for this area and it will continue to accommodate the storm water flows from surrounding undeveloped and developed areas.

RO-7.6 Cont.

9. Defendant-Intervenors agree to abide by the Urban/Wildland Interface requirements, as set forth in Section 6.1.4 of the Western Riverside County Multiple Species Habitat Conservation Plan ("MSHCP") and agree that the Conservation Areas referenced in this agreement will be treated as if they are a MSHCP Conservation Area for purposes of application of the Urban/Wildland Interface requirements. In particular the Parties agree to implement the requirements of Section 6.1.4 including, but not limited to, noise, drainage, barriers and the following:

a. Night lighting shall be directed away from the Conservation Areas to protect species within the Conservation Areas from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting in the Conservation Areas is not increased beyond .5 candle/foot adjacent to developed lots. It is recognized that public street lighting, where adjacent to the Conservation Area, shall meet the applicable lighting standards established by County Engineering Design Standard 1001, inclusive of full cut off fixtures and shall be Mount Palomar compliant. In addition, to the extent permissible under local, state and federal law, the locations of fixtures would be selected based on desired angles of light and proximity to the Conservation Areas. Along roadways adjacent to the Conservation Areas, the light would have a defined optical system to project lumens downward to minimize light trespass into the Conservation Areas including sharp cut off with no uplight component. Devices that may be employed to directionally control light may include lenses, louvers, barn doors, and

snoots. Beam patterns would be asymmetric with the light aimed at the road surface area. The proposed lighting for the Developable Area would be consistent with guidelines (See Darkskysociety.org) established by the Dark Sky Society, whose international mission is to "preserve and protect the nighttime environment and our heritage of the dark skies through quality outdoor lighting."

10. LNR Riverside agrees to pay Plaintiffs $65,000.00 for fees and costs incurred by Plaintiffs relative to the Lawsuit within thirty (30) days of dismissal of this case.

11. Defendant–Intervenors agree that when current planning is begun for the Meridian West Campus or Developable Area, they will discuss with Plaintiffs the alignment of Brown Street. Plaintiffs may provide input with regard to SKR conservation, however the Defendant-Intervenors are under no obligation to alter the planned alignment based upon this input.

a. Defendant-Intervenors agree that Brown Street, and in particular the intersection of Brown Street and Alessandro Boulevard, will be designed to minimize impacts to wildlife movement from the neighboring Sycamore Canyon Wilderness Park. Such mitigation measures will include, but are not limited to, the following: reductions in night lighting within and adjacent to the Conservation Areas while still complying with County minimum street light requirements; fencing to reduce public access and allow wildlife movement; and signs to reduce trespass and inform the public of the sensitive nature of the areas.

12. Defendant-Intervenors agree that the existing Cactus Avenue, as depicted on Exhibit A, will be the only road bisecting the Conservation Areas in the March SKR Management Area/March Air Force Base west campus to connect the existing and future Meridian development in the vicinity of Plummer Street with the future Meridian West Campus. Other anticipated infrastructure that has the potential to impact the Conservation Areas described in this Agreement is listed on Exhibit A.

RO-7.6 Cont.

13. Defendant-Intervenors agree that soft-bottomed culverts will be installed beneath any future modifications to Cactus Avenue to allow for animal passage underneath Cactus Avenue. The dimensions of such culverts shall be approximately 6 feet in height by 20 feet in width to allow for adequate passage of animals north-south through the Conservation Areas. The culverts shall be located to maximize potential animal movement in combination with the feasibility of their installation and located in the locations generally outlined on Exhibit A as "Clear Span Crossings."

C. **General Provisions.**

1. This Agreement has no precedential value and may not be used as evidence in any judicial or administrative proceeding against the Federal Defendants and/or Defendant-Intervenors, except to enforce the terms of the Agreement and terms agreed by the Parties herein. In any other judicial or administrative proceeding, this Agreement may not be used to present or imply any position of the Federal Defendants and/or Defendant-Intervenors with regard to the SKR Management Area.

2. No Party shall use this Agreement or the terms herein as evidence that any Party is required to initiate consultation under the ESA or perform environmental analysis in any other proceeding involving the trade-out and/or development of the March SKR Management Area/ March Air Force Base west campus.

D. **Notices.** All notices called for pursuant to this Agreement shall be given in writing by personal delivery, or recognized overnight delivery service which obtains the signature of the addressee or its agent as evidence of delivery, or confirmed electronic transmission or telecopy/facsimile to the addresses listed below. All such notices or communications shall be deemed to have been given and received on the first to occur of: (i) actual receipt by any of the addressees listed below; or (ii) the date of delivery by recognized overnight delivery services; and/or (iii) upon receipt by the sender of electronic confirmation of delivery of such notices or communications sent by telecopy/facsimile. A Party may change its address by giving written notice thereof to the others in accordance with the provisions of this section.

Center for Biological Diversity	Jonathan Evans Center for Biological Diversity 351 California Street, Suite 600 San Francisco, CA 94104
San Bernardino Valley Audubon Society	Drew Feldmann San Bernardino Valley Audubon Society PO Box 10973 San Bernardino, CA 92423-0973
Jim Bartel, Field Supervisor for the Carlsbad Office of the United States Fish and Wildlife Service; the United States Fish and Wildlife Service; and Ken Salazar, Secretary of the Interior.	Bradley H. Oliphant, Trial Attorney Joanna K. Brinkman, Trial Attorney Ben Franklin Station, P.O. Box 7611 Washington, DC 20044-7611
March Joint Powers Authority	Michelle Ouellette Best Best & Krieger LLP 3390 University Avenue, 5th Floor Riverside, CA 92501
LNR Riverside LLC	Hans Van Ligten Rutan & Tucker LLP 611 Anton Blvd. Costa Mesa, CA 92626-1931

RO-7.6 Cont.

E. **Further Assurances: Covenant to Sign Documents.** Each Party shall take all actions and do all things, and execute, with acknowledgement or affidavit, if required, any and all documents and writings that may be necessary or proper to achieve the purposes and objectives of this Agreement.

F. **Statement of Compliance.** Within thirty (30) days following any written request by a Party, the other Parties shall execute and deliver a statement certifying that this Agreement is unmodified and in full force and effect or if there have been modifications hereto, that this Agreement is in full force and effect as modified, that there are no current uncured defaults under this Agreement, and any other information reasonably requested.

G. **Verification of Compliance.** Any Party may request in writing that the other Parties provide verification of compliance with the terms of this Agreement, including attached Exhibits. The other Parties shall provide the requesting Party with such verification within ninety (90) days of receipt of the request. Such verification shall be in writing and shall include a signed statement from a representative of the Parties, or their respective successors, as the case may be, that the Parties have fully complied with their obligations in this Agreement.

H. **No Agency.** It is expressly agreed that, in carrying out this Agreement, no relationship of principal and agent shall ever exist between the Parties hereto.

I. **No Third Party Beneficiaries**. It is expressly agreed that this Agreement is not for the benefit of any person or entity not a Party hereto or described as a related entity and representative herein. No person or entity who or which is not a signatory to this Agreement shall be deemed to be benefited or intended to be benefited by any provision hereof, and no such person or entity shall acquire any rights or causes of action against either the CBD, Audubon, the Service, the Secretary, March JPA or LNR Riverside hereunder as a result of the Parties' performance or non-performance of their respective obligations under this Agreement. Each of the Parties hereby acknowledges and agrees to the provisions of this Paragraph.

RO-7.6 Cont.

J. **Entire Agreement**. The Parties acknowledge that this Agreement is signed and executed without reliance upon any actual or implied promises, warranties or representations made by any of the Parties or by any representative of any of the Parties, other than those which are expressly contained within this Agreement. This Agreement, including the true and correct Recitals above, inclusive of all definitions contained therein, that are incorporated by reference herein as operative covenants and specifically relied upon by the Parties in executing this Agreement, constitutes the entire agreement and understanding among and between the Parties and supersedes any and all other agreements whether oral or written between the Parties.

K. **Incorporation of Recitals**. The recitals to this Agreement, above, are hereby incorporated herein and made a part hereof.

L. **Amendments and Modifications**. The Order entering this Agreement may be modified by the Court upon good cause shown, consistent with the Federal Rules of Civil Procedure, by (i) written stipulation between the Parties filed with and approved by the Court, or (ii) upon written motion filed by one of the Parties and granted by the Court if the Court determines that such amendment is necessary to prevent a gross miscarriage of justice.

M. **Enforcement of Agreement.** At least 30 days prior to filing any motion to enforce this Agreement, the Party contemplating the motion must bring its claimed breach to the attention of the other Party, in writing, and make a good faith effort to resolve the dispute informally within 30 days thereafter. The Parties agree that they will meet and confer (either

telephonically or in-person) at the earliest possible time in a good-faith effort to resolve the claim before seeking relief from the Court. If the Parties are unable to resolve the claim themselves, either Party may seek relief from the Court. The Parties agree not to seek to invoke the contempt powers of the district court for any alleged breach of this Agreement without fully following the dispute resolution conditions above. Notwithstanding the dismissal of this action the Parties hereby stipulate and respectfully request that the Court retain jurisdiction to oversee compliance with this Agreement and to resolve any motions to modify such terms. *See Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375 (1994).

N. **Construction of Agreement.** This Agreement is the product of arms-length negotiations between the Parties and their respective attorneys. Each of the Parties hereto expressly acknowledges and agrees that this Agreement shall be deemed to have been mutually prepared so that the rule of construction to the effect that ambiguities are to be resolved against the drafting Party shall not be employed in the interpretation of this Agreement. The paragraph and section headings used in this Agreement are for reference only and shall not affect the construction of this Agreement.

O. **Representations as to Negotiation Process.** The Parties hereto represent to each other that each Party has been represented by counsel with respect to this Agreement and all matters covered by and relating to it, that they have been fully advised by such counsel with respect to their rights and with respect to the execution of this Agreement. The Parties further represent that each Party has entered into this Agreement of his, her, or its free will and independent action without undue pressure, coercion or influence of any sort.

RO-7.6 Cont.

P. **Settlement, No Admissions by Parties**. Each of the Parties acknowledges that this Agreement relates to the avoidance of litigation and the preclusion of actions described above. The Parties, therefore, agree that this Agreement is not to be treated or construed, at any time or in any manner whatsoever, as an admission by either Party regarding the merits of the allegations in *Center for Biological Diversity v. Jim Bartel, et. al.* (S.D. Cal. No. 09-cv-1864-JAH-POR). All Parties recognize, acknowledge and agree that entering into this Agreement by any Party receiving any money is not a concession of its respective damages or the costs in the Lawsuit. This Agreement effectuates settlement of claims in the Lawsuits between the settling Parties that are disputed, contested or denied, and other related matters. Neither this Agreement nor any Party's performance under it is intended to be or shall be asserted by any other Party to be an admission of any kind or character whatsoever except as to the admitted fact that a full, fair and equitable settlement has been reached by each of the Parties. This Agreement is in compromise of the disputed claims between the Parties and shall never be treated as an admission of liability by any Party, court, arbitrator(s), mediator(s), or dispute resolution panel.

Q. **Choice of Law and Choice of Forum**. This Agreement shall be deemed to have been executed and delivered within the State of California; the rights and obligations of the Parties hereunder shall be governed, construed and enforced in accordance with the laws of the State of California. The venue for any dispute arising from or related to this Agreement, its performance, and its interpretation shall be the U.S. District Court for the Southern District of California.

R. **Authorized Signatory**. Each Party represents and warrants to each other Party that its signature to this Agreement has the authority to bind the Party and this Agreement does in fact bind the Party, and that they have the authority to agree to the Court's entry of the terms and conditions of this Agreement and do hereby agree to the terms herein.

S. **Effective Date**. This Agreement is effective upon its execution by all Parties and the entry of an order by the Court ratifying the Agreement.

T. **Counterparts**. This Agreement may be executed in counterparts and when so executed by the Parties, shall become binding upon them and each such counterpart will be an original document.

9/5/12
Date

Center for Biological Diversity
by PETER GALVIN

Approved as to Form by JONATHAN EVANS

9/5/12
Date

San Bernardino Valley Audubon Society
by DREW FELDMANN

Approved as to Form by JONATHAN EVANS

Date

March Joint Powers Authority
by _____

Approved as to Form by _____

Date

LNR Riverside LLC
by _____

Approved as to Form by _____

RO-7.6 Cont.

R. **Authorized Signatory**. Each Party represents and warrants to each other Party that its signature to this Agreement has the authority to bind the Party and this Agreement does in fact bind the Party, and that they have the authority to agree to the Court's entry of the terms and conditions of this Agreement and do hereby agree to the terms herein.

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T. **Counterparts**. This Agreement may be executed in counterparts and when so executed by the Parties, shall become binding upon them and each such counterpart will be an original document.

_____ Date	_____ Center for Biological Diversity by _____ Approved as to Form by _____ _____
_____ Date	_____ San Bernardino Valley Audubon Society by _____ Approved as to Form by _____ _____
9/6/12 Date	Lori M. Stone March Joint Powers Authority by Lori Stone, Executive Director Approved as to Form by Michele Mund
_____ Date	_____ LNR Riverside LLC by _____ Approved as to Form by _____ _____

RO-7.6 Cont.

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R. **Authorized Signatory**. Each Party represents and warrants to each other Party that its signature to this Agreement has the authority to bind the Party and this Agreement does in fact bind the Party, and that they have the authority to agree to the Court's entry of the terms and conditions of this Agreement and do hereby agree to the terms herein.

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T. **Counterparts**. This Agreement may be executed in counterparts and when so executed by the Parties, shall become binding upon them and each such counterpart will be an original document.

_____
Date

_____
Center for Biological Diversity
by _____

Approved as to Form by_____

_____

_____
Date

_____
San Bernardino Valley Audubon Society
by _____

Approved as to Form by_____

_____

RO-7.6 Cont.

_____
Date

_____
March Joint Powers Authority
by _____

Approved as to Form by_____

_____

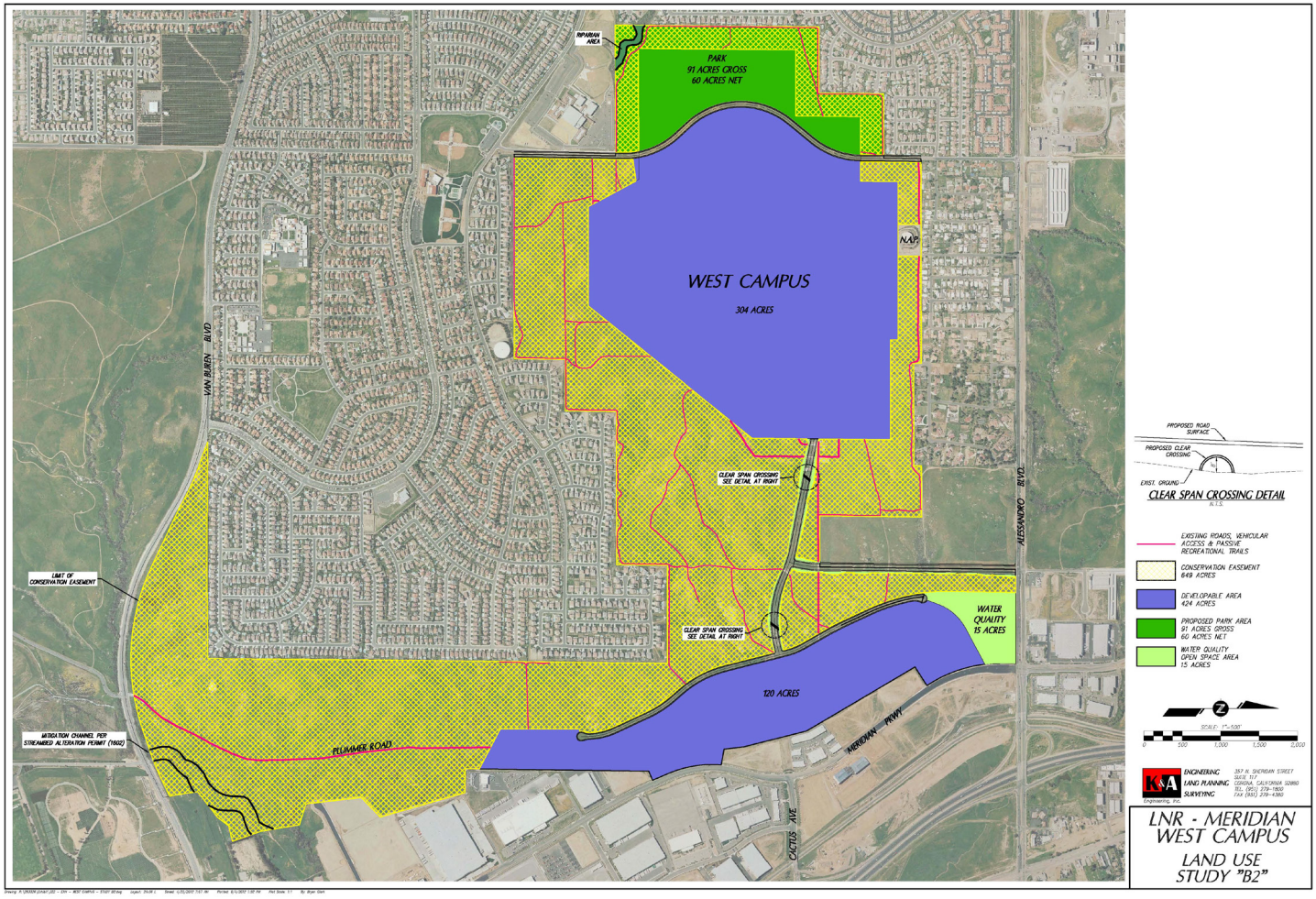
9-10-12
Date

_____
LNR Riverside LLC
by LNR RIVERSIDE HOLDINGS, LLC
by: Lang Cottrell, Vice President
Approved as to Form by _____

RUTAN & TUCKER, LLP

EXHIBIT A

RO-7.6
Cont.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PARK
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60 ACRES NET
WEST CAMPUS
304 ACRES
N.A.P.
VAN BUREN BLVD
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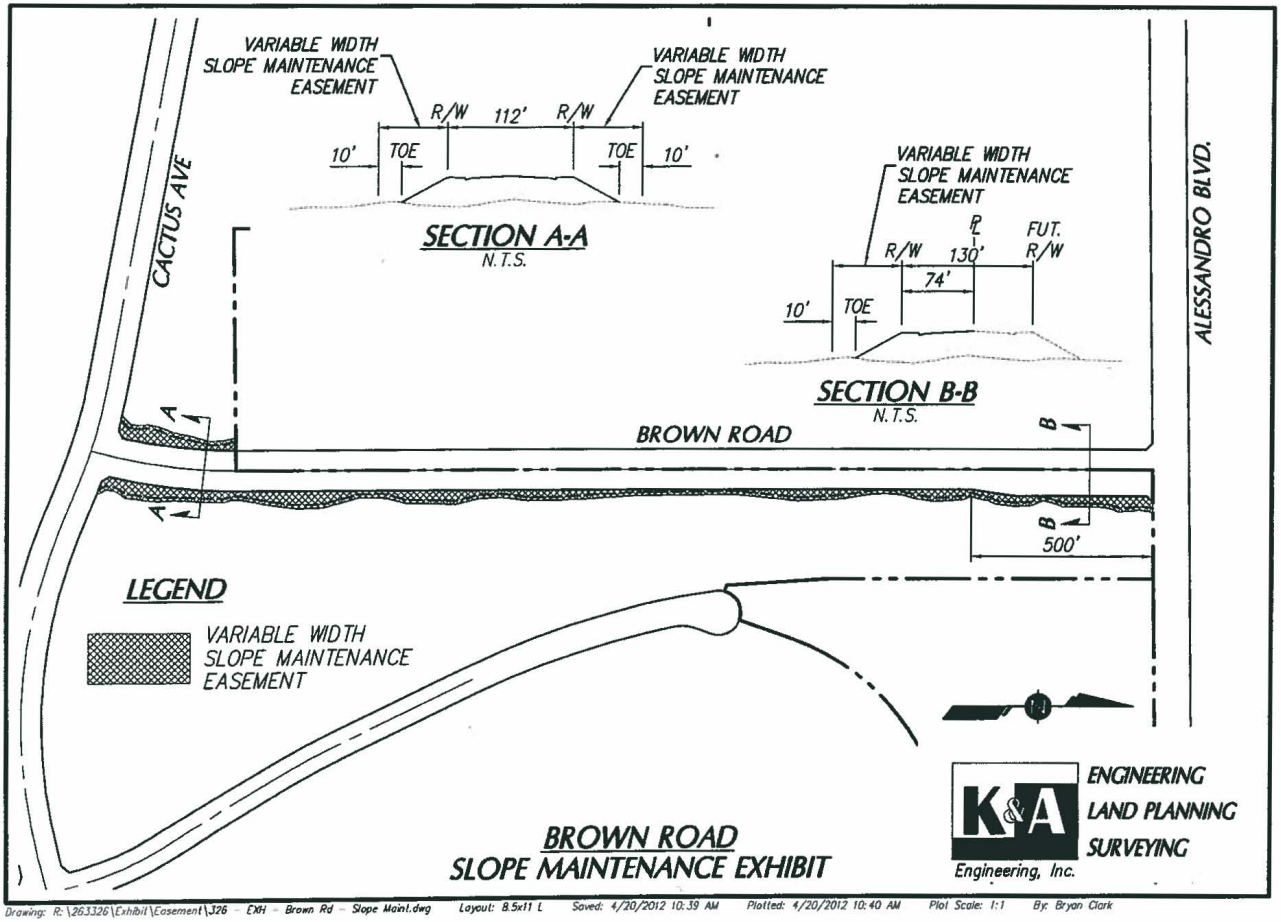
CLEAR SPAN CROSSING SEE DETAIL AT RIGHT
CLEAR SPAN CROSSING SEE DETAIL AT RIGHT
WATER QUALITY 15 ACRES
120 ACRES
MITIGATION CHANNEL PER STREAMBED ALTERATION PERMIT (1602)
PLUMMER ROAD
MERIDIAN PKWY
CACTUS AVE
IRVINE COMPANY
PROPOSED ROAD SURFACE
PROPOSED CLEAR CROSSING
EXIST. GROUND
CLEAR SPAN CROSSING DETAIL
N.T.S.
EXISTING ROADS, VEHICULAR ACCESS & PASSIVE RECREATIONAL TRAILS
CONSERVATION EASEMENT 649 ACRES
DEVELOPABLE AREA 424 ACRES
PROPOSED PARK AREA 91 ACRES GROSS 60 ACRES NET
WATER QUALITY OPEN SPACE AREA 15 ACRES
SCALE: 1"=500'
0 500 1,000 1,500 2,000
K&A Engineering, Inc.
ENGINEERING
LAND PLANNING
SURVEYING
357 N. SHERMAN STREET SUITE 117 CORONA, CALIFORNIA 92880 TEL (951) 279-1850 FAX (951) 279-4360
LNR - MERIDIAN WEST CAMPUS
LAND USE STUDY "B2"

RO-7.6 Cont.



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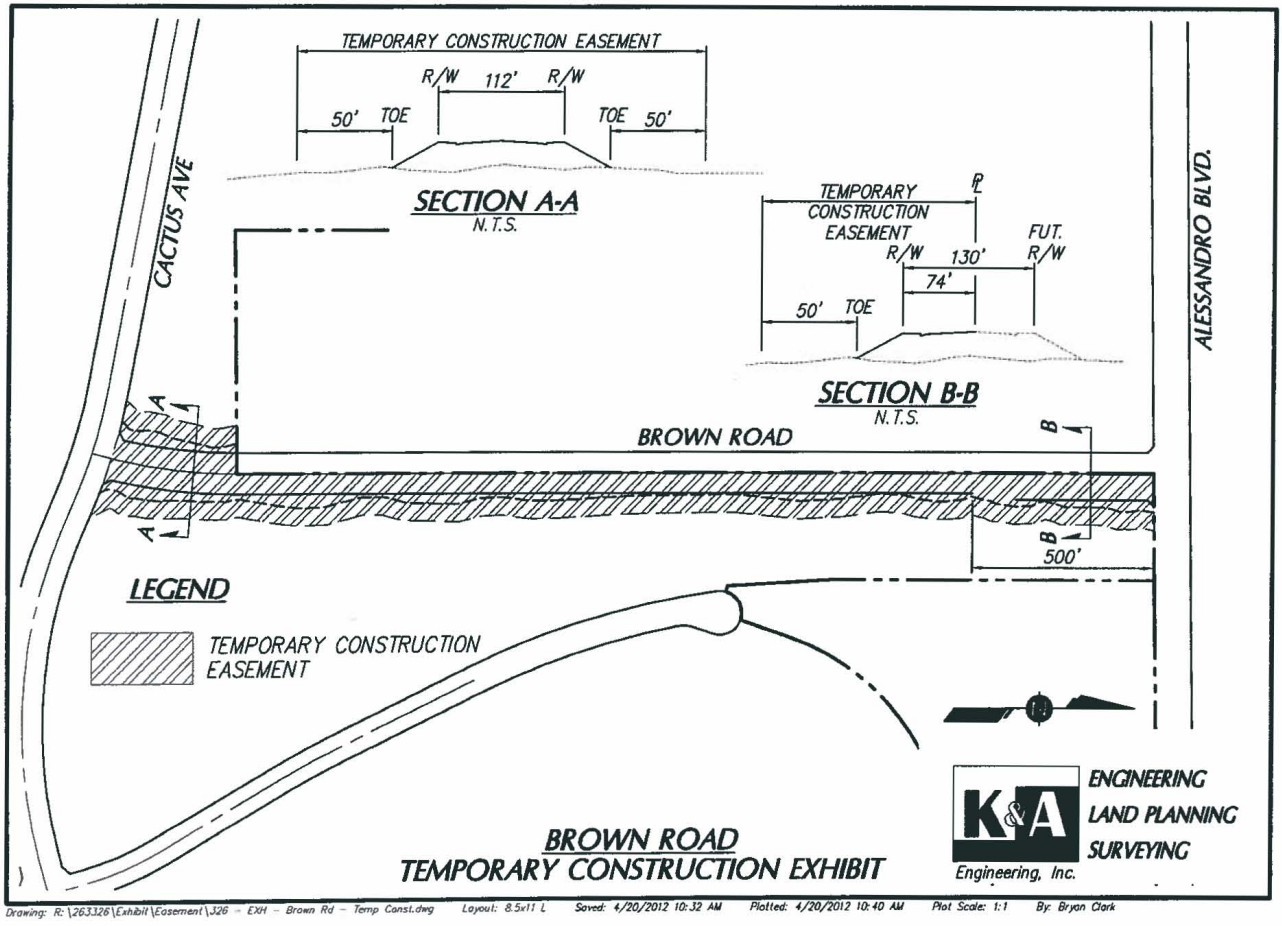
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R/W 112' R/W
50' TOE
TOE 50'
SECTION A-A
N.T.S.
CACTUS AVE
TEMPORARY CONSTRUCTION EASEMENT
℄
R/W 130' FUT. R/W
74'
50' TOE
SECTION B-B
N.T.S.
ALESSANDRO BLVD.
BROWN ROAD
A
A
B
B
500'
LEGEND
TEMPORARY CONSTRUCTION EASEMENT
K&A
ENGINEERING
LAND PLANNING
SURVEYING
Engineering, Inc.
BROWN ROAD
TEMPORARY CONSTRUCTION EXHIBIT
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RO-7.6
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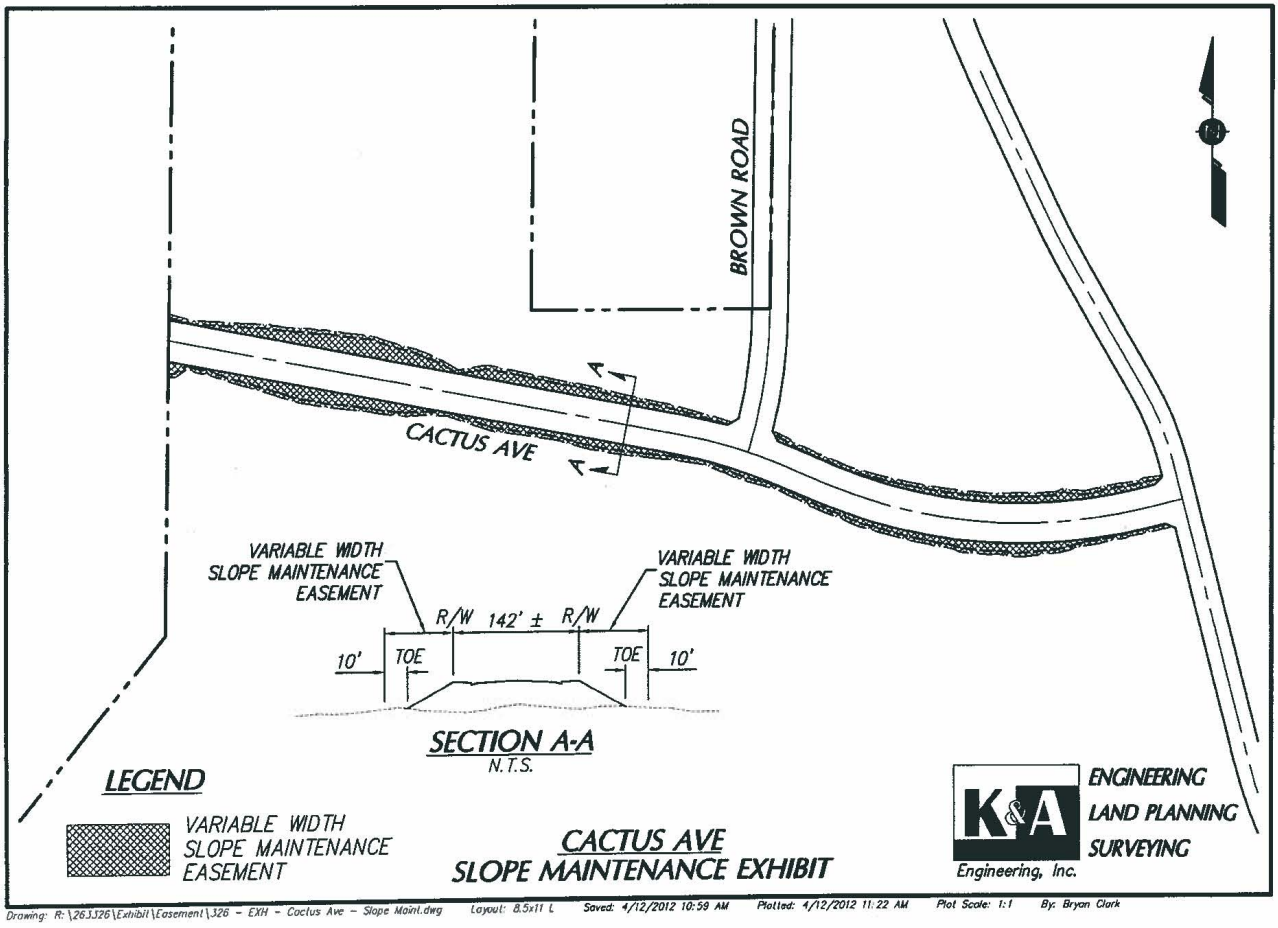
BROWN ROAD
CACTUS AVE
A
A
VARIABLE WIDTH
SLOPE MAINTENANCE
EASEMENT
R/W 142' ± R/W
VARIABLE WIDTH
SLOPE MAINTENANCE
EASEMENT
10'
TOE
TOE
10'
SECTION A-A
N.T.S.
LEGEND
VARIABLE WIDTH
SLOPE MAINTENANCE
EASEMENT
CACTUS AVE
SLOPE MAINTENANCE EXHIBIT
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Engineering, Inc.
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LAND PLANNING
SURVEYING
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By: Bryan Clark

RO-7.6
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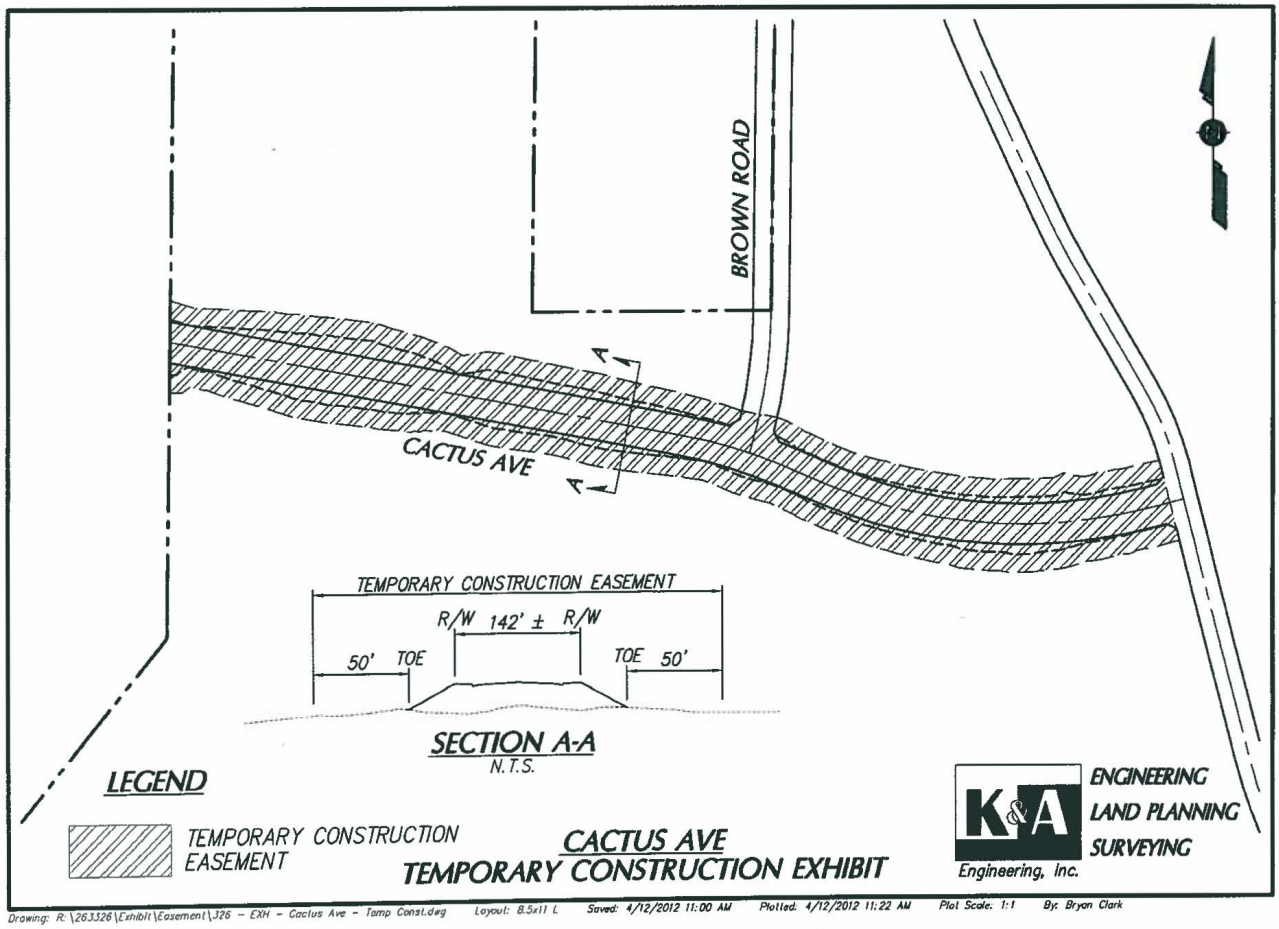

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RO-7.6
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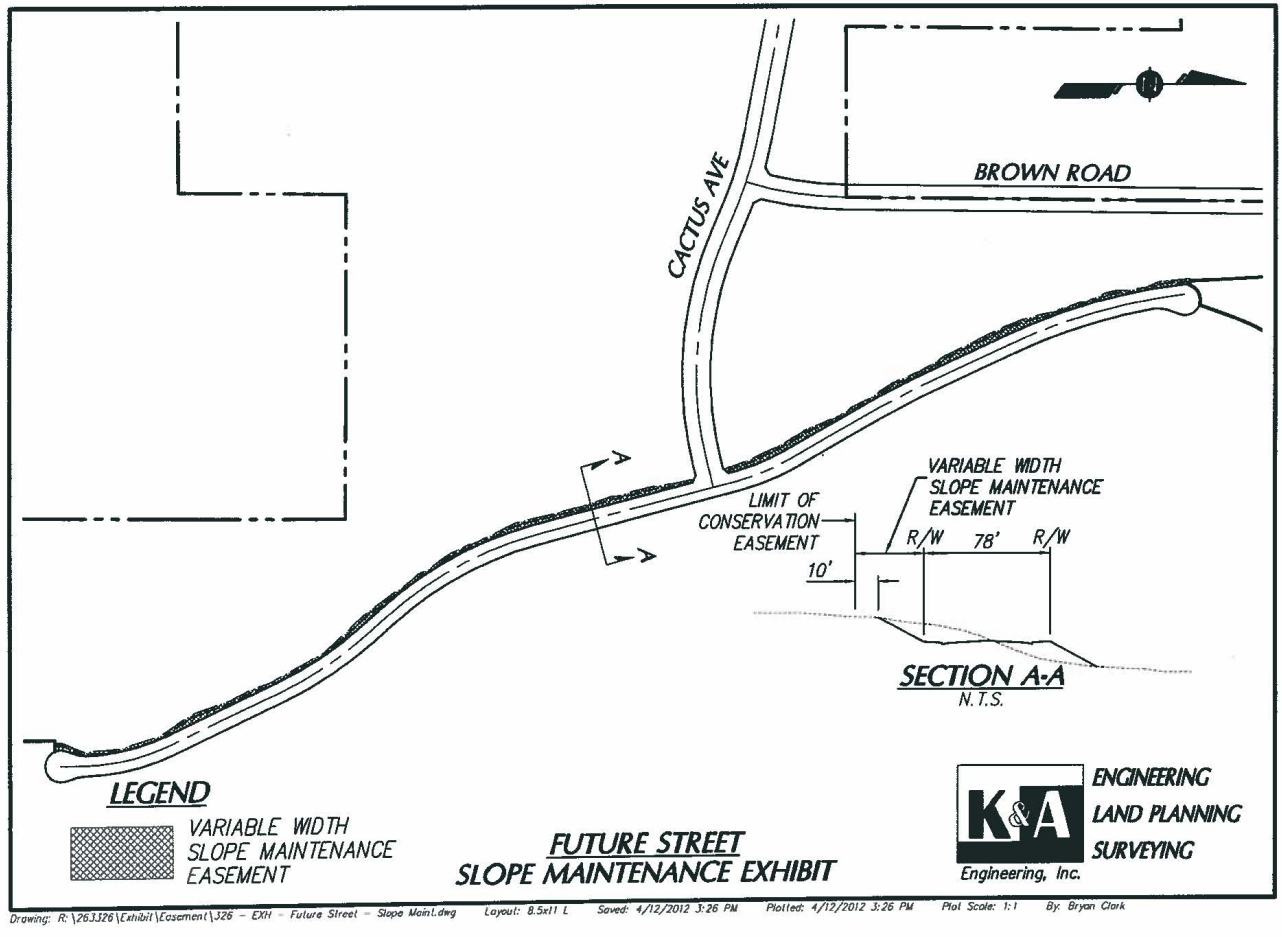
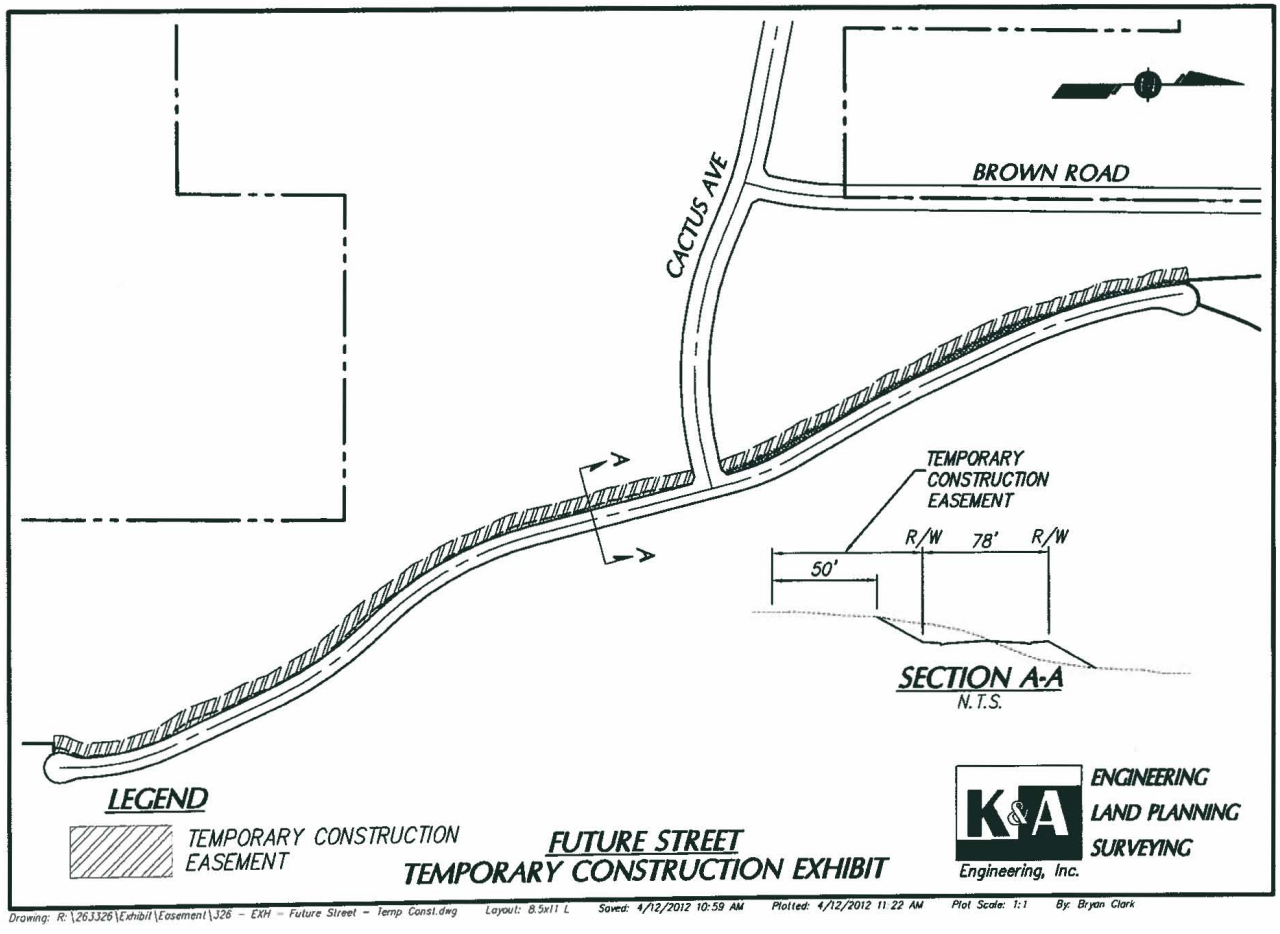

BROWN ROAD
CACTUS AVE
A
A
LIMIT OF CONSERVATION EASEMENT
10'
VARIABLE WIDTH SLOPE MAINTENANCE EASEMENT
R/W
78'
R/W
SECTION A-A
N.T.S.
LEGEND
VARIABLE WIDTH SLOPE MAINTENANCE EASEMENT
FUTURE STREET
SLOPE MAINTENANCE EXHIBIT
K&A
ENGINEERING
LAND PLANNING
SURVEYING
Engineering, Inc.
Drawing: R:\263326\Exhibit\Easement\326 - EXH - Future Street - Slope Maint.dwg Layout: 8.5x11 L Saved: 4/12/2012 3:26 PM Plotted: 4/12/2012 3:26 PM Plot Scale: 1:1 By: Bryan Clark

RO-7.6
Cont.



Case 3:09-cv-01864-JAH-DHB Document 109-1 Filed 09/11/12 PageID.1023 Page 23 of 28

RO-7.6
Cont.

EXHIBIT B

RO-7.6
Cont.

Exhibit B

(*Center for Biological Diversity, et al. v. Jim Bartel, et al.*,
S.D. Cal. No. 09-cv-1864-JAH-POR)

Mitigation Measures for Any Development in the Developable Area

- All exterior on-site light fixtures shall be fully shielded with no light emitted above the horizon.
- Exterior on-site lighting shall not exceed .5 candle/foot at the property line confirmed through point-by-point photometric study.
- All exterior lighting shall be low-pressure sodium or high-pressure sodium. Metal Halide is prohibited.
- Maximum on-site lighting wattage is 750.
- Maximum height of on-site exterior lighting is 25'.
- Preferential parking spaces shall be offered to car pools and van pools.
- Employers with 250 employees or more shall develop a trip reduction plan to increase vehicle occupancy.
- Buildings shall be designed to reduce energy usage by utilizing solar or low emissions water heaters, double paned glass windows, using light colored roofing materials, using skylights in warehouses, orienting buildings north to the extent practical, and increasing wall and attic insulation above Title 24 requirements.
- A construction relations officer should be appointed to act as a community liaison to oversee on-site construction activity and all emissions and congestion related matters.
- Restrict idling emission from trucks by using auxiliary power units and electrification at the industrial warehouse facilities.
- Landscape with appropriate drought-tolerant species to reduce water consumption.
- Project shall provide plentiful short- and long- term bicycle parking facilities to meet peak season maximum demand (e.g., one bike rack space per 20 vehicle/employee parking spaces).
- Project shall provide "end-of-trip" facilities including showers, lockers, and changing space (e.g., four clothes lockers and one shower provided for every 80 employee parking spaces, separate facilities for each gender for projects with 160 or more employee parking spaces).
- Project design shall include a designated bicycle route connecting all units, on-site bicycle parking facilities, offsite bicycle facilities, site entrances, and primary building entrances to

RO-7.6
Cont.

existing Class I or Class II bike lane(s) within one-half mile. Bicycle route connects to all streets contiguous with project site. Bicycle route has minimum conflicts with automobile parking and circulation facilities. All streets internal to the project wider than 75 feet have Class II bicycle lanes on both sides.

- The project shall provide a pedestrian access network that internally links all uses and connects to all existing/planned external streets and pedestrian facilities contiguous with the project site. Project design shall include a designated pedestrian route interconnecting all internal uses, site entrances, primary building entrances, public facilities, and adjacent uses to existing external pedestrian facilities and streets. Route has minimal conflict with parking and automobile circulation facilities. Streets within the project have sidewalks on both sides. All sidewalks are a minimum of five feet wide and feature vertical curbs. Pedestrian facilities and improvements such as grade separation, wider sidewalks, and traffic calming are implemented wherever feasible to minimize pedestrian barriers. All site entrances provide pedestrian access.

- Project shall provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.

- Project shall be oriented towards existing transit, bicycle, or pedestrian corridor. Setback distance between project and existing or planned adjacent uses shall be minimized. Setbacks between project buildings and planned or existing sidewalks shall be minimized. Buildings shall be oriented towards existing or planned street frontage. Primary entrances to buildings shall be located along planned or existing public street frontage. Project shall provide bicycle access to any planned bicycle corridor(s). Project shall provide pedestrian access to any planned pedestrian corridor(s).

RO-7.6 Cont.

- Employers with over 250 employees shall provide on-site food vending machines, fridge, microwave and mail facilities and use reasonable effort to provide an ATM, onsite computer, internet connection, and other service to reduce the need for employees to leave for services during business hours.

- Project site shall be on a vacant infill site, redevelopment area, or brownfield or greyfield lot that is highly accessible to regional destinations, through public transit.

- Project shall install Energy Star labeled roof materials.

- Project shall use CARB-certified diesel construction equipment.

- Project sponsor shall encourage the recycling/reuse of demolished construction material.

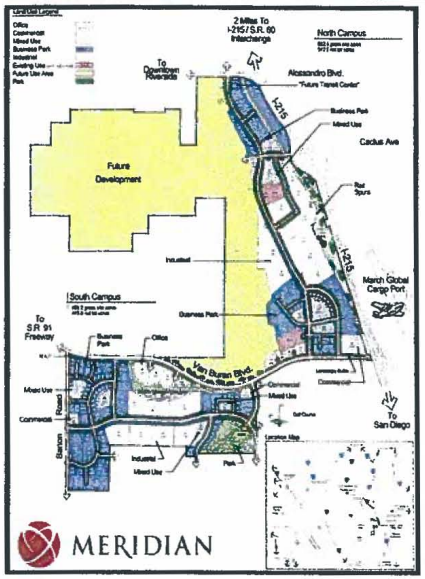
- Provide parking lot areas will include 40% tree coverage (approximately 1 tree for every 14 stalls) for office uses and 30% tree coverage (approximately 1 tree for every 20 stalls) for industrial or business park uses within 10 to 15 years of construction. Project will use trees that mature over a longer time frame with lower low water demand. Shade requirements will exclude truck courts and drive isles.

- Provide one preferential parking space for EVs/CNG vehicles for single user parking lots and shared retail parking per hundred required spaces not to exceed 4 preferential parking spaces per development. 1 charging facility will be provided for every 2 EV stalls.
- Provide energy efficient appliances (e.g., Energy Star) and energy-reducing programmable thermostats that automatically adjust temperature settings.
- Provide low flow and waterless fixtures for restroom facilities.
- All lots within the Meridian development adjacent to the Conservation Easement Areas shall be landscaped with native and non-invasive plant materials to protect biological resources, such as habitat supporting LBV.
- The proposed non-potable water system will meet "Purple" pipe standards for reclaimed water systems.
- The LEED checklist shall be provided for evaluation prior to approval of the design plans and also prior to approval of the construction plans verifying that a minimum score consistent with LEED certification is achieved. Submittal of the LEED checklist shall be from a registered architect or LEED accredited professional (AP).

RO-7.6 Cont.

MERIDIAN

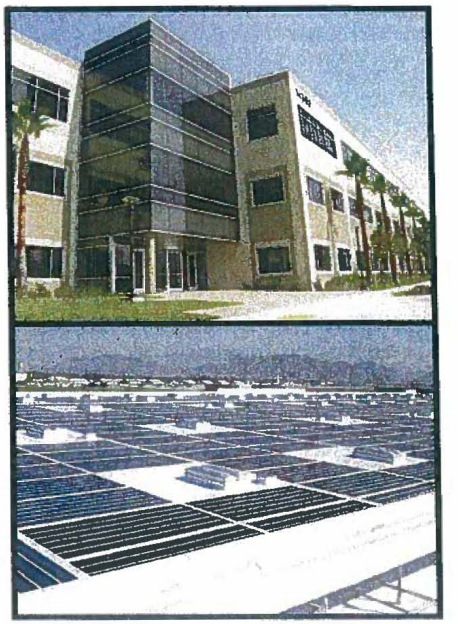
The Green Alternative



- Meridian is a 1,290–acre mixed-use development with projected employment of approximately 15,000 jobs.
- The Meridian Design Guidelines were awarded the 2008 Association of Defense Communities (ADC) Most Innovative Community Project.
- Meridian includes over 14 miles of bike lanes, 18 miles of sidewalks, and bus pullouts to encourage the use of alternate transportation.
- Meridian is home to the future Moreno Valley/March Field Metrolink Station, with approximately 350,000 square feet of office development currently surrounding the Metrolink site.
- All employment uses include bike racks, preferential parking for car pools, solar or low emission water heaters, and high efficency high-pressure sodium exterior lighting.
- Reclaimed water purple pipe is plumbed for all landscaped areas in the 1,290-acre Meridian development.

RO-7.6 Cont.

- MJPA enforces the WRCOG Good Neighbor Guidelines for the siting of warehouse and distribution uses near residential communities.
- All Meridian developments are required to provide an on-site recycling area and designated truck routes.
- The 3-story Intellicenter development is a LEED Gold certified office building adjacent to the future Metrolink station.
- The Fresh and Easy food production and warehouse facility operates a 2 Megawatt photo-voltaic solar roof system producing approximately 25% of their energy demand.
- Fresh and Easy utilizes electric hybrid trailer refrigeration units which minimizes the use of energy and diesel fuel at their facility.
- In lieu of hauling materials to local landfills, LNR recycled 70,000 tons of concrete and asphalt, as well as slabs from former military structures for street base course in Meridian. They mulched and recycled trees, shrubs and vegetation for reuse; and transplanted and re-used many of the palm trees.



SB 994

February 14, 2024

RO-7.7

Background

- March JPA (JPA) Created by Cities of Moreno Valley, Perris, Riverside and the County of Riverside in 1993
  - Regional approach in planning the reuse of property and surplus facilities
  - Land use authority beginning 1997
  - Numerous legislative actions and agreements approved by the JPA Commission since 1997.

- 14th Amendment executed April 18, 2023
  - Land use authority under County of Riverside jurisdiction as of July 1, 2025

RO-7.7
Cont.

Disposition and Development Agreements

- **Disposition and Development Agreements**
  - West March DDA
    - West March DDA between March JPA and LNR Riverside, LLC - December 27, 2001
    - First Amendment (Regarding D-3 West Property) - May 1, 2006
    - Assignment and Assumptions from March JPA Redevelopment to March JPA - March 2, 2011
    - Memorandum of Assignment of West March DDA - March 2, 2011
    - Assignment from LNR Riverside, LLC to Meridian Park, LLC. (Two Recorded Documents) - August 7, 2015
    - Second Amendment to West March DDA - October 26, 2022
    - Memorandum of Second Amendment to West March DDA - December 6, 2022
    - Partial Assignment of Disposition and Development Agreement - April 6, 2023
  - March LifeCare Campus DDA
    - DDA between March JPA Redevelopment Agency and March HealthCare Development, LLC - April 7, 2010
    - Assignment and Assumption from March JPA Redevelopment Agency, March JPA and March HealthCare LLC - March 2, 2011
    - First Amendment to Agency Note modifying purchase price and closing dates - March 7, 2012
    - Partial Assignment and Assumption and Amendment of DDA - August 4, 2018
    - Second Amendment, modifying the Schedule of Performance - September 29, 2018
    - 3rd Amendment, granting extension for development - January 25, 2022
    - Fourth Amendment, granting an extension for development - May 2, 2023

RO-7.7 Cont.

Statutory, Settlement Agreements, and Other Actions

- **Statutory Development Agreement**
  - LNR (Meridian)
    - March JPA and LNR Riverside, LLC - June 18, 2004
    - Assignment of Agreement for Lots K-4, 1A, U1-8 and Meridian South Campus between LNR Riverside, LLC and Meridian Park, LLC - August 7, 2015
    - Extension of the DA for two additional 5-year terms - June 30, 2016
- **Settlement Agreements**
  - Settlement and General Release Agreement for Development of March Business Center within the March Joint Powers Authority - September 22, 2003
  - Settlement Agreement (Center for Biological Diversity, et al v Bartel, et al.) - September 12, 2012
- **Special Tax Districts**
  - Meridian LLMD #1
  - CFD 2010-1
- **Ordinances and Resolutions**
  - Approximately 80 ordinances and 640 resolutions
  - Ordinance examples: Truck Route, Landscape Ordinance Amendment.
  - Resolution examples: Approval of CFD rates and levy and assessments for LLMD #1

RO-7.7
Cont.

Why the Need for Legislation

- To provide clarity and alleviate ambiguity and ensure continuity of services through existing land use approvals, landscape maintenance districts, community facilities districts, and other laws (ordinances and resolutions).
- To transfer zoning and planning regulations.
- No alternative procedures outlined in law
  - Generally, orderly transfer of boundaries occurs through LAFCO.
  - JPAs not regulated by LAFCO
  - Similar to a city disincorporation, which occurs through a LAFCO process or can be done through legislation.
- Implementation Strategy
  - Level of complexity of legislative actions over nearly three decades. Over 20 years for some of the agreements.

RO-7.7
Cont.

Proposed Legislation SB 994

- Streamlines transfer of land use authority to County of Riverside
  - Transfer contractual rights and obligations
    - Developer agreements, settlement agreements
  - Ensures land use laws stay in effect until the County updates zoning and planning regulations in the future.
- Ensures continued maintenance of public infrastructure
  - LLMD
  - CFD
- All regulatory ordinances and resolutions will remain in place until the County updates these through an appropriate process.
  - Approximately 80 Ordinances (including original and updates)
  - Approximately 640 Resolutions

RO-7.7
Cont.

Meridian West Campus – Upper Plateau

UPDATE

This update was requested by RNOW residents: **Item 9.3 of the March 22, 2023, March Joint Powers Commission** is related to the Disposition and Development Agreement for the West March Planning Area. This is an item that was continued from the February 8th, 2023, March Joint Powers Commission meeting. Thank you.

RO-7.8

For more information please contact the development group at:

Adam Collier
Vice President – Planned Communities
Lewis Management Corp.
1156 N. Mountain Avenue
Upland, CA 91786
Adam.Collier@lewismc.com
(909) 946-7593Direct/Fax

Recirculated Draft EIRs (Extended to February 26, 2024)
Letter regarding Appendices pages 3084-3733
Appendix J-2
Recirculated Draft EIR
Recirculated Technical Appendices

News & Updates
Community Meeting Notice for February 9th hosted by Meridian Park West, LLC.
Draft EIR (Environmental Impact Report) – (Click HERE)
Notice of Availability – (Click HERE)

Technical Appendices A through S
Appendix A. IS-NOP Scoping
Appendix B. Aesthetics
Appendix C-1. AQ Report
Appendix C-2. HRA Report
Appendix D. BRTR
Appendix E-1 Cultural Resources (Confidential Site Records Removed)
Appendix E-2. Cultural Resources
Appendix F. Energy Assessment

RO-7.8 Cont.

Appendix J-4. Wildlife Hazard Review
Appendix K-1. Prelim Hydro Report
Appendix K-2. WQMP
Appendix K-3. WQMP Building B
Appendix K-4. WQMP Building C
Appendix K-5. Hydro Building B
Appendix K-6. Hydro Building C
Appendix L. ALUC Consistency
Appendix M. Noise Study
Appendix N. Transportation
Appendix O. WSA
Appendix P-1. Sewer Study Report
Appendix P-2. Riverside Facilities Master Plan
Appendix Q. Fire Protection Plan
Appendix R. Alternatives Calculations
Appendix S. Settlement Agreement

RO-7.8 Cont.

Documents
Community Meeting Notice for February 9th hosted by Meridian Park West, LLC.
West Campus Upper Plateau Specific Plan 5th Screencheck Clean (01-10-2023)
Revised West Campus Upper Plateau Specific Plan 6th Screencheck (07-31-2023)
TPM 20750
Plot Plan Building B
Plot Plan Building C

August 18, 2022 Presentation

Comment Form

Submit your comments or questions below. Thank you.

Name

Email

RO-7.8 Cont.

RO-7.8
Cont.

I'm not a robot
reCAPTCHA
Privacy - Terms

Submit

14205 Meridian Parkway, Ste. 140
Riverside, CA 92518

951.656.7000
info@MarchJPA.com

Hours of Operation
Mon: 7:30am – 5:00pm
Tue: 7:30am – 5:00pm
Wed: 7:30am – 5:00pm
Thu: 7:30am – 5:00pm
Fri: Closed

RO-7.8
Cont.

REVISED/EXTENDED NOTICE OF AVAILABILITY FOR A RECIRCULATED DRAFT EIR

March Joint Powers Authority has revised the Notice of Availability and has extended the public review period for the West Campus Upper Plateau Recirculated Draft Environmental Impact Report (SCH#2021110304) to February 26, 2024

March Joint Powers Authority (March JPA) is the Lead Agency for a project known as the West Campus Upper Plateau, located on 445.43 acres at the extended alignments of Cactus Avenue and Barton Street, within Riverside County in the March JPA planning jurisdiction. Following the release of the Recirculated Draft EIR, it was discovered that the text on pages 3084 – 3733 of the appendices are blank. These blank pages consist of the majority of the Phase 2 Environmental Assessment Report, included as Appendix J-2 of the Recirculated Draft EIR. While Appendix J-2 of the Recirculated Draft EIR is identical to Appendix J-2 of the originally-circulated Draft EIR and is publicly available on the March JPA website, this appendix is being uploaded separately to both the March JPA website and the State Clearinghouse ceqanet site, and the public comment period for the Recirculated Draft EIR has been extended to February 26, 2024, to allow the public meaningful opportunity to review and comment on Appendix J-2 irrespective of the fact that no changes or additions to Appendix J-2 were made in the Recirculated Draft EIR.

Project Title:	**West Campus Upper Plateau SCH# 2021110304**
Project Location – Specific; Identify street address and cross streets or attach a map showing project site (preferably a USGS 15' or 7 1/2' topographical map identified by quadrangle name):	Located at the extended alignments of Cactus Avenue and Barton Street, identified in the attached USGS map.
Project Location – Agency:	March Joint Powers Authority
Project Location – County:	Riverside

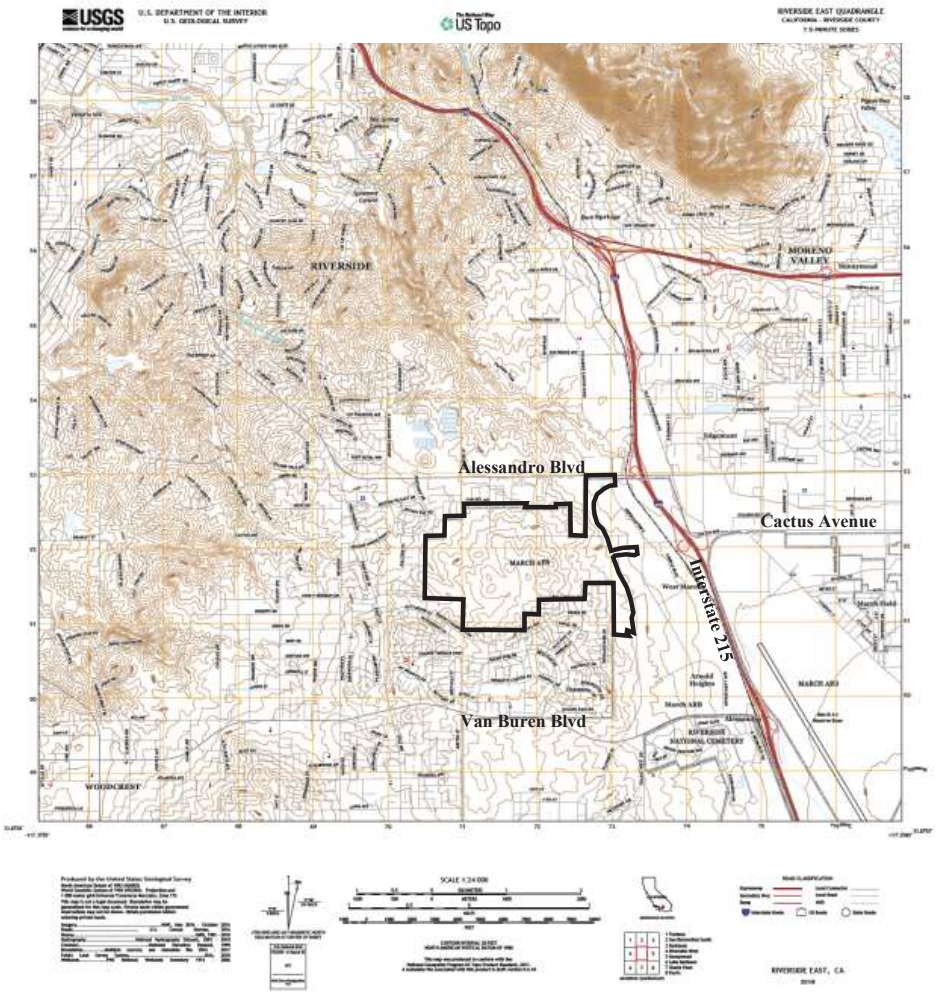
Description of Nature, Purpose, and Beneficiaries of Project:

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

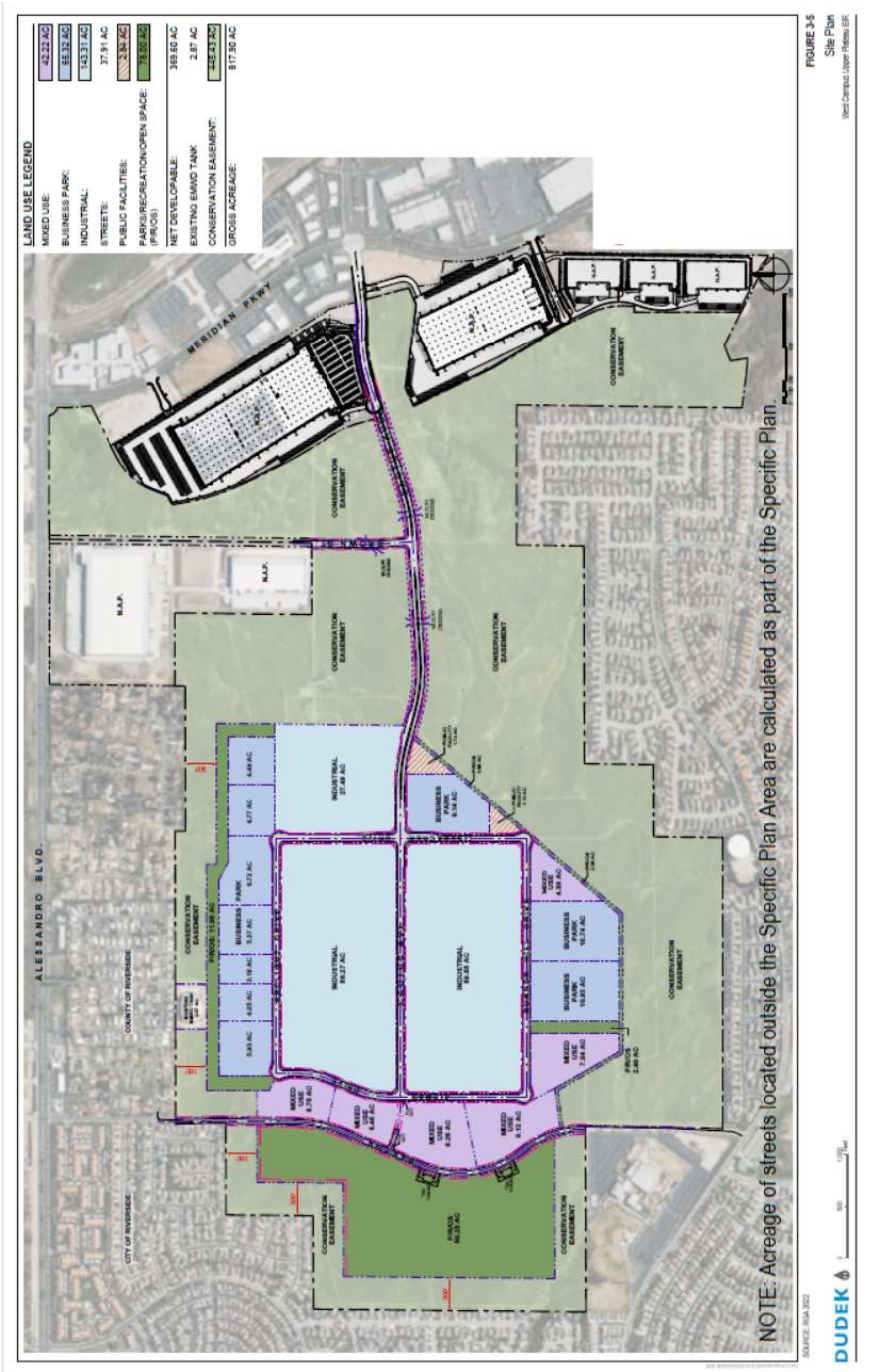
Project Site – Specify if project site is included on any list of hazardous waste facilities:	The Department of Toxic Substances Control's EnviroStor database and SWRCB's GeoTracker database identify the Project site is not located on a site with known contamination (SWRCB 2021) or hazardous materials site (DTSC 2021).
Place and time of scheduled meetings:	To Be Determined
Lead Agency:	March Joint Powers Authority
Division	Planning Department
Date when project noticed to public:	December 2, 2023

RO-7.9

Address where copy of the recirculated EIR Sections (2.0 Introduction, 3.0 Project Description, 4.2 Air Quality, 4.8 Hazards and Hazardous Materials, and 4.10 Land Use and Planning pursuant to Section 15088.5(c)) is available and how it can be obtained in an electronic format: March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside CA, 92518 https://marchjpa.com/mjpa-meridian-west-campus/	
Review Period:	**(Extended) December 2, 2023 through February 26, 2024**
Contact Person:	Dan Fairbanks, Planning Director: fairbanks@marchjpa.com
Contact Person's Telephone (Area Code/Extension:	(951) 656-7000



RO-7.9 Cont.


LAND USE LEGEND
MIXED USE: 42.22 AC
BUSINESS PARK: 65.32 AC
INDUSTRIAL: 143.31 AC
STREETS: 37.91 AC
PUBLIC FACILITIES: 2.84 AC
PARKS/RECREATION/OPEN SPACE (PR/OS): 78.00 AC
NET DEVELOPABLE: 369.60 AC
EXISTING EMWD TANK: 2.87 AC
CONSERVATION EASEMENT: 445.43 AC
GROSS ACREAGE: 817.90 AC
MERIDIAN PKWY
ALESSANDRO BLVD.
CONSERVATION EASEMENT
N.A.P.
INDUSTRIAL
BUSINESS PARK
MIXED USE
PR/OS
CITY OF RIVERSIDE
COUNTY OF RIVERSIDE
NOTE: Acreage of streets located outside the Specific Plan Area are calculated as part of the Specific Plan.
DUDEK
FIGURE 3-5
Site Plan
West Campus Upper Plateau EIR

RO-7.9
Cont.

RO-7

Center for Biological Diversity
February 26, 2024

RO-7.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-7.2 This comment is introductory and refers to the CBD Settlement Agreement and Senate Bill (SB) 994. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-7.3 This comment states that CBD wants to ensure that the 2012 CBD Settlement Agreement remains in effect, regardless of whether March JPA transfers authority of the Project site and/or the CBD Settlement Agreement to the County. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-7.4 This comment provides a brief overview of SB 994 (proposed legislation introduced in the California Legislature on January 31, 2024 regarding the return of land use authority from the March JPA to the County of Riverside and the continued maintenance of public infrastructure) and discusses the 2012 CBD Settlement Agreement with March JPA. SB 994, as amended on March 19, 2024, is limited to clarifying the process by which March JPA can transfer jurisdiction over any landscaping and lighting maintenance districts (LLMD) and community facilities districts (CFD) to the County of Riverside. This may include a LLMD or CFD applicable to the Project. Regarding enforcement of the CBD Settlement agreement, please see Topical Response 9 – Long Term Implementation and Enforcement. The comment states that the Project appears to conform with the major provisions of the CBD Settlement Agreement. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-7.5 This comment suggests that the proposed legislation SB 994 could affect the administration of the CBD Settlement Agreement, and the comment states that CBD wants to ensure that the CBD Settlement Agreement remains in place regardless of whether it is administered by the March JPA or the County of Riverside. SB 994, as amended on March 19, 2024, is limited to clarifying the process by which March JPA can transfer jurisdiction over any landscaping and lighting maintenance districts (LLMD) and community facilities districts (CFD) to the County of Riverside. This may include a LLMD or CFD applicable to the Project. Regarding enforcement of the CBD Settlement agreement, please see Topical Response 9 – Long Term Implementation and Enforcement. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-7.6 This comment is an attachment to Letter RO-7 and is a copy of the 2012 CBD Settlement Agreement in its entirety. A copy of the CBD Settlement Agreement is included in the EIR as Appendix S-1. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-7.7 This comment is an attachment to Letter RO-7 and is a copy of County of Riverside presentation slides dated February 14, 2024, regarding the proposed legislation SB 994. SB 994, as amended on March 19, 2024, is limited to clarifying the process by which March JPA can transfer jurisdiction over any landscaping

and lighting maintenance districts (LLMD) and community facilities districts (CFD) to the County of Riverside. This may include a LLMD or CFD applicable to the Project. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-7.8 This comment is an attachment to Letter RO-7 and is a print-out of the March JPA website where the Recirculated Draft EIR and other Project documents are posted and available for public review. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-7.9 This comment is an attachment to Letter RO-7 and is the Revised/Extended Notice of Availability for a Recirculated Draft EIR for the West Campus Upper Plateau Recirculated Draft EIR. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

From: Ciara Thrower <ciara@envirovoters.org>
Sent: Monday, February 26, 2024 3:28 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau Opposition Letter
Attachments: West Campus Upper Plateau Opposition Letter.docx

Hello,

Attached is my organization's Opposition Letter to the West Campus Plateau Project. RO-8.1

Please reach out if you have any questions.

Thank you,

Ciara Thrower (she/her)
Inland Empire Regional Organizer
California Environmental Voters

E ciara@envirovoters.org | **W** www.envirovoters.org
M 909.827.8790

We are now EnviroVoters, formerly CLCV.
Learn about the name change.

CALIFORNIA ENVIRONMENTAL VOTERS

February 26, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

On behalf of California Environmental Voters, I am writing to submit comments on the recirculated draft Environmental Impact Report (REIR) for the proposed West Campus Upper Plateau. I serve as the Inland Empire Regional Organizer for EnviroVoters and have been organizing young people in the region to support climate action.

The West Campus Upper Plateau (the "Project") would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside.

RO-8.2

After reviewing the REIR, it continues to be clear that the March Joint Powers Authority (JPA) is scrambling to push through an unpopular project before it sunsets July 1, 2025. Changes to the project itself from the original EIR are negligible if not even more upsetting to the residents and communities surrounding the March JPA territory. Specifically, the following areas of the recirculated draft EIR appear to be unstable, dismissive, and predatory in nature.

RO-8.3

1. The yet-to-be adopted draft Environmental Justice (EJ) element is included extensively throughout the EIR, and the existing specific plan is assumed a priority to fit its objectives. Your process of adopting an EJ element and the REIR simultaneously and stating that one fulfills the

RO-8.4

other undermines the credibility of the community's ability to meaningfully impact either of them. The EJ should follow proper CEQA noticing and environmental review.

2. I, along with many community members, implore you to follow the CEQA process while adopting your EJ element. We also ask that you put a warehouse moratorium in place until the EJ element process is complete.
3. Page 3-24 of the REIR refers to community benefits, including a park. Simply put, this park is a work of fiction. The Developer has made clear they will only fund a "park feasibility study" and that neither they nor the County will be funding a park. The soonest the community might expect a park is in the year 2042 when the City of Riverside can annex this land. In other words, there is no park; and therefore, no community benefit.
4. Page 3-24 of the recirculated EIR also mentions the need for the JPA and applicant to agree to a 15-year development agreement with two potential five-year options. Not only do we object to you giving this unresponsive developer another 25-year license to build more warehouses surrounding March ARB, the federal government objects to such contracting practices. Federal Acquisition Regulations (FAR) Subpart 6.1 and 6.3 clearly identify how agencies are to grant contracts. This applicant does not offer the JPA best practices, lowest price, best value, or is the only source of a product or service that are required to offer a non-competitive contract like the proposed 15-year Development Agreement. This is especially disturbing and irresponsible considering the JPA will sunset July 1, 2025 yet will have agreed to a 15–25-year contract with a profit-driven business.
5. The lack of non-industrial alternative plans in the REIR is dismissive of clear and overwhelming public opposition to this project. For two years, residents have tried to understand why the JPA and applicant have been unwilling to discuss and plan for non-industrial land uses for the Upper Plateau, and the answer we keep returning to is greed. Without public notice, the JPA and applicant pushed through an agreement to transmit the land based on the construction of four large warehouses on October 26, 2022. This demonstrates a predetermined use for this land despite your continued insistence that the JPA and applicant have engaged with the public throughout this process. Your actions prioritize the pocketbooks of the applicant and the JPA member agencies instead of job growth and community development as you advertise on your website and within your public presentations.

By signing my name to this letter, I respectfully request that the elected representatives of the JPA commission and the JPA staff be accountable to the community surrounding the West Campus Upper Plateau. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document, not to amend it 18 months before sunsetting to push through one last warehouse project. You also have a duty to work with local communities to develop this land with the people and municipalities that make up the Joint Powers Commission.

The REIR for the West Campus Upper Plateau project is deficient and unstable and should be reconsidered. Reasonable alternative land uses must be developed consistent with the County

RO-8.4 Cont.

RO-8.5

RO-8.6

RO-8.7

RO-8.8

RO-8.9

and City of Riverside's overall land use planning and Good Neighbor Guidelines. Please don't allow this predatory project to be your lasting legacy. I await your detailed response.

RO-8.9
Cont.

Sincerely,

Ciara Thrower
Inland Empire Regional Organizer, California Environmental Voters

RO-8

California Environmental Voters
February 26, 2024

RO-8.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-8.2 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-8.3 This comment expresses concern that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RO-8.4 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, requests a CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RO-8.5 This comment questions the funding of the Park, citing the text on page 3-24 of Recirculated Chapter 3, Project Description. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with off-site utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete.

RO-8.6 This comment objects to the Development Agreement and references federal acquisition regulations. March JPA and the proposed Development Agreement are not subject to the referenced federal acquisition regulations. California Planning and Zoning Law and specifically, Government Code section 65864 et seq. governs the authority and contents of development agreements such as that proposed here. As explained in Topical Response 9, Long-Term Project Implementation and Enforcement, the County of Riverside will be implementing and enforcing the proposed Development Agreement after July 1, 2025.

RO-8.7 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. The comment also raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. With regard to the October 26, 2022, agreement referenced in the comment, please see Topical Response 10, Development and Disposition Agreement.

RO-8.8 This comment states that March JPA and the applicant have a duty to adhere to the March ARB General Plan and engage the local communities and municipalities. It should be noted that the March Air Reserve Base does not have an adopted General Plan. The Project's consistency with the March JPA General Plan goals and policies is included in Recirculated Section 4.10, Land Use and Planning. March JPA and the applicant conducted multiple public outreach efforts regarding the Project including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation. Using a radius of 1,200 feet around the perimeter of the Project site, March JPA distributed 2,172 public notices. March JPA engaged with local jurisdictions and service providers (see,

e.g., the traffic scoping agreement in Appendix N-2). With regard to the timing and development of the Draft Environmental Justice Element, please see Response RO-8.4, above. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-8.9 This comment states that the Recirculated EIR is deficient and unstable. As discussed in Response RO-8.3, above, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections. The comment also requests alternative land uses consistent with the County of Riverside's and City of Riverside's Good Neighbor Guidelines. As discussed in Recirculated Section 4.10, Land Use and Planning, and Topical Response 4, Project Consistency, the Project is consistent with the Good Neighbor Guidelines of the County of Riverside and City of Riverside. Regarding alternative land uses, please see Topical Response 8, Alternatives, for an analysis of Alternative 5 – Non-Industrial Alternative.

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From: Mission Grove Neighborhood Association <missiongrovena@gmail.com>
Sent: Monday, February 26, 2024 10:57 PM
To: Dan Fairbanks
Subject: Comments on Recirculated Draft EIR for West Campus Upper Plateau Project
Attachments: REIR Community Letter.pdf

RE: Public comment on the record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

RO-9.1

Steering Committee

Mission Grove Neighborhood Association
missiongrovena@gmail.com
https://www.missiongrovena.org/
951-394-2526

Mission Grove Neighborhood Association

February 26, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

We are writing to submit comments on the recirculated draft Environmental Impact Report (REIR) for the proposed West Campus Upper Plateau Project on behalf of the Mission Grove Neighborhood Association.

RO-9.2

Concerns Regarding the REIR:

While reviewing the REIR, we identified several areas that warrant further consideration and clarification:

Environmental Justice (EJ) Element: The incorporation of the draft EJ element within the REIR raises concerns about its potential impact on community input. We recommend that the EJ element follow a separate CEQA noticing and environmental review process to ensure a transparent and independent evaluation. This would allow for meaningful community engagement and contribute to a more comprehensive understanding of potential environmental justice impacts.

RO-9.3

Community Benefits: The proposed park referenced in the REIR as a community benefit appears uncertain. The lack of commitment from both the developer and the county regarding funding and timeframe for the park's creation raises questions about its actual viability. We urge a clear and transparent approach to outlining this project's development and funding plan.

RO-9.4

Development Agreement: The proposed 15-year development agreement with the potential for five-year extensions raises concerns regarding adherence to best practices. Federal Acquisition Regulations specify procedures for awarding contracts that prioritize factors like best value, lowest price, and non-competitiveness. We request further justification for the proposed agreement length and its compliance with these regulations, particularly considering the JPA's upcoming sunset in July 2025.

RO-9.5

Alternative Land Uses: The REIR lacks a comprehensive exploration of potential non-industrial land uses for the Upper Plateau. We urge the inclusion of diverse alternatives that address the concerns raised by the community and align with the long-term vision established in the March ARB General Plan. R0-9.6

Recommendations:

Conduct a separate CEQA process for the draft EJ element.

Clarify the development and funding plan for the proposed community park.

Ensure the proposed development agreement adheres to best contracting practices and considers the JPA's sunset date.

Include alternative land uses in the REIR that align with the community's concerns and the March ARB General Plan. R0-9.7

Conclusion:

We believe that the current REIR for the West Campus Upper Plateau project requires further consideration and revision to address the aforementioned concerns. We urge a comprehensive and transparent approach to land development that prioritizes the surrounding community's well-being and aligns with established planning guidelines.

Thank you for your time and consideration. We look forward to your detailed response and a collaborative approach to addressing the future of the West Campus Upper Plateau. R0-9.8

Sincerely,

Steering Committee
Mission Grove Neighborhood Association
missiongrovena@gmail.com
https://www.missiongrovena.org/
951-394-2526

RO-9

Mission Grove Neighborhood Association
February 26, 2024

RO-9.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-9.2 This comment is introductory in nature. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RO-9.3 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element and requests a CEQA process for the Environmental Justice Element. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

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completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The LLMD will be responsible for the maintenance of the Park once complete.

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RO-9.6 The comment requests diverse alternatives including a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. The comment refers to the March ARB General Plan; however, it should be noted that the March Air Reserve Base does not have an adopted General Plan. The Project's consistency with the March JPA General Plan goals and policies is included in Recirculated Section 4.10, Land Use and Planning.

RO-9.7 This comment lists out four recommendations based on the comments provided in RO-9.3 through RO-9.6. Please see Responses RO-9.3 through RO-9.6 above.

RO-9.8 This comment states that the Recirculated Draft EIR and Project require further consideration; however, the comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

10.3 Recirculated Individual Responses to Comments

Comment Letter	Name	Date Received
Individuals		
RI-1	Mike McCarthy	12/01/23
RI-2	Jerry Shearer	12/03/23
RI-3	Mike McCarthy	12/03/23
RI-4	Jen Larratt Smith	12/11/23
RI-5	Laren Tan	12/14/23
RI-6	Mike McCarthy	12/23/23
RI-7	Aaron Bushong	01/05/24
RI-8	Alissa Chitwood	01/05/24
RI-9	Ana Ramirez	01/05/24
RI-10	Beverly Arias	01/05/24
RI-11	Blanca Rivera	01/05/24
RI-12	Bobby Robinette	01/05/24
RI-13	Carolina Rodriguez	01/05/24
RI-14	Claire Grimes	01/05/24
RI-15	Eunhee Kim	01/05/24
RI-16	Fera Momtaz	01/05/24
RI-17	Ira and Rajean Long	01/05/24
RI-18	Janice Oien	01/05/24
RI-19	Jason Gonsman	01/05/24
RI-20	Jean Aklufi	01/05/24
RI-21	Joe Aklufi	01/05/24
RI-22	John Lyell	01/05/24
RI-23	John Viafora	01/05/24
RI-24	John W. Hagmann	01/05/24
RI-25	Josie Sosa	01/05/24
RI-26	Kristy Doty	01/05/24
RI-27	Lenora Mitchell	01/05/24
RI-28	Linda Rivera	01/05/24
RI-29	Linda Tingley Rivera	01/05/24
RI-30	Luis Rodriguez	01/05/24
RI-31	Maria Rodriguez	01/05/24
RI-32	Mark Calhoun	01/05/24
RI-33	Mark Lien	01/05/24
RI-34	Mary Peters	01/05/24
RI-35	Matt Silveous	01/05/24
RI-36	Melissa Suarez	01/05/24
RI-37	Michael and Margie Bayarsky	01/05/24
RI-38	Michael and Sandra Cook	01/05/24
RI-39	Mike Cachat	01/05/24
RI-40	Mike Cachat	01/05/24
RI-41	Peter Pettis	01/05/24
RI-42	Randall Lindegard	01/05/24

Comment Letter	Name	Date Received
Individuals		
RI-43	Raymond Or	01/05/24
RI-44	Ronald Peters	01/05/24
RI-45	Shaan Saigol	01/05/24
RI-46	Shirley Ng	01/05/24
RI-47	Steve Balmer	01/05/24
RI-48	Steven Haas	01/05/24
RI-49	Steven McElroy	01/05/24
RI-50	Suzanne Page	01/05/24
RI-51	The Balmer Family	01/05/24
RI-52	Tia Ballesteros	01/05/24
RI-53	Veronica Juarez	01/05/24
RI-54	William Landa	01/05/24
RI-55	Abdallah Karim	01/06/24
RI-56	Christine Martin	01/06/24
RI-57	David Doty	01/06/24
RI-58	Estevan K Gonzalez	01/06/24
RI-59	Frank and Michelle Erdodi	01/06/24
RI-60	Lisa Alfred	01/06/24
RI-61	Molly Brooke Becker	01/06/24
RI-62	Nancy Ward	01/06/24
RI-63	Amber Peaslee	01/07/24
RI-64	Erin Conlisk	01/07/24
RI-65	Jenna Pontious	01/07/24
RI-66	Lindsay Barnes	01/07/24
RI-67	Mary Viafora	01/07/24
RI-68	Milo Rivera	01/07/24
RI-69	Patty Huddleston	01/07/24
RI-70	Richard Stalder	01/07/24
RI-71	Anthony Reyes	01/08/24
RI-72	Brian Barnes	01/08/24
RI-73	Brian Wardle	01/08/24
RI-74	Cindy Chiek	01/08/24
RI-75	David Quirarte	01/08/24
RI-76	Elizabeth Iribe	01/08/24
RI-77	Erin Lehman	01/08/24
RI-78	Esmeralda Montes	01/08/24
RI-79	Faith j. Mata	01/08/24
RI-80	Michele Bello Muehls	01/08/24
RI-81	Nicolette Rohr	01/08/24
RI-82	Ryan Pezer	01/08/24
RI-83	Senanu Spring-Pearson	01/08/24
RI-84	Rattana Chiek	01/09/24
RI-85	David Drexler	01/09/24
RI-86	Laila Derak	01/09/24
RI-87	Scott McLean	01/09/24

Comment Letter	Name	Date Received
Individuals		
RI-88	Tuesday Ramunni	01/09/24
RI-89	Allison Shelton	01/10/24
RI-90	Annabelle Porter	01/10/24
RI-91	Gabriella Zlaket	01/10/24
RI-92	George Robledo	01/10/24
RI-93	James Mysliwiec	01/10/24
RI-94	Jeanette Sharpe	01/10/24
RI-95	Kelly Wrightstone	01/10/24
RI-96	Patricia Welbourne	01/10/24
RI-97	Steve Domingues	01/10/24
RI-98	Tim and Arianna Thornton	01/10/24
RI-99	Carlos Llinguin	01/11/24
RI-100	Elias Valencia	01/11/24
RI-101	Gregory Russell	01/11/24
RI-102	John McCalley	01/11/24
RI-103	Michael Hampton	01/11/24
RI-104	Michael Kaudze	01/11/24
RI-105	Suzanne Pearson	01/11/24
RI-106	Tim Martin	01/11/24
RI-107	Everardo Carvajal	01/12/24
RI-108	Ajay Shah	01/12/24
RI-109	Craig Atchison	01/12/24
RI-110	Craig Atchison	01/12/24
RI-111	Dwight Woodward	01/12/24
RI-112	Fernando Jose	01/12/24
RI-113	Generation MTB	01/12/24
RI-114	Juan Zarate	01/12/24
RI-115	Riley Angels	01/12/24
RI-116	Tonya Huff	01/12/24
RI-117	George Robledo	01/13/24
RI-118	Alejandra Joseph	01/13/24
RI-119	Ben Guillen	01/13/24
RI-120	Bobby Vacco	01/13/24
RI-121	John Ramirez	01/13/24
RI-122	Mario Salgado	01/13/24
RI-123	Milton Solorzano	01/13/24
RI-124	Nick Ryan	01/13/24
RI-125	Aaron Bernstein	01/14/24
RI-126	Aaron Peterson	01/14/24
RI-127	Alex Allred	01/14/24
RI-128	Angel Roldan	01/14/24
RI-129	Anthony Jones	01/14/24
RI-130	Christopher Manivong	01/14/24
RI-131	Dane McCants	01/14/24
RI-132	DeAmadja Dennis	01/14/24

Comment Letter	Name	Date Received
Individuals		
RI-133	Debora Trujillo	01/14/24
RI-134	Ethan Ortega	01/14/24
RI-135	Frank Ramirez	01/14/24
RI-136	Frank Ramirez	01/14/24
RI-137	Jake Zini	01/14/24
RI-138	Jaime Tatenco	01/14/24
RI-139	Janette Aragon	01/14/24
RI-140	Jose Pineda	01/14/24
RI-141	Keri Davis	01/14/24
RI-142	Kristen Lane	01/14/24
RI-143	Marc Duron	01/14/24
RI-144	Michael Burt	01/14/24
RI-145	Paul Pastor	01/14/24
RI-146	Richard Gate	01/14/24
RI-147	Robert Sanderson	01/14/24
RI-148	Victor Reyes	01/14/24
RI-149	Brendon Allen	01/15/24
RI-150	Chris Kasey	01/15/24
RI-151	Damon Monticello	01/15/24
RI-152	Daniel Cuevas	01/15/24
RI-153	Derrick Sartain	01/15/24
RI-154	Erik Ramirez	01/15/24
RI-155	Gared Lin	01/15/24
RI-156	George Fickett	01/15/24
RI-157	George Robledo	01/15/24
RI-158	Greg Renne	01/15/24
RI-159	Guillermo Trujillo	01/15/24
RI-160	Jacob Perez	01/15/24
RI-161	Joel Macias	01/15/24
RI-162	Justin Vergason	01/15/24
RI-163	Matthew Muzzy	01/15/24
RI-164	Mike Savicky	01/15/24
RI-165	Preston Jordan	01/15/24
RI-166	Sabrina Walsberg	01/15/24
RI-167	Sean Donovan	01/15/24
RI-168	Shiloh Sanders	01/15/24
RI-169	Sterling Martin	01/15/24
RI-170	Taylor Spinogatti	01/15/24
RI-171	Aaron Solis	01/16/24
RI-172	Al Serna	01/16/24
RI-173	Andrea Wood	01/16/24
RI-174	Blake Rossi	01/16/24
RI-175	Brian Backman	01/16/24
RI-176	CJ Figueroa	01/16/24
RI-177	Daniel Beveridge	01/16/24

Comment Letter	Name	Date Received
Individuals		
RI-178	Devon Hauser	01/16/24
RI-179	Eunhee Kim	01/16/24
RI-180	Fera S. Momtaz	01/16/24
RI-181	Gerald Tiangco	01/16/24
RI-182	Jason Crowell	01/16/24
RI-183	Juan Garcia	01/16/24
RI-184	Kelsey Dorfmeyer	01/16/24
RI-185	Kyle Cregg	01/16/24
RI-186	Larry Lest	01/16/24
RI-187	Lynn Larsen	01/16/24
RI-188	Magie Lacambra	01/16/24
RI-189	Matthew Peterson	01/16/24
RI-190	Matt Silveous	01/16/24
RI-191	Michael Messer	01/16/24
RI-192	Pedro Francisco	01/16/24
RI-193	Rick Smith	01/16/24
RI-194	Ronald Peters	01/16/24
RI-195	Scott Barlow	01/16/24
RI-196	Shawn McDonald	01/16/24
RI-197	Sue Nipper	01/16/24
RI-198	Tiffany Tighe	01/16/24
RI-199	Francisco Sola	01/17/24
RI-200	Lon Walcker	01/17/24
RI-201	Molly Nazeck	01/17/24
RI-202	David Chavers	01/18/24
RI-203	Larry Colen	01/18/24
RI-204	Linda Tingley Rivera	01/18/24
RI-205	E.N. Anderson	01/19/24
RI-206	Jay Davis	01/19/24
RI-207	Kyle Reed	01/19/24
RI-208	Chris Stock	01/22/24
RI-209	John Alfred	01/22/24
RI-210	Kris Lovekin	01/22/24
RI-211	Erika, Miles, and Gwen Cruz	01/23/24
RI-212	Janet Bernabe	01/23/24
RI-213	Leo Cruz	01/23/24
RI-214	Leonides Cruz II	01/23/24
RI-215	Bertha Morales	01/24/24
RI-216	Casey Welch	01/24/24
RI-217	Michael Fargher	01/24/24
RI-218	Meredith Medin	01/25/24
RI-219	Branden Aguilera	01/26/24
RI-220	Fredy Orozco	01/28/24
RI-221	Jessica Diaz	01/29/24
RI-222	Kevin Heinemann	01/29/24

Comment Letter	Name	Date Received
Individuals		
RI-223	Nicole Bernas	01/30/24
RI-224	Ciro Guzman	01/31/24
RI-225	Nikki Grimes	01/31/24
RI-226	Laura Sandidge	02/02/24
RI-227	Julie Weatherford	02/05/24
RI-228	Peter Pettis	02/05/24
RI-229	Veronica Juarez	02/05/24
RI-230	Dr. Noemi Alexander	02/09/24
RI-231	Brenda Shearer	02/11/24
RI-232	Jerry Shearer	02/11/24
RI-233	Jerry Shearer	02/11/24
RI-234	Jen Larratt Smith	02/13/24
RI-235	Mike McCarthy	02/15/24
RI-236	David Reznick	02/15/24
RI-237	Melody Clark	02/15/24
RI-238	Elijah Sbar	02/18/24
RI-239	Andrea Wood	02/20/24
RI-240	Connie Ransom	02/20/24
RI-241	Debra Whitney	02/20/24
RI-242	Esmeralda Montes	02/20/24
RI-243	Esther Munoz	02/20/24
RI-244	Joe Aklufi	02/20/24
RI-245	John Lyell	02/20/24
RI-246	Mary Moran	02/20/24
RI-247	Mohsen Lesani	02/20/24
RI-248	Patricia Welbourne	02/20/24
RI-249	Raymond Or	02/20/24
RI-250	Candi Erwin	02/20/24
RI-251	John Santorufo	02/21/24
RI-252	Roseann Reynolds	02/22/24
RI-253	Jen Larratt Smith	02/23/24
RI-254	Mike McCarthy	02/23/24
RI-255	Ying Shen	02/24/24
RI-256	Carlos Llinguin	02/25/24
RI-257	Christopher Shearer	02/25/24
RI-258	George Harvilla	02/25/24
RI-259	Jerry Shearer	02/25/24
RI-260	Jerry Shearer	02/25/24
RI-261	Kevin Shearer	02/25/24
RI-262	Michael Wilson	02/25/24
RI-263	Abby Banning	02/26/24
RI-264	Abdallah Karim	02/26/24
RI-265	Adeli Nol	02/26/24
RI-266	Amy Litt	02/26/24
RI-267	Andrew Silva	02/26/24

Comment Letter	Name	Date Received
Individuals		
RI-268	Beverly Arias	02/26/24
RI-269	Blanca Rivera	02/26/24
RI-270	Mary Humbolt	02/26/24
RI-271	Carolyn Rasmussen	02/26/24
RI-272	Christina and Kelly Barhorst	02/26/24
RI-273	Rick and Christine Miller	02/26/24
RI-274	Cindy Chiek	02/26/24
RI-275	Corinne Perez	02/26/24
RI-276	David Drexler	02/26/24
RI-277	David Rose	02/26/24
RI-278	Deb Whitney	02/26/24
RI-279	Felix and Felicia Valencia	02/26/24
RI-280	Frank and Michelle Erdodi	02/26/24
RI-281	Gabriella Zlaket	02/26/24
RI-282	Honey Bernas	02/26/24
RI-283	Jack Katzanek	02/26/24
RI-284	Jason Gonsman	02/26/24
RI-285	Jeanine Sabel	02/26/24
RI-286	Jennifer Diaz	02/26/24
RI-287	Josie Sosa	02/26/24
RI-288	Lani Creely	02/26/24
RI-289	Leo Mullarky	02/26/24
RI-290	Lin Zhao	02/26/24
RI-291	Linda Tingley Rivera	02/26/24
RI-292	Loralee Larios	02/26/24
RI-293	Maria Rodriguez	02/26/24
RI-294	Marko Spasojevic	02/26/24
RI-295	Michael Wilson	02/26/24
RI-296	Michele Muehls	02/26/24
RI-297	Peter Pettis	02/26/24
RI-298	Rattana Chiek	02/26/24
RI-299	Rich Priebe	02/26/24
RI-300	Richard Stalder	02/26/24
RI-301	Anthony Scimia Jr	02/26/24

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Dear Mr. Fairbanks:

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR), as it did not make any meaningful, substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. 1

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before the March JPA sunsets in July 2025. 2

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR, yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board, in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. 3

Thank you,
Aaron Bushong
24-year resident of the Orangecrest neighborhood (92508)

Form Letter RA Response to Comments

Comment Letter	Name	Date
Individuals		
RI-7	Aaron Bushong	01/05/24
RI-9	Ana Ramirez	01/05/24
RI-10	Beverly Arias	01/05/24
RI-11	Blanca Rivera	01/05/24
RI-12	Bobby Robinette	01/05/24
RI-13	Carolina Rodriguez	01/05/24
RI-14	Claire Grimes	01/05/24
RI-15	Eunhee Kim	01/05/24
RI-16	Fera Momtaz	01/05/24
RI-17	Ira and Rajean Long	01/05/24
RI-18	Janice Oien	01/05/24
RI-19	Jason Gonsman	01/05/24
RI-20	Jean Aklufi	01/05/24
RI-21	Joe Aklufi	01/05/24
RI-23	John Viafora	01/05/24
RI-24	John W. Hagmann	01/05/24
RI-25	Josie Sosa	01/05/24
RI-26	Kristy Doty	01/05/24
RI-27	Lenora Mitchell	01/05/24
RI-28	Linda Rivera	01/05/24
RI-29	Linda Tingley Rivera	01/05/24
RI-30	Luis Rodriguez	01/05/24
RI-31	Maria Rodriguez	01/05/24
RI-32	Mark Calhoun	01/05/24
RI-33	Mark Lien	01/05/24
RI-34	Mary Peters	01/05/24
RI-35	Matt Silveous	01/05/24
RI-37	Michael & Margie Bayarsky	01/05/24
RI-38	Michael & Sandra Cook	01/05/24
RI-39	Mike Cachat	01/05/24
RI-40	Mike Cachat	01/05/24
RI-41	Peter Pettis	01/05/24
RI-42	Randall Lindegard	01/05/24
RI-43	Raymond Or	01/05/24
RI-44	Ronald Peters	01/05/24
RI-45	Shaan Saigol	01/05/24
RI-46	Shirley Ng	01/05/24
RI-47	Steve Balmer	01/05/24
RI-48	Steven Haas	01/05/24
RI-49	Steven McElroy	01/05/24
RI-50	Suzanne Page	01/05/24
RI-51	The Balmer Family	01/05/24

Comment Letter	Name	Date
Individuals		
RI-52	Tia Ballesteros	01/05/24
RI-53	Veronica Juarez	01/05/24
RI-54	William Landa	01/05/24
RI-55	Abdallah Karim	01/06/24
RI-56	Christine Martin	01/06/24
RI-57	David Doty	01/06/24
RI-58	Estevan K Gonzalez	01/06/24
RI-59	Frank and Michelle Erdodi	01/06/24
RI-60	Lisa Alfred	01/06/24
RI-61	Molly Brooke Becker	01/06/24
RI-62	Nancy Ward	01/06/24
RI-63	Amber Peaslee	01/07/24
RI-65	Jenna Pontious	01/07/24
RI-66	Lindsay Barnes	01/07/24
RI-67	Mary Viafora	01/07/24
RI-68	Milo Rivera	01/07/24
RI-69	Patty Huddleston	01/07/24
RI-70	Richard Stalder	01/07/24
RI-72	Brian Barnes	01/08/24
RI-73	Brian Wardle	01/08/24
RI-74	Cindy Chiek	01/08/24
RI-75	David Quirarte	01/08/24
RI-76	Elizabeth Iribe	01/08/24
RI-78	Esmeralda Montes	01/08/24
RI-79	Faith J. Mata	01/08/24
RI-80	Michele Bello Muehls	01/08/24
RI-81	Nicolette Rohr	01/08/24
RI-82	Ryan Pezer	01/08/241
RI-84	Rattana Chiek	01/09/24
RI-85	David Drexler	01/09/24
RI-86	Laila Derak	01/09/24
RI-87	Scott McLean	01/09/24
RI-88	Tuesday Ramunni	01/09/24
RI-89	Allison Shelton	01/10/24
RI-90	Annabelle Porter	01/10/24
RI-91	Gabriella Zlaket	01/10/24
RI-92	George Robledo	01/10/24
RI-93	James Mysliwiec	01/10/24
RI-95	Kelly Wrightstone	01/10/24
RI-96	Patricia Welbourne	01/10/24
RI-97	Steve Domingues	01/10/24
RI-98	Tim and Arianna Thornton	01/10/24
RI-99	Carlos Llinguin	01/11/24
RI-100	Elias Valencia	01/11/24
RI-101	Gregory Russell	01/11/24

Comment Letter	Name	Date
Individuals		
RI-103	Michael Hampton	01/11/24
RI-104	Michael Kaudze	01/11/24
RI-105	Suzanne Pearson	01/11/24
RI-106	Tim Martin	01/11/24
RI-107	Everardo Carvajal	01/12/24
RI-108	Ajay Shah	01/12/24
RI-109	Craig Atchison	01/12/24
RI-110	Craig Atchison	01/12/24
RI-111	Dwight Woodward	01/12/24
RI-112	Fernando Jose	01/12/24
RI-113	Generation MTB	01/12/24
RI-114	Juan Zarate	01/12/24
RI-115	Riley Angels	01/12/24
RI-116	Tonya Huff	01/12/24
RI-117	George Robledo	01/13/24
RI-118	Alejandra Joseph	01/13/24
RI-119	Ben Guillen	01/13/24
RI-120	Bobby Vacco	01/13/24
RI-121	John Ramirez	01/13/24
RI-122	Mario Salgado	01/13/24
RI-123	Milton Solorzano	01/13/24
RI-124	Nick Ryan	01/13/24
RI-125	Aaron Bernstein	01/14/24
RI-126	Aaron Peterson	01/14/24
RI-127	Alex Allred	01/14/24
RI-128	Angel Roldan	01/14/24
RI-129	Anthony Jones	01/14/24
RI-130	Christopher Manivong	01/14/24
RI-131	Dane McCants	01/14/24
RI-132	DeAmadja Dennis	01/14/24
RI-133	Debora Trujillo	01/14/24
RI-134	Ethan Ortega	01/14/24
RI-135	Frank Ramirez	01/14/24
RI-137	Jake Zini	01/14/24
RI-138	Jaime Tatenco	01/14/24
RI-139	Janette Aragon	01/14/24
RI-140	Jose Pineda	01/14/24
RI-141	Keri Davis	01/14/24
RI-142	Kristen Lane	01/14/24
RI-143	Marc Duron	01/14/24
RI-144	Michael Burt	01/14/24
RI-145	Paul Pastor	01/14/24
RI-146	Richard Gate	01/14/24
RI-147	Robert Sanderson	01/14/24
RI-148	Victor Reyes	01/14/24

Comment Letter	Name	Date
Individuals		
RI-149	Brendon Allen	01/15/24
RI-150	Chris Kasey	01/15/24
RI-151	Damon Monticello	01/15/24
RI-152	Daniel Cuevas	01/15/24
RI-153	Derrick Sartain	01/15/24
RI-154	Erik Ramirez	01/15/24
RI-155	Gared Lin	01/15/24
RI-156	George Fickett	01/15/24
RI-157	George Robledo	01/15/24
RI-158	Greg Renne	01/15/24
RI-159	Guillermo Trujillo	01/15/24
RI-160	Jacob Perez	01/15/24
RI-161	Joel Macias	01/15/24
RI-162	Justin Vergason	01/15/24
RI-163	Matthew Muzzy	01/15/24
RI-164	Mike Savicky	01/15/24
RI-165	Preston Jordan	01/15/24
RI-166	Sabrina Walsberg	01/15/24
RI-167	Sean Donovan	01/15/24
RI-168	Shiloh Sanders	01/15/24
RI-169	Sterling Martin	01/15/24
RI-170	Taylor Spinogatti	01/15/24
RI-171	Aaron Solis	01/16/24
RI-172	Al Serna	01/16/24
RI-173	Andrea Wood	01/16/24
RI-174	Blake Rossi	01/16/24
RI-175	Brian Backman	01/16/24
RI-176	CJ Figueroa	01/16/24
RI-177	Daniel Beveridge	01/16/24
RI-178	Devon Hauser	01/16/24
RI-179	Eunhee Kim	01/16/24
RI-180	Fera S. Momtaz	01/16/24
RI-181	Gerald Tiangco	01/16/24
RI-182	Jason Crowell	01/16/24
RI-184	Kelsey Dorfmeyer	01/16/24
RI-185	Kyle Cregg	01/16/24
RI-186	Larry Lest	01/16/24
RI-187	Lynn Larsen	01/16/24
RI-188	Magie Lacambra	01/16/24
RI-190	Matt Silveous	01/16/24
RI-191	Michael Messer	01/16/24
RI-192	Pedro Francisco	01/16/24
RI-193	Rick Smith	01/16/24
RI-195	Scott Barlow	01/16/24
RI-196	Shawn McDonald	01/16/24

Comment Letter	Name	Date
Individuals		
RI-197	Sue Nipper	01/16/24
RI-198	Tiffany Tighe	01/16/24
RI-199	Francisco Sota	01/17/24
RI-200	Lon Walcker	01/17/24
RI-201	Molly Nazeck	01/17/24
RI-204	Linda Tingley Rivera	01/18/24
RI-206	Jay Davis	01/19/24
RI-207	Kyle Reed	01/19/24
RI-210	Kris Lovekin	01/22/24
RI-212	Janet Bernabe	01/23/24
RI-215	Bertha Morales	01/24/24
RI-218	Meridith Medin	01/25/24
RI-219	Branden Aguilera	01/26/24
RI-220	Fredy Orozco	01/28/24
RI-221	Jessica Diaz	01/29/24
RI-222	Kevin Heinemann	01/29/24
RI-223	Nicole Bernas	01/30/24
RI-224	Ciro Guzman	01/31/24
RI-225	Nikki Grimes	01/31/24
RI-227	Julie Weatherford	02/05/24
RI-228	Peter Pettis	02/05/24
RI-229	Veronica Juarez	02/05/24
RI-239	Andrea Wood	02/20/24
RI-242	Esmeralda Montes	02/20/24
RI-243	Esther Munoz	02/20/24
RI-244	Joe Aklufi	02/20/24
RI-245	John Lyell	02/20/24
RI-246	Mary Moran	02/20/24
RI-247	Mohsen Lesani	02/20/24
RI-249	Raymond Or	02/20/24
RI-250	Candi Erwin	02/20/24
RI-251	John Santorufo	02/21/24
RI-252	Roseann Reynolds	02/22/24
RI-255	Ying Shen	02/24/24
RI-256	Carlos Llinguin	02/25/24
RI-263	Abby Banning	02/26/24
RI-264	Abdallah Karim	02/26/24
RI-265	Adeli Nol	02/26/24
RI-266	Amy Litt	02/26/24
RI-268	Beverly Arias	02/26/24
RI-269	Blanca Rivera	02/26/24
RI-270	Mary Humbolt	02/26/24
RI-272	Cristina and Kelly Barhorst	02/26/24
RI-273	Rick and Christine Miller	02/26/24
RI-274	Cindy Chiek	02/26/24

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RI-278	Deb Whitney	02/26/24
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RI-285	Jeanine Sabel	02/26/24
RI-287	Josie Sosa	02/26/24
RI-288	Lani Creely	02/26/24
RI-289	Leo Mullarky	02/26/24
RI-291	Linda Tingley Rivera	02/26/24
RI-292	Loralee Larios	02/26/24
RI-293	Maria Rodriguez	02/26/24
RI-294	Marko Spasojevic	02/26/24
RI-296	Michele Muehls	02/26/24
RI-297	Peter Pettis	02/26/24
RI-298	Rattana Chiek	02/26/24
RI-300	Richard Stalder	02/26/24
RI-301	Anthony Scimia Jr	02/26/24

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Friday, December 1, 2023 9:04 AM
To: Dan Fairbanks; Dr. Grace Martin; Conder, Chuck; jperry@riversideca.gov; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org; district1@rivco.org; district5@rivco.org; edd@moval.org
Cc: Jennifer Larratt-Smith; jsydor@yahoo.com; Clerk
Subject: Request for public comment period extension for Recirculated draft EIR: SCH 2021110304

Dear Mr. Fairbanks,

Thank you for the opportunity to comment on the Recirculated Draft EIR schedule.

The Recirculated Draft EIR is being released over the winter holiday season with a 45-day comment period from December 2, 2023 through Jan 16, 2024.

I would like to formally request a 15-to-30 day extension of the public comment period given the extensive revisions and the conflict with multiple holiday weeks (Christmas, New Years).

RI-1.1

Thank you for your attention to this matter.

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

RI-1

Mike McCarthy
December 1, 2023

RI-1.1 This comment requests that the 45-day public comment period on the Recirculated Draft EIR sections be extended to a total of 60-75 days. The Recirculated Draft EIR was released for public review on December 1, 2023, for an initial 45-day period. The public comment period was extended to February 26, 2024, for a total of 87 days. The comment does not raise any specific questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Sunday, December 3, 2023 6:51 PM
To: Clerk; kphung@cityofperris.org; cmiramontes@cityofperris.org; Rafael; CM Office; Michele Patterson; jperez@rivco.org; mfutrell@riversideca.gov; Dan Fairbanks; Dr. Grace Martin
Cc: Conder, Chuck; Jim Perry; Supervisor Kevin Jeffries; mayor@moval.org; district5 @rivco.org; rrogers@cityofperris.org; edd@moval.org; Michael Vargas
Subject: Public Comment for TAC 12/4 meeting Item 6a

Dear Technical Advisory Committee and Staff,

Monday afternoon, you are considering a Draft Environmental Justice element for the March JPA. This release coincides with the re-release of the draft EIR for the West Campus Upper Plateau project that the local community overwhelmingly rejects. It is insulting to think that while the JPA has existed since 1996, and have consistently built warehouses in communities that CalEnviroScreen 4.0 lists in the 98th and 99th percentile, the JPA has chosen the last days of November 2023 to amend the General Plan for an organization that sunsets in July 2025. This effort is clearly in response to comment letters submitted by the community in response to the draft EIR for the West Campus Upper Plateau, and rather than engage with the community and consider the comments in these letters, the JPA is obviously assisting in the applicant's desire to push through a significantly controversial project despite the very communities that this copy-paste EJ policy intends to protect and represent.

I have concerns with the process by which the JPA is going about this amendment to the General Plan, as they have already inserted in into the revised draft EIR for the West Campus Upper Plateau project being recirculated currently. The policy in its current form reads as a unimaginative cut-and-paste from the County, filled with policies that the March JPA has no ability or intention to follow through on in the 19 months it has left to exist.

Specifically, the policies that the JPA has no ability or intention of fulfilling include: RI-2.1

- The March JPA has no time or budget to create a ‘far-ranging, creative, forward-thinking public education and community-oriented outreach campaign’ about EJ issues or hazards (HC 15.7)
- The March JPA has no jurisdiction over the Salton Sea (policy HC 16.1)
- The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC 16.8), and rejected community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10)
- The March JPA won’t be coordinating with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7)
- The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13)
- The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

As I have mentioned, what concerns me is that the JPA has decided to engage simultaneously with a re-circulation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304) and in this proposal, the JPA references this not-yet-adopted policy extensively in the document. How meaningful are community comments for a General Plan amendment if it is already assumed that the agency will adopt the plan wholesale before the process has even started? As it stands, the public comment window for the re-circulated draft will close before you are able to officially adopt a policy. How can a community officially comment on a draft EIR when it is contingent on policies that have not been finalized and that are wholly unresponsive to the specific EJ needs of the area? The JPA's process communicates that it is not actually interested in meaningful feedback, that this is an exercise with a pre-determined outcome (just as this whole experience with the West Campus has been), and is exactly the opposite of what the civic engagement policies the JPA is trying to adopt is attempting to codify.

RI-2.2

As indicated in the City of Riverside's recently adopted public engagement policy, in order to have a functioning EJ policy, an agency like the March JPA would actually need to incorporate feedback from the community into their land use planning and decisions. That is what such a policy establishes and that is what governors of the public are tasked with doing. To date, the March JPA only engages with the public when forced to involve community wishes by a court, and even then, the JPA has shown that is only follows through on settlement terms that benefit them or the sole-source applicant that has had far too much influence in this region for far too long. If only someone would realize the negative influences this applicant has had on our region, and, oh I don't know, tell them enough is enough. But that is wishful thinking on my part. Let's build yet more warehouses around a community of retired military veterans and their final resting place!

Please consider slowing down this process, listening to the community as this proposed policy says you will do, and drafting a sensible EJ element to the General Plan that responds to the community's needs, is realistic to the agency's capabilities and mission, and will transition to and benefit the County once the JPA sunsets in 2025. Please also consider recommending that the JPA pauses the release of the Recirculated EIR for the Upper Plateau until the EJ general plan amendment process is complete so that the community can meaningfully comment on a policy that has been approved by the JPA and thus will be relevant to the applicant's proposed project.

RI-2.3

Thank you.

Sincerely,

Jerry Shearer
92508

RI-2

Jerry Shearer
December 3, 2023

RI-2.1 This comment is directed to the March JPA Technical Advisory Committee and March JPA staff regarding its December 4, 2023, consideration of the Draft Environmental Justice Element for the March JPA General Plan. The comment questions the use of the County of Riverside's environmental justice policies. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The comment does not raise any specific questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-2.2 This comment raises concerns regarding evaluation of the Draft Environmental Justice Element in the Recirculated Draft EIR sections. The comment questions how the public can comment on the EIR when it is contingent on policies that have not yet been finalized. CEQA Guidelines Section 15125(d) requires the EIR discuss any inconsistencies between the Project and adopted General Plan goals and policies. As discussed in RI-2.1, above, on April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-2.3 This comment raises concerns regarding the public review process for the Draft Environmental Justice Element and requests the Project CEQA process be delayed until the completion of the Environmental Justice Element. March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the

Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The comment does not raise any specific questions or concerns about the analysis in the Recirculated Draft EIR sections.

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Sunday, December 3, 2023 11:21 AM
To: Clerk; kphung@cityofperris.org; cmiramontes@cityofperris.org; Guzman, Rafael; CM Office; Michele Patterson; jperez@rivco.org; mfutrell@riversideca.gov; Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: Public comment for TAC 12/04/23 meeting - item 6a - relating to Recirculated DEIR for SCH 2021110304

TAC members, Clerk,

Thank you for the opportunity to submit comments on the draft Environmental Justice (EJ) element to amend the March JPA General Plan.

I appreciate the intent to include an EJ element 19 months prior to the MJPA sunsetting, but the process lacks integrity. As proposed, it is inappropriate policy designed to paper-over an ongoing CEQA deficiency in an under-review project, rather than a good-faith EJ element reflecting local community issues, MJPA land-use authority and goals, and earnest civic engagement.

MJPA staff and the TAC need to formally include communities in the design and implementation of an EJ element for it to have integrity. By releasing the draft EJ element and pre-deciding it will be adopted as part of a recirculated draft EIR (RIR), MJPA staff created a muddled process where community members are simultaneously commenting on a draft EJ element and commenting on a RIR that is contingent on the draft EJ element policies. The recursiveness of the EJ element and RIR process is irregular. Lastly, the wholesale adoption of policies from the County EJ element is unlikely to be altered by the MJPA because the MJPA cannot change county EJ policies. This confusing process creates three issues.

First, March JPA staff are proposing to copy and paste the County of Riverside EJ element onto the March JPA General Plan, even though the jurisdiction, staff, resources, and timeline for the two agencies are completely different. This leads to an absurd set of policies that the March JPA cannot implement or fund between now and July 2025. For example: RI-3.1

- The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7)
- The March JPA has no jurisdiction over the Salton Sea (policy HC 16.1)
- The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC 16.8), and rejects community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10)
- The March JPA will not coordinate with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7)
- The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13)
- The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

At a minimum, a proposed EJ element needs to incorporate MJPA priorities, exclude inapplicable county policies, and describe community priorities through an active (and hopefully formal) community engagement process. This copy-paste of County policy is neither thoughtful, applicable, or reflective of local input. Adopting a General Plan amendment

with more than a dozen policies that the MJPA has no intention of implementing is dishonest, poor governance, and a litigation risk.

Second, adopting the County's EJ element in its entirety appears to preclude meaningful involvement of the local EJ community in developing, implementing, and enforcing the proposed EJ element for the MJPA. Environmental justice is about meaningful involvement – defined by statute as the development, implementation, and enforcement of protective environmental laws, regulations, and policies. If the local community has no say in the pre-decided final policies, the MJPA has contradicted the proposed policy at its core. By unilaterally proposing to adopt the county EJ element prior to meeting with community members to discuss EJ policies, or even announcing that an EJ element was under consideration, the MJPA continues to demonstrate its process of decision-making ignores community engagement.

RI-3.1 Cont.

Third, the process is now hopelessly muddled in the community with the proposed Grove Warehouses project. MJPA staff incorporated a draft EJ element released 11/30 with no prior discussion at TAC or at the commission into a RIR released 12/2. This is highly irregular from a process perspective since no formal body of the MJPA reviewed the draft EJ element prior to incorporation in an under-review CEQA project. Commenting periods will overlap for the EJ element and the RIR. Given the explicit contingencies of the proposed EJ element on the RIR, it is not clear how comments on the EJ element will be separate from RIR comments, nor is it clear that the MJPA staff can act independently on both issues simultaneously since changes in either process will affect the other. If the MJPA makes no changes to the EJ element, the EJ element will be pre-decisional and omit civic engagement. If the MJPA changes the draft EJ element, it will need to recirculate the RIR to allow another round of public comment.

RI-3.2

I don't see any solution that can fix the inherent flaws in the integrity of this process beyond withdrawing the RIR until the EJ element is adopted. To continue the proposed path will inevitably lead to a challenge of the legitimacy of the pre-decisional EJ element.

Sincerely,

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

RI-3

Mike McCarthy
December 3, 2023

RI-3.1 This comment is directed to the March JPA Technical Advisory Committee and March JPA staff regarding its December 4, 2023, consideration of the Draft Environmental Justice Element for the March JPA General Plan. The comment questions the use of the County of Riverside's environmental justice policies and public engagement regarding the Environment Justice Element. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies. The comment does not raise any specific questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-3.2 This comment raises concerns regarding evaluation of the Draft Environmental Justice Element within the Recirculated Draft EIR sections. The comment questions how the public can comment on the EIR when it is contingent on policies that have not yet been finalized. CEQA Guidelines Section 15125(d) requires the EIR discuss any inconsistencies between the Project and adopted General Plan goals and policies. As discussed in RI-3.1, above, on April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

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From: Jen L <jlarrattsmith@gmail.com>
Sent: Monday, December 11, 2023 7:36 AM
To: Dan Fairbanks
Subject: Fwd: Public Comment for TAC 12/4 meeting Item 6a

Dear Mr. Fairbanks,

Please include this forwarded email in the official public comments for the Recirculated Draft EIR as well. RI-4.1

Thank you,

Jennifer Larratt-Smith

---------- Forwarded message ---------
From: **Jen L** <jlarrattsmith@gmail.com>
Date: Sun, Dec 3, 2023 at 4:13 PM
Subject: Public Comment for TAC 12/4 meeting Item 6a
To: clerk@marchjpa.com <clerk@marchjpa.com>, kphung@cityofperris.org <kphung@cityofperris.org>, cmiramontes@cityofperris.org <cmiramontes@cityofperris.org>, Guzman, Rafael <RGuzman@riversideca.gov>, CM Office <cmoffice@moval.org>, Michele Patterson <michelep@moval.org>, jperez@rivco.org <jperez@rivco.org>, mfutrell@riversideca.gov <mfutrell@riversideca.gov>, Dan Fairbanks <fairbanks@marchjpa.com>, Dr. Grace Martin <martin@marchjpa.com>
Cc: Michael McCarthy <mikem@radicalresearch.llc>

Dear Technical Advisory Committee and Staff,

Tomorrow you are considering a Draft Environmental Justice element for the March JPA. I find it curious that while the JPA has existed since 1996 and have consistently built warehouses in communities that CalEnviroScreen 4.0 lists in the 98th and 99th percentile, the JPA has chosen the eleventh hour to amend the General Plan. It feels too little, too late, and I fear that it is being done in haste.

I am a big believer in Environmental Justice. However, I have concerns with the process by which the JPA is going about this amendment. The policy in its current form reads as a hasty cut-and-paste from the County, filled with policies that the March JPA has no ability nor intention to follow through on in the 19 months it has left to exist. (For specific examples, please reference the public comment email sent by my neighbor Mike McCarthy.) RI-4.2

Far more worrisome: the JPA has decided to engage simultaneously with a recirculation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304) and to reference this not-yet-adopted policy extensively in the document. How meaningful are community comments for a General Plan amendment if it is already assumed that the agency will adopt the plan wholesale before the process has even started? As it stands, the public comment window for the recirculated draft will close before you are able to officially adopt a policy. How can a community officially comment on a Draft EIR when it is contingent on policies that have not been finalized? RI-4.3

Ironically, your process communicates that you are not actually interested in meaningful feedback, that this is an exercise with a pre-determined outcome, which is exactly the opposite of what the civic engagement policies you are trying to adopt say you will do. RI-4.4

Please consider slowing down this process, listening to the community as your policy says you will do, and drafting a sensible EJ element to the General Plan that responds to the community's needs and is realistic to the agency's capabilities. Please also consider pulling the Recirculated EIR until the EJ general plan amendment process is complete so that the community can meaningfully comment. RI-4.4 Cont.

Thank you.

Sincerely,

Jen Larratt-Smith
Riverside Neighbors Opposing Warehouses (R-NOW)
92508

RI-4

Jen Larratt-Smith
December 11, 2023

RI-4.1 This comment is an email transmittal of a public comment for the Technical Advisory Committee meeting held on December 4, 2023. The comment requests the letter be included in the Recirculated Draft EIR public comments.

RI-4.2 This comment is directed to the March JPA Technical Advisory Committee and March JPA staff regarding its December 4, 2023, consideration of the Draft Environmental Justice Element for the March JPA General Plan. The comment questions the use of the County of Riverside's environmental justice policies. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The comment does not raise any specific questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-4.3 This comment raises concerns regarding evaluation of the Draft Environmental Justice Element in the Recirculated Draft EIR sections. The comment questions how the public can comment on the EIR when it is contingent on policies that have not yet been finalized. CEQA Guidelines Section 15125(d) requires the EIR discuss any inconsistencies between the Project and adopted General Plan goals and policies. As discussed in RI-4.2, above, on April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-4.4 This comment raises concerns regarding the public review process for the Draft Environmental Justice Element and requests the Project CEQA process be delayed until the completion of the Environmental

Justice Element. March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8, and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The comment does not raise any specific questions or concerns about the analysis in the Recirculated Draft EIR sections.

From: Tan, Laren <LATan@llu.edu>
Sent: Thursday, December 14, 2023 4:43 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

12/14/2023
To: March Joint Powers Authority

Public comment for the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304

As a practicing pulmonologist, I urge March JPA to protect and improve public health against transportation pollution and to support measures to secure clean air for all Californians, especially those in Riverside. While we are not currently equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts, according to the draft West Campus Upper Plateau Project Environmental Impact Report. The Project's operational source emissions are anticipated to exceed the regional thresholds of significance for VOC, NOx, CO, and PM10 emissions. The impact of this could be significant and unavoidable. RI-5.1

Emissions from the Project and future vehicle emissions to support warehouse functions could also significantly impact direct and neighboring communities. The American Lung Association has highlighted that transportation sources are responsible for 80 percent of smog-forming NOx pollution, 90 percent of toxic diesel particle pollution and roughly half of California's carbon pollution.[1] Unfortunately, increasing climate change impacts, such as wildfires and extreme heat events, are making the job of cleaning California's air much more difficult. Some of the most ozone-polluted cities in the United States are in California. Riverside and neighboring communities have extreme high ozone days and horrible particle pollution. Too many of our most vulnerable communities bear the most significant burdens when the air is unhealthy to breathe.[2] Transportation pollution impacts Californians' health through increased risk of asthma attacks, emergency room visits and hospitalizations, lung cancer, heart attacks, strokes, and premature death. Those at most significant risk for harm include children, the elderly, and those with lung and heart disease. We must consider these impacts as new warehouses are being built and invest in an infrastructure that considers the health of those who call Riverside their home. RI-5.2

I urge that the lung health and overall well-being of Californians in Riverside be carefully thought of and that measures be taken to ensure that zero-emission and healthy transportation investments that sustain warehouse operations are a priority before any final decision is made on the project to ensure Riverside will have healthy, sustainable communities now and into the future. RI-5.3

Sincerely,
Laren Tan, MD, MBA

Laren Tan, MD, MBA, is an Associate Professor of Medicine for the Department of Medicine, Pulmonary and Critical Care. The opinions expressed are his/her own and he/she does not speak on behalf of his employer.

1. California Air Resources Board. 2016 Mobile Source Strategy. https://ww3.arb.ca.gov/planning/sip/2016sip/2016mobsrc.pdf
2. https://www.lung.org/research/sota/city-rankings/states/california/riverside

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RI-5

Laren Tan
December 14, 2023

RI-5.1 This comment summarizes the conclusions regarding emissions from the Project, as discussed in detail in Recirculated Section 4.2, Air Quality. The comment does not raise any additional questions or identify any new information.

RI-5.2 This comment discusses the health impacts resulting from pollution and references CARB's 2016 Mobile Source Strategy and the American Lung Association's 2023 Report Card for the County of Riverside. As discussed in the Recirculated Section 4.2, Air Quality, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. MM-AQ-1 through MM-AQ-27 would further reduce impacts to sensitive receptors. The comment does not raise any additional questions or identify any new information.

RI-5.3 This comment requests that measures be taken to ensure that zero-emission and healthy transportation investments be made. MM-AQ-8 requires all TRU loading docks to provide electrical hookups and all loading docks designed to be compatible with SmartWay trucks. MM-AQ-11 requires main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Regarding fleet electrification, MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed.

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From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Saturday, December 23, 2023 7:20 AM
To: Conder, Chuck; edd@moval.org; district1@rivco.org; district5@rivco.org; jperry@riversideca.gov; rrogers@cityofperris.org; mayor@moval.org; mvargas@cityofperris.org
Cc: Dan Fairbanks; Dr. Grace Martin; Jennifer Larratt-Smith; jsydor@yahoo.com
Subject: warehouse ISR noncompliance at March JPA - relevant to EJ element and SCH 2021110304

Commissioners, MJPA staff,

Merry Christmas – sorry to keep sending you stuff as the holidays approach, but Santa dropped this article in my lap.

The LA Times reported on the SCAQMD citing warehouses for noncompliance with the warehouse indirect source Rule 2305 this morning.
Four March JPA warehouses made the list of 109 warehouses across Southern California – an impressive contribution.
https://www.latimes.com/environment/story/2023-12-22/warehouse-crackdown-results-in-over-100-pollution-violations

The four MJPA mega-warehouses being fined are based on the table released by the LA times– searching for MJPA zip codes 92508, 92518, and 92571.
Global-One Logistics - 21822 Opportunity Way Riverside
MOBIS Parts America – 15001 Meridian Pkwy, Riverside
Safavieh Carpets – 20800 Krameria Way Riverside
Sysco Corporation – 15750 Meridian Pkwy Riverside

Please keep this criminal element away from my community. Warehouse operators are bad neighbors prioritizing making a buck at our expense.

RI-6.1

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

RI-6

Mike McCarthy
December 23, 2023

RI-6.1 This comment provides a link to an article about Southern California warehouses out of compliance with SCAQMD Rule 2305 reporting requirements and identifies four noncompliant warehouses in the March JPA Planning Area. As identified in Recirculated Section 4.2, Air Quality, industrial buildings greater than or equal to 100,000 square feet within the Specific Plan Area would be subject to Rule 2305 reporting requirements. The comment does not raise any specific questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Friday, January 5, 2024 8:31 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR), as it did not make any meaningful, substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before the March JPA sunsets in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-7.1

It is telling that you propose no substantive changes in the REIR, yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board, in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Thank you,
Aaron Bushong
24-year resident of the Orangecrest neighborhood (92508)

RI-7

Aaron Bushong
January 5, 2024

RI-7.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Alissa Chitwood <alissachitwood@gmail.com>
Sent: Friday, January 5, 2024 3:38 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. RI-8.1

The addition of an Environmental Justice (EJ) policy and your justification for how the project fits, are surface level and non-substantive. This EJ policy ought to have been drafted prior to the start of the current project, not concurrently as an in-process project, which you are trying to push through by the end of July 2025. The EJ policy leaves much to be desired and the integrity of said policy questioned.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. Completing the CEQA process while concurrently moving forward with the warehouse project, signals to our community that results of the process are not meaningful and not to be trusted given the already significant investment in the addition of warehouses. Only with a warehouse moratorium, ensuring the welfare of our community while the CEQA process is conducted properly, provides reassurance to our community that the environmental impact is accurately assessed. Information from CEQA documents released in March 2023 demonstrate that the proposed warehouses do yield maximum daily emissions on a significant level unless mitigation measures are taken, which is problematic at best. With the additional EJ policy, more information is needed to reassure the community proper steps and processes are being followed according to not only the letter of the law, but the spirit. The EJ should go through the full CEQA process while a warehouse moratorium is in effect to achieve this. RI-8.2

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, fits into the existing plan. For the past two years, you have not made known nor seemingly considered non-industrial alternatives, and refused a Community Advisory Board in spite of our community members specifically expressing desires for alternate use and several written communications. Your claims to value "civic engagement" in your EJ policy are disingenuous.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. I have lived in the Orangecrest area since moving to Riverside in 2011, and while I'm open to change and the development of the area, the negative impact the addition of warehouses upon proposed warehouses in our community is cause for concern. I would like to see proper processes being followed to provide reassurance that the environment and my family are being cared for with the manner and consideration you would desire for your own family and with those with where you reside. Thank you for your time. RI-8.3

Sincerely,

Alissa Chitwood
92508

RI-8

Alissa Chitwood
January 5, 2024

RI-8.1 This comment expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits, under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-8-2 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, requests a full CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-8.3 This comment raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Regarding the comment's request for a community advisory board, creation of an advisory committee is within the scope of the March Joint Powers Commission's authority. However, whether the Commission establishes an advisory committee or not, the creation of an advisory committee is not germane to the CEQA analysis for the Project. The comment further requests a non-industrial alternative. In response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. With regard to the process for the proposed Environmental Justice Element for the March JPA General Plan, please refer to Response to Comment RI-8.2 above.

From: aramjim09@gmail.com
Sent: Friday, January 5, 2024 12:04 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-9.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Ana Ramirez
92508

Sent from my iPhone

RI-9

Ana Ramirez
January 5, 2024

RI-9.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Beverly Arias <beverly951@yahoo.com>
Sent: Friday, January 5, 2024 8:25 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the %2��cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you%2��ve completed that process should you evaluate if the current project plan meets its standard.

RI-10.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value %2��civic engagement%2�� in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Please consider our input, as residents/taxpayers and our families.

Sincerely,

Beverly M. Arias

92504

Sent from Yahoo Mail on Android

RI-10

Beverly Arias
January 5, 2024

RI-10.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentence to the form letter: "Please consider our input, as residents/taxpayers and our families." This addition does not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Friday, January 5, 2024 6:40 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-11.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Blanca Rivera
92508

Sent from my iPhone

RI-11

Blanca Rivera
January 5, 2024

RI-11.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Friday, January 5, 2024 12:42 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-12.1

I am a Certified Safety Professional working many years as a Safety Director and Manager in the warehouse industry know first hand the traffic, environmental hazards, security, and safety hazards mass warehouses create. Enough is enough, saturating the area with warehouses is not the answer. This will only cause blight, reduction in property values, and reduce quality of life for all in the area.

RI-12.2

Sincerely,
Bobby Robinette
92508

RI-12

Bobby Robinette
January 5, 2024

RI-12.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-12-2 This comment lists the commenter's professional credentials and experience, and states the Project will cause blight, reduction in property values, and reduce quality of life. Please see Section 4.1, Aesthetics, and Topical Response 1 – Aesthetics, which discuss and analyze the Project's operational aesthetics impacts and determined these impacts to be less than significant. The comment raises no specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Luis Rodriguez <byr2104@hotmail.com>
Sent: Friday, January 5, 2024 11:04 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

My name is Carolina Rodriguez im an student of RCC and as a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-13.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Carolina Rodriguez
92508

RI-13

Carolina Rodriguez
January 5, 2024

RI-13.1 This comment provides personal information, and otherwise is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Claire Grimes <claire.m.grimes@gmail.com>
Sent: Friday, January 5, 2024 12:18 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

My name is Claire Grimes and I am resident of Riverside County and recent college graduate. As I learned about the plans to build more warehouses in Riverside, I have become more concerned about the impact they will have on the environment and the community, especially with so many warehouses already in the County and surrounding areas, some of which are not even being used. RI-14.1

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. RI-14.2

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Claire Grimes
92320

RI-14

Claire Grimes
January 5, 2024

RI-14.1 This comment provides personal information and raises general concerns about impacts caused by warehouses. The comment raises no specific issues, questions, or concerns about the analysis in the Recirculated Draft EIR sections.

RI-14.2 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Eunhee Kim <eunster@yahoo.com>
Sent: Friday, January 5, 2024 12:14 PM
To: Dan Fairbanks
Subject: Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a R-NOW member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit that EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-15.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Eunhee Kim
Raleigh, NC 27615

RI-15

Eunhee Kim
January 5, 2024

RI-15.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: fera momtaz <fera_momtaz@yahoo.com>
Sent: Friday, January 5, 2024 9:22 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-16.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Fera S.Momtaz
Orange Crest community
92508

Sent from my iPhone

RI-16

Fera Momtaz
January 5, 2024

RI-16.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Ira And Rajean <longfam6@att.net>
Sent: Friday, January 5, 2024 8:30 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, we are disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-17.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Our families deserve better!

Sincerely,

Ira and Rajean Long
92506

RI-17

Ira and Rajean Long
January 5, 2024

RI-17.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentence to the form letter: "Our families deserve better!" This addition does not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Janice Oien <gdojlo@yahoo.com>
Sent: Friday, January 5, 2024 8:26 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

RI-18-1

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Janice Oien
<name>
<zip code>92508

Sent from my iPhone

RI-18

Janice Oien
January 5, 2024

RI-18.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: J Gonsman <teamgonsman@yahoo.com>
Sent: Friday, January 5, 2024 11:07 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-19.1

Sincerely,

Jason Gonsman
92508

RI-19

Jason Gonsman
January 5, 2024

RI-19.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Jean Aklufi <jeanaklufi@gmail.com>
Sent: Friday, January 5, 2024 3:50 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-20.1

Sincerely,

Jean Aklufi
92506

Jean

RI-20

Jean Aklufi
January 5, 2024

RI-20.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Friday, January 5, 2024 8:32 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-21.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Joe Aklufi
Riverside, 92506

RI-21

Joe Aklufi
January 5, 2024

RI-21.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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Comment Letter RI-22

From: John Lyell <jlyell@verizon.net>
Sent: Friday, January 5, 2024 8:44 AM
To: Dan Fairbanks; Conder, Chuck
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a local Orangecrest community member, and lifelong Riverside resident, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as you have not made any meaningful changes to the West Campus Upper Plateau (SCH 2021110304), which as you are aware, is a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits, are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. RI-22.1

I ask that you submit the EJ element to a full CEQA process and that a warehouse moratorium be implemented until the process is complete. Only after you’ve completed that process, should you evaluate if the current project plan meets its standard. This will also give you additional time to review the Irvine Great park project and what they have did with similar former federal land. This is the perfect time for the JPA think outside the box and to go out leaving a positive lasting impact on the community and not rows of warehouses, traffic congestion, reduced air quality and crumbling roads. RI-22.2

Great Park | City of Irvine

GREAT PARK FRAMEWORK PLAN

Great Park will be one of the largest municipal parks in the country. Through careful planninç community engagement, it is on track to bring a wide variety of unique cultural and recreati opportunities to Irvine. Great Park has a rich history as the former Marine Corps Air Station El and its 1,300 acres embrace recreation, competitive sports, cultural activities, and the natu environment. Over 500 acres of the park are built and operating, and in 2022, the City approve Great Park Framework Plan to guide the next phase of development. The plan's initial phase b 300 acres of exciting new park amenities, including a world-class outdoor amphitheater, new c attractions, and expansive space dedicated to unprogrammed passive enjoyment. The next ph Great Park draws on extensive community input to deliver an expanding array of new opportu to secure the park's place among the world's greatest metropolitan parks.

GREAT PARK CONCEPTUAL FRAMEWORK PLAN

1. Botanical Gardens
2. Library
3. Veterans Memorial Garden
4. Grand Promenade
5. Great Meadow
6. North Lake
7. Central Lake
8. South Lake
9. Amphitheater
10. Full Circle Farm
11. Pedestrian/Bicycle Bridges
12. Bosque
13. Sports Complex
14. Cultural Terrace
15. Wild Rivers

It is somewhat telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have refused to consider the non-industrial alternatives and refused to implement a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider these alternatives and non-industrial uses for the West Campus Upper Plateau and positive mark on the community.

RI-22.3

Sincerely,

John Lyell
92508

RI-22

John Lyell
January 5, 2024

RI-22.1 This comment provides personal information and is the first three paragraphs of Form Letter RA – Environmental Justice Element. The commenter adds the following phrases to the first paragraph: "as you have not made" and "which as you are aware,". These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

RI-22.2 This comment requests March JPA review the Irvine Great Park Project as an alternative to the Project, particularly in light of the commenter's concerns regarding transportation facility impacts and reduced air quality. The comment includes text and images from the Irvine Great Park Framework Plan. In response, please see Topical Response 8 – Non-Industrial Alternative, for discussion of a non-industrial alternative as well as the Irvine Great Park Project. The comment raises no specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-22.3 This comment is the last paragraph of Form Letter RA – Environmental Justice Element. The commenter adds the following phrase: "and positive mark on the community." This addition does not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: John Viafora <jrviafora@gmail.com>
Sent: Friday, January 5, 2024 4:35 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
John Viafora
Indigo point 92508, Orange Crest

Sent from my iPhone

RI-23

John Viafora
January 5, 2024

RI-23.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: mkymsecltr <mkymsecltr@aol.com>
Sent: Friday, January 5, 2024 6:16 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

John W. Hagmann,
Mission Grove, 92506

Sent from my Verizon, Samsung Galaxy smartphone

RI-24

John W. Hagman
January 5, 2024

RI-24.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Josie Sosa <josie.sosa@gmail.com>
Sent: Friday, January 5, 2024 8:23 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Josie Sosa
92508

Josie Sosa

RI-25

Josie Sosa
January 5, 2024

RI-25.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: K Doty <dkdoty2@gmail.com>
Sent: Friday, January 5, 2024 2:25 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. Many people have expressed their concern about this project, submitted public record comments and asked for alternative uses of the land.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Kristy Doty
92508

Sent from my iPhone

RI-26

Kristy Doty
January 5, 2024

RI-26.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentence to the form letter: "Many people have expressed their concern about this project, submitted public record comments and asked for alternative uses of the land." All public comments received during the Draft EIR and Recirculated Draft EIR public comment periods are responded to in this Final EIR. With regard to alternative uses of the land, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative, and discussion of alternatives proposed through public comment. In response to this remainder of this comment, please see Form Letter RA Response.

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From: Lenora Mitchell <rageturner@gmail.com>
Sent: Friday, January 5, 2024 8:51 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow. Literally selling our health for financial gain is not being civically engaged.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Warehouses on that land are not inevitable and I believe March JPA can do better. You have the resources to do better for the community. Please reach down deep and do better.

Sincerely,

Lenora Mitchell
92508

RI-27

Lenora Mitchell
January 5, 2024

RI-27.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: "Literally selling our health for financial gain is not being civically engaged." and "Warehouses on that land are not inevitable and I believe March JPA can do better. You have the resources to do better for the community. Please reach down deep and do better." These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Friday, January 5, 2024 6:39 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Linda Rivera
92508

Sent from my iPhone

RI-28

Linda Rivera
January 5, 2024

RI-28.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Friday, January 5, 2024 6:38 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the.
Linda Tingley Rivera
92508

Sent from my iPhone

RI-29

Linda Tingley Rivera
January 5, 2024

RI-29.1 This comment is Form Letter RA – Environmental Justice Element with a truncated last sentence. As such, in response to this comment, please see Form Letter RA Response.

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From: Luis Rodriguez <byr2104@hotmail.com>
Sent: Friday, January 5, 2024 11:02 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Luis Rodriguez
Orangecrest 92508

RI-30

Luis Rodriguez
January 5, 2024

RI-30.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Maria Rodriguez <mariarod0421@gmail.com>
Sent: Friday, January 5, 2024 10:59 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Maria R
92508

RI-31

Maria Rodriguez
January 5, 2024

RI-31.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Mark Calhoun <mcalhoun@orepac.com>
Sent: Friday, January 5, 2024 8:25 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-32.1

I ask you to please think through this. My backyard faces where this is supposed to be built and we utilize that area constantly for hiking and riding our bikes. I purchased my home because of this location and am hoping that it will not be ruined with warehouses.

RI-32.2

Sincerely,

Mark Calhoun
92508

Get Outlook for iOS

CONFIDENTIALITY NOTICE: This email and any attachments may be confidential, proprietary or legally privileged.
Any unauthorized review, use, disclosure, distribution or copying of this email is prohibited except by or on behalf of the intended recipient.
If you received this message in error or are not the intended recipient, please delete or destroy the email message and any attachments and n otify the sender immediately.

RI-32

Mark Calhoun
January 5, 2024

RI-32.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-32.2 This comment details personal experience with the Project site and expresses concerns about the loss of recreational open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. The comment raises no specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Mark Lien <marklien7@gmail.com>
Sent: Friday, January 5, 2024 6:32 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-33.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

This is a horrible location to put warehouses, right in the middle of homes on all three sides. The smog, noise and traffic from the warehouses is not wanted. And all the mountain biking trails there will be destroyed. I'm aware that there is Sycamore Canyon, but that area is being invaded by warehouses also. Besides, with a new warehouse proposal in Sycamore Canyon, there is very little flat area to walk around. It is just basically going down and up which is a difficult hike for beginners and children. The upper West plateau is much flatter and easier for children and older residents to hike and walk and enjoy the outdoors. There are so many places in Orange county like that. Everybody wants to move to Orange county. Can we not make Riverside a desirable destination and start by keeping the upper West plateau as a county park for residents to enjoy and keep our residents from moving to Orange county? Please.

RI-33.2

Sincerely,
Mark Lien
92508

RI-33

Mark Lien
January 5, 2024

RI-33.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-33.2 This comment raises concerns regarding Project's air quality, noise, and traffic impacts. Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks, including to children. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts.

With regard to on-site operational noise, Section 4.11, Noise, determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant. Section 4.11, Noise, evaluated the mitigation potential of rubberized asphalt but determined such a measure would not lower off-site traffic noise levels below the level of significance for Roadway Segment #13, so the Project's noise impacts for Roadway Segment #13 is significant and unavoidable.

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

The comment further raises concerns regarding the loss of recreational open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Mary Peters <mariolivas@yahoo.com>
Sent: Friday, January 5, 2024 8:40 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Mary Peters
92508

Sent from my iPhone

RI-34

Mary Peters
January 5, 2024

RI-34.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: matt silveous <mattsilveous1812@gmail.com>
Sent: Friday, January 5, 2024 9:11 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

matt Silveous
92508

RI-35

Matt Silveous
January 5, 2024

RI-35.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Melissa Suarez <melissaims@yahoo.com>
Sent: Friday, January 5, 2024 5:18 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am disappointed in the Recirculated Draft Environmental Impact Report (REIR), as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), which as you should already know, is an extremely unpopular and environmentally harmful project. RI-36.1

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits into this are clearly an empty meaningless ritual meant to check a box so you can say you did your job. This EJ policy shoudl have been drafted years before thee project started, not at the same time as an in-process project you are trying to push through before the JPA sunsets in July 2025. RI-36.2

I request that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan still meets its standard. My guess is that it will not.

It is very telling that you proposed no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, somehow fits the existing plan. Doesn't seem to be on the up and up to me.

For the past two years, you have never considered non-industrial alternatives and flat out refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. You claim to value "civic engagement" but that has yet to be shown. Your EJ policy and how it was done, show the opposite. RI-36.3

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Melissa Suarez
Orangecrest 92508

RI-36

Melissa Suarez
January 5, 2024

RI-36.1 This comment expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits, under the proposed Development Agreement, specifically funding and construction of the proposed Park and the Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-36.2 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, requests a full CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8, and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-36.3 This comment raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Regarding the comment's request for a community advisory board, creation of an advisory committee is within the scope of the March Joint Powers Commission's authority. However, whether the Commission establishes an advisory committee or not, the creation of an advisory committee is not germane to the CEQA analysis for the Project. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. With regard to the process for the proposed Environmental Justice Element for the March JPA General Plan, please refer to Response RI-36.2 above.

From: Michael & Margie Bayarsky <mmbay5@verizon.net>
Sent: Friday, January 5, 2024 9:17 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Sincerely, <name> <zip code>

RI-37

Michael and Margie Bayarsky
January 5, 2024

RI-37.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Michael Cook <m.cook@verizon.net>
Sent: Friday, January 5, 2024 2:58 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
My wife and I have lived in the Orangecrest area since 1991 when we bought our new home and raised our three children.
As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Michael & Sandra Cook 92508

RI-38

Michael and Sandra Cook
January 5, 2024

RI-38.1 This comment includes personal information and is otherwise Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Mike Cachat <mcachat@jensonusa.com>
Sent: Friday, January 5, 2024 10:28 AM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com; mk_futrell@yahoo.com; ppitchford@riversideca.gov; mfutrell@riverisdeca.gov
Subject: Please read the impact this will have on my business
Attachments: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304.eml

Hi Mr. Fairbanks,

See attached my email regarding the environmental impact report for the new warehouse project that will take away the existing trails near the ammo dump yard. I cannot express enough the impact this will have on my bicycle business down the street. I have thousands of riverside residents that use these trails on a daily basis. In addition I have 100+ employees who depend on these trails for our bicycle business to remain strong. I know the March JPA charter requires public use space for trails. The proposed plan will destroy these trails and there are no plans to create new trails. Also losing trails will impact my business and result in job losses. In my view this project goes against the very charter created to govern this land.

RI-39.1

Please consider this statement with the strongest concern possible for my business and the people of Jenson USA and my thousands of customers in the area.

Thank you,

Mike Cachat
Founder and CEO
o.1 (951) 344-1022
e. mcachat@jensonusa.com
w. JensonUSA.com
1615 Eastridge Ave. Riverside, CA 92507

TAG YOUR RIDES #JENSONUSA

From: Mike Cachat <mcachat@jensonusa.com>
Sent: Friday, January 5, 2024 10:14 AM
To: fairbanks@marchjpa.com
Cc: rivnowgroup@gmail.com
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member and business owner in Riverside, I am very disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I also am surprised that the charter to provide trails Is not more important and I really don’t consider the tiny amount of green space around the complex counts as trails. I’m a mountain biker and my 100 employees and hundreds of customers mountain bike on those trails and they are very important to my business. Please keep the area as trails that we can actually use.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-39.2

Sincerely,

Mike Cachat
92507

Mike Cachat
Founder and CEO
o.1 (951) 344-1022
e. mcachat@jensonusa.com
w. JensonUSA.com
1615 Eastridge Ave. Riverside, CA 92507

AMERICA'S BIKE SHOP

TAG YOUR RIDES #JENSONUSA

RI-39

Mike Cachat
January 5, 2024

RI-39.1 This comment expresses concerns about the loss of recreational open space and the impact to the commenter's bicycle business. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The comment raises no specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-39.2 This comment includes personal information and is otherwise Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response. The comment also expresses disappointment that more trails will not be developed as part of the Project, as well as concern about preserving existing trails and the impact the Project will have on bikers and on the commenter's business. In regard to the comment discussing the existing trails used for mountain biking, please see Response to RI-39.2, above.

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From: Mike Cachat <mikecachey@gmail.com>
Sent: Friday, January 5, 2024 10:10 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member and business owner in Riverside, I am very disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I also am surprised that the charter to provide trails Is not more important and I really don’t consider the tiny amount of green space around the complex counts as trails. I’m a mountain biker and my 100 employees and hundreds of customers mountain bike on those trails and they are very important to my business. Please keep the area as trails that we can actually use.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Mike Cachat
92507

RI-40

Mike Cachat
January 5, 2024

RI-40.1 This comment includes personal information and is otherwise Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response. The comment also expresses disappointment that more trails will not be developed as part of the Project, as well as concern about preserving existing trails and the impact the Project will have on bikers and on the commenter's business. In regard to the comment discussing the existing trails used for mountain biking, while the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Friday, January 5, 2024 8:13 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Pete Pettis
92508

RI-41

Peter Pettis
January 5, 2024

RI-41.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Randy Lindegard <rdl50@verizon.net>
Sent: Friday, January 5, 2024 11:03 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Sincerely,

Randall Lindegard
20769 Freeport Dr
Riverside CA 92508

RI-42

Randall Lindegard
January 5, 2024

RI-42.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Shirley <fungyinandjoseph@gmail.com>
Sent: Friday, January 5, 2024 10:23 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Raymond Or
CA 92508

RI-43

Raymond Or
January 5, 2024

RI-43.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: rjpeters13 <rjpeters13@yahoo.com>
Sent: Friday, January 5, 2024 8:43 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Ronald Peters
92508

Sent from my Galaxy

RI-44

Ronald Peters
January 5, 2024

RI-44.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Shaan Saigol <shaansaigol@gmail.com>
Sent: Friday, January 5, 2024 1:04 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Shaan Saigol
92508, Orangercrest Neighborhood

RI-45

Shaan Saigol
January 5, 2024

RI-45.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Shirley <fungyinandjoseph@gmail.com>
Sent: Friday, January 5, 2024 10:22 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

Adding an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse," as it ought to have been drafted years ago, not at the same time as an in-process project that you are trying to push through before sunsetting in July 2025.

Could you please submit the EJ element to a full CEQA process and then implement a warehouse moratorium until the process is complete? Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board despite persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Shirley Ng

CA 92508

RI-46

Shirley Ng
January 5, 2024

RI-46.1 This comment is Form Letter RA – Environmental Justice Element. The commenter revised the following sentences in the form letter: "Adding an Environment Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box." and "Could you please submit the EJ element to a full CEQA process and then implement a warehouse moratorium until the process is complete?". These revisions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Steven Balmer <sjgbalmer@gmail.com>
Sent: Friday, January 5, 2024 8:47 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Steve Balmer
92508

RI-47

Steve Balmer
January 5, 2024

RI-47.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Steven Haas <stevenghaas@me.com>
Sent: Friday, January 5, 2024 3:10 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Steven Haas, 92506

RI-48

Steven Haas
January 5, 2024

RI-48.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Steven McElroy <steven.mcelroy.esq@gmail.com>
Sent: Friday, January 5, 2024 11:32 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Steven McElroy
92508

Sent from my iPhone

RI-49

Steven McElroy
January 5, 2024

RI-49.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: KELLEY PAGE <kpage68684@verizon.net>
Sent: Friday, January 5, 2024 10:14 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a concerned community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Our community deserved better.

Sincerely,

Suzanne Page
92508

Sent from my iPhone

RI-50

Suzanne Page
January 5, 2024

RI-50.1 This comment provides personal information and is otherwise Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Steve Balmer <sjgbalmer@hotmail.com>
Sent: Friday, January 5, 2024 8:51 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

The Balmer Family
92508

RI-51

The Balmer Family
January 5, 2024

RI-51.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Tia Ballesteros <tiaballesteros13@gmail.com>
Sent: Friday, January 5, 2024 8:57 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing to urge you to listen to the neighbors concerns. As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Tia Ballesteros
92508

RI-52

Tia Ballesteros
January 5, 2024

RI-52.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentence to the form letter: "I am writing to urge you to listen to the neighbors concerns." All public comments received during the Draft EIR and Recirculated Draft EIR public comment periods are responded to in this Final EIR. This addition does not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Friday, January 5, 2024 2:46 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. A project that would negatively and directly impact my family and community.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. Doesn’t that make more sense?

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Please take the people living in this community into consideration when making your decisions.

Sincerely,

Veronica Juarez
Orangecrest
92508

RI-53

Veronica Juarez
January 5, 2024

RI-53.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: "A project that would negatively and directly impact my family and community."; "Doesn't that make more sense?" and "Please take the people living in this community into consideration when making your decisions." These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: William Landa <wisaiahlanda@gmail.com>
Sent: Friday, January 5, 2024 2:32 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

William Landa
92518

RI-54

William Landa
January 5, 2024

RI-54.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Abdallah Karim <akarim23@gmail.com>
Sent: Sunday, January 7, 2024 10:21 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Abdallah Karim
92508

RI-55

Abdallah Karim
January 6, 2024

RI-55.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: christine martin <cmcelsemartin@gmail.com>
Sent: Saturday, January 6, 2024 6:51 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

My life in Riverside has spanned 6 decades. It's been a wonderful place to grow and thrive. As a retired educator, I continue to be dedicated to this city working for and hoping for its continued growth as a place for all people who live here to flourish. As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Christine Martin
92506

RI-56

Christine Martin
January 6, 2024

RI-56.1 This comment provides personal information and otherwise is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: As such, in response to this comment, please see Form Letter RA Response.

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From: david doty <animal.adventure.army@gmail.com>
Sent: Saturday, January 6, 2024 12:20 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
David Doty
92508

Sent from my iPhone

RI-57

David Doty
January 6, 2024

RI-57.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Estevan Gonzalez <egonzalez3296@gmail.com>
Sent: Saturday, January 6, 2024 12:27 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Estevan J Gonzalez
92507

RI-58

Estevan K. Gonzalez
January 6, 2024

RI-58.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: FRANK ERDODI <honiebun2k@aol.com>
Sent: Saturday, January 6, 2024 6:08 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Frank and Michelle Erdodi
92508

Sent from my iPad

RI-59

Frank and Michelle Erdodi
January 6, 2024

RI-59.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: John Alfred <jandlalfred@sbcglobal.net>
Sent: Saturday, January 6, 2024 9:02 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. RI-60.1

***Let me highlight my personal concerns*: I have lived in Riverside most of my life (60+ years) as has my husband (~62 years.) My father was born in Riverside, and *his* father was born in Riverside. I very much care about this community and its wellbeing. Reasonable, thoughtful consideration should be top priority before allowing enormous projects that will adversely impact this city and it's neighborhoods. I am deeply concerned about this project and the added large truck traffic, pollution, and noise it will add to our busy city. It will destroy Riverside's pleasant livability in a popular residential area. Again, we ask you to please consider alternative, non-industrial uses for West Campus Upper Plateau. Do not ignore the community outcry against the current plan. RI-60.2 RI-60.3

Sincerely,

Lisa Alfred,
92504

RI-60

Lisa Alfred
January 6, 2024

RI-60.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-60.2 This comment provides personal information and expresses concern about Project impacts due to truck traffic, pollution, and noise. Regarding truck traffic, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains, March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week and truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, as Section 4.15, Transportation, explains, to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts.

With regard to on-site operational noise, Section 4.11, Noise, determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant. Section 4.11, Noise, evaluated the mitigation potential of rubberized asphalt but determined such a measure would not lower off-site traffic noise levels below the level of significance for Roadway Segment #13, so the Project's noise impacts for Roadway Segment #13 is significant and unavoidable.

This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-60.3 This comment requests consideration of a non-industrial alternative. In response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Molly Brooke Becker <mmbrooke@gmail.com>
Sent: Saturday, January 6, 2024 8:03 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

My family and I have lived in Canyon Crest in Riverside for 8 years. One of the main reasons we chose this area was because of the access to the beautiful Sycamore Canyon and the ability to bike to work. We have been so disappointed to see the developments going on around the park which harm the preserves both aesthetically and ecologically. Our youngest son has now developed asthma due to the local poor air quality. We want to see Riverside developed responsibly with the future of our children in mind and we are strongly opposed to the proposed warehouse expansion project.

RI-61.1

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-61.2

Sincerely,

Molly Brooke Becker
92506

RI-61

Molly Brooke Becker
January 6, 2024

RI-61.1 This comment provides personal information and raises concerns regarding loss of recreational open space and air quality impacts. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks, including to children. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-61.2 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: nancy riverbendcommons.org <nancy@riverbendcommons.org>
Sent: Saturday, January 6, 2024 9:17 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Nancy Ward
92504

RI-62

Nancy Ward
January 6, 2024

RI-62.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: peasleeamber <peasleeamber@gmail.com>
Sent: Sunday, January 7, 2024 8:03 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Amber Peaslee
92508

RI-63

Amber Peaslee
January 7, 2024

RI-63.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Erin Conlisk <erin.conlisk@gmail.com>
Sent: Sunday, January 7, 2024 8:05 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am a community member who frequently visits a gym near the West Campus Upper Plateau. At the gym, I have acquaintances within the logistics industry (specifically Amazon) that complain about the pay, conditions, and upward mobility of their jobs. As such, I have followed the progress of the development of the West Campus Upper Plateau. RI-64.1

I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. For example, it seems silly to think that small strips of natural land on the border of the development would serve as a reasonable conservation easement.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I can tell you now, from personal experience, that the logistics industry has not treated the people I know well. Why would I have faith it would treat the broader community justly?

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. RI-64.2

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow. True EJ requires co-production with the community.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Erin Conlisk
92506

RI-64

Erin Conlisk
January 7, 2024

RI-64.1 This comment provides personal information and raises concerns regarding the pay, conditions, and upward mobility within the logistics industry. In response, please see Topical Response 5– Jobs. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-64.2 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: "For example, it seems silly to think that small strips of natural land on the border of the development would serve as a reasonable conservation easement."; "I can tell you now, from personal experience, that the logistics industry has not treated the people I know well. Why would I have faith it would treat the broader community justly?"; and "True EJ requires co-production [*sic*] with the community." With regard to open space, the Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The remaining additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: jenna pontious <jennapbird@icloud.com>
Sent: Sunday, January 7, 2024 12:15 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

<name>
<zip code>

Jenna Pontious She/Hers
C is for Cookie 🍪
Sent from my iPad

RI-65

Jenna Pontious
January 7, 2024

RI-65.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Lindsay Barnes <barnes.lindsayrae@yahoo.com>
Sent: Sunday, January 7, 2024 10:31 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. RI-66.1

As a parent raising my children in Riverside the negative health impacts of even more truck traffic in our city as a result of more warehousing is a major concern. The push, against the wishes of the community, to put in a project that would further increase truck traffic, especially directly adjacent to residential areas, is unacceptable. Furthermore, we should be aiming to diversify our economic base, not doubling down on an industry that harms our environment while offering mostly low-wage, high-injury jobs. RI-66.2

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. We want better for our community as a whole. RI-66.3

Sincerely,
Lindsay Barnes
92506

RI-66

Lindsay Barnes
January 7, 2024

RI-66.1 This comment is the first paragraph of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-66.2 This comment expresses concern about the negative health impacts from truck traffic and expresses opposition to the Project. As detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains, March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week and truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, as Section 4.15, Transportation, explains, to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. The comment also raises issues with the type of jobs that the Project would generate. In response, please see Topical Response 4 – Jobs. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-66.3 This comment is the remainder of Form Letter RA – Environmental Justice Element with the additional sentence: "We want better for our community as a whole." These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Mary Viafora <mlviafora@gmail.com>
Sent: Sunday, January 7, 2024 1:24 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

RI-67.1

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Please consider the families, especially those with young children, and how the project you are proposing will impact their health. If this was your family would you want them surrounded by warehouses and the implications that come with that for years to come, I don’t think so!

RI-67.2

Sincerely,

Mary Viafora
92508

Sent from my iPhone

RI-67

Mary Viafora
January 7, 2024

RI-67.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-67.2 This comment expresses concern about impacts of the Project on the health of families, especially those with young children. As detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks, including to children. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: MJ Rivera <milo.rivera21052@gmail.com>
Sent: Sunday, January 7, 2024 3:54 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits is clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board despite persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Milo Rivera

92508

RI-68

Milo Rivera
January 7, 2024

RI-68.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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Comment Letter RI-69

From: phuddle104 <phuddle104@charter.net>
Sent: Sunday, January 7, 2024 1:54 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

My name is Patty Huddleston and I live in the Mission Grove community. As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value ❓%

Sincerely,

Patty Huddleston

RI-69

Patty Huddleson
January 7, 2024

RI-69.1 This comment provides personal information and is otherwise a truncated Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Richard Stalder <xcoachrs@sbcglobal.net>
Sent: Sunday, January 7, 2024 9:22 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely
Richard Stalder>
92506

Sent from my iPad

RI-70

Richard Stalder
January 7, 2024

RI-70.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Anthony Reyes <a.reyes2785@gmail.com>
Sent: Monday, January 8, 2024 7:21 PM
To: Dan Fairbanks
Subject: Non industrial use the West Campus Upper Plateau Project

To who this may concern,

I'm Anthony Reyes and I'm standing with the community of riders at Greer ranch who are speaking up about the plan to industrialize west campus upper plateau. I've been riding here for a couple months and make the drive from 70 miles away because Greer ranch has killer trails that are hard to come by cause open spaces like Greer ranch have either been taken up by houses, businesses, freeways or other plots land are just not an ideal place to ride a bike. As a fairly new rider at these trails I can tell that there is a tight community here by way of reading facebook post and talking to people when I ride these trails. This place is unique and I look forward to seeing the progression.

RI-71.1

Best regards,

Anthony
Location: 90602

RI-71

Anthony Reyes
January 8, 2024

RI-71.1 This comment provides support for open space and trails such as Greer Ranch, which is approximately 23 miles south of the Project site. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land in perpetuity with existing trails for passive recreational use. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Brian Barnes <bkbdrummer@aol.com>
Sent: Monday, January 8, 2024 4:39 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Brian Barnes
92506

RI-72

Brian Barnes
January 8, 2024

RI-72.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Brian Wardle <wardleb@gmail.com>
Sent: Monday, January 8, 2024 9:57 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Brian Wardle
Orangecrest Neighborhood
92508

RI-73

Brian Wardle
January 8, 2024

RI-73.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Cindy <clchiek@gmail.com>
Sent: Monday, January 8, 2024 9:25 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Cindy Chiek
92508

RI-74

Cindy Chiek
January 8, 2024

RI-74.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: David Quirarte <davidquira14455@gmail.com>
Sent: Monday, January 8, 2024 5:05 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

David Quirarte

92507

RI-75

David Quirarte
January 8, 2024

RI-75.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Elizabeth Iribe <elizabeth.iribe@gmail.com>
Sent: Monday, January 8, 2024 6:59 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Elizabeth Iribe, LMFT, Psy. D.
Psych Social Worker

RI-76

Elizabeth Iribe
January 8, 2024

RI-76.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Erin A Lehman <Erin.A.Lehman@kp.org>
Sent: Monday, January 8, 2024 9:42 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, who is a third generation resident of Riverside, an active runner, hiker and community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make any meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), which continues to be a highly unpopular and environmentally detrimental project. RI-77.1

I see our outdoor areas shrinking, the air quality diminishing, and endure all of the negative impacts that come to increasing volumes of large trucks on our roads that continue to congest our ability to travel in our community and rapidly wear down our roads. RI-77.2

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

There have been no substantive changes in the REIR yet claim that the new EJ policy, which was developed without community input somehow fits the existing plan.

It is nothing less than insulting to continue to endure this authoritative approach toward our community and what we residents actually want and need.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. RI-77.3

Sincerely,

Erin Lehman
92506

NOTICE TO RECIPIENT: If you are not the intended recipient of this e-mail, you are prohibited from sharing, copying, or otherwise using or disclosing its contents. If you have received this e-mail in error, please notify the sender immediately by reply e-mail and permanently delete this e-mail and any attachments without reading, forwarding or saving them. v.173.295 Thank you.

RI-77

Erin Lehman
January 8, 2024

RI-77.1 This comment provides personal information and expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits, under the proposed Development Agreement, specifically funding and construction of the proposed Park and the Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-77.2 This comment expresses concern regarding loss of recreational open space, air quality impacts, and increased truck traffic. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts.

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

RI-77.3 This comment requests a full CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without

adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

From: Esmeralda Montes <emts.deo@gmail.com>
Sent: Monday, January 8, 2024 4:17 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

RI-78.1

At the first Environmental Justice Plan Workshop, community members were only given 10 minutes to review the over 50 detailed policies — many of which couldn't be applied to this project — and were asked to choose which were most important. This workshop appeared rushed and has confirmed to many neighbors that the committee overseeing this project is not taking the proper time to effectively analyze the harm that an industrial project will have on those living in the disadvantaged communities (seen in the Exhibit 7-1 in the new EJ General Plan).

RI-78.2

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-78.3

Sincerely,
Esmeralda M 92553

RI-78

Esmeralda Montes
January 8, 2024

RI-78.1 This comment is the first paragraphs of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-78.2 This comment discusses the commenter's experience at the Environmental Justice Plan Workshop. The Environmental Justice Element process is separate from the CEQA process for the Project. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-78.3 This comment is the last sentence of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Faith Mata <fmata@jensonusa.com>
Sent: Monday, January 8, 2024 4:40 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" i

RI-79.1

I have been riding and hiking these trails for years. There are so few mountain bike and hiking trails locally in comparison to all our surrounding counties and you want to remove what little we have left?! We are literally surrounded by warehouses everywhere we turn…we do not NEED or WANT any more! We do not want to be another Fontana! The air pollution locally is among the worst in the United States! The amount of semi truck traffic locally is horrendous as well. There are literally thousands of other places to build warehouses without taking away the few trails we have remaining. It's bad enough we've already lost about 50 acres worth of land and trails across the street at Sycamore to greedy developers just for another awful warehouse to be built! Have some consideration for what the community wants! Because it certainly isn't hideous, grossly polluting and ugly warehouses in their backyards! None of us wants these warehouses here.

RI-79.2

Sincerely,
Faith J. Mata

JENSON USA
Faith Mata
STORE ASSOCIATE I
o. 19513002877
e. fmata@jensonusa.com | w. JensonUSA.com
1615 Eastridge Ave. Riverside, CA 92507
AMERICA'S BIKE SHOP
TAG YOUR RIDES #JENSONUSA

RI-79

Faith J. Mata
January 8, 2024

RI-79.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-79.2 This comment details the commenter's use of the trails on the Project site. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity.

The comment further raises concerns regarding air pollution and truck traffic. Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts. Regarding truck traffic, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains, March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week and truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, as Section 4.15, Transportation, explains, to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

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From: Michele Muehls <michelebello@hotmail.com>
Sent: Monday, January 8, 2024 3:28 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
Thank you for taking the time to read this. It means a great deal to myself and my family.
As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Michele Bello Muehls
Hawarden, 92506

Sent from my iPhone

RI-80

Michele Bello Muehls
January 8, 2024

RI-80.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: "Thank you for taking the time to read this. It means a great deal to myself and my family." These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Nicolette Rohr <nicolette.rohr@gmail.com>
Sent: Monday, January 8, 2024 11:09 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Nicolette Rohr
92506

RI-81

Nicolette Rohr
January 8, 2024

RI-81.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Ryan Pezer <ryanpezer@gmail.com>
Sent: Monday, January 8, 2024 5:30 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. RI-82.1

I use the proposed area to ride my mountain bike as a means to clear the mental toll we all face each and every day. I'd prefer not to ride my bicycle on the roadways as there are far more dangers of moving vehicles, etc. RI-82.2

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. RI-82.3

Sincerely,

Ryan Pezer
92501

RI-82

Ryan Pezer
January 8, 2024

RI-82.1 This comment is the first paragraph of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-82.2 This comment details the commenter's use of the trails on the Project site for biking. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-82.3 This comment is the remainder of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Senanu Pearson <senanu.pearson@gmail.com>
Sent: Monday, January 8, 2024 12:09 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I was disappointed to see that despite the inadequacy of the environmental impact report regarding the West Campus Upper Plateau (SCH 2021110304), the recirculated draft contains largely the same language and the same inadequacies. The cecirculated draft still does not address the concerns of community members, whose lives will be directly impacted by this environmentally costly project. RI-83.1

Although I am pleased to see that an environmental justice component has been included, this component needs to go through the full CEQA process to determine whether the current plan meets its standard. RI-83.2

Throughout this process, I have been disappointed that only industrial uses of this land have been seriously considered. The land, located in a residential community, should be used to enhance the community, not be bulldozed. RI-83.3

Sincerely,

Senanu Spring-Pearson
Riverside, CA 92506

RI-83

Senanu Spring-Pearson
January 8, 2024

RI-83.1 This comment expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits, under the proposed Development Agreement, specifically funding and construction of the proposed Park and the Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-83.2 This comment requests CEQA review of the environmental justice component to determine if the Project is consistent. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-83.2 The comment requests consideration of a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Rattana Chiek <rchiek@gmail.com>
Sent: Tuesday, January 9, 2024 8:22 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Rattana Chiek
92508

RI-84

Rattana Chiek
January 9, 2024

RI-84.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: David Drexler <drxman@att.net>
Sent: Tuesday, January 9, 2024 2:31 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Sincerely,

RI-85

David Drexler
January 9, 2024

RI-85.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Laila D. <contactlailanow@gmail.com>
Sent: Tuesday, January 9, 2024 8:53 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse," as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Laila Derak
92882

RI-86

Laila Derak
January 9, 2024

RI-86.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Scott McLean <smclean@jensonusa.com>
Sent: Tuesday, January 9, 2024 8:42 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

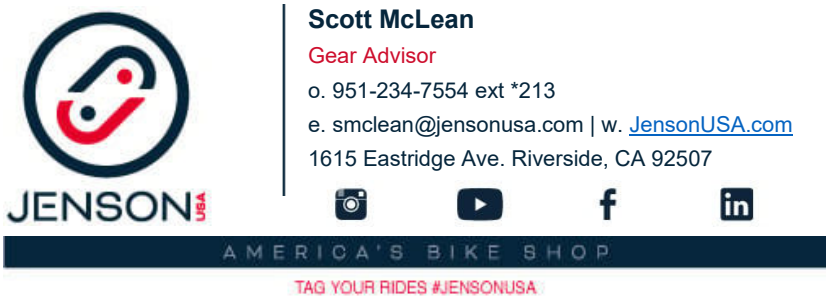
It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Scott McLean
91362

Scott McLean
Gear Advisor
o. 951-234-7554 ext *213
e. smclean@jensonusa.com | w. JensonUSA.com
1615 Eastridge Ave. Riverside, CA 92507



RI-87

Scott McLean
January 9, 2024

RI-87.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: TUESDAY MORGAN <themor@sbcglobal.net>
Sent: Tuesday, January 9, 2024 1:29 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Tuesday Ramunni
Orangecrest Community Homeowner since 2009
29708

RI-88

Tuesday Ramunni
January 9, 2024

RI-88.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Allison Shelton <allisonkshelton@gmail.com>
Sent: Wednesday, January 10, 2024 2:54 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. RI-89.1

On a personal note, my family uses this space for family bike outings , I use it daily for hikes, the MLK cross country team uses the trails for training. Our community does not need more industrial spaces, we need the green spaces we have. RI-89.2

Sincerely,
Allison Shelton
Orange Crest community member
92508

RI-89

Allison Shelton
January 10, 2024

RI-89.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-89.2 This comment details the commenter's use of the trails on the Project site. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Annabelle Porter <belleporter@gmail.com>
Sent: Wednesday, January 10, 2024 12:04 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Annabelle Porter
92508

RI-90

Annabelle Porter
January 10, 2024

RI-90.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Gabriella Zlaket <gzlaket@gmail.com>
Sent: Wednesday, January 10, 2024 10:43 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Good evening. As a community member, I am very disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Thank you for your time and attention to my request.

Sincerely,

Gabriella Zlaket
92508

Sent from my iPhone

RI-91

Gabriella Zlaket
January 10, 2024

RI-91.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: "Good evening." and "Thank you for your time and attention to my request." These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Robledo Maintenance <robledomaintenance@icloud.com>
Sent: Saturday, January 13, 2024 6:46 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

Respectfully,
George Robledo
M: 951-796-2743

Sent from my iPhone

RI-92

George Robledo
January 10, 2024

RI-92.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: jmvtec <jmvtec@aol.com>
Sent: Wednesday, January 10, 2024 9:54 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

James Mysliwiec
20672 Iris Canyon Rd
Riverside. CA 92508
702-281-8375

RI-93

James Mysliwiec
January 10, 2024

RI-93.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Jeanette <jeanettezsharpe@gmail.com>
Sent: Wednesday, January 10, 2024 5:42 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Please take the time to listen to our community of concerned and informed citizens. My family lives adjacent to the fields proposed for the Grove Warehouses. We have an invested interest in what's happening in our community, our neighborhood. Besides increased pollution, traffic, noise - am I not able to keep my windows open at night for fear of hearing "warehouse noise such as beeping of forklifts, the humming of trucks" and so forth, in addition to the degradation of what was preserved nature fields, our homes and property will now devalue. As such, please consider the following. RI-94.1

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. RI-94.2

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Jeanette Sharpe
Agapanthus Court, 92508
*Grove Community neighborhood backing to the fields for the proposed warehouses

RI-94

Jeanette Sharpe
January 10, 2024

RI-94.1 This comment summarizes personal experience residing near the Project site and expresses concerns about Project impacts from pollution, traffic, and noise. Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts.

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

With regard to on-site operational noise, Section 4.11, Noise, determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations.

The comment further raises concerns regarding the degradation of what was preserved nature fields. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods.

RI-94.2 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: KELLY WRIGHTSTONE <kellywrightstone@sbcglobal.net>
Sent: Wednesday, January 10, 2024 11:16 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-95.1

We purchased our home here in 2000 when the base was still active and NO plans where ever to be warehouses. We bought for the open fields and space. Not to be surrounded by concrete buildings and traffic that is polluting our lungs and environment. We moved out this way to have less traffic and nature. You are ruining all of that.

RI-95.2

Sincerely,

Kelly Wrightstone

92508

RI-95

Kelly Wrightstone
January 10, 2024

RI-95.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-95.2 This comment states there were no plans for warehouses when the commenter purchased their home in 2000. The March JPA General Plan groups the Business Park and Industrial land use designations under the Industry classification. The Master EIR for the March JPA General Plan acknowledged that operations and activities within Business Park could include limited industrial. In addition to warehousing, the Business Park definition includes industrial uses such as light manufacturing and research and development centers. This Business Park definition and the designation of the Project site as Business Park, Industrial, and Park/Recreation/Open Space were included in the March JPA General Plan and Master EIR when it was adopted at a noticed public meeting in 1999.

The comment further expresses concerns about increased air pollution and truck traffic. As detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains, March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week and truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, as Section 4.15, Transportation, explains, to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Trish Welbourne <twelbournewhite@gmail.com>
Sent: Wednesday, January 10, 2024 5:36 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Our lives will forever be affected for the worse. As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. This impacts our way of living, the added traffic and pollution will affect our lives in a negative way.

Sincerely,

Patricia Welbourne
92508
--
Trish
Volunteer Adoption Coordinator

RI-96

Patricia Welbourne
January 10, 2024

RI-96.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: "Our lives will forever be affected for the worse." and "This impacts our way of living, the added traffic and pollution will affect our lives in a negative way." As detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains, March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week and truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, as Section 4.15, Transportation, explains, to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. In response to the remainder of this comment, please see Form Letter RA Response.

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From: Steve Domingues <stevedomingues24@gmail.com>
Sent: Wednesday, January 10, 2024 2:36 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau Project

Dear Mr. Fairbanks,

I work over in RIverside by Sycamore Canyon. I have worked there for 3 years. I ride there with co workers and business clients.

As community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Steve Domingues
92507

RI-97

Steve Domingues
January 10, 2024

RI-97.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: "I work over in Riverside by Sycamore Canyon. I have worked there for 3 years. I ride there with co workers and business clients." While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. In response to the remainder of this comment, please see Form Letter RA Response.

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From: Arianna Thornton <ariannagray@hotmail.com>
Sent: Wednesday, January 10, 2024 4:22 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As community members, we are disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

We ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Tim and Arianna Thornton
92508

Get Outlook for Android

RI-98

Tim and Arianna Thornton
January 10, 2024

RI-98.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Carlos LLiguin <malinalli_1997@yahoo.com>
Sent: Thursday, January 11, 2024 8:28 PM
To: Dan Fairbanks
Cc: Carlos LLiguin
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Carlos Lliguin
92508

RI-99

Carlos Llinguin
January 11, 2024

RI-99.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Elias Valencia <eliasvalencia21@gmail.com>
Sent: Thursday, January 11, 2024 2:12 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

RI-100.1

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau such as dedicated hiking and biking trails and parks that would beautify this area and bring the community together. More warehouses would only worsen our air quality and further clog our already busy freeways.

RI-100.2

Sincerely,

Elias Valencia
Mission Grove Resident

RI-100

Elias Valencia
January 11, 2024

RI-100.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-100.2 This comment requests consideration of a non-industrial alternative with dedicated hiking and biking trails and parks. Please see Topical Response 8, Alternatives, for a discussion of a parks alternative. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity.

The comment further raises concerns regarding the Project's air quality impacts and truck traffic. As detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains, March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week and truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, as Section 4.15, Transportation, explains, to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Russell, Gregory <Gregory.Russell@rccd.edu>
Sent: Thursday, January 11, 2024 12:35 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Gregory Russell
92506

--

Gregory Russell, Ph.D.
Associate Professor, Life Sciences
Riverside City College
951-222-8926
gregory.russell@rccd.edu
https://rccd-edu.zoom.us/my/gregrussell

RI-101

Gregory Russell
January 11, 2024

RI-101.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: jmccsilver@aol.com
Sent: Thursday, January 11, 2024 5:42 PM
To: Dan Fairbanks
Subject: Support for development

I support development and utilization per the plans submitted and reviewed. Keep up the good work. John McCalley, it41 Millpond pl., Riverside, Ca
Sent from AOL on Android

RI-102.1

RI-102

John McCalley
January 11, 2024

RI-102.1 This comment is in support of the Project. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Michael Hampton <hampton2005@gmail.com>
Sent: Thursday, January 11, 2024 1:56 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-103.1

I have ridden the trails on this property for years and it will be very sad to see them removed. I ride there most weekends with a lot of other mountain bike riders and we have very few other local places to ride. We have more than our share of warehouses in the area already. We don't need more of them.

RI-103.2

Sincerely,
Michael Hampton
92506

RI-103

Michael Hampton
January 11, 2024

RI-103.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-103.2 This comment describes personal experience with the Project site and raises concerns regarding the loss of recreational open space for biking. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Michael Kaudze <kaudze@gmail.com>
Sent: Thursday, January 11, 2024 7:20 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits is clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Michael Kaudze
92508

RI-104

Michael Kaudze
January 11, 2024

RI-104.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Suzanne Pearson <suzsir@yahoo.com>
Sent: Thursday, January 11, 2024 11:43 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, REcirculated Draft Environmental Impact Report State Clearinghouse No 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau and leave some open space for families to enjoy.

Thank you for your time,

Suzanne Pearson
Dayton Street, 92508

RI-105

Suzanne Pearson
January 11, 2024

RI-105.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following phrase to the end of the form letter: "and leave some open space for families to enjoy." The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. In response to the remainder of this comment, please see Form Letter RA Response.

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From: CHRISTINE MARTIN <timnchrismartin@aol.com>
Sent: Thursday, January 11, 2024 2:31 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Tim Martin
92506

RI-106

Tim Martin
January 11, 2024

RI-106.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: USC <ebcarvaj@usc.edu>
Sent: Friday, January 12, 2024 8:44 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

RI-107

Everardo Carvjal
January 12, 2024

RI-107.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Ajay Shah <ajayatsc@yahoo.com>
Sent: Friday, January 12, 2024 8:05 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Ajay shah
92508

RI-108

Ajay Shah
January 12, 2024

RI-108.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: MTB Raging <craigatchison@gmail.com>
Sent: Friday, January 12, 2024 10:03 PM
To: Dan Fairbanks

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

Keep the open land available, there is plenty of 60,000 sqft buildings out here.
Sincerely,

Craig Atchison
8304 Atlanta Ave, Huntington Beach, CA 92646

RI-109

Craig Atchison
January 12, 2024

RI-109.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. The commenter adds the following sentence to the end of the form letter: "Keep the open land available, there is plenty of 60,000 sqft buildings out here." Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. In response to the remainder of this comment, please see Form Letter RA Response.

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From: MTB Raging <craigatchison@gmail.com>
Sent: Friday, January 12, 2024 10:00 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

RI-110

Craig Atchison
January 12, 2024

RI-110.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Dwight Woodward <thewoodward5@ymail.com>
Sent: Friday, January 12, 2024 8:53 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

Dwight Woodward

RI-111

Dwight Woodward
January 12, 2024

RI-111.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Fernando Jose <fj041018@gmail.com>
Sent: Friday, January 12, 2024 8:08 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. No more warehouses. The community deserves better!

Sincerely,
Fernando Jose
92501

RI-112

Fernando Jose
January 12, 2024

RI-112.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the end of the form letter: "No more warehouses. The community deserves better!" These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Generation MTB <admin@generationmtb.org>
Sent: Friday, January 12, 2024 8:41 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-113

Generation MTB
January 12, 2024

RI-113.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Juan Zarate <juzara714@yahoo.com>
Sent: Friday, January 12, 2024 9:30 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
-Juan Zarate
20608 Stony Brook Cir.
Riverside CA, 92508
951-322-8017

RI-114

Juan Zarate
January 12, 2024

RI-114.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Riley Angels <rileyangels16@gmail.com>
Sent: Friday, January 12, 2024 8:56 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Riley Angels
92508

RI-115

Riley Angels
January 12, 2024

RI-115.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Huff, Tonya <Tonya.Huff@rcc.edu>
Sent: Friday, January 12, 2024 3:23 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

My name is Tonya Huff and I'm a professor of biology and environmental science at RCC. I have lived in the Riverside area for the past 15 years. As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Tonya Huff
92509

Sent from my iPad

RI-116

Tonya Huff
January 12, 2024

RI-116.1 This comment provides personal information and otherwise is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: George Robledo <specializedchicano@icloud.com>
Sent: Saturday, January 13, 2024 6:45 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a very concerned community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

Respectfully,
George Robledo
M: 951-796-2743

Sent from my iPhone

RI-117

George Robledo
January 13, 2024

RI-117.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Alejandra Dubcovsky <adubcovskyj@gmail.com>
Sent: Saturday, January 13, 2024 3:31 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am Alejandra. I have lived in Riverside since 2016, and work at the University as does my husband. My children attend RUSD, and we generally love living here.

But I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did **not make meaningful substantive changes to the West Campus Upper Plateau (**SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, **please consider alternative, non-industrial uses for the West Campus Upper Plateau.**

Sincerely,

Alejandra Joseph
92506

RI-118

Alejandra Joseph
January 13, 2024

RI-118.1 This comment provides personal information and otherwise is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Ben Guillen <ben.guillen4@gmail.com>
Sent: Saturday, January 13, 2024 4:23 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit that EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement”

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Ben Guillen

92882

RI-119

Ben Guillen
January 13, 2024

RI-119.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Bobby Vacco <bobbyvacco@gmail.com>
Sent: Saturday, January 13, 2024 11:31 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-120.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-120.2

Thank you for considering my views on this important matter.
Sincerely,
Bobby Vacco
92882

RI-120

Bobby Vacco
January 13, 2024

RI-120.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-120.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: John Ramirez <mavonyour6@icloud.com>
Sent: Saturday, January 13, 2024 12:16 PM
To: Dan Fairbanks
Subject: Sycamore canyon

To: fairbanks@marchjpa.com
Bcc: rivnowgroup@gmail.com

Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

RI-121.1

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. RI-121.1 Cont.

My name is John Ramirez and I've been a local to the SoCal mountain bike community since I was just barley going into highschool I am now 21 and have been able to ride with amazing people and make connections in this wonderful community and I would hate to see such a place like sycamore canyon be lost by warehouses. RI-121.2

Sincerely,

John Ramirez
92336

RI-121

John Ramirez
January 13, 2024

RI-121.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-121.2 This comment provides the commenter's personal involvement in the SoCal mountain bike community and raises concerns regarding loss of recreational open space like Sycamore Canyon. The Project will not impact Sycamore Canyon. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

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From: Mario Salgado <mariosalgado2@yahoo.com>
Sent: Saturday, January 13, 2024 4:03 PM
To: Dan Fairbanks
Subject: Save Sycamore

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Mario Salgado
Orangecrest Resident

Sent from Yahoo Mail - Shop Smart, Shop Organized

RI-122

Mario Salgado
January 13, 2024

RI-122.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Milton Solorzano <milton.solorzano@gmail.com>
Sent: Saturday, January 13, 2024 12:43 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Milton Solorzano

92563

RI-123

Milton Solorzano
January 13, 2024

RI-123.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Nicholson Ryan <nryan6638@gmail.com>
Sent: Saturday, January 13, 2024 11:51 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-124.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-124.2

Thank you for considering my views on this important matter.

Sincerely,
Nick Ryan
92504

RI-124

Nick Ryan
January 13, 2024

RI-124.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-124.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Aaron Bernstein <aaronbernstein1992@gmail.com>
Sent: Sunday, January 14, 2024 8:27 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-125.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-125.2

Thank you for considering my views on this important matter.
Sincerely,
Aaron Bernstein
92324

Sent from my iPhone

RI-125

Aaron Bernstein
January 14, 2024

RI-125.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-125.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Aaron Oceanside <aaronpeterson123@gmail.com>
Sent: Sunday, January 14, 2024 1:32 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-126.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-126.2

Thank you for considering my views on this important matter.

Sincerely,
Aaron Peterson
92081

RI-126

Aaron Peterson
January 14, 2024

RI-126.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-126.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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Comment Letter RI-127

From: Alex Allred <alexstewartallred@gmail.com>
Sent: Sunday, January 14, 2024 7:26 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-127.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-127.2

Thank you for considering my views on this important matter.

Sincerely,
Alex Allred
91765

RI-127

Alex Allred
January 14, 2024

RI-127.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-127.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Roldan gaming <angelzacatecas12@gmail.com>
Sent: Sunday, January 14, 2024 10:38 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-128.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-128.2

Thank you for considering my views on this important matter.
Sincerely,
Angel Roldan
92253

Ive been living here in Moreno Valley for 18 years and I just started riding my bike again. And now I'm constantly riding my mountain bike and I absolutely love the trails that are the on the left side on sycamore. And I know lots of other people enjoy spending their time riding and walking the trails through out sycamore. I love sycamore because it is really close to home and the trails are just so good to ride on and many other people feel the same way.

RI-128.3

RI-128

Angel Roldan
January 14, 2024

RI-128.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-128.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

RI-128.3 This comment describes the commenter's personal experience with biking in Sycamore. The Project will not impact Sycamore Canyon. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

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From: Anthony Jones <antjones0201@yahoo.com>
Sent: Sunday, January 14, 2024 5:26 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-129.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-129.2

Thank you for considering my views on this important matter.

Sincerely,

Anthony Jones
92392

Sent from my iPhone

RI-129

Anthony Jones
January 14, 2024

RI-129.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-129.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Christopher Manivong <cmanivong@gmail.com>
Sent: Sunday, January 14, 2024 10:17 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-130.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

Even though I live far away, I have made my way to this location and have joined and befriend many within this community who call this landmark their home. There are generations of new or old riders that are being added to the community daily and should have a chance to continue.

Thank you for considering my views on this important matter.

RI-130.2

Sincerely,

Christopher Manivong
91706

RI-130

Christopher Manivong
January 14, 2024

RI-130.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-130.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. This comment describes the commenter's personal experience with biking on the Project Site. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

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From: Dane McCants <danemccants328@gmail.com>
Sent: Sunday, January 14, 2024 11:44 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

Thank you for considering my views on this important matter.
Sincerely,
Dane McCants
91773

RI-131

Dane McCants
January 14, 2024

RI-131.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-131.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: DeAmadja Dennis <dedennis12@gmail.com>
Sent: Sunday, January 14, 2024 5:45 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Subject: *Dear Mr. Fairbanks*,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

Thank you for considering my views on this important matter.

Thank you for your time,
DeAmadja Dennis

92504

RI-132

DeAmadja Dennis
January 14, 2024

RI-132.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-132.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: trujillodebora <trujillodebora@gmail.com>
Sent: Sunday, January 14, 2024 10:34 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-133.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-133.2

Please, don't take away this special place that brings so much joy to the mtb community. It's more than just a place to bike, it allows people to come together and form friendships. This is the place where I met Johanna an mtb rider. Who I now consider a really good, close friend. It's also a great place to learn. It allows us to practice and perfect our skill for the sport we love! Please don't take away our school.

RI-133.3

Thank you for considering my views on this important matter.
Sincerely,
debora trujillo
91748

Sent from my T-Mobile 5G Device

RI-133

Debora Trujillo
January 14, 2024

RI-133.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-133.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

RI-133.3 This comment describes the commenter's personal experience with biking in the Project site. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

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From: Ethan Ortega <ortegae0515@gmail.com>
Sent: Sunday, January 14, 2024 9:33 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-134.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-134.2

Thank you for considering my views on this important matter.

-Ethan Ortega

RI-134

Ethan Ortega
January 14, 2024

RI-134.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-134.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Frank Ramirez <frank@krakenins.com>
Sent: Sunday, January 14, 2024 3:26 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-135.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-135.2

Thank you for considering my views on this important matter.

Sincerely,

Frank Ramirez
Kraken Insurance Services

92584

RI-135

Frank Ramirez
January 14, 2024

RI-135.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-135.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

INTENTIONALLY LEFT BLANK

From: Frank Ramirez <frank@krakenins.com>
Sent: Sunday, January 14, 2024 3:44 PM
To: Dan Fairbanks
Subject: Sycamore Canyon

Hey Guys,

I love infrastructure and I love new business. Why? Because I sell workers comp and insurance. But not where I play! Do not build warehouses at Sycamore Canyon. Period. I grew up in Moreno Valley and live/work in Temecula now but come back to ride here trails every weekend. RI-136.1

RI-136

Frank Ramirez 2
January 14, 2024

RI-136.1 This comment is in opposition to building warehouses at Sycamore Canyon and discusses commenter's area biking. The Project will not impact Sycamore Canyon. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Anthony Zini <tonyzini@icloud.com>
Sent: Sunday, January 14, 2024 5:29 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-137.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-137.2

Thank you for considering my views on this important matter.
Sincerely,
Jake
92605

Sent from my iPhone

RI-137

Jake Zini
January 14, 2024

RI-137.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-137.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Jaime Tatenco <jaimetatenco@yahoo.com>
Sent: Sunday, January 14, 2024 4:42 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

RI-138.1

This territory is an opportunity for the community to come together and escape everyday life. Having a place to run, cycle, and walk with family is important as it serves as a way to bring all of us together.

RI-138.2

Thanks,

Jaime Tatenco
Field Service Tech | Captiveaire
P: 323-633-3488
jaime.tatenco@captiveaire.com
business P: 760-290-1271

RI-138

Jaime Tatenco
January 14, 2024

RI-138.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-138.1 This comment expresses commenter's opinion of the importance of the existing recreational uses at the project site. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Janette Aragon <jabaskets@gmail.com>
Sent: Sunday, January 14, 2024 10:53 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-139.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-139.2

Thank you for considering my views on this important matter.
Sincerely,
Janette Aragon
91786

Janette Aragon

RI-139

Janette Aragon
January 14, 2024

RI-139.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-139.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Jose Pineda <jose@riversidereo1.com>
Sent: Sunday, January 14, 2024 2:29 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

Get Outlook for iOS

RI-140

Jose Pineda
January 14, 2024

RI-140.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Keri Davis <keripdavis@gmail.com>
Sent: Sunday, January 14, 2024 12:51 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-141.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-141.2

Thank you for considering my views on this important matter.
Sincerely,
Keri
92371

Sent from my iPhone

RI-141

Keri Davis
January 14, 2024

RI-141.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-141.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Kristen Lane <lane.kristen@gmail.com>
Sent: Sunday, January 14, 2024 1:07 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-142.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-142.2

Thank you for considering my views on this important matter.
Sincerely,
Kristen Lane
92805

Sent from my iPad

RI-142

Kristen Lane
January 14, 2024

RI-142.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-142.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Marc Duron <marcduron93@gmail.com>
Sent: Sunday, January 14, 2024 5:56 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I Marc Duron 92505

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

From: Marc Duron <marcduron93@gmail.com>
Sent: Sunday, January 14, 2024 5:56 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I Marc Duron 92505

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" i

RI-143.1

RI-143

Marc Duron
January 14, 2024

RI-143.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Michael Burt <mdburt94@gmail.com>
Sent: Sunday, January 14, 2024 5:42 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-144.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-144.2

Thank you for considering my views on this important matter.
Sincerely,
Michael Burt
91761

Sent from my iPhone

RI-144

Micheal Burt
January 14, 2024

RI-144.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-144.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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RI-145

Paul Pastor
January 14, 2024

RI-145.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Richard Gate <richard@951bikes.com>
Sent: Sunday, January 14, 2024 2:48 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-146.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-146.2

It has also not escaped notice by the community that the industrial parks already built are far from full. Many of these are still empty in this area and we fail to see why we need more.

RI-146.3

Thank you for considering my views on this important matter.

Sincerely,

Richard Gate
951 Bikes
Moreno Valley

RI-146

Richard Gate
January 14, 2024

RI-146.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-146.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

RI-146.3 The comment raises concerns regarding vacancies in area warehouses. Table 1 of the "Economic Impact Analysis of the March Joint Powers Authority (MJPA) Development Projects" by Dr. Qisheng Pan presents 2023 employment data for the various existing developments within the March JPA Planning Area (Appendix U). As shown in Table 1, there are few vacancies within the March JPA Planning Area. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Robert Sanderson <rrbrtsndr@gmail.com>
Sent: Sunday, January 14, 2024 12:41 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-147.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-147.2

Thank you for considering my views on this important matter.
Sincerely,
Robert sanderson
92503

Sent from my iPhone

RI-147

Robert Sanderson
January 14, 2024

RI-147.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-147.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Victor Reyes <reye.sv1899@gmail.com>
Sent: Sunday, January 14, 2024 10:45 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy. I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-148.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-148.2

Thank you for considering my views on this important matter.

Sincerely,
Victor Reyes
92555

RI-148

Victor Reyes
January 14, 2024

RI-148.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-148.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Brendon Allen <brendonmallen@icloud.com>
Sent: Monday, January 15, 2024 5:57 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-149.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-149.2

Thank you for considering my views on this important matter.
Sincerely,
Brendon Allen
91786

RI-149

Brendon Allen
January 15, 2024

RI-149.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-149.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Chris Kasey <knuckledragger30@gmail.com>
Sent: Monday, January 15, 2024 8:26 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-150.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-150.2

Thank you for considering my views on this important matter.
Sincerely,
Christian Kasey
95062

Chris Kasey
(831) 234-7772
1287 Brommer St.
Santa Cruz, CA 95062

RI-150

Chris Kasey
January 15, 2024

RI-150.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-150.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Damon Monticello <dmonticello@jensonusa.com>
Sent: Monday, January 15, 2024 8:00 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

There is a vibrant community of hikers and bikers that use this land. Please consider the opportunity cost of developing it into warehouses.

RI-151.1

Sincerely,

Damon Monticello
92507

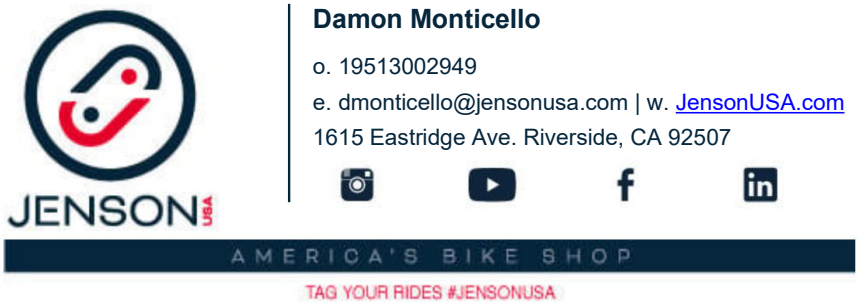
Damon Monticello
Jenson USA Warranty
dmonticello@jensonusa.com

Damon Monticello

o. 19513002949

e. dmonticello@jensonusa.com | w. JensonUSA.com

1615 Eastridge Ave. Riverside, CA 92507



RI-151

Damon Monticello
January 15, 2024

RI-151.1 This comment is Form Letter RA – Environmental Justice Element. The commenter has removed the phrase "…is the 'cart before the horse', as it…." from the third sentence, and adds the sentence "There is a vibrant community of hikers and bikers that use this land. Please consider the opportunity cost of developing it into warehouses." Regarding biking and hiking, while the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. In response to the remainder of this comment, please see Form Letter RA Response.

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From: hollywoodae86 <hollywoodae86@gmail.com>
Sent: Monday, January 15, 2024 7:06 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-152.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-152.2

Thank you for considering my views on this important matter.
Sincerely,
Daniel cuevas
91106

Sent from my iPhone

RI-152

Daniel Cuevas
January 15, 2024

RI-152.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-152.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: SO. CAL SHREDDER <derricksartain@gmail.com>
Sent: Monday, January 15, 2024 8:15 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-153.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-153.2

Thank you for considering my views on this important matter.
Sincerely,
Derrick Sartain
92335

RI-153

Derrick Sartain
January 15, 2024

RI-153.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-153.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: erik ramirez <eramirez1312@gmail.com>
Sent: Monday, January 15, 2024 8:00 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-154.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice

RI-154.2

Thank you for considering my views on this important matter.
Sincerely,
Erik Ramirez
92583

RI-154

Erik Ramirez
January 15, 2024

RI-154.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-154.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Gared Lin <gared.lin25@gmail.com>
Sent: Monday, January 15, 2024 8:12 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-155.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Th community loves the preserve and it has so many use cases that benefit the general public. I really hope this does not go through

RI-155.2

Thank you for considering my views on this important matter.
Sincerely,
Gared Lin
92354

RI-155

Gared Lin
January 15, 2024

RI-155.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-155.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: George Fickett <gefiv23@gmail.com>
Sent: Monday, January 15, 2024 9:01 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-156.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-156.2

Thank you for considering my views on this important matter.
Sincerely,
George fickett
92399

Sent from my iPhone

RI-156

George Fickett
January 15, 2024

RI-156.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-156.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: George Robledo <specializedchicano@icloud.com>
Sent: Monday, January 15, 2024 11:17 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

Respectfully,
George Robledo
M: 951-796-2743

Sent from my iPhone

RI-157

George Robledo
January 15, 2024

RI-157.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Greg Renne <gregrenne@hotmail.com>
Sent: Monday, January 15, 2024 10:58 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Greg Renne
92508

RI-158

Greg Renne
January 15, 2024

RI-158.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Guillermo Trujillo <guillermohvac@gmail.com>
Sent: Monday, January 15, 2024 7:36 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-159.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-159.2

Thank you for considering my views on this important matter.

Sincerely

Guillermo Trujillo

91748

RI-159

Guillermo Trujillo
January 15, 2024

RI-159.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-159.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

INTENTIONALLY LEFT BLANK

From: Jacob Perez <jacobmpiam@gmail.com>
Sent: Monday, January 15, 2024 10:42 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I have lived in the San Bernardino/ Riverside area for many years. I (along with friends and family)have enjoyed the few areas remaining for public recreation during this time. Hiking, biking have been a major part in our lives to assist with mental and physical health.
As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

RI-160.1

Jacob Perez

RI-160

Jacob Perez
January 15, 2024

RI-160.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: "I have lived in the San Bernardino/ Riverside area for many years. I (along with friends and family)have enjoyed the few areas remaining for public recreation during this time. Hiking, biking have been a major part in our lives to assist with mental and physical health." Regarding biking and hiking, while the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. In response to the remainder of this comment, please see Form Letter RA Response.

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From: Joel Macias <joelmacias31@yahoo.com>
Sent: Monday, January 15, 2024 7:09 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-161.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-161.2

Thank you for considering my views on this important matter.
Sincerely,
Joel macias
92336

Sent from my iPhone

RI-161

Joel Macias
January 15, 2024

RI-161.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-161.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Justin Vergason <justinvergason@gmail.com>
Sent: Monday, January 15, 2024 8:18 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy. I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards. Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice. Thank you for considering my views on this important matter. Sincerely, Justin Vergason 92056

RI-162.1

RI-162.2

RI-162

Justin Vergason
January 15, 2024

RI-162.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-162.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Matthew Muzzy <moutainmisfits1991@gmail.com>
Sent: Monday, January 15, 2024 8:05 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-163.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-163.2

Thank you for considering my views on this important matter.
Sincerely,
Matthew Muzzy
91786

RI-163

Matthew Muzzy
January 15, 2024

RI-163.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-163.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Mike Savicky <msavicky@gmail.com>
Sent: Monday, January 15, 2024 5:47 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-164.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-164.2

Thank you for considering my views on this important matter.
Sincerely,
Mike savicky
92883

RI-164

Mike Savicky
January 15, 2024

RI-164.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-164.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Preston Jordan Jr. <preston205@gmail.com>
Sent: Monday, January 15, 2024 2:35 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

It is amazing to me how Sycamore Canyon has quickly turned from a wonderful place to hike and ride a bike in peace to a mowed down place to add EVEN MORE warehouses. The side of Sycamore across from Ammo Dump has already been considerably knocked and shifted from what was a nice, peaceful area to be outside to another warehouse... WONDERFUL. I understand that we don't own this land, but it is incredibly sad to see that business/money has become the driving force behind all of these unfortunate changes. I used to see tons of people, including an elderly man with his dogs and another elderly couple spend time in Sycamore, but since the development of this recent warehouse by the self-storage place, I haven't seen them since. It is now looking like the ammo dump side is going to follow suit... how ridiculously sad. RI-165.1

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. RI-165.2

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Preston Jordan Jr.
92507

RI-165

Preston Jordan
January 15, 2024

RI-165.1 This comment describes the commenter's personal observations in Sycamore Canyon and expresses general disapproval of warehouse development. The Project will not impact Sycamore Canyon. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. The comment does not raise any questions or concerns about the Recirculated Draft EIR sections.

RI-165.2 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Sabrina Walsberg <sabrina.walsberg@hotmail.com>
Sent: Monday, January 15, 2024 7:46 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-166.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-166.2

Thank you for considering my views on this important matter.
Sincerely,
Sabrina Walsberg
92563

RI-166

Sabrian Walsberg
January 15, 2024

RI-166.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-166.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Sean Donovan <sdonovan91@gmail.com>
Sent: Monday, January 15, 2024 9:39 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-167.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-167.2

Thank you for considering my views on this important matter.
Sincerely,
Sean Donovan
92883

RI-167

Sean Donovan
January 15, 2024

RI-167.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-167.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Shiloh Sanders <sanders.shiloh@gmail.com>
Sent: Monday, January 15, 2024 9:41 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-168.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-168.2

We want to protect this land for the community! Thank you for considering my views on this important matter.

Sincerely,
Shiloh Sanders
92083

RI-168

Shiloh Sanders
January 15, 2024

RI-168.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-168.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Sterling <motomartin613@gmail.com>
Sent: Monday, January 15, 2024 11:50 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-169.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-169.2

Thank you for considering my views on this important matter.

Sincerely,

Sterling Martin

92506

RI-169

Sterling Martin
January 15, 2024

RI-169.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-169.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Taylor Spinogatti <tspinogatti@gmail.com>
Sent: Monday, January 15, 2024 9:18 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-170.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-170.2

Thank you for considering my views on this important matter.
Sincerely,
Taylor Spinogatti
92882

RI-170

Taylor Spinogatti
January 15, 2024

RI-170.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-170.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Aaron Solis <aaronpharmd27@gmail.com>
Sent: Tuesday, January 16, 2024 5:02 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-171.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-171.2

Thank you for considering my views on this important matter.
Sincerely,
Aaron Solis
92507

Sent from my iPhone

RI-171

Aaron Solis
January 16, 2024

RI-171.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-171.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Al Serna <alserna09@yahoo.com>
Sent: Tuesday, January 16, 2024 6:54 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-172.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-172.2

Thank you for considering my views on this important matter.
Sincerely,
Al Serna
92508

Al Serna

RI-172

Al Serna
January 16, 2024

RI-172.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-172.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Andrea Wood <andrea.wood@ucr.edu>
Sent: Tuesday, January 16, 2024 7:58 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-173.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. This project would impact an important outdoor recreation area for the surrounding community. Personally, I recreate on or near this area several times a month and witness a vast amount of wildlife during my hikes and rides. The Inland Empire as a whole has too many industrial parks that are just eye sores and do nothing to give back directly to the citizens of Riverside. Please make provisions in this plan that consider what the citizens want and need rather than give in to the easiest revenue stream. Please act now before removing one of our greatest treasures in SoCal, our open space areas.

RI-173.2

Sincerely,
ANDREA WOOD
Riverside, CA 92521

RI-173

Andrea Wood
January 16, 2024

RI-173.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-173.2 This comment expresses concerns about the loss of recreational open space and wildlife habitat. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. The comment raises no specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: blake rossi <blakerossi94@gmail.com>
Sent: Tuesday, January 16, 2024 1:03 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-174.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-174.2

Thank you for considering my views on this important matter.
Sincerely,
Blake Rossi
93561

Sent from my iPhone

RI-174

Blake Rossi
January 16, 2024

RI-174.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-174.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Brian Backman <mtbikerbboy@yahoo.com>
Sent: Tuesday, January 16, 2024 4:42 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-175.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-175.2

We've already lost several acres of trails with the distribution center going up on the north side of Alessandro Blvd. Please, do not allow more to be consumed. My kids have grown up riding the trails there and I would very much like to continue to have these trails for them and I to ride for years to come.

RI-175.3

Thank you for considering my views on this important matter.
Sincerely,
Brian Backman
92505

Sent from Yahoo Mail on Android

RI-175

Brian Backman
January 16, 2024

RI-175.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-175.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

RI-175.3 This comment expresses concerns about the loss of recreational open space for biking. Regarding biking, while the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. The comment raises no specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: cjfig _mtb <cjfigmtb@gmail.com>
Sent: Tuesday, January 16, 2024 3:10 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am CJ Figueroa and I live in SoCal and have my whole life! I am a big part of the mountain biking community, for I give to the local trails and influence others, I believe the sycamore trails and land should not be tore down! As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement”

RI-176.1

Sincerely
CJ

Zip code: 92694
Address: 1 merriam st.

RI-176

CJ Figueroa
January 16, 2024

RI-176.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. The commenter adds the following sentence to the form letter: "I am CJ Figueroa and I live in SoCal and have my whole life! I am a big part of the mountain biking community, for I give to the local trails and influence others, I believe the sycamore trails and land should not be tore down!" The Project will not impact Sycamore Canyon. Regarding biking, while the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. In response to the remainder of this comment, please see Form Letter RA Response.

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From: daniel beveridge <daniel.bev98@gmail.com>
Sent: Tuesday, January 16, 2024 7:34 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-177.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice as our younger generations are currently in need of spaces in which they can be outdoors and not stuck inside.

RI-177.2

Thank you for considering my views on this important matter.

Sincerely,
Daniel Beveridge
92883

RI-177

Daniel Beveridge
January 16, 2024

RI-177.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-177.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Devon Hauser <hause009@cougars.csusm.edu>
Sent: Tuesday, January 16, 2024 4:49 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-178.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-178.2

Thank you for considering my views on this important matter.
Sincerely,
Devon Hauser
92882

Sent from my iPhone

RI-178

Devon Hauser
January 16, 2024

RI-178.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-178.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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Comment Letter RI-179

From: Eunhee Kim <eunster@yahoo.com>
Sent: Tuesday, January 16, 2024 9:45 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a R-NOW member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-179.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Eunhee Kim
Raleigh, NC 27615

RI-179

Eunhee Kim
January 16, 2024

RI-179.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: fera momtaz <fera_momtaz@yahoo.com>
Sent: Tuesday, January 16, 2024 9:38 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Fera S.Momtaz
Orange Crest community
92508

Sent from my iPhone

RI-180

Fera S. Momtaz
January 16, 2024

RI-180.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Art is my Alibi <geraldtiangco@gmail.com>
Sent: Tuesday, January 16, 2024 1:00 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-181.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-181.2

Thank you for considering my views on this important matter.
Sincerely,
Gerald Tiangco
92555

Sent from my iPhone

RI-181

Gerald Tiangco
January 16, 2024

RI-181.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-181.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Jason Crowell <jasoncharlescrowell@gmail.com>
Sent: Tuesday, January 16, 2024 3:44 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-182.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-182.2

Thank you for considering my views on this important matter.
Sincerely,
Jason
92563

Sent from my iPhone

RI-182

Jason Crowell
January 16, 2024

RI-182.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-182.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Juan Garcia <cuauhtliuer@yahoo.com>
Sent: Tuesday, January 16, 2024 8:24 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I express my disappointment as a concerned community member regarding the Recirculated Draft Environmental Impact Report (REIR) for the West Campus Upper Plateau (SCH 2021110304). Unfortunately, it appears that the document falls short of making meaningful substantive changes to this highly unpopular and environmentally detrimental project. RI-183.1

The introduction of an Environmental Justice (EJ) policy and your justifications for its alignment with the project seem more like an empty ritual intended to fulfill a requirement rather than a genuine effort to address environmental concerns. The timing of drafting the EJ policy concurrently with the ongoing project raises concerns, as it should have been developed years ago rather than in tandem with a project nearing completion by July 2025.

I urge you to subject the EJ element to a comprehensive California Environmental Quality Act (CEQA) process and implement a warehouse moratorium until this process reaches its conclusion. Only after completing this rigorous evaluation should the current project plan be assessed against the standards set forth. RI-183.2

It is noteworthy that the REIR proposes no substantial changes while asserting that the newly introduced EJ policy, formulated without community input, seamlessly aligns with the existing project plan. Over the past two years, there has been a conspicuous absence of consideration for non-industrial alternatives. Additionally, your refusal to establish a Community Advisory Board despite persistent requests, thousands of signatures, and numerous emails raises questions about your commitment to genuine civic engagement.

As the community has consistently advocated for over a year, I strongly urge you to explore alternative, non-industrial uses for the West Campus Upper Plateau. Sincere consideration of such alternatives is crucial for fostering a sustainable and harmonious coexistence with the surrounding environment. RI-183.3

Sincerely,

Juan Garcia
Syracuse Street 92508

RI-183

Juan Garcia
January 16, 2024

RI-183.1 This comment expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-183.2 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, and requests a full CEQA process for the Environmental Justice Element and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-183.3 This comment raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Regarding the comment's request for a community advisory board, creation of an advisory committee is within the scope of the March Joint Powers Commission's authority. However, whether the Commission establishes an advisory committee or not, the creation of an advisory committee is not germane to the CEQA analysis for the Project. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. With regard to the process for the March JPA Environmental Justice Element, please refer to Response RI-183.2 above.

From: Kelsey Dorfmeyer <k.dorfmeyer@yahoo.com>
Sent: Tuesday, January 16, 2024 6:56 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-184.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-184.2

Thank you for considering my views on this important matter.
Sincerely,
Kelsey Dorfmeyer
92508

Sent from my iPhone

RI-184

Kelsey Dorfmeyer
January 16, 2024

RI-184.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-184.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: kyle cregg (officialcregg) <kylecregg8@gmail.com>
Sent: Tuesday, January 16, 2024 9:08 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-185.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-185.2

Thank you for considering my views on this important matter.
Sincerely,
Kyle cregg
92882

Sent from my iPhone

RI-185

Kyle Cregg
January 16, 2024

RI-185.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-185.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Larry Iest <iestlarry@gmail.com>
Sent: Tuesday, January 16, 2024 11:07 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Larry Iest
92508

RI-186

Larry Iest
January 16, 2024

RI-186.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Lynn L <lynnreneelarsen@gmail.com>
Sent: Tuesday, January 16, 2024 9:19 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy doesn't ring true.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Dr. Lynn Larsen
Dayton Street

RI-187

Lynn Larsen
January 16, 2024

RI-187.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Magie Lacambra <mags0128@gmail.com>
Sent: Tuesday, January 16, 2024 8:30 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I realize that you are a busy individual, and thank you in advance for reading my email. I also hope that flooding your inbox with emails from our community, demonstrates how important this project is to each of us, and urge you to act in our favor.

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. This area would be much better utilized and appreciated by community members, without having monstrous warehouses polluting our views and our air.

Sincerely,

Magie Lacambra
92508

RI-188

Magie Lacambra
January 16, 2024

RI-188.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: "I realize that you are a busy individual, and thank you in advance for reading my email. I also hope that flooding your inbox with emails from our community, demonstrates how important this project is to each of us, and urge you to act in our favor." All public comments received during the Draft EIR and Recirculated Draft EIR comment periods are responded to in this Final EIR. These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Matthew Petersen <fix8oscill8@gmail.com>
Sent: Tuesday, January 16, 2024 7:12 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-189.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-189.2

Thank you for considering my views on this important matter.
Sincerely,
Matthew Petersen
90290

RI-189

Matthew Peterson
January 16, 2024

RI-189.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-189.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: matt silveous <mattsilveous1812@gmail.com>
Sent: Tuesday, January 16, 2024 11:02 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Matt Silveous
92508

RI-190

Matt Silveous
January 16, 2024

RI-190.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Michael Messer <messdrums@icloud.com>
Sent: Tuesday, January 16, 2024 9:55 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-191.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-191.2

Thank you for considering my views on this important matter.
Sincerely,
Michael Messer
92507

Sent from my iPhone

RI-191

Michael Messer
January 16, 2024

RI-191.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-191.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Pedro Francisco <pedro.francisco0220@gmail.com>
Sent: Tuesday, January 16, 2024 2:21 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit that EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i Pedro Francisco
92570

RI-192

Pedro Francisco
January 16, 2024

RI-192.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Rick Smih <srickk11@yahoo.com>
Sent: Tuesday, January 16, 2024 7:19 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Sincerely,

RI-193

Rick Smith
January 16, 2024

RI-193.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Ronald Peters <rjpeters13@yahoo.com>
Sent: Tuesday, January 16, 2024 11:24 AM
To: Dan Fairbanks
Cc: Michael McCarthy; Jen L.
Subject: Re: Revised/Extended Notice of Availability for the West Campus Upper Plateau Recirculated Draft EIR (SCH# 2021110304)
Attachments: West Campus_Hazardous Waste_Signed_2024-01-14.pdf

Here's my comment letter for the Recirculated Draft Environmental Impact Report.

RI-194.1

On Thursday, January 11, 2024 at 05:21:41 PM PST, Dan Fairbanks <fairbanks@marchjpa.com> wrote:

March JPA has circulated a Revised/Extended Notice of Availability for the West Campus Upper Plateau Recirculated Draft EIR (SCH# 2021110304) to extend the review period to February 26, 2024.

The extended review is because the text on pages 3084 – 3733 of the recirculated draft EIR Appendices are blank. These blank pages consist of the majority of the Phase 2 Environmental Assessment Report, included as Appendix J-2 of the Recirculated Draft EIR. While Appendix J-2 of the Recirculated Draft EIR is identical to Appendix J-2 of the originally-circulated Draft EIR, which is publicly available on the March JPA website, Appendix J-2 is being uploaded separately to both the March JPA website and the State Clearinghouse ceqanet site. Accordingly, the public comment period for the Recirculated Draft EIR is extended to Monday, February 26, 2024 to allow the public a meaningful opportunity to review and comment on Appendix J-2 irrespective of the fact that no changes or additions to Appendix J-2 were made in the Recirculated Draft EIR.

The Recirculated Draft EIR, the Revised/Extended Notice of Availability, the Draft EIR Appendices, and Appendix J-2 are available on the March JPA website for review and comment. This information may be obtained at: https://marchjpa.com/mjpa-meridian-west-campus/

If you require additional information, please feel free to contact me at (951) 656-7000

"Bringing Good Jobs to Riverside County"
MARCH JOINT POWERS AUTHORITY

Dan Fairbanks

Planning Director

March Joint Powers Authority

14205 Meridian Parkway, #140

Riverside, CA 92518

Phone: (951) 656-7000

Fax: (951) 653-5558

Email: fairbanks@marchjpa.com

Jan. 13, 2024

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

Re: West Campus Upper Plateau, Environmental Impact Report

Dear Mr. Fairbanks:

On behalf of R-Now.com and a concerned resident of 7762 Northrop Dr., *Riverside,* I am writing to submit comments on the Recirculated Draft Environmental Impact Report for the proposed West Campus Upper Plateau. R-Now was formed to fight warehouse development impacting our residential community, and over development of warehouses in the southern California area. I'm a registered civil engineer with over 38 years of experience and have worked on design of warehouse projects throughout my career. RI-194.2

My specific concern is related to a section of the RDEIR listed below:

Threshold HAZ-2. Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (page 180):

Unexploded Ordnances: My concern is for unexploded ordnances unidentified, since there is the potential for areas that may not have been documented over the life of the facility. Unless there is documented evidence that all current military policy has been followed in the clearance of ordnances, then the area is not cleared. Please provide further documentation beyond that of Robert Estrada's communication in 2022, cited on page181. The less than significant label for HAZ-2, unexploded ordnance is not valid. RI-194.3

Construction: The use of explosives was discussed as part of the construction methods for breaking rock in the DEIR. Would not explosives be considered hazardous material, and the labeling of construction under the various developments as less than significant for HAZ-2, and no mitigation required is not valid. (page 180 to 182) RI-194.4

Threshold HAZ-3. Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The RDEIR identified the Grove Community Church Preschool being within the 1/4-mile or 1320-feet of the mixed use land. Measurements from Google Earth indicates the industrial parcel would also be within the 1320-feet of Grove Community Church Preschool. The special designation of MM-HAZ-2 (reduces the ¼-mile, 1320-feet) for the mixed use parcels to prohibit use of toxic or highly toxic gases at these facilities RI-194.5

appears to circumvent the policy JPA incorporated with the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a), (page 170). The HAZ-3 condition should be address with a zoning variance for the affected parcels if the MM-HAZ-2 zoning is going to be incorporated and allow the surrounding public to comment.

RI-194.5 Cont.

Threshold HAZ-4. For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?

A portions of the project are within the C1 And C2 compatibility zones (page 184 & page 275). The Dudek Figure 4.10-1, (page 273), AICUZ Noise Contours (2018), indicates the project area resides in the 60dB range. 60 dB range is equivalent of a normal conversation. Within the same RDEIR document Table 4.8-1 (Mead & Hunt, 2014, page 185), C2 zone for prohibited uses, it requires a highly noise-sensitive outdoor non-residential uses. Figure 4.8-2, (page 195), Riverside County Airport Land Use Compatibility Criteria, Noise, indicates residential use is in the 55-60 db range. It appears the HAZ-4 narratives are trying to rule out residential use in the justification for industrial use. It also appears current studies completed for the DEIR, 24-Hour Ambient Noise Level Measurements Results (page 587) show an average range of 48.4 to 52.7 dB, throwing out the high and low. This study indicates the current noise levels never reaches an average 60 dB range. At a minimum it appears the cited documents listed above may be out of date, and a new noise level study should be prepared to make the case for industrial use versus residential exclusion. The less-than significant Impact with mitigation requirement is not valid for HAZ-4.

RI-194.6

Threshold HAZ-5. Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

My neighbor lives within 200-feet of the project perimeter (St. Andrews Dr.) and the open space zone. His homeowners insurance company recently dropped due to proximity to the open space. They indicated it was due to fire danger. My neighbor is currently without insurance. The information provided under Campus Development (page 186), and the area no longer classified as a High Fire Hazard Severity Zone seems to be inappropriate. With additional people the development will attract it will only increase the likelihood of potential fire danger and significant risk of loss. The less than significant and no additional mitigation is not valid.

RI-194.7

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial warehouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

RI-194.8

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions. RI-194.9

Sincerely,

Ronald J. Peters, P.E.

Rjpeters13@yahoo.com
7762 Northrop Dr., Riverside, Ca. 92508

RI-194

Ronald Peters
January 16, 2024

RI-194.1 This comment is the transmittal email for the comment letter.

RI-194.2 This comment is an introductory comment providing background on the commenter and the R-Now organization.

RI-194.3 This comment states concern over the potential presence of unexploded ordinances (UXO) that are unidentified and areas that have not been cleared. The comment questions the sufficiency of the support for the less-than-significant determination under Threshold HAZ-2. As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, the US Air Force Military Munitions Response Program (USAF MMRP) conducted an evaluation of the site and concluded further munitions response was not required. As stated therein, "[t]he goal of the USAF MMRP is to make munitions response areas (MRAs) safe for reuse and to protect human health and the environment. The USAF MMRP addresses issues related to munitions and explosives of concern (MEC) and munitions constituents (MC) associated with MRAs, as well as evaluates actual or potential hazardous substances, pollutants, or contaminants on defense sites other than operational ranges." (USAF 2013). Evidence of disposal was not identified, with the exception of Landfill No. 5, which has been thoroughly investigated and remediated. The final comprehensive site evaluation conducted by USAF MMRP in March 2013 concluded further investigation of the four potential MRAs was unnecessary, because previous investigative and cleanup actions have taken place, which did not identify MEC or UXO. This was further confirmed in 2022 by Robert Estrada, BRAC environmental coordinator, in an email stating "there is no basis to conduct any response action, including UXO survey." As discussed in the Final EIR, In the extremely unlikely event UXO remains withing the Specific Plan Area, MM HAZ-1 was modified to require that all ground disturbing activities be conducted by workers trained to look for any suspect contamination, including UXO. As such, considering that the only earthwork activities would occur within the Specific Plan Area where munitions were stored in concrete bunkers and the area where munitions were disposed, detonated, and buried has been remediated to the satisfaction of all overseeing regulatory agencies, the potential for adverse effects related to unidentified unexploded ordnance would be less than significant with implementation of MM-HAZ-1.

RI-194-4 This comment asks if explosives used during construction would be considered hazardous material, impacting the less than significant finding for Threshold HAZ-2 in the Recirculated Section 4.8, Hazards and Hazardous Materials. The use of explosives is regulated under Title 19 CCR Division 1 Chapter 10 – Explosives, and Health & Safety Code Section 12101. These regulations require permits prior to use of explosives. Use permits require review by the fire department and other overseeing agencies, and plans, as necessary, would be prepared to protect surrounding residences from blast impacts. Specifically:

Title 19 CCR Division 1 Chapter 10: This regulation addresses the sale, transportation, storage, use, and handling of explosives in California. Requirements for obtaining permits from the local fire chief having jurisdiction and blasting guidelines (such as blasting times, warning devices, and protection of adjacent structures and utilities) are also explained in Chapter 10 of Title 19.

HSC 12101: No person shall manufacture, sell, furnish, give away, receive, store, possess, transport, use, or otherwise handle explosives without a permit.

Compliance with relevant regulations would result in less than significant impacts with respect to accident and upset conditions relating to the use of explosives during construction. No mitigation is required. As such, no revisions or modifications to Section 4.8, Hazards and Hazardous Materials, are required in response to this comment.

RI-194-5 This comment states the Recirculated Draft EIR sections identified that the Grove Community Church Preschool is with ¼ mile (1,320 feet) of the proposed mixed-use land use designation, and Google Earth measurements indicate the preschool would be within 1,320 feet of industrial parcels. The comment suggests the special designation outlined in MM-HAZ-2 for mixed-use parcels is not consistent with the Draft Environmental Justice Element policies.

As described in Recirculated Section 4.8 Hazards and Hazardous Materials, the Grove Community Church preschool building, which is self-contained and accessed from the south side, is just over a quarter mile from the nearest proposed industrial use, but approximately 1,100 feet southwest of the proposed mixed use land uses of the Campus Development. Proposed mixed-use developments would be required to prepare and submit a Hazardous Materials Management Plan and Hazardous Materials Business Plan to the Riverside County Department of Environmental Health, as well as comply with any applicable fire code requirements as enforced by the County fire department to minimize the potential for any emissions or releases of hazardous materials. Nonetheless, even with adherence to these existing regulatory requirements, potential hazardous materials handled at these proposed mixed-use developments could result in potentially significant impacts to the preschool at the Grove Community Church. As such, implementation of MM-HAZ-2 would be required, which prohibits facilities located within one-quarter mile of an existing school from storing, handling, or using toxic or highly toxic gases at quantities that exceed threshold levels established by California Health and Safety Code 25532. With the implementation of the identified mitigation measures, hazard impacts from the Project would be less than significant. The comment does not identify specific Environmental Justice policies of concern. The Project, including the implementation of MM-HAZ-2, which would be enforced through the MMRP. would not conflict with the Environmental Justice Element policies related to the use of hazardous materials, which include Policy HC 15.5 and Policy HC 16.26 as detailed in Recirculated Section 4.10, Land Use and Planning. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-194-6 This comment suggests there are inconsistencies in the EIR discussion of noise contours "to rule out residential use in the justification for industrial use." Contrary to the commenter's statement, the ALUCP Compatibility Zone C2 prohibits highly noise-sensitive outdoor non-residential uses. The discussion under Threshold HAZ-4 evaluates the Project's consistency with the March ARB/MIP ALUCP, not a residential alternative. For a discussion of a residential alternative, please see Topical Response 8 – Alternatives.

RI-194-7 This comment discusses the declassification of the Project site as a High Fire Hazard Severity Zone and indicates the additional people that will be attracted by the proposed development would increase the

likelihood of potential fire danger and significant risk of loss. Contrary to the commenter's statement, the Project would incorporate mitigation to reduce wildfire impacts. As referenced under Threshold HAZ-5 and discussed in Section 4.18, Wildfire, under PDF-FIRE-1, the Project will comply with Chapter 33 of the California Fire Code, which prescribes minimum safeguards for construction, alteration and demolition operations to provide reasonable safety to life and property from fire during construction operations within a fire hazard severity zone. Under PDF-FIRE-2, the Project will implement the recommendations of the Fire Protection Plan (Appendix Q) for water supply, fuel modification and defensible space, access, building ignition and fire resistance, and fire protection systems, among other pertinent fire protection criteria, which complies with or exceeds existing code requirements for building in a fire hazard severity zone. Implementation of MM-FIRE-1 through MM-FIRE-3 would further reduce the Project's wildfire impacts to less than significant.

This comment is noted. The wildfire evaluation is based on Cal Fire's VHFHSZ designations. Private insurance adjustments and individual property evaluations are not related to, nor do they necessarily consider Cal Fire's fire severity zones.

RI-194—8 This comment expresses general opposition to the Project and urges the JPA to reject the proposed Project. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-194-9 This comment is a conclusionary statement.

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From: Scott Barlow <barlowtimber@gmail.com>
Sent: Tuesday, January 16, 2024 9:25 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I have owned a home in the Orangecrest Community for 23 years and as a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. I am concerned about the negative impact this will have on the already heavy traffic congestion in the area, and resulting impact to property values.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Dr. Scott Barlow
92508

RI-195

Scott Barlow
January 16, 2024

RI-195.1 This comment is Form Letter RA – Environmental Justice Element. The commenter includes personal information and adds the following sentence to the form letter: "I am concerned about the negative impact this will have on the already heavy traffic congestion in the area, and resulting impact to property values." The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains, March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week and truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, as Section 4.15, Transportation, explains, to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. In response to the remainder of this comment, please see Form Letter RA Response.

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From: shawn mcdonald <shawn11762@msn.com>
Sent: Tuesday, January 16, 2024 8:29 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

My name is Shawn McDonald and I have lived in the Inland Empire for the greater part of my almost 50years. During that time, I have often ridden my back on this land as it is a great weekend riding destination. Fast forward to 2024, my son now rides and trains there as a high school MTB rider, and this land is being threatened. All over the I.E. we see valuable nature based recreational areas eliminated or minimized in the name of progress and profit. Please represent the people and our future and stop this continued plight.

RI-196.1

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-196.2

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Shawn McDonald
92530

RI-196

Shawn McDonald
January 16, 2024

RI-196.1 This comment describes the commenter's personal experience with mountain biking in the Inland Empire and raises concerns regarding loss of recreational open space. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

RI-196.2 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Sue Nipper <markel221@gmail.com>
Sent: Tuesday, January 16, 2024 8:41 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

The warehouses you propose will be a blight on our beautiful community and bring health-damaging pollution and excessive truck traffic to our backyards.
As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Susan Nipper
92508

RI-197

Sue Nipper
January 16, 2024

RI-197.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentence to the form letter: "The warehouses you propose will be a blight on our beautiful community and bring health-damaging pollution and excessive truck traffic to our backyards." Regarding blight, please see Section 4.1, Aesthetics, and Topical Response 1 – Aesthetics, which discuss and analyze the Project's operational aesthetics impacts and determined these impacts to be less than significant. Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts.

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

In response to the remainder of this comment, please see Form Letter RA Response.

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From: Tiffany Tighe <tighetiffany@gmail.com>
Sent: Tuesday, January 16, 2024 1:05 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

I live in the area for the past 43 years, and seen both the short tern and the Environmental damage your project will have on my home, family and the community.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

As your choice to move ahead will greatly effect our daily quality of life.

Ask yourself, do you want this in your backyard, and for me THIS is my backyard....I did not chose to live or buy my home in an industrial complex

Sincerely,
TIFFANY Tighe
Rancho Vista Rd. 92508

RI-198

Tiffany Tighe
January 16, 2024

RI-198.1 This comment is Form Letter RA – Environmental Justice Element. The commenter adds the following sentences to the form letter: "I live in the area for the past 43 years, and seen both the short tern [*sic*] and the Environmental damage your project will have on my home, family, and the community." and "As your choice to move ahead will greatly effect our daily quality of life. Ask yourself, do you want this in your backyard, and for me THIS is my backyard…I did not chose to live or buy my home in an industrial complex". These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: fsola@latinoprojects.org
Sent: Wednesday, January 17, 2024 1:56 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No.
2021110304

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Francisco Sola
92506

RI-199

Francisco Sola
January 17, 2024

RI-199.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Lon Walcker <sailon2@gmail.com>
Sent: Wednesday, January 17, 2024 12:10 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Lon Walcker
92506

RI-200

Lon Walcker
January 17, 2024

RI-200.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Molly Nazeck <mnazeck@gmail.com>
Sent: Wednesday, January 17, 2024 3:06 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Molly Nazeck
Green Acres resident 92518

RI-201

Molly Nazeck
January 17, 2024

RI-201.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: David Chavers <flavorchav@yahoo.com>
Sent: Thursday, January 18, 2024 8:49 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am the head mountain bike coach at one of our local high schools. We have over 50 middle and high school riders that depend on this area to train. Please consider this in your decision making regarding the West Campus Upper Plateau Project. RI-202.1

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy. RI-202.2

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice. RI-202.3

Thank you for considering my views on this important matter.
Sincerely,
David Chavers
92562

Sent from my iPhone

RI-202

David Chavers
January 18, 2024

RI-202.1 This comment details personal experience with the Project site and expresses concerns about the loss of recreational open space for biking. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. The comment raises no specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-202.2 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-202.3 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Larry Colen <lrc@red4est.com>
Sent: Thursday, January 18, 2024 2:25 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

RI-203.1

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-203.2

Thank you for considering my views on this important matter.
Sincerely,
Larry Colen
92507

--
Larry Colen
lrc@red4est.com sent from ret13est

RI-203

Larry Colen
January 18, 2024

RI-203.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-203.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Thursday, January 18, 2024 8:26 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Linda Tingley Rivera
92508

Sent from my iPhone

RI-204

Linda Tingley Rivera
January 18, 2024

RI-204.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Gene Anderson <geneanderson510@gmail.com>
Sent: Friday, January 19, 2024 2:25 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-205.1

I have been monitoring the wildlife of the Upper Plateau for the last year, and have found that it is the last stronghold of Western Meadowlarks and Western Kingbirds in the western part of the county. These are attractive birds that deserve protection. Many other wild birds and mammals find refuge there. They really deserve to have this last bit of open space preserved.

RI-205.2

Sincerely,
E. N. Anderson
1846 BIgelow Rd., Riverside 92506
<name>
<zip code>

RI-205

E.N. Anderson
January 19, 2024

RI-205.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-205.2 The commenter states they have identified Western Meadowlarks and Western Kingbirds on the Project site. Western Meadowlark is not a special status species as it is one of the most abundant and widely distributed grassland birds. Similarly, Western Kingbird is a common bird and not a special status species. The comment further suggests the open space should be maintained. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The Project would implement MM-BIO-1 through MM-BIO-9, which would reduce the Project's biological impacts to less than significant. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: JAY DAVIS <jdphotography@msn.com>
Sent: Friday, January 19, 2024 6:09 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

Jay Davis

RI-206

Jay Davis
January 19, 2024

RI-206.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Kyle Reed <brewngold23@yahoo.com>
Sent: Friday, January 19, 2024 11:57 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
As a longstanding community member, I am very disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sun setting in July 2025
. I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.
It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.
For over a year countless members of the community have asked for SERIOUS consideration of alternative non-industrial uses for the West Campus Upper Plateau.

Respectfully,

Kyle Reed
92506

RI-207

Kyle Reed
January 19, 2024

RI-207.1 This comment provides personal information and is otherwise Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

INTENTIONALLY LEFT BLANK

From: Chris <chrisstockcreative@gmail.com>
Sent: Monday, January 22, 2024 12:37 PM
To: Dan Fairbanks

Dear Mr. Fairbanks,

I am a long term neighbor in the area of The Grove Community Church. In fact I used to work at the church. The impact to a neighborhood where I worked so hard to be able to afford isn't fair. If I knew that I would be sharing the streets that I use to at one time get to my quiet and peaceful residence, but now share with tractor trailers and pollutants I would have stayed a resident of Moreno Valley! Furthermore what isn't fair is that politicians who do not live in the neighborhood make decisions that affect residences based solely on the mighty dollar. I am asking that for once the right thing is done. Why an industrial park in the heart of a suburban community? California is crying out for more affordable residences. Why not another community and an infrastructure to support it with shopping and restaurants? What about the impact of continued warehouses in our community and the electrical grid? I have already noticed more power glitches, black outs and outrageous bills. I have also seen disruption in wireless devices such as phones. Warehouse use of power, wireless and automated devices impact the grids and lives of residences forced to share the already strained resources due to industrial growth. The area that was once zoned residential, a protected wild life area, and Military land now is only a land grab for the highest bidder who has no regard for their neighbors. RI-208.1

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit that EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. RI-208.2

Sincerely,

Chris Stock

92508

Sent from Mail for Windows

RI-208

Chris Stock
January 22, 2024

RI-208.1 This comment expresses general disapproval of the Project and raises concerns regarding truck traffic and air quality. Regarding truck traffic, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains, March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week and truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, as Section 4.15, Transportation, explains, to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts.

The comment further requests consideration of residential or other non-industrial alternatives. Please see Topical Response 8, Alternatives, for a discussion of an all-residential alternative and the evaluation of Alternative 5, Non-Industrial Alternative.

The comment additionally raises concerns about the Project's impact to the electric grid and wireless network. As discussed in Section 4.17, Utilities and Service Systems, the Project will have less than significant impacts to the electric and telecommunications systems.

Finally, the comment suggests the Project site was once zoned residential, a protected wildlife area and military land. The Project site has never been zoned residential. As detailed in Recirculated Section 4.10, Land Use and Planning, since the development of the March JPA General Plan in 1999, the Project site has been slated for development. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations. The March JPA General Plan includes warehousing in the definition of Business Park uses. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open

space. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. With regard to wildlife habitat, the Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-208.2 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

From: John Alfred <jkalfred61@gmail.com>
Sent: Monday, January 22, 2024 2:17 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

RI-209.1

I'm writing here because as a resident of Riverside since 1962, this is home for my family and me. I'm deeply concerned with how our city and region are being over run with these massive logistics facilities that compound the air quality issues we already have and that agencies like AQMD have made such great strides in improving. In addition to the increased air pollution, these buildings are destroying open space, species habitats and littering the views in our region with giant concrete boxes. My children and grandchildren live in Riverside and this kind of poor land management infringes on their futures, with regard to quality of life and respiratory health. Even though I don't live directly adjacent to this development, what's bad for part of Riverside and the surrounding region is bad for all of Riverside and the surrounding region. These are some of the reasons I'm opposed to this development.

RI-209.2

Finally, as the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-209.3

Sincerely,

John Alfred
92504

RI-209

John Alfred
January 22, 2024

RI-209.1 This comment is the first 4 paragraphs of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-209.2 This comment expresses general disapproval of the Project and states concern over the Project's impacts to air quality, open space and habitat, and aesthetics. Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks, including to children. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts. Regarding open space and habitat, the Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. Regarding aesthetics, as detailed in Section 4.1, Aesthetics, the Project will have a less than significant impact to viewsheds with the implementation of MM-AES-1 (Construction Equipment Staging and Screening). This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-209.3 This comment is the last sentence of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Kris Lovekin <krislovekin@gmail.com>
Sent: Monday, January 22, 2024 6:36 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I ask that you make meaningful substantive changes to the environmental impact report for the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

For the past two years, you have declined to consider non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Kris Lovekin

92507

RI-210

Kris Lovekin
January 22, 2024

RI-210.1 This comment is an abbreviated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Erika L <lerikacruz5@gmail.com>
Sent: Tuesday, January 23, 2024 9:28 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a mother of two who deliberately chose Mission Grove for its proximity to nature, I express profound disappointment in the Recirculated Draft Environmental Impact Report (REIR), particularly in its failure to incorporate meaningful changes to the West Campus Upper Plateau (SCH 2021110304) – a project widely deemed as both unpopular and environmentally harmful. RI-211.1

The introduction of an Environmental Justice (EJ) policy appears to be a perfunctory checkbox exercise, lacking genuine substance. This EJ policy should have been established long before, not concurrently with a project you're rushing to conclude before the July 2025 sunset. I insist on subjecting the EJ aspect to a thorough CEQA process and imposing a warehouse moratorium until completion. Only then should the project be assessed against the new standards. RI-211.2

It's alarming that the REIR suggests no significant changes while asserting that the newly developed EJ policy seamlessly aligns with the existing plan. Despite community pleas, non-industrial alternatives have been disregarded, and a Community Advisory Board request has been consistently denied over the past two years, despite thousands of signatures and emails. Your claim of valuing "civic engagement" in the EJ policy rings hollow.

For over a year, the community has persistently urged consideration of alternative, non-industrial uses for the West Campus Upper Plateau. I strongly urge you to genuinely listen to these pleas and explore options that prioritize preserving the natural essence that drew families like mine to Mission Grove in the first place. RI-211.3

Sincerely,
Erika, Miles, and Gwen Cruz
92508

RI-211

Erika, Miles and Gwen Cruz
January 23, 2024

RI-211.1 This comment provides personal information and expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-211.2 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, requests a full CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-211.3 This comment raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Regarding the comment's request for a community advisory board, creation of an advisory committee is within the scope of the March Joint Powers Commission's authority. However, whether the Commission establishes an advisory committee or not, the creation of an advisory committee is not germane to the CEQA analysis for the Project. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. With regard to the process for the March JPA Environmental Justice Element, please refer to Response RI-211.2 above.

From: Janet Bernabe <bernabejanet22@gmail.com>
Sent: Tuesday, January 23, 2024 3:31 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely

Janet Bernabe
92571

bernabejanet22@gmail.com/ 951.581.0781

“Every moment is an organizing opportunity, every person a potential activist, every minute a chance to change the world.” — Dolores Huerta

RI-212

Janet Bernabe
January 23, 2024

RI-212.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: leo <minustheleo@gmail.com>
Sent: Tuesday, January 23, 2024 9:23 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a father of two deeply invested in fostering a connection with nature for my family, I find myself disheartened by the lack of meaningful changes in the Recirculated Draft Environmental Impact Report (REIR), specifically concerning the West Campus Upper Plateau (SCH 2021110304). The proposed project is both unpopular and environmentally concerning. RI-213.1

The introduction of an Environmental Justice (EJ) policy seems more like a perfunctory gesture than a genuine effort. Ideally, such a policy should have been established years ago, not hastily drafted alongside a project nearing completion by July 2025. I urge you to subject the EJ component to a comprehensive CEQA process and impose a warehouse moratorium until the evaluation is complete. Only then should the project be assessed against these new standards. RI-213.2

It's concerning that the REIR suggests no substantial alterations while asserting that the newly developed EJ policy seamlessly aligns with the existing plan. Despite community requests, you've overlooked non-industrial alternatives and rejected a Community Advisory Board, undermining the claim of valuing "civic engagement" in your EJ policy.

For over a year, the community has persistently advocated for exploring alternative, non-industrial uses for the West Campus Upper Plateau. I implore you to heed these requests and genuinely consider options that prioritize preserving the natural landscape for future generations. RI-213.3

Sincerely,
Leo Cruz
92508

RI-213

Leo Cruz
January 23, 2024

RI-213.1 This comment expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-213.2 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, requests a full CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-213.3 This comment raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Regarding the comment's request for a community advisory board, creation of an advisory committee is within the scope of the March Joint Powers Commission's authority. However, whether the Commission establishes an advisory committee or not, the creation of an advisory committee is not germane to the CEQA analysis for the Project. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. With regard to the process for the March JPA Environmental Justice Element, please refer to Response RI-213.2 above.

From: Leonides Cruz <cruz.leonides@gmail.com>
Sent: Tuesday, January 23, 2024 10:34 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a father of two young children eager to share my passion for hiking and mountain biking in nature, I find myself disheartened by the Recirculated Draft Environmental Impact Report (REIR), specifically its lack of meaningful changes to the West Campus Upper Plateau (SCH 2021110304) – a project that is both unpopular and environmentally damaging. RI-214.1

The introduction of an Environmental Justice (EJ) policy and your justifications for its alignment with the project seem like mere token gestures. This EJ policy should have been established years ago, not hastily drafted alongside a project you're rushing to finalize before the July 2025 sunset. I urge you to subject the EJ component to a comprehensive CEQA process and implement a warehouse moratorium until its completion. Only then should the project be assessed against these new standards. RI-214.2

It's concerning that the REIR proposes no substantive changes while asserting that the newly developed EJ policy seamlessly fits the existing plan. Despite community requests, you've neglected non-industrial alternatives and rejected a Community Advisory Board despite persistent appeals, thousands of signatures, and numerous emails. Your claims of valuing "civic engagement" in your EJ policy appear hollow.

For over a year, the community has consistently urged the consideration of alternative, non-industrial uses for the West Campus Upper Plateau. I implore you to genuinely heed these requests and explore options that prioritize preserving the natural environment for families like mine who cherish outdoor activities with their children. RI-214.3

Sincerely,
Leonides Cruz II
92508

RI-214

Leonides Cruz II
January 23, 2024

RI-214.1 This comment expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-214.2 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, requests a full CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-214.3 This comment raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Regarding the comment's request for a community advisory board, creation of an advisory committee is within the scope of the March Joint Powers Commission's authority. However, whether the Commission establishes an advisory committee or not, the creation of an advisory committee is not germane to the CEQA analysis for the Project. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. With regard to the process for the March JPA Environmental Justice Element, please refer to Response RI-214.2 above.

From: Bertha Morales <berthamoralesrealtor@gmail.com>
Sent: Wednesday, January 24, 2024 11:16 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. RI-215.1

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow. RI-215.2

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. RI-215.3

Sincerely,

Bertha Morales
92507

RI-215

Bertha Morales
January 24, 2024

RI-215.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: KC <kc45caliber@gmail.com>
Sent: Wednesday, January 24, 2024 7:50 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

in your EJ policy rings hollow.

The Sycamore trails and parks have offered so much good to myself and others alike as these types of natural areas are far and few these days. We wouldn't want to see more destruction of the little bit of untouched land left as this will likely continue to be a slippery slope continuing the process of more warehouses taking over open community land. Please choose the peoples wishes over the money. As there is no going back once warehouses are erected on this land.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Casey Welch

of Riverside 92501

RI-216

Casey Welch
January 24, 2024

RI-216.1 This comment is the first four paragraphs of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-216.2 This comment provides the commenter's personal involvement in the SoCal mountain bike community and raises concerns regarding loss of recreational open space like Sycamore Canyon. The Project will not impact Sycamore Canyon. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

RI-216.3 This comment is the last sentence of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Michael Fargher <fargher.michael@gmail.com>
Sent: Wednesday, January 24, 2024 6:13 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-217.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-217.2

Thank you for considering my views on this important matter.
Sincerely,
Michael
92672

Sent from my iPhone

RI-217

Michael Gargher
January 24, 2024

RI-217.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-217.2 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Meredith Medin <meredithem99@gmail.com>
Sent: Thursday, January 25, 2024 8:23 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a former resident of Riverside county, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As my friends in the community have asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Meredith Medin
91730
Sent from my iPhone

RI-218

Meridith Medin
January 25, 2024

RI-218.1 This comment includes personal information and is otherwise Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Branden Aguilera <zealouscreative@gmail.com>
Sent: Friday, January 26, 2024 10:47 AM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I'm writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-219.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-219.2

Thank you for considering my views on this important matter.

Sincerely,

Branden Aguilera
92405

Branden 'BZ' Aguilera
Creative Direction | Design | Communications
www.BZealous.com
txt: 909-991-3441

RI-219

Branden Aguilera
January 26, 2024

RI-219.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-219.2 This comment requests a non-industrial alternative and discusses environmental justice. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative, as well as the response to comment RI-219.1, above, related to the Environmental Justice Element.

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From: fredy orozco <forozco101@hotmail.com>
Sent: Sunday, January 28, 2024 9:41 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” i

Sent from my T-Mobile 5G Device
Get Outlook for Android

RI-220

Fredy Orozco
January 28, 2024

RI-220.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Jessica Diaz <jessica.diaz9390@gmail.com>
Sent: Monday, January 29, 2024 8:04 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Jessica Diaz

92508

RI-221

Jessica Diaz
January 29, 2024

RI-221.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Kevin Heinemann <kevinheinemann@gmail.com>
Sent: Monday, January 29, 2024 2:25 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-222.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Putting warehouses surrounded on 3 sides by homes, a church with daycare does not serve the community in any way.

RI-222.2

Sincerely,

Kevin Heinemann
92508

RI-222

Kevin Heinemann
January 29, 2024

RI-222.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-222.2 This comment expresses concern about the Project site location in relation to adjacent residential uses and a church with a daycare. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. The preschool at Grove Community Church is approximately 800 feet away from the Campus Development. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. The comment further states that the Project does not serve the community. Public benefits provided by the Project would include increased job opportunities for local residents, preservation of open space, extension of the roadway infrastructure and the pedestrian and bicycle circulation system, a new approximately 60-acre public park, and construction of the Meridian Fire Station, at the intersection of Opportunity Way and Meridian Parkway (see Topical Response 6, Meridian Fire Station, for additional details). This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Nicole Bernas <onecosmiclove@icloud.com>
Sent: Tuesday, January 30, 2024 6:03 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am not happy with the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly only meant to check a box. Your EJ policy is the “cart before the horse", as it should have been an important element in the beginning of a project, not at the same time as an in-process project that you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed *without community input*, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community have asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-223.1

We had a community meeting last week and a member gave us a poll sheet with options of land use for the West Campus Upper Plateau. We each got 3 stickers and were asked to place them in the sections that most align with our desire for that land that is so close to home. NOT ONE was on more warehouses or industrial parks. This really shows that you are not listening to or taking the concerns of your constituents into consideration here.

RI-223.2

Sincerely,

Nicole Bernas
92508

RI-223

Nicole Bernas
January 30, 2024

RI-223.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-223.2 This comment expresses concern about public engagement. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Ciro Guzman <cguzman@jensonusa.com>
Sent: Wednesday, January 31, 2024 2:10 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am currently an employee at JensonUSA. I started mountain biking only a few months ago and recently landed one of my longest jumps at Ammo Dump. It would be more than devastating to me if you guys happened to get rid of one of the few spots where I learned how to mountain bike. It's where I did my first big gap. If the gaps were to be replaced it would hit a sentimental spot for me, knowing that I would no longer be able to enjoy or go back to the same features that made me into the rider I am today. I understand as a business you must capitalize on opportunities such as building more businesses; but if you guys look at it from one of our perspectives, you'd see that the spots are more than just a trail. Me, my coworkers, and my buddies all feel the same way. I truly hope you can be open and realize the type of damage this would do to a fellow mountain biker. RI-224.1

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit that EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. RI-224.2

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board despite persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely, Ciro Guzman

Ciro Guzman
92557

Get Outlook for iOS

Ciro Guzman

o.

e. cguzman@jensonusa.com | w. JensonUSA.com

1615 Eastridge Ave. Riverside, CA 92507

AMERICA'S BIKE SHOP

TAG YOUR RIDES #JENSONUSA

RI-224

Ciro Guzman
January 31, 2024

RI-224.1 This comment describes personal experience with the Project site and raises concerns regarding the loss of recreational open space for biking. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-224.2 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Nikki Grimes <nikkigrimes9@gmail.com>
Sent: Wednesday, January 31, 2024 8:03 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am an internationally recognized author and artist specializing in books for children and young adults. As an artist, I am keenly sensitive to the impact the environment has on our health and well-being. I fear the West Campus Upper Plateau Project does not take these interests into account.

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Nikki Grimes

92879

RI-225

Nikki Grimes
January 31, 2024

RI-225.1 This comment provides personal information about the commenter and is otherwise Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: L S <nichole19161@gmail.com>
Sent: Friday, February 2, 2024 3:50 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR), as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project to my community as well as to the surrounding communities, which includes disadvantaged communities. RI-226.1

I have serious concerns about the air quality in my community, along with the fact that regardless of what you put in the REIR, warehouse operators are not following the rules of the South Coast Air Quality Management (SCAQMD) Districts Waire program indirect source rule (rule 2305). SCAQMD's December 2023 Newsletter states that about 50% of the warehouses throughout Los Angeles, Orange County and the Inland Empire are out of compliance with the rule (https://www.aqmd.gov/home/research/pubs-docs-reports/newsletters/october-november-december-2023/warehouse-enforecement-initiative). That number is expected to grow as more warehouses are built. Rule 2305 is in your REIR, section 4.6 (air quality), and it is failing to do what it is supposed to do. This is just another example as to why the community can not afford to allow any more warehouses in our backyards. RI-226.2

Under the REIR section 4.10 (Land Use & Planning), Table 4.10-1, there are several policies (3.1, 3.6, 4.6, 10.1) and "goals" (10, 11) related to specific truck routes (PDF-TRA-2) and signage (MM-AQ-15), and PDF-TRA-3, which is the 100k funding to MJPA for truck route enforcement for two years. I want to know who is going to enforce this truck route enforcement? All surrounding law enforcement agencies (RPD, CHP, MVPD, RSO) are short staffed and I can all but guarantee this enforcement will not happen, especially with only a 100k allotment over two years. Section 10.56.050 of the Riverside Municipal Code restricts trucks over 3 axles on many streets that are traveled by trucks coming and going from existing warehouses MJPA and Riverside City Council approved. I live by many of the restricted roads and I can attest that there is NO enforcement, and our restricted roads are traveled by 4 axle vehicles all day and night with no repercussions or enforcement. I've personally witnessed these restricted trucks pass by a minimum of five signs that state no 4 axle traffic. Your REIR "solutions" to this issue are not adequate, and us residents will be bombarded by more pollution, gridlock and road damage by these 4 axle trucks not heeding your signs or suggested routes. The 215 and 60 freeways are gridlocked by 4 axle vehicles and they will continue to look for ways to bypass the routes MJPA is designating. RI-226.3

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a **warehouse moratorium** until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. RI-226.4

It is telling that you propose no substantive changes in the REIR, yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-226.4
Cont.

Sincerely,

Laura Sandidge
Mission Grove 92508

RI-226

Laura Sandidge
February 2, 2024

RI-226.1 This comment is the first paragraph of Form Letter RA – Environmental Justice Element with the added reference to "to my community as well as to the surrounding communities, which includes disadvantaged communities." These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

RI-226.2 This comment states that SCAQMD's December 2023 Newsletter states that about 50% of the warehouses throughout Los Angeles, Orange County, and the Inland Empire are out of compliance with SCAQMD Rule 2305 reporting requirements. As identified in Recirculated Section 4.2, Air Quality, industrial buildings greater than or equal to 100,000 square feet within the Specific Plan Area would be subject to, and comply with, Rule 2305 reporting requirements. The comment does not raise any questions or concerns about the Recirculated Draft EIR sections.

RI-226.3 This comment questions truck route enforcement through PDF-TRA-2, MM-AQ-15, and PDF-TRA-3. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. If the Project is approved, March JPA will amend its truck route ordinance as described in PDF-TRA-2. Section 4.13, Public Services, explains that March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week. The commercial truck route enforcement is paid through an existing truck route mitigation fund. Additionally, Section 4.15, Transportation, explains that to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. Additionally, MM-AQ-15 requires that prior to issuance of an occupancy permit, March JPA shall confirm that signs clearly identifying the approved truck routes have been installed along the truck routes to and from the project site and within the Project site. March JPA will monitor compliance of both Project Design Features and mitigation measures through the MMRP.

RI-226.4 This comment is the last three paragraphs of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: julie weatherford <julieweatherford@gmail.com>
Sent: Monday, February 5, 2024 4:00 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, retired public health professional, advocate of environmental justice, and lifelong resident of Riverside, I am writing to express my profound disappointment in the Recirculated Draft Environmental Impact Report (REIR) as it made no meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives, and you have refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, I urge you to consider alternative, non-industrial and environmentally just uses for the West Campus Upper Plateau.

Sincerely,
Julie Weatherford
Hawarden Hills neighborhood, 92506

RI-227

Julie Weatherford
February 5, 2024

RI-227.1 This comment provides personal information and is otherwise Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Monday, February 5, 2024 9:48 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Peter Pettis
92508

RI-228

Peter Pettis
February 5, 2024

RI-228.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Monday, February 5, 2024 8:55 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am deeply disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Our community and infrastructure can no longer support more warehouses.

Sincerely,

Veronica Juarez
Orangecrest 92508

RI-229

Veronica Juarez
February 5, 2024

RI-229.1 This comment is Form Letter RA – Environmental Justice Element, plus the additional sentence "Our community and infrastructure can no longer support more warehouses". These additions do not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Noemi Alexander <noemi.alexander@gmail.com>
Sent: Friday, February 9, 2024 9:59 AM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I am reaching out to you as a homeowner in Orangecrest, and as the RUSD School Board Trustee representing the district in which the WCUP project is being proposed. The West Campus Upper Plateau project will detrimentally impact children in our school district as this project is situated near three elementary schools, one middle school, and the largest Highschool in the district. I am writing to ask you to make substantive changes to the Recirculated Draft Environmental Impact Report (REIR) of the West Campus Upper Plateau (SCH 2021110304). RI-230.1

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits seems disingenuous. Your EJ policy ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. RI-230.2

No substantive changes were proposed in the REIR yet the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. RI-230.3

Sincerely,

Dr. Noemi Hernandez Alexander
92508

RI-230

Dr. Noemi Alexander
February 9, 2024

RI-230.1 This comment includes personal information and expresses concern regarding Project impacts on children in the Riverside Unified School District (RUSD) based on the location of three elementary schools, one middle school, and the largest high school in the RUSD in relation to the Project site. The closest RUSD school to the Project site is Benjamin Franklin Elementary School at a distance of approximately 3,300 feet (0.62 miles). The comment does not identify specific impacts of concern. Environmental impacts to sensitive receptors surrounding the Project site were considered, and impacts to these receptors are discussed throughout the EIR. For example, the air quality analysis within the EIR took into consideration potential impacts to the nearest school to the Project site, which is the preschool located at Grove Community Church (Location R8). Given that air quality impacts at the preschool fall below established thresholds, the impacts at the RUSD schools located even further from the Project site would be further reduced. The comment refers to changes to the EIR that the commenter would like to request; however, the comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-230-2 The comment raises concerns about the drafting and timing of the March JPA's Draft Environmental Justice Element in relation to the Project, requests a full CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March JPA Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The

Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-230.3 This comment notes that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

This comment also raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Regarding the comment's request for a community advisory board, creation of an advisory committee is within the scope of the March Joint Powers Commission's authority. However, whether the Commission establishes an advisory committee or not, the creation of an advisory committee is not germane to the CEQA analysis for the Project. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. With regard to the process for the March JPA Environmental Justice Element, please refer to Response to Comment RI-230.2 above.

From: Jerry Shearer <shearer32@verizon.net>
Sent: Sunday, February 11, 2024 6:16 PM
To: Dan Fairbanks
Cc: Cindy Camargo
Subject: Public comment on record for the draft Environmental Justice Element of the March JPA General Plan dated November 30, 2023
Attachments: MJPA-EJELetter-021224BS.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Draft Environmental Justice Element as posted to your website and referenced in the emails below. Please find my comments in the attached letter. I look forward to your thoughts and appreciate your consideration. RI-231.1

Please reply to confirm receipt of this public comment.

Sincerely,

Brenda Shearer
Riverside 92508
shearer32@verizon.net

11 February 2024

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

RE: Public comment on record for the draft Environmental Justice Element of the March JPA General Plan dated November 30, 2023

Attention Mr. Fairbanks:

Thank you for considering my comments on the draft Environmental Justice Element as an amendment to the March JPA's General Plan. While this letter is similar to my husbands, I also agree with the concerns provided in this letter. Please do not represent this comment letter as me using a template, in fact, I learned a great deal about the March JPA as my neighbor and Environmental Justice in helping my husband write this letter. This letter focuses on the inclusion of the draft Environmental Justice element as both a standalone amendment with comments as well as details incorporated into the recirculated draft EIR for the West Campus Upper Plateau project (SCH 2021110304), as well as my objection to the March JPA's characterization of the "Application of Environmental Justice Policies" as part of the March JPA's General Plan on page 3 of 14 of the PDF posted on your website.

Standard government contracting procedures allow for quick adoption of an agreement or contract because of pressing factors like public safety or timely acquisition by the government of a product or service at an advantageous price or offering. I do not see where in the government's guidance that the release of the Environmental Justice Element at the same time as including it as a part of a specific land development project meets the acquisition or contracting standards at the federal or state government level. The timing of your release of this policy is questionable. In addition, your interpretation that the March JPA General Plan (as approved and through this proposed amendment) contains goals and policies that "are evaluated as a continuum of direction within broad interpretation parameters" is no more than your attempt to interpret and construct the General Plan to meet your narrowly focused development practices and land use plans as the March JPA prepares to sunset in July 2025. You have consistently demonstrated your willingness to venture away from the original intentions of the General Plan and Final Reuse Plan at the whim of the profit-driven goals of your single source development partner and their greedy investors. The authors of the General Plan had a clear vision for how the land surrounding March ARB could be used to provide both blue and white-collar jobs, recreation and open-space areas, and community focused business opportunities for local entrepreneurs, military personnel, and college graduates. For example, under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners

RI-231.1

in areas adjacent to the base." In addition, in your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions," and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." And finally, the Final Reuse Plan (1996) describes how "the planning process was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse." But you have ignored these guidelines giving preference to a very narrow interpretation of how the repurposed land should be redeveloped. These founding organizational documents clearly indicate a preference for community preference in decision making and land use planning which you have largely ignored, dismissed, or purposefully excluded or marginalized increasingly over the past 15 years. Your willingness to overlook these clear objectives demonstrates your eagerness to serve private industry and predatory capitalism over the people living in the communities surrounding March ARB. I am curious to know why the March JPA staff, Commission, and your partners have excluded the public in every aspect of the redevelopment of public lands surrounding the base.

On November 29, 2023, the March JPA released information on their website and through mailed notifications and email to members of the Westmont Village, Green Acres, and Veteran's Village communities within the March JPA planning area that an Environmental Justice Element was under consideration. The March JPA included the draft Environmental Justice Element in two completely separate but concurrent business filings with no input from all impacted community members (and no public notification that an Environmental Justice Element was under consideration, a disturbing pattern), no review by the March JPA Technical Advisory Committee, and no input from the March JPA Commission. The Environmental Justice Element has not undergone any formal CEQA review, as required under CEQA for a general plan amendment. And you clearly shared drafts of this plan, if not the very draft published on your website, with your contractors and the applicant for the West Campus Upper Plateau prior to the public ever being made aware of your plans to establish an Environmental Justice Element. Why are you pursuing these two simultaneous yet wholly connected efforts now and in this manner? Why, for a policy that lives and dies with public engagement, did you exclude the public and include private contractors and for-profit commercial entities? What is your definition of stakeholders?

RI-231.1 Cont.

Whatever your responses, and I imagine they will be as insufficient as your justification for bastardizing the General Plan's language to meet your anti-community business objectives, it is about time you considered an Environmental Justice Element for the March JPA's General Plan. It concerns me, as I have mentioned, that the release of the draft at the end of November 2023 coincided with the recirculation of the draft EIR for the West Campus Upper Plateau project (and is included as part of this updated plan) that the local community (including more than 160 members from the most at-risk communities within the March JPA development territory) overwhelmingly rejects. It is frankly insulting to think that while the March JPA has existed since 1996, and have consistently built warehouses in communities that CalEnviroScreen 4.0 lists in

the 98th and 99th percentile, the March JPA has chosen the last days of November 2023 to amend the General Plan for an organization that sunsets in July 1, 2025. It is farcical to think that the March JPA intends to actually carry through with this absurd and ambitious plan, and as a member of an active community that opposes the land development practices of the March JPA, I don't believe this effort is genuine on your part. Your last minute draft Environmental Justice Element is clearly in response to comment letters submitted by the community in response to the draft EIR for the West Campus Upper Plateau, and rather than engage with the community and consider the comments in these letters, the March JPA is obviously placating to the applicant's greed and desire to push through a significantly controversial project despite unanimous opposition from the very communities that this copy-paste Environmental Justice policy intends to protect and represent.

Looking back to page 3 of the draft Environmental Justice plan online, the paragraphs addressing the "Application of Environmental Justice Policies" spells out the fact quite clearly: you do not intend to comply with this plan, only to use it as a way to measure the degree to which you are working toward "the direction set by the goal or policy is met, a level of compliance is achieved such that the direction set by the goal or policy is met within a continuum framework" to satisfy your behind the scenes effort to pass CA Senate Bill 994. Per the bill summary posted on www.fastdemocracy.com, the March JPA is seeking authority from the State of California to "authorize the authority to transfer jurisdiction over any landscaping and lighting maintenance districts and any community facilities districts, as specified, and to assign its contractual obligations relating to the use of land to the county … require the application of specified authority land use laws and entitlements, as specified, on and after July 1, 2025." Your attempts to manipulate the system in a way not available to the public in order to force through the unpopular West Campus Upper Plateau project even after the March JPA ceases to exist is a disturbing misuse of power and clearly is being done to cut out the public and our wishes for how the land surrounding the March ARB is repurposed. You have no intention of adhering to the goals or policies in the draft Environmental Justice Element. But what is worse is that you are developing a framework to lock out the public (exactly the opposite of aligning with the objectives stated in your draft policy) while negotiating with the County of Riverside to continue your pro-developer, anti-community policies and legal relationships after you close your doors for good. You need to amend the General Plan so that these policies are in place so you or your successor agency can continue to contract needless and unpopular warehouses on the remaining March JPA lands, and CA SB994 will ensure that the County of Riverside is obligated to grant the greedy applicant and its investors time and land to profit at the expense of people's health and life choices even as it inherits all of the costs of your destructive business decisions.

I have concerns with the process by which the JPA is going about this amendment to the General Plan, as you and your contractors have already inserted it into the revised draft EIR for the West Campus Upper Plateau project being recirculated currently. The policy in its current form reads as an unimaginative cut-and-paste from the County of Riverside, filled with policies that the March JPA has no ability or intention to follow through on in the 18 months it has left to exist.

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Maybe this is your intention. You plan to amend the General Plan with some form of the draft plan posted November 2023 and you will then attempt to amend the specific plan for the West Campus Upper Plateau while it is in the final stages of review or even possibly after the Commission has voted on it. And if you succeed in getting CA SB994 approved by the State, your plan appears like it will work. When this area falls under the land permitting jurisdiction of the County of Riverside, it will be more capable of administering the Environmental Justice Element you have included, but how is it equipped to administer your unfunded obligations related to this policy? Please elaborate in detail your plan to actually implement this plan in regards to past and current specific plan amendments to the General Plan in a more meaningful way than measuring progress on an ongoing basis.

Diving a bit deeper, the draft policy posted on your website is a wholesale copy-paste of the County of Riverside Environmental Justice Element incorporated in the Healthy Communities section of the County of Riverside General Plan. Your justification for this adoption appears to be that the County of Riverside will be the successor agency to the March JPA in July 2025, though no written succession plan is available on your website today outside of revenue sharing detailed in the 14th Amendment to the General Plan and CA SB994 (not on the JPA website). This copied plan is desperate, reactionary management and decision-making on your part. Your choice to take this path is indefensible because the timeframes, financial resources, jurisdiction, accountability, and specific issues of the two land-use agencies are completely different. The March JPA needs to examine its own planning area and create an Environmental Justice Element that is specific to the needs of the community members who live in the surrounding communities; it should contain land-use policies that will govern the residents and neighbors of the March JPA planning area regardless of how long your organization has left to exist, not the County of Riverside.

RI-231.1 Cont.

The County of Riverside's Environmental Justice Element includes 77 policies, many of which are long-range goals. However, the March JPA is sunsetting in 18 months and cannot make long-range plans like those found in your draft Environmental Justice Element. The March JPA has limited staff, time, and resources to establish, monitor, and manage such a plan, and you cannot achieve or even work towards any long-range objectives for your planning area. Adopting the County of Riverside's objectives leads to an absurd number of policies that make no sense. Specifically, the policies that the March JPA has no ability or intention of fulfilling include:

1. The March JPA has no history of, and has repeatedly rejected the idea of coordinating with community-based organizations and community members to develop an outreach plan to increase public awareness and participation in the local planning process (HC 15.1), especially in relationship to Environmental Justice communities (HC 15.2-15.3).
2. The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7).
3. The March JPA has no jurisdiction over the Salton Sea (HC 16.1).

4. The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC 16.8), and rejected community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10).
5. The March JPA won't be coordinating with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7).
6. The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13).
7. The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

As I have mentioned, what concerns me is that the March JPA has decided to engage simultaneously with a draft Environmental Justice policy and the recirculation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304), though you consistently state the two "projects" are unrelated, and that the JPA references this not-yet-adopted policy extensively in the document. How meaningful are community comments for a General Plan amendment if it is already assumed that the agency will adopt the plan wholesale for even one specific plan before the process has started? As it stands, the public comment window for the recirculated draft EIR will close before you are able to officially adopt an Environmental Justice policy. How can a community officially comment on a project's draft EIR when it is contingent on policies in the General Plan have not been finalized, and the policies are wholly unresponsive to the specific Environmental Justice needs of the area? The March JPA's process communicates that it is not actually interested in meaningful feedback, that this is an exercise with a predetermined outcome, a process that fulfills a legal requirement rather than fulfills the JPA's responsibility to "protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses," and finally is exactly the opposite of the language and spirit of the civic engagement policies that the March JPA is trying to adopt and codify.

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The proposed Environmental Justice Element for the March JPA needs to incorporate March JPA priorities, exclude inapplicable County of Riverside policies, and describe community priorities through a formal and active community engagement process. This copy-paste of the County of Riverside policy is neither specific, concrete, nor targeted and it is devoid of all community input. Adopting a General Plan amendment with more than a dozen policies that the March JPA has no intention of implementing is dishonest, poor governance, leaves behind unfunded obligations, and is a litigation risk. Incorporating the draft Environmental Justice Element into an existing March JPA draft EIR as if it will be adopted without modification is also dishonest, unstable, and risks litigation. Is the County of Riverside aware of the unfunded obligations that the March JPA is leaving behind? Is the County of Riverside prepared to assume the legal

responsibilities and liabilities left behind by the March JPA? If so, please provide written evidence of the communications stating their acceptance of these terms.

Around the country, but especially in the Inland Empire, urban planning (and those responsible for it) continues to have an uneasy relationship with Environmental Justice advocates and requirements. Poor planning decisions and discriminatory practices have historically heightened the burdens of environmental contamination in low-income neighborhoods and communities of color, in comparison to largely white, wealthy populations. This is why the residents of Irvine, Temecula, and Pasadena are able to assure their communities are not overrun by narrowly focused land uses like industrial and warehousing. Since the 1980s, activists have garnered some regulatory and scholarly support for changes to policy and planning processes, but urban planners have been slow to adopt an explicit Environmental Justice framework in land-use policies in more diverse, poorer, and less educated communities. The urban planning profession, however, has the task of helping ensure that future development does not repeat the unjust environmental injustices of the past.

Adopted in 2016 and implemented in 2018, California Senate Bill (SB) 1000 calls for local jurisdictions with disadvantaged communities to include Environmental Justice considerations in their general land use plans. CA SB1000 is intended to ensure transparency and community engagement in urban planning processes, mitigate the harm of living near environmental hazards, and facilitate equitable access to health-promoting amenities such as recreation, healthy and affordable food options, and safe and sanitary housing.

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Without support from elected officials, public agencies, and senior planning managers, progress toward Environmental Justice has been and will continue to be slow and uneven. Hence, the real work of Environmental Justice takes place in the implementation and enforcement of laws and policies, and the insistence of this implementation and enforcement by all residents and communities. Environmental Justice will not be fully realized without strong oversight and political leadership, and racial and economic diversification of urban planning institutions. It seems as if the March JPA is a bit late in its efforts to implement and enforce laws and policies that protect all residents and communities, and is quite unimaginative in its approach to addressing CA SB1000 a full six years after the State implementation of its guidelines.

Yet, there is guidance available to inform the public and land use authorities like the March JPA about how to engage with the public in this area. The California DoJ and SB1000 implementation toolkit lists some best practices for community engagement. As others before me have requested, I ask that the March JPA engage in these standard practices.

1. Form an Environmental Justice advisory committee
2. Partner with local community organizations to form authentic goals
3. Consult with tribal groups to preserve culture and history
4. Stagger meeting times and locations to increase participation and offer childcare

5. Make meetings and documents accessible in many languages including ASL

The best practice for an Environmental Justice policy is that it is community led (CA SB1000 Implementation Toolkit, California DoJ). Instead of following this best practice, the March JPA engaged a large engineering/architectural firm (Michael Baker International) to lead the Environmental Justice policy development and you released a draft Environmental Justice policy without any community notification, much less public participation. Michael Baker International is the lead environmental consultant on more than six warehouse projects in southern California, including the I-15 Logistics Center in Fontana and the Southern California Logistics Center 44 in Victorville. It is not clear what qualifications in Environmental Justice they have, as there are no example projects focused on Environmental Justice issues on their website beyond environmental compliance for mega-projects. There are multiple environmental consultants or nonprofit organizations that could have been hired to help in this process that would not have this apparent conflict of interest. Aside from an existing relationship with Michael Baker International, what organizational qualifications does the March JPA believe this contractor has to benefit residents of Moreno Valley, Perris, Riverside, and Riverside County? How are they accountable to you to develop and implement a working Environmental Justice Element as an amendment to the General Plan? And how accountable to the public are you when they fail to develop a policy that meaningfully engages the residents of western Riverside County?

The March JPA has, as I have said previously, copied a plan that demonstrates desperate and reactionary management and decision-making practices on your part. However, one only needs to look down the 10 Freeway to find a better example of a functioning Environmental Justice plan at work. An example of an operational Environmental Justice policy is found in the Los Angeles Area Environmental Enforcement Collaborative. The densely populated communities closest to the I-710 freeway in Los Angeles County are severely impacted by pollution from goods movement and industrial activity, similar to the logistics dystopia the March JPA is creating in western Riverside County. However, in a multiyear effort, a unique collaboration of federal, state, and local governments and nonprofit organizations have been working together to improve the environmental and public health conditions for residents along this corridor. Working with local communities, members of the Collaborative:

- Partner with community leaders to identify pollution sources, “ground-truth” agency data sources, and develop plans for immediate action.
- Engage with community organizations to propose land use designations that integrate with and enhance neighborhoods, parks, and sensitive receptors.
- Improve compliance with environmental laws by targeting inspections and enforcement at the state, federal, and local levels to address the pollution sources of most concern to communities.
- Build on the existing community partnerships and the targeted enforcement efforts of CalEPA’s Department of Toxic Substances Control (DTSC).
- Sustain multi-year partnerships with communities, offering voluntary programs, tools, capacity-building grant opportunities, educational information, and training.

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Through this policy, the Collaborative continues to work with community representatives and local, state and federal regulatory agencies (e.g., Waterboards, air quality and public health agencies, planning departments) to coordinate environmental pollution mitigating activities including inspection and enforcement activities, ground-truthing real sources of environmental pollution in and around communities and schools and sensitive receptors. This example is a good model of how business, government, and the public form a more collaborative relationship. This is in stark contrast to the March JPA and how you are conducting business with the simultaneous release of a draft Environmental Justice plan in two "unconnected projects," each required to follow the CEQA process of posting, review, and comment.

An example much closer to the March area of influence can be found in the City of Riverside's recently adopted public engagement policy (though they are struggling to implement their policy throughout all City departments). In order to have a functioning Environmental Justice Element, an agency like the March JPA would actually need to incorporate feedback from the community into their land use planning and decisions. Genuine civic engagement, like the type the City of Riverside is implementing today, is what a public engagement policy establishes, and what as governors of the public (which the March JPA Commission is supposed to be) you are tasked with doing. To date, the March JPA only engages with the public when forced to involve community wishes by a court mandate or settlement, and even then, the March JPA has shown that it only follows through on settlement terms that benefit your agency or the sole-source applicant that has had far too much influence in this region for far too long. For example, one of the unfunded obligations the March JPA will need to deal with prior to sunsetting July 2025 is the 2012 Center for Biological Diversity Settlement Agreement that requires the construction of a 60-acre park among other things. For more than a year, I and many other community members and organizations have asked the March JPA for involvement in planning for this park. In the February 14, 2024 March JPA Commission meeting agenda, it appears you have been meeting privately with the City and County of Riverside, "Meetings of parks officials and senior management from Riverside County and the City of Riverside were held on December 4, 2023 and January 18, 2024 to discuss the proposal for a park as a component of the West Campus Upper Plateau. Follow-up meetings are expected." It is quite clear that the March JPA has engaged far more meaningfully with JPA Staff, City and County staff, and the Lewis Group and its investors than you ever have with the public. These secretive meetings about an issue deeply important to the community surrounding March ARB demonstrates your lack of urgency to involve the public in ways that your draft Environmental Justice Element says you are going to engage with the public. Your efforts to covertly discuss the park is proof that you are only doing the minimum necessary to allow you to continue to build more warehouses around a community of retired military veterans and the final resting places that provide full military honors for our veterans! Your purposeful dismissal of public concern negates anything you write in your draft Environmental Justice plan.

RI-231.1 Cont.

With the unannounced release of the draft Environmental Justice Element in two places or "projects", the March JPA violated the core principle of Environmental Justice – meaningful civic engagement in policy development. Residents of the March JPA community were not notified at all until the draft Environmental Justice Element was released online. In contrast, the master developer and environmental consultants working with the March JPA were given early access to the policy and fully incorporated it into a recirculated draft EIR for the West Campus Upper Plateau released three days after the draft Environmental Justice Element was released to the public. The consideration of an Environmental Justice Element was not released via CEQANET notification, nor was it released to community members via published agendas of March JPA Commission or TAC Committee meetings occurring between March 2023 and November 2023. I know as I attended many of these meetings in person. Your consideration of the draft Environmental Justice Element was done behind closed doors by March JPA employees, staff, your consultants, and the master developer. Nothing says Environmental Justice like excluding the public from the creation and writing of this document. And now you are trying to backwards map your way into public engagement by hosting two public workshops to discuss the plan you copy-pasted in secrecy. Why have you chosen to work in this exclusionary manner? Does it have anything to do with the Lewis Group's insistence that you obligate the West Campus Upper Plateau project before expiring on July 1, 2025? Is that why you are pursuing a shady political approach of passing CA SB994 at the same time you are rushing to finalize the West Campus Upper Plateau warehouse project? How can you claim to be engaging with the public when your every action works against public interest?

RI-231.1 Cont.

To incorporate the draft Environmental Justice Element into an active recirculated draft EIR so extensively, it was necessary for multiple environmental consultants and the master developer to have access to the draft Environmental Justice policies months before the recirculation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304) was released, though allegedly these two "projects" are unrelated. In contrast, the community was not even notified, and certainly was not consulted or engaged during this same time. This is notable not only for its inconsistency with best practice as identified by CEQA and DoJ, it is also notable for its deliberate withholding of responses to CEQA comment on the draft EIR made on March 9, 2023, and for its inconsistency with the very words of the March JPA General and Final Reuse Plans. The March JPA staff knows that the community wants to be engaged in this public agency and its environmental policy-making but chooses not to allow collaborative participation, and thus this draft Environmental Justice Element is disingenuous, manipulative to those serving on and voting on the March JPA Commission, manipulative of the legal and political systems in the State of California, and insulting to the public.

For years now, the March JPA has disproportionately added to the burden of communities living within its planning area by choosing a heavy industrial land-use policy with minimal mitigation measures. I experience the negative impacts of this burden on a daily basis. You have also been derelict in updating your General Plan to address CA SB1000, with over five general plan amendments since 2018 that included no mention of environmental justice. It is ironic that

California SB1000, which is codified in Government Code Section 63502(h), requires jurisdictions with disadvantaged communities to either include an Environmental Justice Element in their general plan or incorporate Environmental Justice goals, policies, and objectives throughout other general plan elements, and the March JPA insists on forcing through this plan on two separate but connected "projects" while ignoring public sentiment on either of them. CA SB1000 is triggered when a jurisdiction concurrently adopts or revises two or more general plan elements if there is one or more disadvantaged communities within the jurisdiction. A "disadvantaged community" is an area identified by the California Environmental Protection Agency as such or that is a low-income area disproportionately affected by environmental pollution and other hazards that may lead to negative health effects or environmental degradation within its planning area. What has taken the March JPA so long to address this requirement? And why are you doing it now so hastily and without public involvement or participation? Why are you working covertly to move a draft Environmental Justice Element through with proper CEQA requirements? Why are you working covertly with private and government groups to push through a flawed and irrelevant policy and controversial industrial projects?

Please consider slowing down this process, listening to the community just as this proposed policy says you will do, and draft a sensible Environmental Justice Element to the March JPA's General Plan that responds to the community's needs, is realistic to the agency's capabilities and mission, includes metrics and milestones to measure progress toward and compliance with individual policies and goals (as any element of a "project" of this scope would do), and will transition to and benefit the County of Riverside once the March JPA sunsets in July 2025 (not one driven by greedy developers and investors or one that leave the County with unfunded obligations and liabilities). Please also consider pausing the release of the Recirculated Draft EIR for the West Campus Upper Plateau until the Environmental Justice Element General Plan amendment process is complete so that the community can meaningfully comment on a policy that has been approved by the March JPA and its Commission and thus will be relevant to the applicant's proposed project. Please make a better attempt to empower the public rather than patronize and placate us.

RI-231.1
Cont.

"A good person is the friend of all living things."

Brenda Shearer

Brenda Shearer
Riverside, CA 92508
shearer32@verizon.net

RI-231

Brenda Shearer
February 11, 2024

RI-231.1 This comment letter and associated transmittal email are identified as comments on the March JPA Draft Environmental Justice Element, which is not part of the proposed Project. This comment letter was separately included in the administrative record for the Environmental Justice Element. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area. March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The comment requests the Project EIR be paused until the adoption of the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Sunday, February 11, 2024 5:39 PM
To: Dan Fairbanks
Cc: Cindy Camargo
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: MJPA-EJELetter-021224JS.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Draft Environmental Justice Element as posted to your website and referenced in the emails below. Please find my comments in the attached letter. I look forward to your thoughts and appreciate your consideration.

RI-232.1

Please reply to confirm receipt of this public comment.

Sincerely,

Jerry Shearer
Riverside 92508

On Thursday, December 28, 2023 at 09:56:15 AM PST, Dan Fairbanks <fairbanks@marchjpa.com> wrote:

March JPA is circulating this notice to identify a due date for comments regarding the draft March JPA Environmental Justice Element. A prior public notice was sent out on November 30, 2023, providing a link to the draft Environmental Justice Element and inviting recipients to the first Community Workshop. **This notice provides a due date of February 15, 2024 for comments on the draft March JPA Environmental Justice Element.**

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During the development of the Environmental Justice Element, March JPA hosted the first of two workshops on Tuesday, December 19, 2023, at March Field Air Museum located at 22550 Van Buren Boulevard, Riverside, CA. The meeting PowerPoint presentation and Dot Poll results are available at: https://marchjpa.com/. Summary discussions regarding the Open Comment Session at the Community Workshop will also be placed on the March JPA website.

For more information or to submit comments on draft documents as they become available, please contact:

• Dan Fairbanks, Planning Director, March Joint Powers Authority

• Email: fairbanks@marchjpa.com Phone: (951) 656-7000

• Current draft Environmental Justice Element is available at: https://marchjpa.com/wp-content/uploads/2023/11/Draft-Environmental-Justice-Element.pdf

Dan Fairbanks

March JPA Planning Director

(951) 656-7000

From: Dan Fairbanks
Sent: Thursday, November 30, 2023 4:55 PM
Subject: Workshop for the draft March JPA Environmental Justice Element

March Joint Powers Authority (March JPA) is preparing an Environmental Justice Element to the March JPA General Plan. According to the State of California, Environmental Justice is defined as "the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." Upon completion, the Environmental Justice Element will be included as part of the March JPA General Plan, and it will reflect the agency's commitment to reducing environmental burdens and ensuring all residents have the opportunity to access public facilities and services that improve their quality of life. The March JPA Environmental Justice Element would be applicable within the existing March JPA planning jurisdiction. Other nearby land, including the adjacent March Air Reserve Base and Riverside National Cemetery would not be subject to the provisions of the Environmental Justice Element. A more complete description of the March JPA Environmental Justice Element is provided in the attached Workshop notification, and a link to the draft Environmental Justice Element is provided below. The Environmental Justice Element is NOT a part of the West March Upper Plateau project. Given the timing on the process, the EJ Element will likely appear before the Commission for a formal action toward the end of first quarter of 2024.

The first Workshop is planned for Tuesday, December 19, 2023, at March Field Air Museum, 6:30 – 8:00 PM, 22550 Van Buren Boulevard, Riverside, CA

The current draft Environmental Justice Element is available at: https://marchjpa.com/wp-content/uploads/2023/11/Draft-Environmental-Justice-Element.pdf

For information or to submit comments on draft documents, please contact: Dan Fairbanks, March JPA Planning Director, 951-656-7000 or fairbanks@marchjpa.com

Dan Fairbanks

Planning Director

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Email: fairbanks@marchjpa.com

11 February 2024

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

RE: Public comment on record for the draft Environmental Justice Element of the March JPA General Plan dated November 30, 2023

Attention Mr. Fairbanks:

Thank you for considering my comments on the draft Environmental Justice Element as an amendment to the March JPA's General Plan. This letter focuses on the inclusion of the draft Environmental Justice element as both a standalone amendment with comments as well as details incorporated into the recirculated draft EIR for the West Campus Upper Plateau project (SCH 2021110304), as well as my objection to the March JPA's characterization of the "Application of Environmental Justice Policies" as part of the March JPA's General Plan on page 3 of 14 of the PDF posted on your website.

Standard government contracting procedures allow for quick adoption of an agreement or contract because of pressing factors like public safety or timely acquisition by the government of a product or service at an advantageous price or offering. I do not see where in the government's guidance that the release of the Environmental Justice Element at the same time as including it as a part of a specific land development project meets the acquisition or contracting standards at the federal or state government level. The timing of your release of this policy is questionable. In addition, your interpretation that the March JPA General Plan (as approved and through this proposed amendment) contains goals and policies that "are evaluated as a continuum of direction within broad interpretation parameters" is no more than your attempt to interpret and construct the General Plan to meet your narrowly focused development practices and land use plans as the March JPA prepares to sunset in July 2025. You have consistently demonstrated your willingness to venture away from the original intentions of the General Plan and Final Reuse Plan at the whim of the profit-driven goals of your single source development partner and their greedy investors. The authors of the General Plan had a clear vision for how the land surrounding March ARB could be used to provide both blue and white-collar jobs, recreation and open-space areas, and community focused business opportunities for local entrepreneurs, military personnel, and college graduates. For example, under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." In addition, in your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions," and "Protect the interest of, and existing

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commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." And finally, the Final Reuse Plan (1996) describes how "the planning process was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse." But you have ignored these guidelines giving preference to a very narrow interpretation of how the repurposed land should be redeveloped. These founding organizational documents clearly indicate a preference for community preference in decision making and land use planning which you have largely ignored, dismissed, or purposefully excluded or marginalized increasingly over the past 15 years. Your willingness to overlook these clear objectives demonstrates your eagerness to serve private industry and predatory capitalism over the people living in the communities surrounding March ARB. I am curious to know why the March JPA staff, Commission, and your partners have excluded the public in every aspect of the redevelopment of public lands surrounding the base.

On November 29, 2023, the March JPA released information on their website and through mailed notifications and email to members of the Westmont Village, Green Acres, and Veteran's Village communities within the March JPA planning area that an Environmental Justice Element was under consideration. The March JPA included the draft Environmental Justice Element in two completely separate but concurrent business filings with no input from all impacted community members (and no public notification that an Environmental Justice Element was under consideration, a disturbing pattern), no review by the March JPA Technical Advisory Committee, and no input from the March JPA Commission. The Environmental Justice Element has not undergone any formal CEQA review, as required under CEQA for a general plan amendment. And you clearly shared drafts of this plan, if not the very draft published on your website, with your contractors and the applicant for the West Campus Upper Plateau prior to the public ever being made aware of your plans to establish an Environmental Justice Element. Why are you pursuing these two simultaneous yet wholly connected efforts now and in this manner? Why, for a policy that lives and dies with public engagement, did you exclude the public and include private contractors and for-profit commercial entities? What is your definition of stakeholders?

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Whatever your responses, and I imagine they will be as insufficient as your justification for bastardizing the General Plan's language to meet your anti-community business objectives, it is about time you considered an Environmental Justice Element for the March JPA's General Plan. It concerns me, as I have mentioned, that the release of the draft at the end of November 2023 coincided with the recirculation of the draft EIR for the West Campus Upper Plateau project (and is included as part of this updated plan) that the local community (including more than 160 members from the most at-risk communities within the March JPA development territory) overwhelmingly rejects. It is frankly insulting to think that while the March JPA has existed since 1996, and have consistently built warehouses in communities that CalEnviroScreen 4.0 lists in the 98th and 99th percentile, the March JPA has chosen the last days of November 2023 to amend the General Plan for an organization that sunsets in July 1, 2025. It is farcical to think that the March JPA intends to actually carry through with this absurd and ambitious plan, and as a

member of an active community that opposes the land development practices of the March JPA, I don't believe this effort is genuine on your part. Your last minute draft Environmental Justice Element is clearly in response to comment letters submitted by the community in response to the draft EIR for the West Campus Upper Plateau, and rather than engage with the community and consider the comments in these letters, the March JPA is obviously placating to the applicant's greed and desire to push through a significantly controversial project despite unanimous opposition from the very communities that this copy-paste Environmental Justice policy intends to protect and represent.

Looking back to page 3 of the draft Environmental Justice plan online, the paragraphs addressing the "Application of Environmental Justice Policies" spells out the fact quite clearly: you do not intend to comply with this plan, only to use it as a way to measure the degree to which you are working toward "the direction set by the goal or policy is met, a level of compliance is achieved such that the direction set by the goal or policy is met within a continuum framework" to satisfy your behind the scenes effort to pass CA Senate Bill 994. Per the bill summary posted on www.fastdemocracy.com, the March JPA is seeking authority from the State of California to "authorize the authority to transfer jurisdiction over any landscaping and lighting maintenance districts and any community facilities districts, as specified, and to assign its contractual obligations relating to the use of land to the county … require the application of specified authority land use laws and entitlements, as specified, on and after July 1, 2025." Your attempts to manipulate the system in a way not available to the public in order to force through the unpopular West Campus Upper Plateau project even after the March JPA ceases to exist is a disturbing misuse of power and clearly is being done to cut out the public and our wishes for how the land surrounding the March ARB is repurposed. You have no intention of adhering to the goals or policies in the draft Environmental Justice Element. But what is worse is that you are developing a framework to lock out the public (exactly the opposite of aligning with the objectives stated in your draft policy) while negotiating with the County of Riverside to continue your pro-developer, anti-community policies and legal relationships after you close your doors for good. You need to amend the General Plan so that these policies are in place so you or your successor agency can continue to contract needless and unpopular warehouses on the remaining March JPA lands, and CA SB994 will ensure that the County of Riverside is obligated to grant the greedy applicant and its investors time and land to profit at the expense of people's health and life choices even as it inherits all of the costs of your destructive business decisions.

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I have concerns with the process by which the JPA is going about this amendment to the General Plan, as you and your contractors have already inserted it into the revised draft EIR for the West Campus Upper Plateau project being recirculated currently. The policy in its current form reads as an unimaginative cut-and-paste from the County of Riverside, filled with policies that the March JPA has no ability or intention to follow through on in the 18 months it has left to exist. Maybe this is your intention. You plan to amend the General Plan with some form of the draft plan posted November 2023 and you will then attempt to amend the specific plan for the West Campus Upper Plateau while it is in the final stages of review or even possibly after the

Commission has voted on it. And if you succeed in getting CA SB994 approved by the State, your plan appears like it will work. When this area falls under the land permitting jurisdiction of the County of Riverside, it will be more capable of administering the Environmental Justice Element you have included, but how is it equipped to administer your unfunded obligations related to this policy? Please elaborate in detail your plan to actually implement this plan in regards to past and current specific plan amendments to the General Plan in a more meaningful way than measuring progress on an ongoing basis.

Diving a bit deeper, the draft policy posted on your website is a wholesale copy-paste of the County of Riverside Environmental Justice Element incorporated in the Healthy Communities section of the County of Riverside General Plan. Your justification for this adoption appears to be that the County of Riverside will be the successor agency to the March JPA in July 2025, though no written succession plan is available on your website today outside of revenue sharing detailed in the 14th Amendment to the General Plan and CA SB994 (not on the JPA website). This copied plan is desperate, reactionary management and decision-making on your part. Your choice to take this path is indefensible because the timeframes, financial resources, jurisdiction, accountability, and specific issues of the two land-use agencies are completely different. The March JPA needs to examine its own planning area and create an Environmental Justice Element that is specific to the needs of the community members who live in the surrounding communities; it should contain land-use policies that will govern the residents and neighbors of the March JPA planning area regardless of how long your organization has left to exist, not the County of Riverside.

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The County of Riverside's Environmental Justice Element includes 77 policies, many of which are long-range goals. However, the March JPA is sunsetting in 18 months and cannot make long-range plans like those found in your draft Environmental Justice Element. The March JPA has limited staff, time, and resources to establish, monitor, and manage such a plan, and you cannot achieve or even work towards any long-range objectives for your planning area. Adopting the County of Riverside's objectives leads to an absurd number of policies that make no sense. Specifically, the policies that the March JPA has no ability or intention of fulfilling include:

1. The March JPA has no history of, and has repeatedly rejected the idea of coordinating with community-based organizations and community members to develop an outreach plan to increase public awareness and participation in the local planning process (HC 15.1), especially in relationship to Environmental Justice communities (HC 15.2-15.3).
2. The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7).
3. The March JPA has no jurisdiction over the Salton Sea (HC 16.1).
4. The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC

16.8), and rejected community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10).

5. The March JPA won't be coordinating with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7).
6. The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13).
7. The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

As I have mentioned, what concerns me is that the March JPA has decided to engage simultaneously with a draft Environmental Justice policy and the recirculation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304), though you consistently state the two "projects" are unrelated, and that the JPA references this not-yet-adopted policy extensively in the document. How meaningful are community comments for a General Plan amendment if it is already assumed that the agency will adopt the plan wholesale for even one specific plan before the process has started? As it stands, the public comment window for the recirculated draft EIR will close before you are able to officially adopt an Environmental Justice policy. How can a community officially comment on a project's draft EIR when it is contingent on policies in the General Plan have not been finalized, and the policies are wholly unresponsive to the specific Environmental Justice needs of the area? The March JPA's process communicates that it is not actually interested in meaningful feedback, that this is an exercise with a predetermined outcome, a process that fulfills a legal requirement rather than fulfills the JPA's responsibility to "protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses," and finally is exactly the opposite of the language and spirit of the civic engagement policies that the March JPA is trying to adopt and codify.

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The proposed Environmental Justice Element for the March JPA needs to incorporate March JPA priorities, exclude inapplicable County of Riverside policies, and describe community priorities through a formal and active community engagement process. This copy-paste of the County of Riverside policy is neither specific, concrete, nor targeted and it is devoid of all community input. Adopting a General Plan amendment with more than a dozen policies that the March JPA has no intention of implementing is dishonest, poor governance, leaves behind unfunded obligations, and is a litigation risk. Incorporating the draft Environmental Justice Element into an existing March JPA draft EIR as if it will be adopted without modification is also dishonest, unstable, and risks litigation. Is the County of Riverside aware of the unfunded obligations that the March JPA is leaving behind? Is the County of Riverside prepared to assume the legal responsibilities and liabilities left behind by the March JPA? If so, please provide written evidence of the communications stating their acceptance of these terms.

Around the country, but especially in the Inland Empire, urban planning (and those responsible for it) continues to have an uneasy relationship with Environmental Justice advocates and requirements. Poor planning decisions and discriminatory practices have historically heightened the burdens of environmental contamination in low-income neighborhoods and communities of color, in comparison to largely white, wealthy populations. This is why the residents of Irvine, Temecula, and Pasadena are able to assure their communities are not overrun by narrowly focused land uses like industrial and warehousing. Since the 1980s, activists have garnered some regulatory and scholarly support for changes to policy and planning processes, but urban planners have been slow to adopt an explicit Environmental Justice framework in land-use policies in more diverse, poorer, and less educated communities. The urban planning profession, however, has the task of helping ensure that future development does not repeat the unjust environmental injustices of the past.

Adopted in 2016 and implemented in 2018, California Senate Bill (SB) 1000 calls for local jurisdictions with disadvantaged communities to include Environmental Justice considerations in their general land use plans. CA SB1000 is intended to ensure transparency and community engagement in urban planning processes, mitigate the harm of living near environmental hazards, and facilitate equitable access to health-promoting amenities such as recreation, healthy and affordable food options, and safe and sanitary housing.

Without support from elected officials, public agencies, and senior planning managers, progress toward Environmental Justice has been and will continue to be slow and uneven. Hence, the real work of Environmental Justice takes place in the implementation and enforcement of laws and policies, and the insistence of this implementation and enforcement by all residents and communities. Environmental Justice will not be fully realized without strong oversight and political leadership, and racial and economic diversification of urban planning institutions. It seems as if the March JPA is a bit late in its efforts to implement and enforce laws and policies that protect all residents and communities, and is quite unimaginative in its approach to addressing CA SB1000 a full six years after the State implementation of its guidelines.

Yet, there is guidance available to inform the public and land use authorities like the March JPA about how to engage with the public in this area. The California DoJ and SB1000 implementation toolkit lists some best practices for community engagement. As others before me have requested, I ask that the March JPA engage in these standard practices.

1. Form an Environmental Justice advisory committee (I volunteer for this every time I write or speak with you and you ignore or reject my overtures.)
2. Partner with local community organizations to form authentic goals
3. Consult with tribal groups to preserve culture and history
4. Stagger meeting times and locations to increase participation and offer childcare
5. Make meetings and documents accessible in many languages including ASL

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The best practice for an Environmental Justice policy is that it is community led (CA SB1000 Implementation Toolkit, California DoJ). Instead of following this best practice, the March JPA engaged a large engineering/architectural firm (Michael Baker International) to lead the Environmental Justice policy development and you released a draft Environmental Justice policy without any community notification, much less public participation. Michael Baker International is the lead environmental consultant on more than six warehouse projects in southern California, including the I-15 Logistics Center in Fontana and the Southern California Logistics Center 44 in Victorville. It is not clear what qualifications in Environmental Justice they have, as there are no example projects focused on Environmental Justice issues on their website beyond environmental compliance for mega-projects. There are multiple environmental consultants or nonprofit organizations that could have been hired to help in this process that would not have this apparent conflict of interest. Aside from an existing relationship with Michael Baker International, what organizational qualifications does the March JPA believe this contractor has to benefit residents of Moreno Valley, Perris, Riverside, and Riverside County? How are they accountable to you to develop and implement a working Environmental Justice Element as an amendment to the General Plan? And how accountable to the public are you when they fail to develop a policy that meaningfully engages the residents of western Riverside County?

The March JPA has, as I have said previously, copied a plan that demonstrates desperate and reactionary management and decision-making practices on your part. However, one only needs to look down the 10 Freeway to find a better example of a functioning Environmental Justice plan at work. An example of an operational Environmental Justice policy is found in the Los Angeles Area Environmental Enforcement Collaborative. The densely populated communities closest to the I-710 freeway in Los Angeles County are severely impacted by pollution from goods movement and industrial activity, similar to the logistics dystopia the March JPA is creating in western Riverside County. However, in a multiyear effort, a unique collaboration of federal, state, and local governments and nonprofit organizations have been working together to improve the environmental and public health conditions for residents along this corridor. Working with local communities, members of the Collaborative:

- Partner with community leaders to identify pollution sources, “ground-truth” agency data sources, and develop plans for immediate action.
- Engage with community organizations to propose land use designations that integrate with and enhance neighborhoods, parks, and sensitive receptors.
- Improve compliance with environmental laws by targeting inspections and enforcement at the state, federal, and local levels to address the pollution sources of most concern to communities.
- Build on the existing community partnerships and the targeted enforcement efforts of CalEPA’s Department of Toxic Substances Control (DTSC).
- Sustain multi-year partnerships with communities, offering voluntary programs, tools, capacity-building grant opportunities, educational information, and training.

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Through this policy, the Collaborative continues to work with community representatives and local, state and federal regulatory agencies (e.g., Waterboards, air quality and public health agencies, planning departments) to coordinate environmental pollution mitigating activities including inspection and enforcement activities, ground-truthing real sources of environmental pollution in and around communities and schools and sensitive receptors. This example is a good model of how business, government, and the public form a more collaborative relationship. This is in stark contrast to the March JPA and how you are conducting business with the simultaneous release of a draft Environmental Justice plan in two "unconnected projects," each required to follow the CEQA process of posting, review, and comment.

An example much closer to the March area of influence can be found in the City of Riverside's recently adopted public engagement policy (though they are struggling to implement their policy throughout all City departments). In order to have a functioning Environmental Justice Element, an agency like the March JPA would actually need to incorporate feedback from the community into their land use planning and decisions. Genuine civic engagement, like the type the City of Riverside is implementing today, is what a public engagement policy establishes, and what as governors of the public (which the March JPA Commission is supposed to be) you are tasked with doing. To date, the March JPA only engages with the public when forced to involve community wishes by a court mandate or settlement, and even then, the March JPA has shown that it only follows through on settlement terms that benefit your agency or the sole-source applicant that has had far too much influence in this region for far too long. For example, one of the unfunded obligations the March JPA will need to deal with prior to sunsetting July 2025 is the 2012 Center for Biological Diversity Settlement Agreement that requires the construction of a 60-acre park among other things. For more than a year, I and many other community members and organizations have asked the March JPA for involvement in planning for this park. In the February 14, 2024 March JPA Commission meeting agenda, it appears you have been meeting privately with the City and County of Riverside, "Meetings of parks officials and senior management from Riverside County and the City of Riverside were held on December 4, 2023 and January 18, 2024 to discuss the proposal for a park as a component of the West Campus Upper Plateau. Follow-up meetings are expected." It is quite clear that the March JPA has engaged far more meaningfully with JPA Staff, City and County staff, and the Lewis Group and its investors than you ever have with the public. These secretive meetings about an issue deeply important to the community surrounding March ARB demonstrates your lack of urgency to involve the public in ways that your draft Environmental Justice Element says you are going to engage with the public. Your efforts to covertly discuss the park is proof that you are only doing the minimum necessary to allow you to continue to build more warehouses around a community of retired military veterans and the final resting places that provide full military honors for our veterans! Your purposeful dismissal of public concern negates anything you write in your draft Environmental Justice plan.

With the unannounced release of the draft Environmental Justice Element in two places or "projects", the March JPA violated the core principle of Environmental Justice – meaningful

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civic engagement in policy development. Residents of the March JPA community were not notified at all until the draft Environmental Justice Element was released online. In contrast, the master developer and environmental consultants working with the March JPA were given early access to the policy and fully incorporated it into a recirculated draft EIR for the West Campus Upper Plateau released three days after the draft Environmental Justice Element was released to the public. The consideration of an Environmental Justice Element was not released via CEQANET notification, nor was it released to community members via published agendas of March JPA Commission or TAC Committee meetings occurring between March 2023 and November 2023. I know as I attended many of these meetings in person. Your consideration of the draft Environmental Justice Element was done behind closed doors by March JPA employees, staff, your consultants, and the master developer. Nothing says Environmental Justice like excluding the public from the creation and writing of this document. And now you are trying to backwards map your way into public engagement by hosting two public workshops to discuss the plan you copy-pasted in secrecy. Why have you chosen to work in this exclusionary manner? Does it have anything to do with the Lewis Group's insistence that you obligate the West Campus Upper Plateau project before expiring on July 1, 2025? Is that why you are pursuing a shady political approach of passing CA SB994 at the same time you are rushing to finalize the West Campus Upper Plateau warehouse project? How can you claim to be engaging with the public when your every action works against public interest?

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To incorporate the draft Environmental Justice Element into an active recirculated draft EIR so extensively, it was necessary for multiple environmental consultants and the master developer to have access to the draft Environmental Justice policies months before the recirculation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304) was released, though allegedly these two "projects" are unrelated. In contrast, the community was not even notified, and certainly was not consulted or engaged during this same time. This is notable not only for its inconsistency with best practice as identified by CEQA and DoJ, it is also notable for its deliberate withholding of responses to CEQA comment on the draft EIR made on March 9, 2023, and for its inconsistency with the very words of the March JPA General and Final Reuse Plans. The March JPA staff knows that the community wants to be engaged in this public agency and its environmental policy-making but chooses not to allow collaborative participation, and thus this draft Environmental Justice Element is disingenuous, manipulative to those serving on and voting on the March JPA Commission, manipulative of the legal and political systems in the State of California, and insulting to the public.

For years now, the March JPA has disproportionately added to the burden of communities living within its planning area by choosing a heavy industrial land-use policy with minimal mitigation measures. I experience the negative impacts of this burden on a daily basis. You have also been derelict in updating your General Plan to address CA SB1000, with over five general plan amendments since 2018 that included no mention of environmental justice. It is ironic that California SB1000, which is codified in Government Code Section 63502(h), requires jurisdictions with disadvantaged communities to either include an Environmental Justice

Element in their general plan or incorporate Environmental Justice goals, policies, and objectives throughout other general plan elements, and the March JPA insists on forcing through this plan on two separate but connected "projects" while ignoring public sentiment on either of them. CA SB1000 is triggered when a jurisdiction concurrently adopts or revises two or more general plan elements if there is one or more disadvantaged communities within the jurisdiction. A "disadvantaged community" is an area identified by the California Environmental Protection Agency as such or that is a low-income area disproportionately affected by environmental pollution and other hazards that may lead to negative health effects or environmental degradation within its planning area. What has taken the March JPA so long to address this requirement? And why are you doing it now so hastily and without public involvement or participation? Why are you working covertly to move a draft Environmental Justice Element through with proper CEQA requirements? Why are you working covertly with private and government groups to push through a flawed and irrelevant policy and controversial industrial projects?

Please consider slowing down this process, listening to the community just as this proposed policy says you will do, and draft a sensible Environmental Justice Element to the March JPA's General Plan that responds to the community's needs, is realistic to the agency's capabilities and mission, includes metrics and milestones to measure progress toward and compliance with individual policies and goals (as any element of a "project" of this scope would do), and will transition to and benefit the County of Riverside once the March JPA sunsets in July 2025 (not one driven by greedy developers and investors or one that leave the County with unfunded obligations and liabilities). Please also consider pausing the release of the Recirculated Draft EIR for the West Campus Upper Plateau until the Environmental Justice Element General Plan amendment process is complete so that the community can meaningfully comment on a policy that has been approved by the March JPA and its Commission and thus will be relevant to the applicant's proposed project.

I close by offering once again to volunteer my time to serve on a community advisory board, working with the March JPA to draft and finalize an authentic Environmental Justice Element amendment to the General Plan, and then to consider and propose reasonable land uses that adhere to the General Plan and benefit local communities. Please let me know how I can help.

"When one tugs at a single thing in nature, one finds it attached to the rest of the world."

Jerry Shearer

Jerry Shearer
Riverside, CA 92508
jsydor@yahoo.com

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RI-232

Jerry Shearer

RI-232.1 This comment is a transmittal email. While the email subject references the Recirculated Draft EIR, the comment discusses the March JPA Draft Environmental Justice Element, which is not part of the proposed Project. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-232.2 This comment letter is identified as comments on the March JPA Draft Environmental Justice Element, which is not part of the proposed Project. This comment letter was separately included in the administrative record for the Environmental Justice Element. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area. March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element.

The comment requests the Project EIR be paused until the adoption of the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Sunday, February 11, 2024 5:58 PM
To: Dan Fairbanks
Cc: Cindy Camargo
Subject: Re: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Hello Dan,

For clarity, this email and letter is in response to the EJ Element, which is also included in the Upper Plateau draft EIR. Please include comments from me in both places.

Jerry Shearer

On Sunday, February 11, 2024 at 05:39:18 PM PST, Jerry Shearer Jr. <jsydor@yahoo.com> wrote:

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Draft Environmental Justice Element as posted to your website and referenced in the emails below. Please find my comments in the attached letter. I look forward to your thoughts and appreciate your consideration.

Please reply to confirm receipt of this public comment.

Sincerely,

Jerry Shearer
Riverside 92508

RI-233.1

On Thursday, December 28, 2023 at 09:56:15 AM PST, Dan Fairbanks <fairbanks@marchjpa.com> wrote:

March JPA is circulating this notice to identify a due date for comments regarding the draft March JPA Environmental Justice Element. A prior public notice was sent out on November 30, 2023, providing a link to the draft Environmental Justice Element and inviting recipients to the first Community Workshop. **This notice provides a due date of February 15, 2024 for comments on the draft March JPA Environmental Justice Element.**

During the development of the Environmental Justice Element, March JPA hosted the first of two workshops on Tuesday, December 19, 2023, at March Field Air Museum located at 22550 Van Buren Boulevard, Riverside, CA. The meeting PowerPoint presentation and Dot Poll results are available at: https://marchjpa.com/. Summary discussions regarding the Open Comment Session at the Community Workshop will also be placed on the March JPA website.

For more information or to submit comments on draft documents as they become available, please contact:

• Dan Fairbanks, Planning Director, March Joint Powers Authority

• Email: fairbanks@marchjpa.com Phone: (951) 656-7000

• Current draft Environmental Justice Element is available at: https://marchjpa.com/wp-content/uploads/2023/11/Draft-Environmental-Justice-Element.pdf

Dan Fairbanks

March JPA Planning Director

(951) 656-7000

From: Dan Fairbanks
Sent: Thursday, November 30, 2023 4:55 PM
Subject: Workshop for the draft March JPA Environmental Justice Element

March Joint Powers Authority (March JPA) is preparing an Environmental Justice Element to the March JPA General Plan. According to the State of California, Environmental Justice is defined as "the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." Upon completion, the Environmental Justice Element will be included as part of the March JPA General Plan, and it will reflect the agency's commitment to reducing environmental burdens and ensuring all residents have the opportunity to access public facilities and services that improve their quality of life. The March JPA Environmental Justice Element would be applicable within the existing March JPA planning jurisdiction. Other nearby land, including the adjacent March Air Reserve Base and Riverside National Cemetery would not be subject to the provisions of the Environmental Justice Element. A more complete description of the March JPA Environmental Justice Element is provided in the attached Workshop notification, and a link to the draft Environmental Justice Element is provided below. The Environmental Justice Element is NOT a part of the West March Upper Plateau project. Given the timing on the process, the EJ Element will likely appear before the Commission for a formal action toward the end of first quarter of 2024.

The first Workshop is planned for Tuesday, December 19, 2023, at March Field Air Museum, 6:30 – 8:00 PM, 22550 Van Buren Boulevard, Riverside, CA

The current draft Environmental Justice Element is available at: https://marchjpa.com/wp-content/uploads/2023/11/Draft-Environmental-Justice-Element.pdf

For information or to submit comments on draft documents, please contact: Dan Fairbanks, March JPA Planning Director, 951-656-7000 or fairbanks@marchjpa.com

RI-233.2 Cont.

Dan Fairbanks

Planning Director

March Joint Powers Authority

14205 Meridian Parkway, #140

Riverside, CA 92518

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Email: fairbanks@marchjpa.com

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RI-233

Jerry Shearer
February 11, 2024

RI-233.1 This comment requests that the comment letter submitted by the commenter (included herein as Letter RI-232) should be considered for both the Draft Environmental Justice Element and the Recirculated Draft EIR for the proposed Project. Please see Response RI-232.1 above.

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From: Jen L <jlarrattsmith@gmail.com>
Sent: Tuesday, February 13, 2024 5:54 PM
To: Dan Fairbanks
Subject: Public Comment for EJ element
Attachments: image001.jpg; Jen EJ letter.pdf; EJ Petition Signatures.pdf

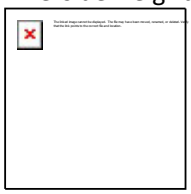
Dear Mr. Fairbanks,

Attached is my comment letter for the March JPA Environmental Justice element General Plan Amendment as well as petition signatures from the three identified EJ communities. RI-234.1

Please email me confirming receipt of these attachments.

Thank you!

Jen Larratt-Smith
Riverside Neighbors Opposing Warehouses



Jennifer Larratt-Smith, Chair
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Riverside, CA 92508
951-384-1916
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Feb 13, 2024

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

Re: Comment for Draft Environmental Justice Policy GP #23-02

Dear Mr. Fairbanks:

I have several concerns about the draft Environmental Justice (EJ) policy being presented by the March Joint Powers Authority (JPA) both in its process and its content.

Process

Below is a timeline of the release of the EJ policy as well as a draft recirculated Environmental Impact Report (REIR) for the West Campus Upper Plateau (2021110304). While the March JPA claims there is no relation to each other, the suspicious timing and the REIR's extensive quoting of the yet-to-be-adopted policy says otherwise.

RI-234.1

11/29/23
The EJ element notice was released to at least one of the EJ communities within the March JPA boundary, and a community member sent it to me. The policy had never before been seen or reviewed by anyone in the community. No draft had ever been presented at a Technical Advisory Committee (TAC) meeting or in front of the Commission. I can only conclude that the entire draft policy was written behind closed doors with Michael Baker International, their paid consultant.

I emailed the CEO of the March JPA to ask why R-NOW was not notified after two years of requesting that the March JPA be more transparent with the community. She claimed in her reply that she was planning to notify other community members the next day.

11/30/23
The JPA sent the notice out to more community members, including me, after being prompted. The email specifically states: "The Environmental Justice Element is NOT a part of the West March Upper Plateau project."

12/1/23
A member of R-NOW spotted the Notice of the Recirculated EIR (REIR) on the JPA website.

12/2/23
A notice of the REIR was released to the public. The REIR quotes the draft EJ policy extensively. It discusses how the project proposal meets its requirements. The public comment for the REIR will close on February 26, 2024, even though the draft EJ will not be finalized until (estimated) the end of the first quarter 2024.

12/19/23
JPA held its first public workshop on the EJ element the week before Christmas. Dan Fairbanks, the Planning Director, publicly acknowledged that they will not be able to implement the EJ element in its entirety given that they are sunsetting in July 2025. He asked the community to help him "prioritize" which of the elements to focus on with a dot poll. He also acknowledged that they don't have any particular staff devoted to the process or implementation of the EJ element at this time. They have hired Michael Baker International to help them draft the policy.

The REIR, released only 2-3 days after the EJ element, extensively quotes the EJ policy to justify how the current project under review adheres to it. It stands to reason that the applicant and their consultants were privy to the draft EJ element long before the community in order to craft this document. Why weren't EJ communities or even the TAC or the Commission involved in the drafting of a policy that is supposed to prioritize "civic engagement"? Why weren't we even notified of your intention to draft an EJ policy? Why was the March JPA in communication with the developer about the EJ policy before informing the community?

The West Campus Upper Plateau project has been in the planning process for years. To somehow claim that without any changes, it miraculously matches a never-before-seen and brand new draft EJ policy — one in which the community has had zero input

RI-234.1 Cont.

—casts doubt upon the entire process. The timing and the nature of the draft EJ policy's release give the impression that the EJ policy was drafted to justify the existing project proposal. An impression further strengthened when you consider that members of R-NOW mentioned the lack of an EJ element in comment letters during the first release of the draft Environmental Impact Report in early 2023. Contrary to the CEO's statements, the EJ element is very much a part of the West Campus Upper Plateau and may have driven the JPA's creation of it.

According to California law, Environmental Justice (EJ) includes "at a minimum, the meaningful consideration of recommendations from communities most impacted by pollution into environmental and land use decisions." Gov. Code § 65040.12(e)(2). Your choice to run these processes simultaneously gives you only two choices:

- Option 1: Adopt the EJ element as is with no significant changes
  To do this is to concede that this EJ policy was predetermined. If at the end of your public comment process, you make no substantive and significant changes from the initial draft, how can you claim that you "meaningfully considered" community feedback? I request that you do a thorough accounting of what feedback you receive for this EJ element. Discuss which of the comments you substantively incorporated and which you chose not to implement and why.
    -
- Option 2: Meaningfully incorporate community feedback, potentially nullifying the analysis in your recirculated draft EIR
  Your claim that the West Campus Upper Plateau project meets criteria for the draft EJ element has put you in a bind. If you make significant changes to the draft EJ element, your analysis will no longer be viable. You will have to recirculate the draft EIR again so that the community has the opportunity to provide feedback, something we cannot do when the public comment period ends before the EJ element has had a chance to be adopted.

To circulate both draft documents simultaneously as you have done creates the impression that you have pre-determined that your EJ policy will be adopted as is and without community input. I request that the March JPA not proceed with existing project proposals until your EJ element goes through a proper process and is finalized. There is no way to meaningfully analyze and determine if a proposal meets criteria for a policy that has not yet been adopted. And the public cannot meaningfully impact a policy that has been predetermined to be adopted as is.

Let me elaborate on what I mean when I say a "proper process." How does your EJ process and policy address the best practices laid out by the California Department of

RI-234.1 Cont.

Justice (DOJ)?[1] Under best practices for community engagement, the Attorney General (AG) recommends forming a community advisory group, partnering with community organizations, and consulting with local tribes. I cannot speak to the tribal consultation, but as the founder and chair of an active community organization, I can attest that JPA has not "partnered" with me. Instead, the CEO flat-out refused to form a community advisory board in early 2023 when approximately forty community members requested it at a public meeting in January. She also accused me of "scaremongering" because members of the community expressed concern about potential cancer risks related to the warehouse project during public comment at that meeting. Sometimes repeated and direct requests for information are left unanswered by the CEO, and some Commission members have refused to meet with us. More recently, the CEO accused me of engaging in "false narratives" when I asked a Commission member to recuse himself of votes regarding warehouses when an Amazon memo leaked that he was a "cultivated asset" for their company. My "false narrative" happened to come from *The Los Angeles Times* who independently verified the information. Unfortunately, rather than partnering, my attempts to engage the JPA have been met with suspicion, even contempt.

Furthermore, it violates a fundamental principle of environmental justice that the March JPA hired Michael Baker International, whose environmental consulting appears to center around industrial warehouses rather than environmental justice,[2] without consulting or even notifying the community of its intention to draft an EJ element. The fact that an outside consultant drafted the policy may explain the inexcusable omission of the Veterans Village as an identified community. While Dan Fairbanks acknowledged Veterans Village as an EJ community on 12/19/23, the policy itself does not. This glaring omission illustrates the problems with hiring outsiders and businesses to draft policies for local communities without consulting them. Outside firms do not know these communities, let alone what community needs may be. This is why EJ best practices involve engaging the community during the drafting of the element.

Additionally, the March JPA has not followed through on legal requests made by Attorney Jamie Hall in his letter dated 1/4/2024. In the letter, Mr. Hall compels the March JPA to treat the EJ element as a project subject to CEQA. He states:

RI-234.1 Cont.

[1] California Department of Justice's Best Practices for EJ policies: https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf

[2] Michael Baker International is the lead environmental consultant on over ten warehouse projects in southern California, including the I-15 Logistics Center in Fontana and the Southern California Logistics Center 44 in Victorville.

> The adoption of a General Plan Element constitutes a "project" under CEQA, triggering the requirement for environmental review. See *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993) 18 Cal. App. 4th 729, 739 (stating that "project" includes "amendments to a local general plan or elements thereof"). As such, the March Joint Powers Authority must conduct an initial study under CEQA before adopting an Environmental Justice Element for its General Plan, and if necessary, prepare an EIR to fully evaluate the potential environmental impacts. This review must be completed before adoption of the Environmental Justice Element.

To date, the community has not seen a Notice of Preparation for the EJ element, so we can only assume that you are ignoring this letter, disregarding an integral part of SB 1000.

In summary, a proper EJ element ought to engage community members *at its drafting* to ensure that it is addressing specific needs of the community. It should apply specifically to the EJ communities identified in its land use area (more on this in the Content section). It should go through a thorough CEQA process, and it should not be used to analyze the appropriateness of existing projects until it is finalized. The current draft EJ element is grossly deficient in all these areas.

RI-234.1 Cont.

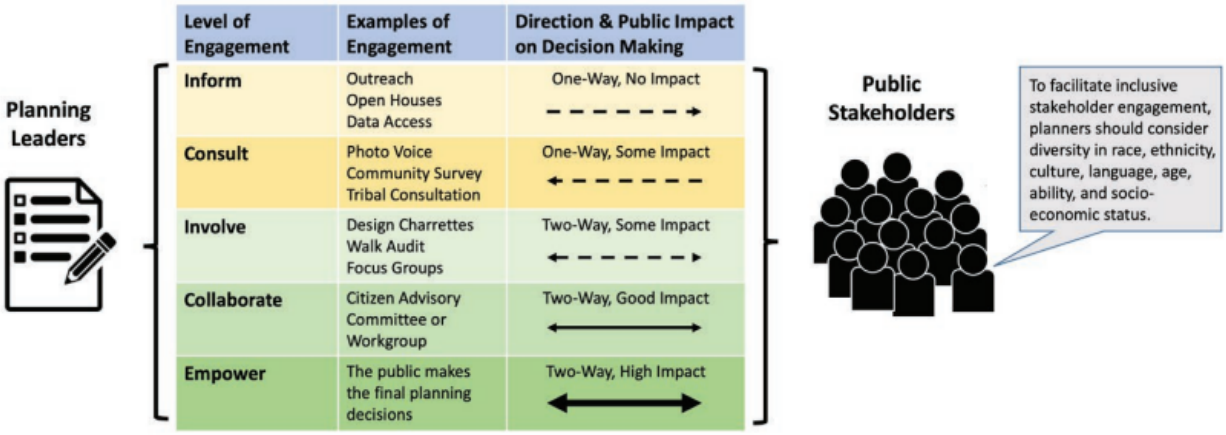
Civic Engagement

According to the Office of Planning and Research (OPR) General Plan Guidelines, "Community engagement is a fundamental part of any general plan update to inform the community vision. It is particularly important with respect to EJ because it allows communities that have often not been included in the planning process to be engaged in the decisions that impact their health and wellbeing."[3]

In the document they also provide a figure showing a spectrum of levels of community engagement:[4]

[3] Quote from p. 34 of the General Plan Guideline,:Chapter 4: Environmental Justice Element: https://opr.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf
[4]Figure 3 from p. 35

Figure 3: Community Engagement Strategies



The JPA held one public workshop during the draft EJ public comment period and plans to hold another five days after comments close. Unfortunately, as I write this letter (2/13/2024), neither the Green Acres Community nor Veterans Village have received notice of the second workshop on 2/20/2024 in spite of at least two emails from community members asking to be informed. This is the bare minimum of "civic engagement."

As one of maybe twenty attendees at the Dec. 19th workshop, I can say that the JPA gleaned little substantive information from the community and did the bare minimum of this spectrum (informing). I estimate 20 community members attended the Dec. 19 workshop, including several members from R-NOW. It was sparsely attended in part because the meeting took place the week before Christmas. While there was one member from Green Acres Community and 4-5 members from Westmont Village, the representation from the three EJ communities living in the March JPA catchment area could hardly be called representative. Furthermore, the meeting was structured such that we could not give substantive comments. We could only place a dot by which part of the consultant-drafted policy we hoped the JPA would prioritize before it sunsets in July 2025. Then, we had time to ask questions. Our ability to meaningfully impact the substance of the policy was minimal.

R-NOW spent some time in the three EJ communities identified by the March JPA: Green Acres, Westmont Village, and Veterans Village. We circulated a petition and gathered 168 signatures from these communities. I have sent a pdf attachment to the

RI-234.1 Cont.

email where I include this comment letter so that you can review the signatures we gathered from each site.

1) R-NOW knocked on doors one morning at Green Acres Community. This housing complex only has 110 homes according to your website. In less than 2 hours, we gathered 54 signatures of residents who do not want industrial zoning on March JPA land, even though roughly a third of the homeowners were not home to answer the door.
2) A member of Westmont Village informally asked members of the community to sign the petition at various meetings she attended. She did not go door-to-door nor ask seniors in assisted living but still managed to glean approximately 69 signatures in this way.
3) R-NOW went to the Veterans Village during their Friday Pantry Day to talk to residents in line on February 9. We gathered 43 signatures from residents and 2 from employees at this location.

R-NOW conducted our own “dot poll” the last week of January 2024. We gave a menu of options for land usage on the West Campus Upper Plateau, and community members were given three dots to place on the poll. Needless to say, none of the community members thought warehouses were the best use of the West Campus Upper Plateau. We had more community members commenting on our dot poll than the March JPA had on theirs, and I believe it is just as, if not more, valid in its representation of community preferences.

R-NOW is a community group run entirely by volunteers. Yet we were able to engage these EJ communities far more effectively and encourage more participation and consensus than the March JPA. A public agency created to repurpose public land for the good of the community can, and should, do better. I urge the JPA to go into the EJ communities and really listen to what the residents have to say about where they live and the effect of your land use decisions on their lives. The truth will be hard to hear, as your insistence to upzone the majority of your land to industrial warehouses have added to a disproportionate environmental burden to these communities. During my canvassing in Green Acres, I met a veteran of the Air Force who had served 36 years in 80 countries and was sickened by the way the March JPA had surrounded his home with warehouses. These residents deserve better!

At bare minimum, do not dismiss the 168 signatures we have gathered telling you these communities do not want more warehouses. Our signatures represent a significant portion of a relatively small population, and we gathered them after only a couple hours at each site. To claim that projects such as the West Campus Upper Plateau fulfills the

RI-234.1
Cont.

requirements of an EJ policy is to completely ignore the purpose of SB 1000 as it adds to the pollution burden of these communities and is in direct opposition to your most vulnerable residents' stated concerns and desires.

Content

The draft EJ element's content is also sorely lacking. It is clearly cut and pasted from the Riverside County policy as evidenced by the fact that many of these policies cannot be implemented by the March JPA. For instance, how will the JPA "monitor changes to the Salton Sea" even though the Salton Sea is not under their jurisdiction (HC 16.1)? Am I really to believe that with seventeen months left in existence and limited staff, the JPA is going to "cooperate with transit providers… to provide whole grain, low fat, low salt and fresh and cooked vegetable options to these communities" (HC 17.1)? Or that they will "pursue funding" for various EJ needs (HC 16.2 - 16.4) when the JPA has no staff devoted to the EJ element and will likely sunset before any of the funding could be obtained? These are clearly elements copied from the County that do not apply. Why draft a policy knowing full well you will not implement it? What is the point of communities trying to impact a policy when you will only cherry pick which of the policies you choose to follow? Doesn't that defeat the purpose of the policy to begin with?

RI-234.1 Cont.

It is as if the JPA has plagiarized its roommate's history paper and turned it into their English class. The JPA has missed the point of the assignment. If an EJ element is meant to address the unique and specific needs of particular EJ communities, how can we accept a policy that was so clearly drafted for another area and will clearly not be followed?

Moreover, the March JPA has demonstrated in the past two years that they will do the *opposite* of what this policy says. As a clear example, HC 16.23 says "Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments." And yet, in the REIR for the West Campus Upper Plateau, ***the March JPA is currently using the draft EJ policy to justify a giant industrial warehouse project with "significant and unavoidable" air quality impacts*** in an area surrounded by residential homes, a pre-school, and a mega-church. They are also doing this in spite of near-unanimous and consistent opposition from the community. HC 15.3 says they will "work with local community-based organizations and environmental justice focus groups to promote civic engagement activities." But R-NOW has submitted thousands of petition signatures, given hours of public comment, and sent thousands of emails, and the JPA refuses to act on any of our requests (e.g. Community Advisory

Board, looking into non-industrial alternate plans). We are treated with suspicion, and our communication has always been one way. We are shouting into a void, and it is falling on deaf ears.

Why should we trust that you have any intention of implementing this EJ policy when you are currently violating many of the stated principles?

The EJ policy language gives the impression that you are actively trying to avoid accountability. On page 3, the policy states (emphasis added):

> To be clear, the General Plan is a document consisting of goals and policies. Such goals and policies are **evaluated as a continuum of direction within broad interpretation parameters**…. EJ Policies are evaluated in the same manner as all other General Plan goals and policies - **subject to interpretation with appropriate determinations of compliance.**

This vague language intentionally leaves loopholes the size of million square foot industrial buildings. It means that once a policy is passed, you have no obligation to fulfill any of its requirements and that you can interpret them in any way you see fit. Your "broad interpretation" has already become apparent in the REIR for the West Campus Upper Plateau when you claim that a warehouse project with Amazon-sized mega-warehouses and "significant and unavoidable impact" on air quality fulfills this EJ policy for a Census tract in the 98th percentile of CalEnviroScreen. At your 1/11/2024 JPA meeting, Christina Miller, a resident of your EJ community of Westmont Village, gave public comment pointing out this discrepancy. She noted that you can have a legitimate EJ policy or you can have new warehouses. You cannot realistically have both.

RI-234.1 Cont.

An EJ element is supposed to include specific implementation policies, but the current draft has weak and general statements. For example, Policy HC 16.5 reads: "Evaluate the compatibility of unhealthy and polluting land uses being located near sensitive receptors…. Similarly, encourage sensitive receptors, such as housing, schools, hospitals, clinics, and childcare facilities to be located away from uses that pose potential hazards to human health and safety." Verbs like "evaluate" and "encourage" are too vague to actually have an impact because they do not commit the JPA nor the developer to any specific, impactful action. In contrast, you could draft policies that establish specific benchmarks.

For example, I can say that I will "evaluate the likelihood that an anvil will break your skull if dropped on your head" and "encourage domestic abusers to stop hitting their wives," but this will in no way reduce the potential harm. If someone chooses to drop an anvil on your head, I can say, "well, it went according to my calculations" or "it was much worse than I feared," but as i had no responsibility to prevent this from happening and no requirement to pay for your medical bills once it does. I have no motivation to act in your interests, especially if the person dropping the anvil pays my salary. The entire purpose of an EJ element is to take actions to protect your most vulnerable populations. As it is, your vague language allows a few researchers and consultants to make money but does not actually meaningfully impact the populations the policy claims to serve.

Please strengthen your policy so that it can provide actual accountability for your decisions.

My earlier argument that the JPA cut and pasted the County's document may reveal why the EJ policy includes such vague, non committal statements. The AG wrote a comment letter in 2021 pointing out the same issue for the County policy.[5] In it, the Attorney General states: "To meet these requirements, an EJ element should include specific and targeted measures that implement the policies in a local government's EJ element. These implementation measures are essential for ensuring that a government's environmental justice-related plans translate into actual improvements for disadvantaged communities." He also states: " Public participation is a crucial step to developing effective and meaningful EJ policies and implementation measures. As such, the County should present its EJ Implementation Plan to the public now, when community members are already considering and commenting on the EJ Policies. ***The Implementation Plan should include target deadlines for the implementation measures and performance standards to encourage accountability***" (emphasis added). Both of these statements also apply to the March JPA draft EJ element, which is unsurprising since it was copied from the County and would therefore contain all the same problems and errors of its plagiarized source. Do not simply regurgitate a document that did not fulfill its assignment. Seek to do better — include implementation strategies and deadlines in your EJ element and to engage the community as you craft them.

RI-234.1 Cont.

During the December 19, 2023 public meeting, Dan Fairbanks admitted that no staff at the JPA are appointed to implement the EJ element and that the JPA will sunset in July 2025. He also admitted that they do not have the ability nor intention to implement the majority of the policies put forth in the document. This was the stated reason he sought

[5] AG Comment Letter to County of Riverside per their EJ policy: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/sb1000-letter-riverside-022421.pdf

our input to help them "prioritize" with our dot poll. If there is little chance that any policies drafted will be implemented, why draft it in the first place?

It appears as though the JPA is hastily adopting an EJ policy at this final hour as a paper exercise because they feel they are legally obligated.[6] The process by which they have done this and the deficient content of the actual policy reveal that the JPA has no intention of reducing the compounded health risks for, or engaging with, their EJ communities. In other words, the March JPA wants to claim they completed the assignment without actually making meaningful changes.

The Alternative

In this comment, I have asserted that the JPA's EJ element has failed in both the process by which it was drafted and the content it contains. As a foil and as an example of a process that incorporates community feedback and makes potentially impactful changes, I will highlight the City of Riverside's efforts to revise their industrial guidelines.

In June of 2022, the Land Use, Sustainability, and Resiliency Committee asked City planning staff to conduct outreach and elicit feedback from communities on revising the City's industrial guidelines. The staff started with a series of listening sessions online and in person. They reached out to R-NOW in August 2022 to invite us to attend. In this series of sessions, they heard from stakeholders including businesses, EJ agencies, and residents. By December 2022, they presented their findings to the Committee. Their summary to the Committee included detailed bullet points capturing community voices, it also lays out several options for response from the Committee.[7] In the months that followed, at the direction of the Committee, City staff clarified their recommendations, investigating timelines etc. to assist the Committee in choosing next steps, resulting in a detailed matrix of options.[8] The Committee incorporated community feedback obtained at these meetings to prioritize next steps.

RI-234.1 Cont.

[6] Indeed, the JPA ought to have amended their General Plan with an EJ element long ago. Since SB 1000 went into effect in 2018, the JPA has made five General Plan amendments without an EJ element:

- JPA 18-03 Freeway business center (next to Old 215 and the 215 and the runway)
- JPA 18-19 The small business center on west of Meridian and north of Van Buren
- JPA 18-24 South Campus (100 acres)
- JPA 20-28 Target warehouse (VIP 215)
- JPA 21-03 South Campus (50 acres plus Village West Drive Extension)

[7] Report: https://riversideca.legistar.com/View.ashx?M=F&ID=11482653&GUID=4CEADEDC-EB30-4EDB-9AF1-490A80BC14DA

[8] Matrix: https://riversideca.legistar.com/View.ashx?M=F&ID=11614901&GUID=94D12995-40BC-46D5-A43E-3F8B1F23C038

In May 2023, the staff held another series of workshops so that community members would have input as to the specific next steps of implementation. Once again, community member feedback actually impacted the direction that the process would take and was faithfully reported.[9]

The City of Riverside has not fully implemented the policy. It will need to go to the Planning Commission, which is made up of advisors to the City, and then to the City Council for adoption. I realize that this process is slow and has been stretched over years, time that the March JPA may not feel it has.[10] But realistically, a General Plan amendment that incorporates community feedback takes time when done right.

No process is perfect, of course. And I have my criticisms of what has taken place since the initial months of the City's process. But I want to highlight a number of things the City of Riverside has done well so far:

- Community members were consulted on every step of the initial process, even before the drafting of potential options, the City pursued and heard from residents.
- City staff faithfully reported concerns and issues shared by the community as well as those shared by businesses and other stakeholders
- City staff laid out actionable policy changes and timelines so that the implementation plan was clear
- The Committee allowed the community to help them prioritize which next steps to pursue first and to help them outline what these next steps might look like
- They have devoted time to the process, not jumping ahead to make policy before hearing from the people who will be directly impacted by it

If the March JPA wants to engage in a fair process in drafting the EJ element, they must follow a similar path:

- Involve community stakeholders *during the initial writing of the policy*, making sure it represents the concerns of the intended stakeholders— in this case, the EJ communities.
- Faithfully and publicly report the specifics of what the community shares.
- Consult community members in prioritizing not only which policies to pursue first but *how* they are pursued.

RI-234.1 Cont.

[9] Report: https://riversideca.legistar.com/View.ashx?M=F&ID=12081908&GUID=30A6D156-5E9C-4CC4-8F24-5600ADF90DEE

[10] However, if they had done the EJ element when the law had directed them to in 2018, it would have.

- Create specific and actionable policies that actually hold the JPA and applicants accountable rather than making mere “encouragements” and “evaluations” that can be easily ignored or dismissed
- Involve the community feedback in the specifics of the implementation policy
- Take your time. Don’t attempt to ram through a heavily polluting industrial project before finalizing your EJ policy.

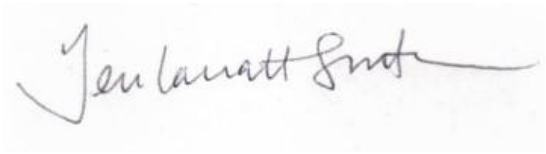
The March JPA needs to scrap the cut-and-paste policy they have and take the time and effort needed to involve community feedback in the EJ element’s drafting. Only then will they craft a legitimate EJ policy that fulfills the intention of SB 1000.

RI-234.1 Cont.

Furthermore, the March JPA must disentangle the current process of drafting an EJ policy from the West Campus Upper Plateau. As stated earlier in this comment, I urge the March JPA not pursue any existing applications for development in the areas covered by this EJ policy until the final policy is in place.

Thank you for the opportunity to provide comments on this General Plan amendment. Please feel free to contact me with any questions.

Sincerely,



Jennifer Larratt-Smith

The March Joint Powers Authority (MJPA) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJPA prohibit its remaining land (West Campus, near Westmont Village, or March LifeCare Campus) from being rezoned to Industrial or warehouse uses. We already bear too heavy a burden when it comes to air pollution and traffic. Alternative land-uses, such as retail, residential, or mixed-use development, would be more likely to enhance our communities. And while the Environmental Justice element is being drafted, we request a temporary warehouse moratorium.

First and Last Name	Signature	Community (WV, GA, VV)
Victor Capacete		GA
ERNIE ROLLY		VV Veterans Village
Wayne Jones	Wayne Jones	1217 VV
William Bell	William F Bell.	VA / VV
John Calkins	John Calkins	VA / VV
Merrick Price	Merrick Price	MVV
HENRY MARIN	Henry Marin	MVV
ROBERT ELKINS	Robert B Elkins	MVV
ARTHUR BERUKEGARD		MVV
ARTHUR JENSEN		MVV
Carroll Turner	Carroll Turner	V.V.
David Cleveland	David Cleveland	MVV
Alvin Jones	Al Jones	MVV

RI-234.2

The March Joint Powers Authority (MJPA) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJPA prohibit its remaining land (West Campus, near Westmont Village, or March LifeCare Campus) from being rezoned to Industrial or warehouse uses. We already bear too heavy a burden when it comes to air pollution and traffic. Alternative land-uses, such as retail, residential, or mixed-use development, would be more likely to enhance our communities. And while the Environmental Justice element is being drafted, we request a temporary warehouse moratorium.

First and Last Name	Signature	Community (WV, GA, VV)
WILLIAM LANDA		Green Acres
Molly Nazek		Green Acres
Shayne Meder		Green Acres
Scott F. Donnell		Green Acres
Jerry W. Newman		Green Acres
Ruthanne Newman		Green Acres
Stan Gray		Green
Harold Anderson		Green Acres
RUBEN MEJIA		GREEN ACRES
Stephanie Bates		Green Acres
Brian Bates		Green Acres
Sam Baird		Green Acres

RI-234.32 Cont.

The March Joint Powers Authority (MJPA) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJPA prohibit its remaining land (West Campus, near Westmont Village, or March LifeCare Campus) from being rezoned to Industrial or warehouse uses. We already bear too heavy a burden when it comes to air pollution and traffic. Alternative land-uses, such as retail, residential, or mixed-use development, would be more likely to enhance our communities. And while the Environmental Justice element is being drafted, we request a temporary warehouse moratorium.

First and Last Name	Signature	Community (WV, GA, VV)
Brandi Anthony		Green Acres
Jacob Anthony		GA
Jennifer Jordan	Jennifer Jordan	Green Acres
Jorrie Shaw	Jorrie Shaw	G.A.
Harmony Szilagyi	Harmony Szilagyi	Green Acres
Sean Szilagyi	Sean Szilagyi	Green acres
Serena Correa		Green acres
Maria I. Correa		Green Acres
Tyler Stuart		Green Acres
Anthony Hughes		Green Acres
Christie Morgan	Christie Morgan	Green Acres

RI-234.2
Cont.

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First and Last Name	Signature	Community (WV, GA, VV)
Rickey Fant	[illegible]	MVV
Robert [illegible]	[illegible]	MVV
Michael Nesbitt	Michael Nesbitt	VV
Rosemary Grafton	Rosemary Grafton	MVV
GINO SALINAS	[illegible]	MVV
Kim Salinas	Kim Salinas	MVV
PETER WILSON	[illegible]	MVV
JUAN FIGUEROA	[illegible]	MV
Joni Constantine	Joni Constantine	VV
DAVID C. BROWN	David C. Brown	VV
PETE [illegible]	[illegible]	VV
Jim Cannizzaro	[illegible]	VV
David Schenk	David Schenk	MVV
JOSEPH E WYSOCK	Joseph E Wysock	MVV

RI-234.2 Cont.

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First and Last Name	Signature	Community (WV, GA, VV)
CHRIS STOCK		ORANGECREST
John Seth		VV
RUSSELL THORNTON		VV
Sean O'Brien		MVV
JAMES ANDERSON		MVV
Steven Neubauer		MVV
JOSEPH CANCINO		MVV
JEFF ALEXANDER		MVV
Wendy Myers	Wendy Myers	MO Val resident
Louis Edgerson	Louis Edgerson	MVV
David Cleveland		MVV
William A. Hardesty	William A. Hardesty	MVV
ROBERT THORNTON		MVV
Sean O'Brien		MVV

RI-234.2 Cont.

The March Joint Powers Authority (MJPA) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJPA prohibit its remaining land (West Campus, near Westmont Village, or March LifeCare Campus) from being rezoned to Industrial or warehouse uses. We already bear too heavy a burden when it comes to air pollution and traffic. Alternative land-uses, such as retail, residential, or mixed-use development, would be more likely to enhance our communities. And while the Environmental Justice element is being drafted, we request a temporary warehouse moratorium.

First and Last Name	Signature	Community (WV, GA, VV)
~~WILLIAM LANDA~~ duplicate		~~Green Acres~~
Shirley Raiford		Green Acres
Anne Smith		Green Acres
Chris Smith		Green Acres
Kristin Martin		Green Acres
Aubrey Martin		Green Acres
CORNELIA DAVIS		GREEN ACRES
Sharon Zamora		Green Acres
Ana Acevitia		Green Acres
Víctor Domínguez		Green Acres
Gary Russo		GREEN ACRES
Linda Kocian		Green Acres
Son Kocian		Green Acres
Marvin Miller		Green Acres

RI-234.2 Cont.

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First and Last Name	Signature	Community (WV, GA, VV)
Lafayette Jones		GA
Carol Aguirre		"
Jennifer Reynolds		
Monica Taylor		
Francisca Abad		
Nancy Kirchmann		
Terry Alcock		
Noemi DeLeon		
Bruce Jordan		
Marietta Jordan		
Alex Bradford		
Diana Martinez		
Castro Richard A		
Leon, Juan		

RI-234.2
Cont.

The March Joint Powers Authority (MJPA) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJPA prohibit its remaining land (West Campus, near Westmont Village, or March LifeCare Campus) from being rezoned to Industrial or warehouse uses. We already bear too heavy a burden when it comes to air pollution and traffic. Alternative land-uses, such as retail, residential, or mixed-use development, would be more likely to enhance our communities. And while the Environmental Justice element is being drafted, we request a temporary warehouse moratorium.

First and Last Name	Signature	Community (WV, GA, VV)
Rita Solanoa	Rita Solanoa	Westmont Village
CAROL WECKER	Carol Wecker	W. V.
RUTH BLATTNER	Ruth Blattner	W. V.
Yvette Agosta	Yvette Agosta	WV
BEVERLY SHORT	Beverly Short	WV
Norm Gibbs	Norman D Gibbs	W V
SHARON BIVINS	Sharon L Bivins	WESTMONT VLG
John March	John March	WV
E.D. Bartel	E.D Bartel	WV
Edwin Peterse	Edwin Peterse	WV
Donna B ockover	Donna L Bockover	
CHUCK SENNEWALD	Chuck Sennewald	WV
ROBERT CURROW	Robert Currow	W V.
JENNIFER FREIENBURG	Jennifer Freienburg	W.V

RI-234.2
Cont.

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First and Last Name	Signature	Community (WV, GA, VV)
CHESTER GILBONS		WV
Ron Englebretson		WV
Kay Yamaguchi		W.V.
RON AKERS		WV
Shahin Ikezawa		WV
Joyce O'Keefe		WV
Mildred Akers		WV
Susan Jennings		WV
Rosalee Chiara		WV
Audrey Beck		WV
Roberta Kenison		W.V.
Anne Stalder		W.V.
Sheila Buchan		W.V.
VICTOR BARNETT		WV

RI-234.2 Cont.

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First and Last Name	Signature	Community (WV, GA, VV)
Christina Miller	[illegible]	Westmont Village
Diane West	[illegible]	WV
DAN WALDO	[illegible]	WV
Martina Waldo	[illegible]	WV
Dalene Sovine	Dalene Sovine	WV
Charles Hale	[illegible]	WV
Marica Tennell	Marica Tennell	WV
BILL BALDOZER	[illegible]	WV
TED GOERES	[illegible]	WV
MARGARET TYRRELL	Margaret Tyrrell	WV
RICHARD SHORT	[illegible]	WV
SUSAN E. VELASCO	Susan E. Velasco	WV
Deborah McManigal	Deborah J. McManigal	WV
~~ROBERT CURNOW~~	~~Robert Curnow~~	~~W.V.~~

RI-234.2 Cont.

The March Joint Powers Authority (MJPA) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJPA prohibit its remaining land (West Campus, near Westmont Village, or March LifeCare Campus) from being rezoned to Industrial or warehouse uses. We already bear too heavy a burden when it comes to air pollution and traffic. Alternative land-uses, such as retail, residential, or mixed-use development, would be more likely to enhance our communities. And while the Environmental Justice element is being drafted, we request a temporary warehouse moratorium.

First and Last Name	Signature	Community (WV, GA, VV)
GAYLYNN TRAY	[illegible]	WESTMONT VILLAGE
Sherry Ikezawa	[illegible]	Westmont
Cornelia	318 E	
Nilda Gainey	[illegible]	Westmont
DAN WALDO	[illegible]	WESTMONT
PAM Shea	[illegible]	Westmont
MARYLOU GREEN	[illegible]	[illegible]
RACHEL CARTHELL	Rachel Carthell	Westmont (WV)
Cindy Callister	Cindy Callister	Westmont
DEANNA COLLINS	DeAnna Collins	Westmont
MARGARET TYRRELL	Margaret Tyrrell	Westmont
PAM WAGNER	Pam Wagner	Westmont
DORIS HEGA	Doris Hega	Westmont
Albert DeCorso	[illegible]	WESTMONT

RI-234.2 Cont.

The March Joint Powers Authority (MJPA) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJPA prohibit its remaining land (West Campus, near Westmont Village, or March LifeCare Campus) from being rezoned to Industrial or warehouse uses. We already bear too heavy a burden when it comes to air pollution and traffic. Alternative land-uses, such as retail, residential, or mixed-use development, would be more likely to enhance our communities. And while the Environmental Justice element is being drafted, we request a temporary warehouse moratorium.

First and Last Name	Signature	Community (WV, GA, VV)
Sylvia Brickin	Sylvia Brickin	Westmont
Nancy Tourville	Nancy Tourville	Westmont
Susan Hannigan	Susan Hannigan	✓
Doris Weingart	Doris Weingart	✓
Grace Sylvester	Grace Sylvester	WV
Eleanor Mags	Eleanor Mags	✓
Lea Sachsel	Lea Sachsel	WMRV
Richard Callister	Richard Callister	WESTMONT
Vera Madison	Vera Madison	WESTMONT
Mary Jones	Mary Jones	W.M
Kay Stump	Kay Stump	Westmont
Susan Hill	Susan Hill	Westmont
Glenda Willison	Glenda Willison	Westmont
Carolyn DeCorte	Carolyn DeCorte	Westmont

RI-234.2
Cont.

The March Joint Powers Authority (MJPA) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJPA prohibit its remaining land (West Campus, near Westmont Village, or March LifeCare Campus) from being rezoned to Industrial or warehouse uses. We already bear too heavy a burden when it comes to air pollution and traffic. Alternative land-uses, such as retail, residential, or mixed-use development, would be more likely to enhance our communities. And while the Environmental Justice element is being drafted, we request a temporary warehouse moratorium.

First and Last Name	Signature	Community (WV, GA, VV)
Richard Johnson		GA
Aurora Johnson		GA
Ray Blevins	Harold Blevins	VV
Eugene		VV
Cooper, Tony		VV
Bill Graham		MVV
Russell Simpson		MV

RI-234.2
Cont.

The March Joint Powers Authority (MJPA) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJPA prohibit its remaining land (West Campus, near Westmont Village, or March LifeCare Campus) from being rezoned to Industrial or warehouse uses. We already bear too heavy a burden when it comes to air pollution and traffic. Alternative land-uses, such as retail, residential, or mixed-use development, would be more likely to enhance our communities. And while the Environmental Justice element is being drafted, we request a temporary warehouse moratorium.

First and Last Name	Signature	Community (WV, GA, VV)
Roseann M Reynolds	Roseann M Reynolds	Green Acres

RI-234.2
Cont.

RI-234

Jen Larratt-Smith
February 13, 2024

RI-234.1 This comment letter and associated transmittal email are identified as comments on the March JPA Draft Environmental Justice Element, which is not part of the proposed Project. This comment letter was separately included in the administrative record for the Draft Environmental Justice Element. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area. March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element.

The comment requests March JPA pause all development applications until the adoption of the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-234.2 This comment consists of a series of petition pages signed by residents of three communities living within the March JPA Planning Area: Westmont Village, Green Acres, and Veteran's Village. The petition requests that March JPA prohibit its remaining land from being rezoned to Industrial or warehouse use and implement a temporary warehouse moratorium while the Draft Environmental Justice Element is in process. As explained above, the Environmental Justice Element has been adopted and is no longer in process. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Tuesday, February 13, 2024 8:28 AM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: public comment on record for draft EJ element and REIR SCH 2021110304
Attachments: EnvironmentalJustice2024_v2.pdf

Mr. Fairbanks,

Attached please find a comment letter on the MJPA draft Environmental Justice Element amendment to the General Plan. Please also apply this letter as a comment on the Recirculated draft EIR 2021110304. RI-235.1

Please email me confirming receipt of this letter.

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

R-NOW

February 13, 2024

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

RE: Public comment on record for GP 23-02: March JPA draft Environmental Justice Element

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the GP 23-02: March JPA (MJPA) draft Environmental Justice Element (draft EJ element). As an adjunct professor in the Department of Environmental Analysis at Pitzer College, my course on Environmental Data Visualization focuses on environmental justice in Southern California. It is disappointing to see the MJPA make this unserious attempt to comply with the legal requirements of SB 1000 to pursue more warehouses in its planning area.

This comment letter focuses on the draft Environmental Justice element, its inclusion into a recirculated EIR prior to community notification, the illegitimate process the March JPA has undertaken to adopt this policy without meaningful involvement of community members, and the distinct lack of commitment to implement any real EJ policies. It focuses on three primary areas: process, policy, and implementation.

On November 29, 2023, the MJPA released information on their website and through mailed notifications or emails to members of the Westmont Village, Green Acres, and Veteran's Village communities within the MJPA planning area that an Environmental Justice (EJ) Element was under consideration[1]. A paid consultant drafted the EJ element with no input from community members (or even notification that an EJ element was under consideration), no agendized review by the MJPA Technical Advisory Committee, and no agendized input from the MJPA Commission. It also has not undergone any formal CEQA review, as required for a general plan amendment. In contrast, the master developer and environmental consultants were given multiple months of access to incorporate this draft policy into the SCH 2021110304 Recirculated EIR to retroactively proclaim that a warehouse complex was 100% compliant with the draft EJ policy unseen by the community. The draft EJ element is a flawed policy, developed by a flawed process, and with no intention for actual implementation of targeted, achievable, and concrete goals. It is merely a paper exercise to address a CEQA deficiency stopping the MJPA from building more warehouses.

RI-235.2

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- GP 23-02: Draft March JPA Environmental Justice Element - November 29, 2023
- General Plan of the March Joint Powers Authority[2], assumed 1999 date – last updated 3/07/2023 (General Plan, 1999)

[1] https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification_.pdf
[2] https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf

- County of Riverside General Plan, Healthy Communities Element (Revised September 2021)[3]
- SB 1000 Implementation Toolkit: Planning for Healthy Communities (2018) – California Environmental Justice Alliance and PlaceWorks[4]
- Best Practices for Implementing SB 1000 (2023)– California Department of Justice[5]
- CalEnviroScreen4.0[6] data for affected census tracts.
- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304, recirculated technical appendices C-1, C-2, C-3a, C-3b, J-1, J-2, J-3, J-4, J-5, J-6, T and Appendices A-S, December 27, 2023 (REIR)
- City of Riverside EJ policies[7]
- City of Moreno Valley EJ policies[8]
- City of Perris EJ policies[9]

Background on Environmental Justice at March JPA

In my EIR comment letter dated March 9, 2023 titled 'EnvironmentalJustice.pdf', I noted that the draft EIR contained no mention of EJ issues in its 1,000+ pages, despite the MJPA planning area containing a CalEnviroScreen4.0 98th percentile impact census tract and being adjacent to a 99th percentile census tract (60605042505). In the best practices for implementing SB 1000, the DoJ recommends that the agency 'Define Unique or Compounded Health Risks of Disadvantaged Communities'. Below is my cursory effort which is more than the MJPA has done to date.

Census tract 6065046700 – 98th percentile cumulative impact score, population 4,721 – includes Westmont Village, Green Acres, Veteran's Village, and the eastern edge of the Edgemont community of Moreno Valley. Scores for individual CalEnviroScreen4.0 variables above the 80th percentile rank are shown in **Table 1.**

RI-235.2

Table 1. CalEnviroScreen4.0 scores for individual pollution and population characteristics above the 80th percentile in the March JPA census tract. Data from CalEnviroScreen4.0 (released 2021).

Tract	variable	Percentile rank (0-100)	Description
6065046700	CIscoreP	98	CalEnviroScreen Impact Score
6065046700	PolBurdP	95	Pollution Burden Score
6065046700	PopCharP	95	Population vulnerability characteristics Score
6065046700	OzoneP	98	Summer Ozone concentration (2017-19)
6065046700	TrafficP	82	Traffic Volumes - 2017
6065046700	CleanupP	83	Hazardous waste sites - 2021
6065046700	GWThreatP	98	Groundwater pollution threats - 2021

[3] https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-Ch10-HCE-092121.pdf
[4] https://caleja.org/2017/09/sb-1000-toolkit-release/
[5] https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf
[6] https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[7] https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/2021/Housing_Element/2021-09%20EJ%20-%20City%20Council%20Draft.pdf
[8] https://moval.gov/cdd/documents/general-plan-update/draft-docs/GP-Elements/08.pdf
[9] https://www.cityofperris.org/home/showpublisheddocument/15026/637807115505230000

6065046700	HazWasteP	88	Hazardous Waste generators and facilities - 2018-20
6065046700	SolWasteP	85	Solid Waste Sites and Facilities - 2021
6065046700	LowBirWP	97	Low Birth Weight Infants - 2009-15
6065046700	CardiovasP	87	Cardiovascular Disease - 2015-17
6065046700	EducatP	82	Population over age 25 with less than a high-school education 2015-19
6065046700	Ling_IsolP	83	Percentage of limited English-speaking households - 2015-19
6065046700	PovertyP	89	Percent of population living below two times federal poverty level (2015-19)
6065046700	UnemplP	81	Percent of population over 16 that is unemployed and eligible for labor force (excludes retirees, students, active military) - 2015-19

March JPA communities are exposed to elevated levels of pollution, including 98th percentile high ozone pollution and groundwater pollution (PFAS spills, see hazards letter). Communities are exposed to 80th+ percentile quantities of hazardous waste generators and facilities, solid waste facilities, high traffic, and an ongoing Superfund cleanup site. These environmental hazards are burdening communities that are vulnerable across a variety of population indicators.

In addition, census tract 06065046700 already contains at least 40 existing warehouses estimated at over 20 million square feet of cumulative space, most of which were built or completed after January 1, 2018 when SB 1000 went into effect. Another 10 warehouses are entitled and/or under construction within the census tract (and March JPA), cumulatively adding another 3 million square feet. Census tract 06065046700 is ranked the 8th highest out of 3747 census tracts within Southern California counties of Orange, Riverside, Los Angeles, and San Bernardino for warehouse footprint and has the highest CalEnviroScreen4.0 impact score of any top 15 tract. This is clearly a disproportionate burden compounding the existing risk in the area. Adding the REIR project would put the cumulative total within the census tract at approximately 27 million square feet cumulatively, in the **99.8th** percentile regionally. RI-235.2

The communities within the MJPA planning area are subject to compounded health risks due to their proximity to the March ARB, the industrial development being implemented by the MJPA, and the surrounding industrial development by March JPA member agencies in Moreno Valley, Perris, Riverside, and Mead Valley. The March JPA has not attempted to engage with its communities in any meaningful policy development, has failed to pursue aggressive mitigation strategies, and has chosen to pursue a policy of upzoning to more intense polluting development at every opportunity over the last 20 years.

Process

Best Practices of Community Engagement

The California Department of Justice and SB 1000 implementation Toolkit lists some best practices for community engagement. I ask that the MJPA engage in these practices.

1. EJ Advisory Committee
2. Partnering with Local Community Organizations

3. Tribal Consultation
4. Meeting Times, Locations, and Childcare
5. Language Access
6. Metrics

R-NOW members are willing to participate in an EJ Advisory Committee. I am happy to volunteer to craft a reasonable policy. The best practice for an EJ policy is that it be community led (SB 1000 Implementation Toolkit, DoJ).

Instead of following best practice, the MJPA has engaged a large engineering/architectural firm (Michael Baker International) to lead the EJ policy development and released a draft EJ policy without any community notification, much less engagement.

Michael Baker International is the lead environmental consultant on over ten warehouse projects in southern California, including the I-15 Logistics Center in Fontana and the Southern California Logistics Center 44 in Victorville. It is not clear what qualifications in Environmental Justice they have, as there are no example projects on their website focused on EJ issues beyond environmental compliance for mega-projects. There are multiple environmental consultants or nonprofit organizations that could have been hired to help in this process that would not have this apparent conflict of interest.

Early Access for Developer within the REIR – No Notification for Community

The MJPA violated the core principle of Environmental Justice – meaningful involvement in policy development – in its development of its drafted Environmental Justice Element. Community was not notified at all until the draft EJ element was released. Community was not onboarded until a draft EJ policy had been incorporated in an REIR. In contrast, the master developer and environmental consultants working on the REIR were given early access to the policy and fully incorporated it into an REIR released 3 days after the draft EJ element was released to the public.

RI-235.2

On November 29, 2023, the MJPA released information on their website and through mailed notifications or emails to members of the Westmont Village, Green Acres, and Veteran's Village communities within the MJPA planning area that an Environmental Justice (EJ) Element was under consideration[10]. MJPA staff and consultants created the draft EJ element with no input from community members, no review by the MJPA Technical Advisory Committee (TAC), and no input from the MJPA Commission. MJPA staff did not notify community members in any manner, post it on CEQANET, or in any published agendas of MJPA commission or TAC committee meetings from March through November 2023. MJPA Staff, its consultants, and the master developer drafted the EJ element behind closed doors without input from community – that is not a legitimate process of community engagement.

On December 2, 2023, the MJPA staff released the REIR for the West Campus project, which fully incorporates the draft EJ element released 3 days prior. The following sections of the REIR rely on the draft EJ element released to the public for 3 days.

- explanation of the draft EJ element of the 1999 March JPA General Plan in the Project Description - Section 3
- addition of draft EJ element policies to the Air Quality analysis – Section 4.2

[10] https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification_.pdf

- discussion of the draft EJ element in the Land Use and Planning section – Section 4.10
- a consistency checklist with the draft EJ element in the Land Use and Planning section – Section 4.10

To incorporate the draft EJ element in each of these sections, it was necessary for multiple environmental consultants and the master developer to have access to the draft EJ policies months before the REIR was released. Community members received no notification and were certainly not consulted or engaged in the crafting of the draft EJ element. This is notable not only for its inconsistency with best practice as identified by CEJA and DoJ, but for its deliberate withholding of responses to CEQA comment on the draft EIR that I made on March 9, 2023. MJPA staff know that the community wants to be engaged in this public agency and its environmental policymaking but choose not to allow collaborative participation, but the MJPA staff rejects meaningful involvement by community in crafting environmental policies affecting its planning area.

This is not a legitimate EJ element until it reflects community voice.

Policy

The Draft EJ Element is Neither Specific, Targeted, Concrete, nor Achievable

The MJPA chose as its draft EJ element to wholesale copy-paste the County of Riverside EJ element incorporated in the Healthy Communities section of the County of Riverside General Plan[11]. The justification for this adoption is that the County of Riverside will be the successor agency to the MJPA in July of 2025. However, this choice is not defensible because the time, financial resources, jurisdiction, and specific issues of the two land-use agencies are completely different. The March JPA needs to examine its own planning area, general plan, and communities to create an EJ element that is specific to the needs of the community members who live there and the land-use decisions and policies that govern the MJPA planning area.

RI-235.2

The County of Riverside EJ element includes 77 policies, many of which are long-range goals. However, the March JPA is sunsetting in 17 months. It has limited staff and time. It cannot achieve long-range planning objectives for the planning area. Adopting the County policies lead to an absurd number of policies that that make no sense. For example:

- The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7)
- The March JPA has no jurisdiction over the Salton Sea (policy HC 16.1)
- The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC 16.8), and rejects community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10)
- The March JPA will not coordinate with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7)

[11] https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-Ch10-HCE-092121.pdf

- The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13)
- The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

At a minimum, a proposed EJ element needs to incorporate MJPA priorities, exclude inapplicable county policies, and describe community priorities through an active (and hopefully formal) community engagement process. This copy-paste of County policy is neither Specific, Concrete, nor Targeted and it is devoid of community input. Adopting a General Plan amendment with more than a dozen policies that the MJPA has no intention of implementing is dishonest, poor governance, and a litigation risk. Incorporating the draft EJ element into a REIR prior to receiving any community feedback introduces an unstable EIR element (consideration of a draft policy) and removes the opportunity of the community to help craft the policies affecting our neighborhoods – thus rendering meaningful involvement moot. This is an attempt to bypass community involvement in the planning process and is in conflict with the EJ element.

EJ Element Background and Application is Inaccurate and Inconsistent with General Plan

In the draft EJ element there are a host of inaccuracies and inconsistencies.

1. P. 2 - Adjacent communities in Moreno Valley, City, and County of Riverside are also affected by MJPA land-use policies and the effects of land-use decisions should include adjacent jurisdictions, consistent with the existing JPA General Plan policies.
2. P.2 - The EJ element will hopefully not contain the full list of County of Riverside EJ policies – many are not applicable – see above.
3. P.2 - The MJPA is currently unincorporated county, right? The March JPA is a land-use authority but is not incorporated as a city. '14th amendment to the March Joint Powers Agreement , the March JPA will be recognized as ***unincorporated territory*** within the County of Riverside…'
4. P.2 - The MJPA includes **three** residential communities – not two. Leaving out the US VETS community is an embarrassing oversight that shows what happens when a non-local consultant writes the EJ element with zero community input. The MJPA staff oversaw the installation of the US VETS facility and should not have omitted this key community. Please update text and Exhibit 7-1 accordingly.

RI-235.2

In addition to the errors above, the description of the General Plan in the draft EJ element contradicts the text of the General Plan describing itself. Here's the description from the draft EJ element – with my emphasized sections in bold. Quote from p.3 of the draft EJ element.

> *The General Plan represents the build-out vision of March JPA. It not only addresses what March JPA envisions to be achieved from new development, it also provides a framework for the collective living and working environment of its residents. Policies applicable to new development will be implemented by March JPA. Other policies to be implemented require cooperation with non-profits, community-based organizations, foundations, other government agencies, as feasible.*
>
> *To be clear, the General Plan is a document consisting of goals and policies.* ***Such goals and policies are evaluated as a continuum of direction within broad***

interpretation parameters. *They are not regulations in the manner that a zoning code consists of regulations with which compliance must be achieved****. Goals and policies are interpreted and if the direction set by the goal or policy is met, a level of compliance is achieved such that the direction set by the goal or policy is met within a continuum framework. EJ Policies are evaluated in the same manner as all other General Plan goals and policies - subject to interpretation with appropriate determinations of compliance.***

And here's the comparison from the 'Purpose of the General Plan' p. v-vi of the General Plan, 1999, again, with my emphasized sections in bold.

Preparing, adopting, implementing, and maintaining ***a general plan serves to link community values to actual physical decisions****. The* ***plan identifies the community's land use, circulation, environmental, economic, and social goals, and policies as they relate to land use and development****. The General Plan establishes goals and policies to reach long-term objectives, and establishes long-term policy for day-to-day decisions, based upon those objectives. The General Plan provides a basis for local government decision making, including a nexus to support development exactions.*

In essence, a ***general plan serves as the blueprint for future growth and development****…****The goals and policies of the General Plan serve as the constitutional framework for March JPA****; provide planning direction for JPA operations and programs, and function as guidelines for all decision-making concerning use and development of the area.*

RI-235.2

I can't reconcile the two descriptions. The General Plan description is clear – it is the constitutional framework, blueprint, and link with community values. In contrast, the EJ element of the General Plan is a wishy-washy legalese description, with many caveats indicating it probably will be minimized and 'evaluated' within a 'continuum'. The EJ element description gives the impression that the polices will not be implemented or actionable. This section needs to be modified to be consistent with the General Plan's description of itself – a clarion call description of the moral values of the agency linking land-use to community values.

The problem is the MJPA is not reflecting community values in its land-use decisions and amending the General Plan with an EJ element will add to that dissonance.

EJ Elements from other member agencies

The cursory and hasty adoption of the County of Riverside EJ policy ignores that there are four member agencies of the MJPA, each with adopted EJ elements. Many of the city policies are applicable but were not considered by the MJPA in their policy list. I request a comparative analysis of the EJ policies of all four member agencies.

City of Riverside

A few policies from the City of Riverside stuck out to me. Please consider these specifically.

- Policy LU-EJ-2.0 – Public Engagement – ensure the citywide community engagement policy provides community members to participate in decisions that affect their environment and health
- Policy AQ-EJ-1.0 – Air Quality – Ensure that land use decisions, including enforcement actions, are made in an equitable fashion to protect residents and workers in EJ communities from the short-term and long-term effects of air pollution
- Policy AC-EJ-1.0 – Arts and Culture – Promote equitable distribution of arts and culture facilities across the city.
- Policy HP-EJ-1.0 – Historic Preservation – Encourage identification and preservation of historic and cultural resources associated with communities whose histories and historical contributions are not well documented.

R-NOW members have specifically asked for land-use that meets each of these policy objectives in our dialogue and correspondence with the MJPA. The REIR project will destroy historical resources that are not well documented, remove the opportunity to preserve a cultural facility in the Mission Grove and Orangecrest neighborhood – an area lacking in those facilities. The MJPA has disproportionately burdened the EJ community with pollution spewing trucks, and the MJPA has repeatedly rejected public engagement in its activities.

City of Moreno Valley

Multiple census block groups within the census tract 6065046700 are within the City of Moreno Valley. Given the proximity and shared responsibility, it is important to consider any Moreno Valley EJ Actions that overlap to make sure they address issues in a coordinated manner.

RI-235.2

- EJ.1 – A – Use the Climate Action Plan to guide City actions and investments aimed at reducing GHG emissions community-wide
- EJ.1 – C – Consider establishing a fee to be paid by new development to assist in the funding of local projects that contribute to enhancement of air quality, particularly in disadvantaged communities.
- EJ.2 – D – Explore development and monitoring of indicators of displacement and use of this data to identify at-risk neighborhoods and target programs and resources to prevent homelessness.
- Map EJ-2 – Census Tract 46700 is a low-vehicle access community.
- EJ.4-1 – Encourage inclusive, participatory City processes that emphasize the collaborative exchange of ideas by all segments of the community.
    - Holding public meetings and outreach activities at culturally appropriate neighborhood gathering places or community events when feasible
    - Employing a wide range of outreach methods and activities, including pop-up events, focus groups, community workshops, and online surveys, in various languages.
    - Encouraging participation of disadvantaged communities in civic process by providing transportation vouchers, translation services, childcare, food, or monetary compensation.

City of Perris

- Goal 1.1 – A high degree of transparency **and inclusion** in the decision-making process.

- Goal 3.1 – A community that reduces the negative impacts of land use changes, environmental hazards, and climate change on disadvantaged communities.
- Goal 3.2 – A community that **actively works** to reduce the impacts of poor air quality.
- Goal 5.1 – Neighborhoods designed to promote safe and accessible connectivity to neighborhood amenities for all residents.
- Goal 6.1 – A diverse housing stock that preserves and enhances housing affordability in the community.

Policy Recommendations-

Community Engagement

Form a Municipal Advisory Council (MAC) or Community Advisory Council (CAC) through the County District Supervisor's office to formally engage with MJPA community members on policies pertaining to land-use, development, policies, and facilities within the area. Give the community a voice in the future of their community as it transitions to unincorporated county.

Reduce Pollution Exposure

I ask that the MJPA modify its EJ policy to reflect an achievable set of short-term policies with a minimal set of policies that can be implemented in the remaining 17 months of its existence. I recommend a **moratorium on new industrial and warehouse developments** within the MJPA planning area until a Good Neighbor Policy can be crafted that reflects stakeholder feedback. That is achievable, targeted, specific to the agency, and concrete.

Promote Public Facilities

I ask that the MJPA fund and build the 48-60 acre park that the MJPA agreed to build 21 years ago. That is achievable, targeted, specific to the agency, and concrete.

RI-235.2

Promote Food Access

I ask that the MJPA establish at least one grocery store or health food option within its planning area. To data it only favors established chain fast-food restaurants (Chipotle, In-N-Out, Starbucks, Jersey Mike's Subs, Farmer Boys, 7-Eleven, Cupcake & Espresso Bar, Waba Grill, Pizza Factory, El Rey Taco Mexican Grill) at its strip plaza developments. That is achievable, targeted, specific to the agency, and concrete.

Promote Safe and Sanitary Homes

Mitigate the impacts of older buildings at Green Acres and Westmont Village to promote healthy living environments for its residents. That is achievable, targeted, specific to the agency, and concrete.

Address Unique or Compounded Health Risks

The MJPA needs to directly address its own warehouse and distribution center planning activities and development on the communities within its planning area. Warehouses and their trucks disproportionately impact MJPA communities. The warehouse moratorium would achieve that goal.

Summary

Warehouse land use in the MJPA planning area disproportionately added to the burden of MJPA communities. MJPA staff continue to pursue an industrial land-use policy with minimal mitigation measures. MJPA has been out of compliance in updating its General Plan to address SB 1000, with over 5 general plan amendments since 2018 that included no mention of environmental justice. It is time for

the MJPA to take bold action and empower and protect its residents by pledging to focus on the communities it serves. The March JPA is out of alignment with its General Plan and is failing to reflect community values in its land-use decisions. It is time to change course and rededicate the MJPA as a public agency serving the public interest – instead of merely the interests of a for-profit master developer that refuses to consider non-industrial land-uses.

RI-235.2
Cont.

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses
92508

RI-235

Mike McCarthy
February 13, 2024

RI-235.1 This comment is a transmittal email. The comment refers to the Recirculated Draft EIR and asks that the letter be applied as a comment on the Recirculated Draft EIR, but does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-235.2 This comment letter is identified as comments on the March JPA Draft Environmental Justice Element, which is not part of the proposed Project. This comment letter was separately included in the administrative record for the Draft Environmental Justice Element. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area. March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies. The comment refers to the Recirculated Draft EIR and asks that the letter be applied as a comment on the Recirculated Draft EIR, but does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: David Reznick <gupy@ucr.edu>
Sent: Thursday, February 15, 2024 5:05 PM
To: Dan Fairbanks
Subject: West Campus Upper Plateau Project REIR

February 14, 2024
Dear Mr. Fairbanks,

I would like to comment on the revised Environmental Impact Report (EIR) on the West Campus Upper Plateau Project (the Project). The revised EIR does not address any of the issues I raised in the letter I submitted last March. I thus feel a need to reiterate my concerns about its evaluation of biological resources on the property proposed for the project. RI-236.1

I am a professor in the Department of Evolution, Ecology and Organismal Biology at UC Riverside and have lived in Riverside for over 30 years. I have done research on local wildlife and am intimately familiar with the local fauna. I have several concerns regarding the biological resources section of the EIR, as outlined below, including both the methodology of the studies and the conclusions drawn from them.

Plants and Wildlife:

1. I challenge the assessment that up to 80% of the grasses in the Project Study Area are non-native. Native grasses are often interspersed within clumps of non-native shrubs. I suspect that the assessment that 80% of the grasses are non-native is an over-estimate.
2. The overestimate error of native grasses is important because it leads to a second problem in the report, which is that certain wildlife species, for example the Los Angeles pocket mouse, are listed as being low potential to occur there. This judgement may be incorrect because their habitat has been underestimated. This would also be the case for coast horned lizards, which could be in the Project Study Area. The horned lizards normally occupy such habitat in this area. One way to assess the likelihood of their presence is to assess the abundance of harvester ant mounds. A usual cause of the disappearance of horned lizards in the vicinity of suburbs is that the enhanced availability of water attracts the invasive Argentine ants, which in turn eliminate the harvester ants that are the preferred food of the horned lizards. If harvester ants continue to thrive on portions of the property, then the horned lizards are likely to be present. They are not likely to be seen in a cursory survey.
3. Some wildlife such as the orange-throated whiptail lizards, were not observed but listed as having moderate potential to occur within the Project Study Area. This species is certain to be in the Study Area based on my personal observations. RI-236.2
4. The red-diamond rattlesnake (which should be listed as red-diamondback rattlesnake) is listed under the Potential to Occur section as “low” and “suitable chaparral, coastal sage scrub, or creek bank habitats are limited or not present.” However, the habitat listed is incorrect since these snakes prefer rocky areas. I have seen this snake species in the Study Area in the past.
5. I did not see an insect survey which should be done since insects are especially important parts of the ecosystem in the Project Study Area.

Vernal Pools:

It appears that the studies used in the EIR were conducted in 2021 and 2022, which were drought years. The fact that Protocol surveys were conducted for Riverside Fairy Shrimp and Vernal Pool Fairy Shrimp and were negative is meaningless under these dry conditions. Studies should be conducted during years with adequate rainfall to support vernal pools throughout the wet season. The few rains early in the season in 2021 and 2022 were not enough to perform a correct assessment since some species will not emerge until later rains are present. This year would be ideal for such surveys. The fact that spadefoot toads are present on the property means that it is likely that there are appropriate vernal pools to sustain the fairy shrimp.

Based on my experience, fairy shrimp should be present in this Study Area given that they are known from appropriate vernal pools on March Air Force base, which is close by and is similar habitat. If fairy shrimp are not observed in vernal

pools, sampling needs to include collecting dirt from the bottom of the vernal pools and incubation under correct conditions to see if fairy shrimp emerge from dormant cysts in the soil.

Blue Line Stream:

The direct or indirect effects of the Project on the Blue Line stream running through Sycamore Canyon is not analyzed. This steam is a tributary of the Santa Ana River and is an ecologically sensitive aquatic environment.

Wildlife Corridors:

The presence of the Project Study Area in a multi-species wildlife corridor is of grave concern. This corridor is part of the Multispecies Habitat Conservation Plan. A critical feature of that plan is that appropriate corridors that join larger tracts of land, such as Sycamore Canyon and the Box Springs Mountains, be maintained to allow for animals to move between them. Such movement and mixing of populations is essential for them to sustain larger effective population sizes and genetic diversity. The mitigation measures proposed are inadequate to deal with the harm that the Project will impose on this sensitive wildlife area.

RI-236.2 Cont.

Given these deficiencies, I request that you do the additional analyses and studies listed above. These include appropriate surveys for harvester ant mounds as a measure of the suitability of the habitat for horned lizards, an appropriate survey of the vernal pools during a rainy season, a more complete assessment of the role this land plays as a wildlife corridor and how losing it would affect the connections among the larger tracts of land that flank it, and an assessment of whether or not construction activities and subsequent land use will affect the drainage area feeding the blue line stream in Sycamore Canyon.

Thank you for allowing me to provide comments on this project.

Sincerely,

David Reznick, Ph.D.
Distinguished Professor, UC Riverside Dept. of Evolution, Ecology and Organismal Biology
5085 Queen St. Riverside, CA 92506
David.reznick@ucr.edu

RI-236

David Reznick
February 15, 2024

RI-236.1 This comment is introductory and states that the commenter previously provided comments on the Draft EIR that are not addressed in the Recirculated EIR sections. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Section 4.2, Biological Resources, of the Draft EIR was not recirculated, and responses to comments on the Draft EIR, including the commenter's previously submitted comments on the biological resources analysis, are included in this Final EIR.

RI-236.2 This comment is the same as Letter I-757 submitted on March 9, 2023. As such, in response, please see Responses I-757.1 through I-757.12.

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From: Mel C <melodiousclark@gmail.com>
Sent: Thursday, February 15, 2024 4:25 PM
To: Dan Fairbanks
Subject: Comments of West Campus Upper Plateau REIR

February 14, 2024

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

RE: Public comment on the West Campus Upper Plateau Project Recirculated Environmental Impact Report (REIR)

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project (the Project). The Project would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. RI-237.1

This comment letter focuses on the revised Air Quality section and is a follow-up to my comment letter to you dated March 10, 2023. Before I begin, I want to share my background. I have a PhD in microbiology and immunology from UCLA and have worked in the biotechnology industry for many years. My earlier comment letter focused on research published in scientific journals linking air pollution to increased risk of dementia as well as an increased risk of autism in children. I had hoped to see this data referenced in the revised Air Quality section in the REIR but I did not see it there. The EIR and REIR acknowledge the well-known issues with lead exposure, but fails to include the newer research I cited that links other compounds in air pollution with these serious neurological diseases. RI-237.2

Why has the REIR not informed the public of the serious consequences on cognitive health that will result from this Project? Perhaps it is because it would scare the public – asthmas is one thing but autism and Alzheimer's Disease are a different kind of devastating outcome that the public should be made aware of. This information is especially important given that the Project would be 794 feet from the Grove pre-school. The parents of children at the pre-school have a right to know this information as do all who live in the area. RI-237.3

I am even more concerned when I see that the cumulative effects on air quality generated by the Project does not take into account the huge air quality impacts from the 215 freeway. Perhaps there is some boundary that is used to exclude the effects from the freeway but there is no question that it adds to the cumulative effects for residents in the area. I also note that air quality experts continue to increase the areas that are affected by pollution and to decrease the levels that are considered acceptable. All of this means that even if you have reverse engineered figures to fit into the acceptable criteria for now, that may not be the case even in the near future. Also, I note the environmental justice aspect involved for people living near the freeway and near this project – much of this community is disadvantaged and that should not make them bear the brunt of air pollution generated by this Project. RI-237.4

Even the overly optimistic draft EIR acknowledges that the Project will have significant and unavoidable impacts on air quality. What it does not acknowledge is the data that is already known and documented scientifically regarding the full impact of the reduced air quality on those who live in the region. RI-237.5

Research regarding the effects on cognitive health caused by the significant and unavoidable impacts on air quality by the proposed Project **must** be disclosed to the public before this project can proceed. RI-237.6

Thank you for allowing me to provide comments on this project.

Sincerely,

Melody Clark, Ph.D.
5085 Queen St.
Riverside, CA 92506

Selected references (there are many more)

Becerra et al., “Ambient Air Pollution and Autism in Los Angeles County, California” Environ health Perspective. 2013 Mar, 121(3): 380-386.

Peters et al., “Air Pollution and Dementia: A Systematic Review” J Alzheimer’s Dis 2019: 60(Suppl) D: S145-S163

Peters, “Ambient air pollution and Alzheimer’s disease: the role of the composition of fine particles, PNAS Jan 10 2023, 120(3)e2220028120

RI-237.6
Cont.

RI-237

Melody Clark, Ph.D.
February 15, 2024

RI-237.1 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footage. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment refers also to a prior comment letter submitted by the commenter on the Draft EIR, dated March 10, 2023, which is included in this Final EIR as Letter I-926. The commenter is referred to Responses I-926.1 through I-926.4. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-237.2 The comment requested additional information regarding a potential link between air pollution and dementia and autism to be included in the Recirculated Section 4.2, Air Quality. As discussed in Recirculated Section 4.2, Air Quality, SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the state, and is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes. As part of the 2022 AQMP – Appendix I: Health Effects,[1] SCAQMD "summarize[d] the health effects and causal determinations as assessed by U.S. EPA and other scientific agencies, to discuss some recent studies published since the latest U.S. EPA reviews, to give some quantitative estimates of the health impacts of air pollution in the South Coast Air Basin, and to present a "local perspective" by highlighting studies conducted in the South Coast Air Basin, Southern California, or California." As part of this review, SCAQMD identified studies evaluating air pollution effects on dementia and autism, but found the effect estimates to be inconsistent. The U.S. EPA uses a weight-of-evidence approach for assessing causality and has not determined there is a causal relationship between air pollution and dementia and autism based on the current body of research.[2] SCAQMD did not include dementia or autism as key health and welfare effects of air pollutants in the 2022 AQMP.[3] Appendix I of the 2022 AQMP includes comprehensive information on possible health impacts from criteria pollutants. March JPA has relied on SCAQMD and the U.S. EPA in assessing the causal links between air pollution and potential health effects. Furthermore, this information would not change the impact analysis or significance conclusions. Therefore, no changes are necessary to the EIR in response to this comment.

RI-237.3 The comment questions the omission of cognitive health consequences of the Project. As discussed in Response RI-237.2, above, SCAQMD and the U.S. EPA do not currently conclude a causal relationship between air pollutants and cognitive health. Recirculated Section 4.2, Air Quality, discloses the air pollutants and known health effects of those pollutants in Section 4.2.1.2 and discusses the health effects of the Project Section 4.2.6. As discussed in Section 4.2.6, while the Project's emissions may contribute to the health effects associated with the pollutants emitted, there are no technically reliable

1 https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/appendix-i.pdf?sfvrsn=6

2 https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/appendix-i.pdf?sfvrsn=6

3 https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/05-ch2.pdf?sfvrsn=12

or meaningful ways to quantitatively measure the health impacts of the Project from specific pollutants. Recirculated Section 4.2, Air Quality, and Appendix C-2, evaluated the cancer and non-cancer health impacts of the Project and determined the Project would not cause a significant human health or cancer risk to adjacent land uses, including the preschool located at Grove Community Church and nearby residences. No changes are necessary to the EIR in response to this comment.

RI-237.4 The comment questions why the cumulative air quality analysis did not include the impacts from the 215 freeway. Emissions from the 215 freeway are already accounted for in the baseline air quality environment. Section 15130 of the CEQA Guidelines states "As defined in Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." The cumulative impact discussion therefore evaluates the Project's impacts alongside other projects. For additional discussion of cumulative impacts, please see Topical Response 7 – Cumulative Projects. The comment further notes the pollution burden on disadvantaged communities. The Project's census tract is large and includes all of the March ARB and the March JPA jurisdiction along with three blocks within the City of Moreno Valley, which appear to have been mapped as part of the March JPA. Residential uses within the Project's census tract are limited to the Westmont Village retirement community off of Village West Drive, which was originally developed for retired military housing, Green Acres, which consists of 111 homes as part of the March Field Historic District, the US Veterans transitional housing facility, and the residential block surrounding the Cottonwood Golf Center, and a few scattered residences in blocks of Moreno Valley included in the census tract. These residential uses within the March ARB census tract are located approximately two miles from the Project site, the residents in the retirement community are to the south of Van Buren Boulevard and the residents in Moreno Valley are to the east on the opposite side of the 215 Freeway. These residences are also located outside the area where the Project's truck route will emit TACs as evaluated in the Project Health Risk Assessment (See Recirculated Section 4.2, Air Quality). The Project is not proximate to these residences such that it will increase their pollution burden. The census tracts adjacent to the Project site (6065042012, 6065042014, and 6065042013), which include the Mission Grove neighborhood, the residences located in Riverside County to the north of the Project site, and the Orangecrest neighborhood south of the Project site, are not identified as disadvantaged or overburdened with pollution.

RI-237.5 The comment alleges the air quality impact conclusions of the Recirculated EIR do not disclose the full impact of reduced air quality. Please see Responses RI-237.2 and RI-237.3, above, for an explanation as to why the commenter's cited research is not included in Recirculated Section 4.2, Air Quality.

RI-237.6 This comment provides concluding remarks and references. Please see Responses RI-237.2 and RI-237.3, above, for an explanation as to why the commenter's cited research is not included in Recirculated Section 4.2, Air Quality.

From: Elijah Sbar <elijahsbarbbb@icloud.com>
Sent: Sunday, February 18, 2024 8:50 AM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
I am writing as a concerned community member regarding the West Campus Upper Plateau Project (State Clearinghouse No. 2021110304). I believe that the Recirculated Draft Environmental Impact Report could benefit from further revisions and community input, especially concerning its Environmental Justice (EJ) policy.

I suggest a thorough review of the EJ element under the CEQA process and recommend a pause on any warehouse developments until this review is complete. This approach would ensure that the project aligns with the community's needs and environmental standards.

RI-238.1

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. Engaging with the community and exploring various options would reflect a genuine commitment to civic engagement and environmental justice.

RI-238.2

Thank you for considering my views on this important matter.
Sincerely,
Elijah Sbar
92506

Sent from my iPhone

RI-238

Elijah Sbar
February 18, 2024

RI-238.1 This comment is a truncated version of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-238.3 This comment requests consideration of non-industrial alternatives. As such, in response to this comment, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Andrea Wood <andrea.wood@ucr.edu>
Sent: Tuesday, February 20, 2024 7:56 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

RI-239.1

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Much of the community, me included, is opposed to this project and do not want more unattractive, large industrial complexes near our neighborhoods, schools, and churches. Please make sure no corners are cut in this process and consider our voices.

RI-239.2

Sincerely,
ANDREA WOOD
Riverside, CA 92521

RI-239

Andrea Wood
February 20, 2024

RI-239.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-239.2 This comment requests a non-industrial alternative and expresses opposition to industrial complexes. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Connie Ransom <ransomrealart@gmail.com>
Sent: Tuesday, February 20, 2024 7:02 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Riverside has been my home since 1968. It has grown and changed over the years, and the people of this city have acted numerous times to preserve nature and the agricultural and historic heritage of this unique community. We have acted to save the hills and the Santa Ana River. Now we want to continue with the kind of preservation that has always been important to the people of this community. I have lived close to downtown where the Tequesquite Arroyo wanders past Mount Rubidoux and empties into the Santa Ana River. I currently live along Sycamore Canyon Park - a nature preserve with a riparian stream running through it. That stream joins the Tequesquite Arroyo after winding through numerous neighborhoods and golf courses. The West Campus Upper Plateau Project would have a devastating impact throughout the city and the Santa Ana River. Please read this email providing support for saving Riverside from such a devastating encroachment on nature and the health of this city. RI-240.1

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. RI-240.2

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Connie Ransom
92507

RI-240

Connie Ransom
February 20, 2024

RI-240.1 This comment provides an introduction to the commenter and suggests the West Campus Upper Plateau Project would impact the City of Riverside and the Santa Ana River. Please see Section 4.2, Biological Resources, and Section 4.9, Hydrology and Water Quality, for evaluation of the Project's impacts to water quality and riparian habitat. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-240.2 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Deb Whitney <surfjade@yahoo.com>
Sent: Tuesday, February 20, 2024 9:03 AM
To: Dan Fairbanks
Cc: jlarrattsmith@gmail.com
Subject: Opposition to Warehouses

Mt. Fairbanks

I would like this email to be considered "an official comment to the Recirculated Draft Environmental Impact Report".

My name is Debra Whitney and I live at 6790 Mssion Grove Parkway North. I am a member of the Mission Grove Neighborhood Association and at the last meeting it came to my attention about the plans for additional warehouses at the March property located near the bunkers.

What I have learned is that the March Joint Powers Authority was charged with repurposing the the land with a goal of replacing 10,000 jobs. The JPA has claimed success in succeeding this goal by creating 38,000 jobs. JOB WELL Done.

So now, it seems that you have impacted our neighborhoods enough with warehouses that increase traffic and impact the environment with buidlings, buildings, and MORE buidlings.

My understanding is the Governor has a goal of conserving 30 percent of California lands as part of a broader effort to fight climate change, protect biodiversity and expand nature for all Californians under Executvie Order N-82-20. Wouldn't that be a better focus for the JPA. To actually provide an environmental benefit that preserves quality of life in our neighborhoods.

I am so disappointed that we continue to add more and more warehousing without thought to the impacts it has on our communities.

So, I implore you to reconsider this action and instead come up with a plan that preserves our natural resource and quality of life in Riverside.

Debra Whitney

RI-241.1

RI-241

Debra Whitney
February 20, 2024

RI-241.1 This comment requests to be considered as an official comment to the Recirculated EIR. The comment expresses general concerns regarding warehouses and quality of life in Riverside and does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

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From: Esmeralda Montes <emts.deo@gmail.com>
Sent: Tuesday, February 20, 2024 6:01 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. **For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails**. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-242.1

Please do not add another infrastructure project to the already overflowing pool of warehouses in the Inland Empire.

RI-242.2

Sincerely,

Esmeralda M, 92553

RI-242

Esmeralda Montes
February 20, 2024

RI-242.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-242.2 This comment expresses opposition to "another infrastructure project." The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

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From: Esther Munoz <bevemunoz@yahoo.com>
Sent: Tuesday, February 20, 2024 1:33 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-243.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Esther Munoz
92567

Sent from my iPad

RI-243

Esther Munoz
February 20, 2024

RI-243.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Joe Aklufi <jaklufi@gmail.com>
Sent: Tuesday, February 20, 2024 9:16 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits is clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate whether the current project plan meets its standard.

RI-244.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, it is clear that you must consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Joseph S. Aklufi
Riverside, 92506

Joe Aklufi
(951)377-4255

RI-244

Joseph S. Aklufi
February 20, 2024

RI-244.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: John Lyell <jlyell@verizon.net>
Sent: Wednesday, February 21, 2024 6:24 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-245.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

John Lyell

RI-245

John Lyell
February 21, 2024

RI-245.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Mary Moran <janiem31220@gmail.com>
Sent: Tuesday, February 20, 2024 1:54 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-246.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Mary Moran
92567 Nuevo, CA

RI-246

Mary Moran
February 20, 2024

RI-246.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Mohsen Lesani <mohsen.lesani@gmail.com>
Sent: Tuesday, February 20, 2024 11:38 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Good morning,

Please consider the email below from the RNOW group. We are worried about the pollution in the area specifically for children. RI-247.1

Mohsen Lesani
92508

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. RI-247.2

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

RI-247

Mohsen Lesani
February 20, 2024

RI-247.1 This comment refers to Form Letter RA – Environmental Justice Element, and raises concerns about pollution in the area specifically for children. Recirculated Section 4.2, Air Quality, and Appendix C-2, evaluated the cancer and non-cancer health impacts of the Project and determined the Project would not cause a significant human health or cancer risk to adjacent land uses, including the preschool located at Grove Community Church and nearby residences.

RI-247.2 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Trish Welbourne <twelbournewhite@gmail.com>
Sent: Tuesday, February 20, 2024 1:08 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. I live near the warehouses already built on Van Buren and Barton and I can tell you the negative impact it has on our community. The noise level, the high amount of traffic, the trucks using our small streets to cut through and avoid the traffic on Van Buren and Barton. The 215 and the 60 interchange which is impossibility to take anymore, the street racing on Barton, cars running red lights on Krameria and stop signs on Mariposa is dangerous and all due to the warehouses. All of these issues started and continue to get worse when the warehouses were opened.

RI-248.1

RI-248.2

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-248.3

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-248.4

Sincerely,

A very concerned resident Patricia Welbourne
92508

RI-248

Patricia Welbourne
February 20, 2024

RI-248.1 This comment is Comment FL-RA.1 of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-248.2 This comment refers to existing warehouses and noise, traffic, cut-through traffic, street racing on Barton, and cars running red lights on Krameria and stop signs on Mariposa, that the commenter attributes to warehouses. This comment discusses existing conditions south of the Orangecrest community and more than a mile south of the Project area and does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

RI-248.3 This comment is Comment FL-RA.2 of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-248.4 This comment is Comment FL-RA.3 of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Shirley <fungyinandjoseph@gmail.com>
Sent: Tuesday, February 20, 2024 8:03 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-249.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Raymond Or

CA 92508

RI-249

Raymond Or
February 20, 2024

RI-249.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Candi Erwin <candierwin@hotmail.com>
Sent: Thursday, February 22, 2024 10:17 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-250.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Candi Erwin>
<92506>

Get Outlook for iOS

RI-250

Candi Erwin
February 22, 2024

RI-2501.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: John Santorufo <majestic6543@yahoo.com>
Sent: Wednesday, February 21, 2024 7:55 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

<name>
<zip code>

RI-251.1

Sent from my iPad

RI-251

John Santorufo
February 21, 2024

RI-251.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Roseann Reynolds <roseannreynolds1@gmail.com>
Sent: Thursday, February 22, 2024 1:56 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

RI-252.1

My very real concern is that industrial facilities will be pushed upon the members of the community the way the Benveezi Logistics Center was years ago. Public input did not matter then, and it appears that public input does not matter now. Please do not go down this road again.

RI-252.2

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-252.3

Sincerely,

Roseann M. Reynolds
Green Acres resident

92518

RI-252

Roseann Reynolds
February 22, 2024

RI-252.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-252.2 This comment expresses concern regarding industrial facilities and public input and references the Benveezi Logistics Center. Regarding public engagement on the Project, March JPA and the applicant conducted multiple public outreach efforts for the Project, including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. The Benveezi Logistics Center is not part of the Project and is commonly referred to as the World Logistics Center. It is located in Moreno Valley, more than ten miles away from the Project site. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

RI-252.3 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

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From: Jen L <jlarrattsmith@gmail.com>
Sent: Friday, February 23, 2024 5:41 PM
To: Dan Fairbanks
Cc: Michael McCarthy
Subject: public comment for recirculated draft EIR SCH 2021110304
Attachments: Jen REIR Comment Letter.pdf; Jen EJ REIR letter.pdf

Dear Mr. Fairbanks,

Attached are my public comments for the recirculated draft EIR for the West Campus Upper Plateau. RI-253.1

Thank you in advance for letting me know that you received them.

Jen

R-NOW

Jennifer Larratt-Smith, Chair
19069 Van Buren Blvd #114-314
Riverside, CA 92508
951-384-1916
jlarrattsmith@gmail.com

Feb 23, 2024

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

Re: Comment for Recirculated Draft Environmental Impact Report (REIR) for the West Campus Upper Plateau, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for the opportunity to comment on the Recirculated Draft Environmental Impact Report (REIR) for the West Campus Upper Plateau, State Clearinghouse No. 2021110304. Given the consistent opposition to the project for the last two years, I am disappointed that the March JPA has chosen to use its REIR to defend the project rather than alter it in any meaningful way. In this comment, I will discuss my concerns with the analysis in the following sections: 1) Project Objectives 2) Hazardous Waste 3) Air Quality and 4) Land Use.

RI-253.2

Project Objectives

Below is a list of each of your primary objectives as laid out in Section 3.3 of the REIR as well as my comments. As detailed below, a couple of the primary objectives for this project have glaring flaws which make them illegitimate, and the rest are not properly analyzed in the REIR. In my estimation, the West Campus Upper Plateau is not the highest and best use of the land given the primary objectives..

RI-253.3

Provide increased job opportunities for local residents through the provision of employment generating businesses.

The claim is that the West Campus Upper Plateau will increase “job opportunities” for “local residents.” In my letter sent during the original draft EIR, for which I have not yet received a response, I include statistics and graphs from reputable sources that show: 1) There are not enough unemployed people in the local area to fill the number of jobs that the logistics industry claims they are creating. 2) The majority of warehouse jobs are low-wage and temporary work with reduced hours, and workers could not afford to live in the local area. 3) The logistics industry has actually weakened the economic outlook of our region overall (more on this below). 4) The vast majority of companies who own and operate the warehouses in the Inland Empire are not local. 5) Industrial is the worst land use possible when it comes to job generation. 6) Automation may lead to mass unemployment if we overinvest in this industry. Please see the original letter for more details and for supportive evidence.

RI-253.4

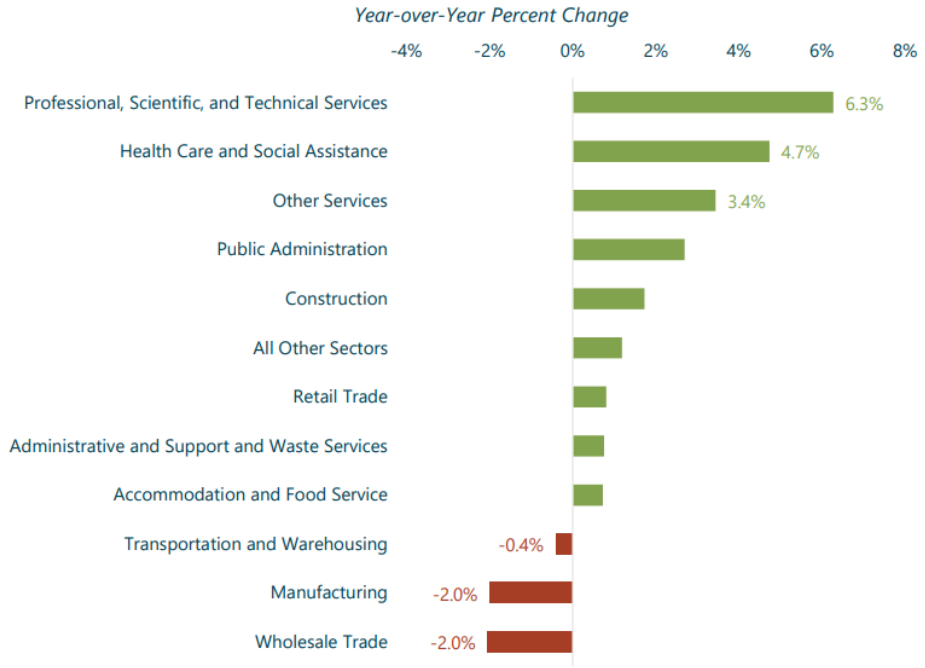
As it has been a year since I wrote the original letter, allow me to update some of the data. In its 2023 report, SCAG continues to paint a grim picture for the industrial economy[1].

> Over the past year, payroll job growth has slowed considerably (+1.6 percent year-over-year), mainly because job growth in Logistics has stalled. However, other sectors have experienced accelerated growth, led by Health Care (+4.7 percent, 12,000 jobs) and Public Administration/Government (+2.5 percent, 6,200 jobs). Professional Scientific and Technical Services sector experienced the largest percentage gain (+5.4 percent) and the third largest absolute increase, adding 2,700 positions….
>
> We expect the logistics sector to continue to weaken in 2024 as household spending patterns revert back to pre-pandemic levels, that is, towards an increased share of consumption of services relative to goods. In the long run, the region’s reliance on Logistics as its anchor industry is cause for concern. Growth in Logistics output and economic activity is expected to last over the foreseeable future, but automation and efforts to shorten supply chains or even re-shore production activities may constrain future employment gains. (p. 76)

RI-253.5

[1] https://scag.ca.gov/sites/main/files/file-attachments/23-3135_scag_2023-briefing-book_120723.pdf

Exhibit 6.3: Change in Employment by Sector in the Inland Empire



Notes and Sources: Values for 2023 are annualized based on data from Jan.-Sept. 2023. Data from California Employment Development Department (2023).

The industrial sector was one of very few industries that saw a decrease in employment over the past year. Yet in spite of this, the region continues with its plans to double the industrial footprint over the next ten years. We do not need another warehouse.

Furthermore, according to Indeed.com, the average salary for a Warehouse Associate in Riverside, CA now is $37,213.[2] (This, of course, assumes that the individual is lucky enough to find steady employment rather than the seasonal, temporary jobs that are characteristic of this industry.) For 2024, the fair market rent for a 1-bedroom apartment at zip code 92508 is $1611 per month,[3] and the median home price is $732,601.[4] To claim that these will be jobs for "local residents" is, at best, naive. At worst, it is intentionally misleading.

Unfortunately, this faulty assumption that local residents will work at the warehouses is used to justify many aspects of this project including an alleged decrease in VMT and

RI-253.5 Cont.

RI-253.6

RI-253.7

[2] Source: https://www.indeed.com/career/warehouse-associate/salaries/Riverside--CA
[3] Source: https://www.rentdata.org/lookup
[4] Source: https://www.zillow.com/home-values/96887/riverside-ca-92508/

consistency with the March JPA General Plan. It is upsetting that a demonstrably false justification continues to be repeated throughout the document in spite of hard evidence to the contrary. Also, if the warehouses supposedly benefit the surrounding residents, why have we gleaned thousands of signatures, sent thousands of emails, and made hours of public comment saying otherwise? The overwhelming majority of local residents do **not** want this land use.

RI-253.7 Cont.

In spite of our well-reasoned and well-supported arguments against using this land for industrial mega-warehouses and near-unanimous opposition, the March JPA consistently refuses to consider proposed alternative uses. During the original Draft EIR, numerous community members submitted alternate plans, yet the REIR does not acknowledge these plans and continues to use its Land Use section to justify its bad project.

RI-253.8

If you truly desired to find the highest and best use of the land to benefit surrounding communities, you would not propose the West Campus Upper Plateau. The community knows that easy money for the developer and member agencies is the only reason to propose this project. To pretend otherwise is dishonest.

RI-253.9

Provide open space amenities to serve the region.

To pat yourselves on the back for providing a conservation easement that you are legally bound to provide (2012 Settlement) is doing the bare minimum with this objective. This land is already beloved by hikers, runners, dog walkers, and mountain bikers currently. This project actually ***diminishes*** the open space amenities available to the community, not only by building on existing open space but by making the space less appealing or usable. Who wants to hike or bike next to sixteen wheelers and boxed buildings?

RI-253.10

Provide an active park consistent with the 2009 Safety Study prepared by March JPA.

This is a Pretend Park. In a TAC meeting late last year, several R-NOW members heard Adam Collier admit that the developer will fund a “park feasibility study” but that the developer has no intention of building this park. Furthermore, he shared that the County has no interest in funding a park and that the City cannot annex the land for over a decade. The JPA has claimed on the REIR that they are providing this part as a community benefit and that this is fulfilling an objective. The reality is that unless something significant changes between now and the next release of the EIR, there will be no park for decades.

Also, as stated in the above objective, you are legally bound to build this park (2003 Settlement). Please stop claiming this as a community benefit to the warehouses. Like the

RI-253.11

conservation easement, you are legally required to provide this feature. You do not, and should not, have to build warehouses to do it.

RI-253.11 Cont.

Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.

It is problematic to list this item as a primary objective. Barton Street and Brown Street are inconsistent with the General Plan Circulation element, as is creating a truck arterial for Cactus Avenue that extends West past Camino del Oro. To amend the General Plan Circulation element requires its own study of environmental impact under CEQA, as it will have a significant impact on traffic flow, as well as potential environmental impacts during construction. Therefore, this is an action that requires a statement of overriding considerations by the March JPA Commission and cannot be a project objective.

RI-253.12

Remove and redevelop a majority of the former munitions storage area of the March AFB.

The munitions bunkers are unique landmarks to the Cold War era in our region in that it is the only Air Force weapons storage area in the state of California. It has a rich history of housing munitions, including nuclear weapons. During the first draft EIR cycle, the City of Riverside wrote a letter recommending the March JPA determine whether these bunkers are eligible to be designated as historic landmarks. This means that these ought to be analyzed under CEQA as a cultural resource, not slated for destruction under your primary objectives. Furthermore, your own Final Reuse Plan and General Plan saw these munitions storage areas as landmarks to be preserved. It is problematic to list the destruction of a significant cultural resource as a primary objective in a CEQA document. As in the objective above, this is an action that requires a statement of overriding considerations by the March JPA Commission.

RI-253.13

Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient, and comfortable.

For the economic reasons listed above, I can safely say that most of the workers to this industrial warehouse will be traveling to the location from outside the surrounding areas. This means that there will be an increase, not a decrease, in vehicle traffic on our roads. As for the pedestrian and bicycle paths, I would hardly call a painted bike lane adjacent to sixteen wheelers barrelling along Cactus Ave. “safe” or “comfortable” to mountain bikers. In its current state, this area is beloved by many local mountain bikers and hikers who oppose this project. Some of them testified to this fact during your January 11, 2023 meeting, including a 13 year old girl who trains on that land with her Woodcrest Christina

RI-253.14

School mountain biking team. The West Campus Upper Plateau project is taking away safe pedestrian walkways and bicycle paths, not adding to them.

Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in Center for Biological Diversity v. Jim Bartel, et al. to preserve open space through establishing a Conservation Easement.
I agree that a land use authority should honor the legal agreements they have already made. I am curious why the 2003 Settlement Agreement is not included as a Primary Objective since its terms have not been fulfilled either.

Since the conservation easement required by the 2012 is being done piecemeal (i.e. a portion of it was designated over a decade ago), the March JPA could rezone and pass the remaining conservation easement required under the Settlement. The only reason it is being lumped into this project is to make the bitter pill easier to swallow. I request that the March JPA consider the remaining conservation easement plan separate from the industrial warehouses.

RI-253.15

In summary, your primary objectives are deficient for this project. I take issue with the existence of two of them, and the Project fails to fulfill any of the others in a meaningful way. Other land uses could also fulfill these objectives, including alternatives that R-NOW submitted during the first circulation of the draft EIR, but thus far, the JPA has refused to consider them.

RI-253.16

Hazards and Hazardous Waste

While I am relieved the JPA finally acknowledged that the munitions bunkers on site may once have housed nuclear weapons, I am disappointed that you waited for community members to call you out on this omission before addressing it. This does not engender trust with the community. Instead of using the EIR process to inform and protect the community, it feels as though you are checking a box for the developer. If you are only willing to admit potential on-site hazards when specifically asked, what else might you be ignoring or hiding?

RI-253.17

The JPA finally acknowledges the concerns that the munitions bunkers may have stored nuclear weapons on site in the REIR with its inclusion of the Cabrera (2006) study. However, the surveys in Cabrera (2006) appear only to have tested surface level radiation in the Weapons Storage Area.

RI-253.18

Unfortunately, in the construction phase of the West Campus Upper Plateau, the plan is to blast bedrock and to dig twenty feet below the surface. Would radiation that seeped deeper into the soil trigger abnormal radiation readings on the surface? Did the study test the entire project site because it only mentions the Weapons Storage Area and does not include a detailed map of the geographic areas tested? Without grid testing of the soil of the entire project site and without testing at the depth of construction, the community will hardly be reassured by an almost-twenty-year-old study that did not anticipate the kind of blasting and soil disruption that this project will bring. I request further testing which includes grid testing at depths of twenty feet. Otherwise, who knows what you will unearth and how this will affect the surrounding community?

RI-253.18 Cont.

I am also perturbed that there has been no analysis of potential hazards coming from blasting bedrock at the site of a natural gas pipeline. This is rolling the dice with peoples' lives and property. Please include mitigation measures that protect the safety of surrounding communities during construction. What kind of explosives will be used and what is the potential risk to the surrounding homes? The munitions bunkers were built to withstand air bombings. The noise and debris of destroying them could potentially damage the health and the property of nearby residents. Please analyze the effects of this planned demolition. The JPA would do well to detail what blasting would entail, including specifying locations, so that they can properly anticipate and mitigate potential hazards.

RI-253.19

Air Quality

I am not an air quality expert, so mostly I defer to my neighbor Dr. Mike McCarthy's comment letter to cover deficiencies in the REIR with respect to air quality. However, recently I have been aware of an air quality hazard that has been on the rise in our area that has not been analyzed in the REIR.

The California Department of Public Health (CDPH) warns residents that infection rates for Valley Fever, a fungus that lives in soil but can infect people when soil is disturbed, have greatly increased in recent years.[5] The fungus infects people when breathed in from soil dug up during construction or by high winds. Symptoms are mostly respiratory although the fungus can spread. The CDPH website states: "Valley fever can be serious and even fatal. Recently in California, there have been more than 1,000 people hospitalized with Valley fever each year, of which about 1 in 10 have died in the hospital."

RI-253.20

[5] Source: https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/ValleyFeverBasics.aspx

According to the CDPH dashboard, there were 349 cases of Valley Fever in Riverside County last year.[6]

RI-253.20 Cont.

I am not sure what testing is available for Valley Fever, but if at all possible, I request the JPA to test the soil for this fungus. In the absence of the ability to test, I ask for mitigation measures that would limit the spread of dust particles in the air when blasting and digging during the construction phase.

RI-253.21

Land Use

The Land Use section analyzes the consistency of the West Campus Upper Plateau project with the March JPA General Plan. Unfortunately, the analysis cherry picks its data. It omits many of the elements of the General Plan for which the project is inconsistent (41 of 108 policies omitted per R-NOW's count) and ignores inconvenient data with policies cited (see examples below). Please do not ignore inconvenient facts. Do not bend your data to claim this project is consistent with your policies and omit details that show it is not. Please provide a detailed justification for why you are omitting policies and data, favoring some over others.

RI-253.22

Below are two examples of policies you cite as consistent by ignoring data that contradicts this finding:

Land Use Goal Policy 1: Land Use Plan provides for a balanced mix of land uses that contribute to the regional setting, and capitalize on the assets of the planning area, while insuring compatibility throughout the planning area and with regional plans.

The reasons for declaring the project consistent with this policy are highly misleading. For example, the explanation says that "development of the Project would occur in a logical pattern of growth through the guidance of a Specific Plan, compatible with adjacent land uses to the east and northeast." It fails to mention that for the north, northwest, west, southwest, south, and southeast it is decidedly incompatible and far from "logical." The project is surrounded by residential homes by more than 305 degrees. How can you ignore the majority of the surrounding area to claim compatibility? The erasure of the surrounding neighborhoods in your justification is a prime example of the ways that your analysis obscures the truth, claiming consistency where there is none.

RI-253.23

Further along in the explanation it says: "As further detailed in Section 4.12, Population and Housing, the Project would maintain the balanced jobs-housing ratio under existing

RI-253.24

[6] Source: https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/ValleyFeverDashboard.aspx

and future conditions of Riverside County, thus, providing an opportunity for residents to work locally, rather than commute to surrounding areas throughout the region."

The idea that this project would bring a "balanced jobs-housing ratio" is laughable. Unemployment is near an all-time low in the region, and our region is in a housing crisis. To use the land for job creation rather than housing is to throw an already jobs-heavy ratio further out of balance. I have already detailed above in my critique of your first primary objective that local residents cannot afford rent or purchase homes in the surrounding area on the salaries paid in these warehouses. To say that this project will provide local jobs is blatantly false and cannot be used as a reasonable justification.

RI-253.24 Cont.

Land Use Goal 2: Locate land uses to minimize land use conflict or creating competing land uses, and achieve maximum land use compatibility while improving or maintaining the desired integrity of the planning area and subregion.

To claim that 4.7 million square feet of industrial warehouses surrounded almost entirely by residential neighborhoods is not a "competing land use" is to ignore simple common sense. A teenager playing SimCity knows that you do not build industrial next to residential. Frankly, the attempted justification is insulting. How can the JPA argue that this is "minimizing land use conflict" when residents will suffer significant and unavoidable air quality and noise impacts by your own estimation? How do you explain away the organized, steady, and near-unanimous protest of this project for two years by its would-be neighbors?

RI-253.25

The explanation under this section is trying to provide justifications for building warehouses based on what is "allowable" under Business Park. How is pushing the boundary of what is allowable based on technical definitions minimizing "land use conflict" or achieving "maximum land use compatibility"? The answer is that it is not. The JPA wants to upzone the area without saying that is what they are doing. Industrial may be "allowable" under Business Park zoning, but why then is there separate Industrial zoning in the General Plan for other areas of the JPA? Industrial uses were not originally intended for the West Campus Upper Plateau, that is why the designation was never given to the area. Industrial warehouses might be the easiest way for the developer and for the JPA to make money, but that does not make it the "maximum land use compatibility" for the surrounding areas.

Let's say my goal is to achieve "maximum health." According to health experts, carbohydrates help fuel metabolism. Since candy is technically a carbohydrate, should I then argue that Jolly Ranchers are consistent with my goal to eat for maximum health? This is the leap of logic your reasoning has made by claiming consistency for this policy.

RI-253.26

Warehouses are the junk food of land use. They are easy and convenient money for developers in the short term, but their long term negative effects are felt by the neighboring communities for decades. They were never intended for the West Campus Upper Plateau and are incompatible with the neighborhoods that surround it on almost every side.

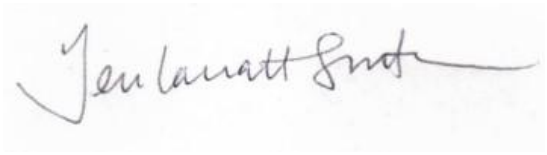
RI-253.26 Cont.

In conclusion, the REIR presents faulty primary objectives, deficient Hazards and Air Quality sections, and erroneous analysis of consistency with its own policy documents.[7] The strained effort to conform a bad project to identified goals and ideas fails to convince. Please consider non-industrial alternatives as the community has asked that you do.

RI-253.27

Thank you for the opportunity to comment.

Sincerely,



Jennifer Larratt-Smith

[7] Please see my separate letter on the deficiencies of the Environmental Justice element for more elaboration on this point.

Jennifer Larratt-Smith, Chair
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Riverside, CA 92508
951-384-1916
jlarrattsmith@gmail.com

Feb 23, 2024

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

Re: Comment for Recirculated Draft Environmental Impact Report (REIR) for the West Campus Upper Plateau, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

In a separate letter commenting on the draft Environmental Justice (EJ) policy being presented by the March Joint Powers Authority (JPA), I shared many concerns about the process by which it is being drafted as well as its vague and irrelevant content. In this comment letter for the recirculated draft Environmental Impact Report (REIR) for the West Campus Upper Plateau, I would like to reiterate many of my concerns in this comment letter because in spite of the JPA's claim that the draft policy is unrelated to this project, the timing and the content of this REIR says otherwise. RI-253.28

Process

Below is a timeline of the release of the EJ policy as well as a draft recirculated Environmental Impact Report (REIR) for the West Campus Upper Plateau.

11/29/23
The EJ element notice was released to at least one of the EJ communities within the March JPA boundary, and a community member sent it to me. The policy had never before been seen or reviewed by anyone in the community. No draft had ever been presented at a Technical Advisory Committee (TAC) meeting or in front of the

Commission. I can only conclude that the entire draft policy was written behind closed doors with Michael Baker International, your paid consultant.

I emailed the CEO of the March JPA to ask why R-NOW was not notified after two years of requesting that the March JPA be more transparent with the community. She claimed in her reply that she was planning to notify other community members the next day.

11/30/23
The JPA sent the notice out to more community members, including me, after being prompted. The email specifically states: "The Environmental Justice Element is NOT a part of the West March Upper Plateau project."

12/1/23
A member of R-NOW spotted the Notice of the Recirculated EIR (REIR) on the JPA website.

12/2/23
A notice of the REIR was released to the public. The REIR quotes the draft EJ policy extensively. It discusses how the project proposal meets its requirements. The public comment for the REIR will close on February 26, 2024, even though the draft EJ will not be finalized until (estimated) the end of the first quarter 2024.

12/19/23
JPA held its first public workshop on the EJ element the week before Christmas. Dan Fairbanks, the Planning Director, publicly acknowledged that they will not be able to implement the EJ element in its entirety given that they are sunsetting in July 2025. He asked the community to help him "prioritize" which of the elements to focus on with a dot poll. He also acknowledged that they don't have any particular staff devoted to the process or implementation of the EJ element at this time. They have hired Michael Baker International to help them draft the policy.

The REIR, released only 2-3 days after the EJ element, extensively quotes the EJ policy to justify how the current project under review adheres to it. It stands to reason that the applicant and their consultants were privy to the draft EJ element long before the community in order to craft this document. Why weren't EJ communities or even the TAC or the Commission involved in the drafting of a policy that is supposed to prioritize "civic engagement"? Why weren't we even notified of the JPA's intention to draft an EJ policy? Why was the March JPA in communication with the developer about the EJ policy before informing the community?

RI-253.28 Cont.

The West Campus Upper Plateau project has been in the planning process for years. To somehow claim that without any changes, it is miraculously consistent with a never-before-seen and brand new draft EJ policy — one in which the community has had zero input —casts doubt upon the entire process. **The timing and the nature of the draft EJ policy's release give the impression that the EJ policy was drafted to justify the existing project proposal. An impression further strengthened when you consider that members of R-NOW mentioned the lack of an EJ element in comment letters during the first release of the draft Environmental Impact Report in early 2023.** Contrary to the CEO's statements, the EJ element is very much a part of the West Campus Upper Plateau and may have driven the JPA's creation of it.

According to California law, Environmental Justice (EJ) includes "at a minimum, the meaningful consideration of recommendations from communities most impacted by pollution into environmental and land use decisions." Gov. Code § 65040.12(e)(2). The choice to run these processes simultaneously gives you only two choices:

- Option 1: Adopt the EJ element as is with no significant changes
  To do this is to concede that this EJ policy was predetermined. If at the end of your public comment process, you make no substantive and significant changes from the initial draft, how can you claim that you "meaningfully considered" community feedback? I request that you do a thorough accounting of what feedback you receive for this EJ element. Discuss which of the comments you substantively incorporated and which you chose not to implement and why.
    -
- Option 2: Meaningfully incorporate community feedback, potentially nullifying the analysis in your recirculated draft EIR
  Your claim that the West Campus Upper Plateau project meets criteria for the draft EJ element has put you in a bind. If you make significant changes to the draft EJ element, your analysis will no longer be viable. You will have to recirculate the draft EIR again so that the community has the opportunity to provide feedback, something we cannot do when the public comment period ends before the EJ element has had a chance to be adopted.

To circulate both draft documents simultaneously as you have done creates the impression that you have pre-determined that your EJ policy will be adopted as is and without community input. I request that the March JPA not proceed with the West Campus Upper Plateau until your EJ element goes through a process that follows the best practices set forth by the Attorney General[1] and is finalized. There is no way to

RI-253.28
Cont.

[1] California Department of Justice's Best Practices for EJ policies: https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf

meaningfully analyze and determine if a proposal meets criteria for a policy that has not followed a proper process and been adopted. And the public cannot meaningfully impact a policy that has been predetermined to be adopted as is.

Let me elaborate on what I mean when I say a "proper process." How does your EJ process and policy address the best practices laid out by the California Department of Justice (DOJ)? Under best practices for community engagement, the Attorney General (AG) recommends forming a community advisory group, partnering with community organizations, and consulting with local tribes. I cannot speak to the tribal consultation, but as the founder and chair of an active community organization, I can attest that JPA has not "partnered" with me. Instead, the CEO flat-out refused to form a community advisory board in early 2023 when approximately forty community members requested it at a public meeting in January. She also accused me of "scaremongering" because members of the community expressed concern about potential cancer risks related to the warehouse project during public comment at that meeting. Sometimes repeated and direct requests for information are left unanswered by the CEO, and some Commission members have refused to meet with us. More recently, the CEO accused me of engaging in "false narratives" when I asked a Commission member to recuse himself of votes regarding warehouses when an Amazon memo leaked that he was a "cultivated asset" for their company. My "false narrative" happened to come from *The Los Angeles Times* who independently verified the information. Unfortunately, rather than partnering, my attempts to engage the JPA have been met with suspicion, even contempt.

RI-253.28 Cont.

Furthermore, it violates a fundamental principle of environmental justice that the March JPA hired Michael Baker International, whose environmental consulting appears to center around industrial warehouses rather than environmental justice,[2] without consulting or even notifying the community of its intention to draft an EJ element. The fact that an outside consultant drafted the policy may explain the inexcusable omission of the Veterans Village as an identified community. While Dan Fairbanks acknowledged Veterans Village as an EJ community on 12/19/23, the policy itself does not. This glaring omission illustrates the problems with hiring outsiders and businesses to draft policies for local communities without consulting them. Outside firms do not know these communities, let alone what community needs may be. This is why EJ best practices involve engaging the community during the drafting of the element.

[2] Michael Baker International is the lead environmental consultant on over ten warehouse projects in southern California, including the I-15 Logistics Center in Fontana and the Southern California Logistics Center 44 in Victorville.

Additionally, the March JPA has not followed through on legal requests made by Attorney Jamie Hall in his letter dated 1/4/2024. In the letter, Mr. Hall compels the March JPA to treat the EJ element as a project subject to CEQA. He states:

> The adoption of a General Plan Element constitutes a "project" under CEQA, triggering the requirement for environmental review. See *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993) 18 Cal. App. 4th 729, 739 (stating that "project" includes "amendments to a local general plan or elements thereof"). As such, the March Joint Powers Authority must conduct an initial study under CEQA before adopting an Environmental Justice Element for its General Plan, and if necessary, prepare an EIR to fully evaluate the potential environmental impacts. This review must be completed before adoption of the Environmental Justice Element.

To date, the community has not seen a Notice of Preparation for the EJ element, so we can only assume that you are ignoring this letter, disregarding an integral part of SB 1000.

In summary, a proper EJ element ought to engage community members *at its drafting* to ensure that it is addressing specific needs of the community. It should apply specifically to the EJ communities identified in its land use area (more on this in the Content section). It should go through a thorough CEQA process, and it should not be used to analyze the appropriateness of existing projects until it is finalized. The current draft EJ element is grossly deficient in all these areas. **And the public cannot meaningfully comment on how a fallacious and unfinalized policy does or does not apply to the environmental impact of a project.**

RI-253.28 Cont.

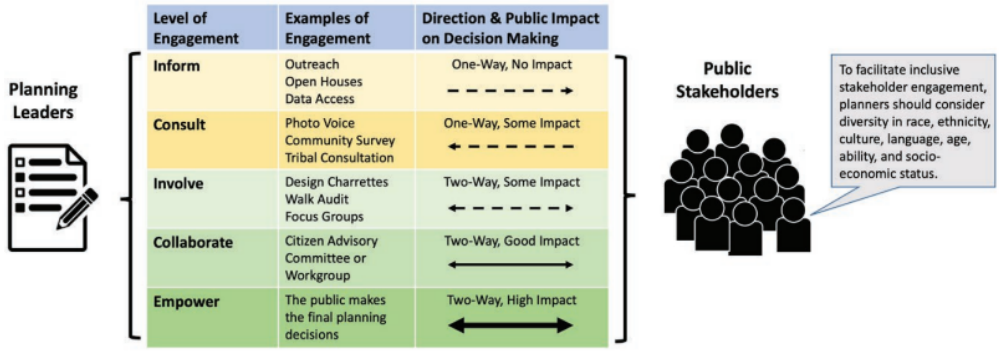
<u>Civic Engagement</u>

According to the Office of Planning and Research (OPR) General Plan Guidelines, "Community engagement is a fundamental part of any general plan update to inform the community vision. It is particularly important with respect to EJ because it allows communities that have often not been included in the planning process to be engaged in the decisions that impact their health and wellbeing."[3]

In the document they also provide a figure showing a spectrum of levels of community engagement:[4]

[3] Quote from p. 34 of the General Plan Guideline,:Chapter 4: Environmental Justice Element: https://opr.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf
[4] Figure 3 from p. 35

Figure 3: Community Engagement Strategies



The JPA held one public workshop during the draft EJ public comment period and plans to hold another five days after comments close. Unfortunately, as I write this letter (2/13/2024), neither the Green Acres Community nor Veterans Village have received notice of the second workshop on 2/20/2024 in spite of at least two emails from community members asking to receive notice. This is the bare minimum of "civic engagement." How can community members engage meaningfully when they don't know where and how to do it?

As one of maybe twenty attendees at the Dec. 19th workshop, I can say that the JPA gleaned little substantive information from the community at their meeting and did the bare minimum (informing). I estimate 20 community members attended the Dec. 19 workshop, including several members from R-NOW. It was sparsely attended in part because the meeting took place the week before Christmas. While there was one member from Green Acres Community and 4-5 members from Westmont Village, the representation from the three EJ communities living in the March JPA catchment area could hardly be called representative. Furthermore, the meeting was structured such that we could not give substantive comments. We could only place a dot by which part of the consultant-drafted policy we hoped the JPA would prioritize before it sunsets in July 2025. Then, we had time to ask questions. Our ability to meaningfully impact the substance of the policy was minimal.

R-NOW spent some time in the three EJ communities identified by the March JPA: Green Acres, Westmont Village, and Veterans Village. We circulated a petition and gathered 168 signatures from these communities. I have sent a pdf attachment to the email where I include this comment letter so that you can review the signatures we gathered from each site.

RI-253.28
Cont.

1) R-NOW knocked on doors one morning at Green Acres Community. This housing complex only has 110 homes according to your website. In less than 2 hours, we gathered 54 signatures of residents who do not want industrial zoning on March JPA land, even though roughly a third of the homeowners were not home to answer the door.
2) A member of Westmont Village informally asked members of the community to sign the petition at various meetings she attended. She did not go door-to-door nor ask seniors in assisted living but still managed to glean approximately 69 signatures in this way.
3) R-NOW went to the Veterans Village during their Friday Pantry Day to talk to residents in line on February 9. We gathered 43 signatures from residents and 2 from employees at this location.

R-NOW conducted our own “dot poll” the last week of January 2024. We gave a menu of options for land usage on the West Campus Upper Plateau, and community members were given three dots to place on the poll. Needless to say, none of the community members thought warehouses were the best use of the West Campus Upper Plateau. We had more community members commenting on our dot poll than the March JPA had on theirs, and I believe it is just as, if not more, valid in its representation of community preferences.

RI-253.28 Cont.

R-NOW is a community group run entirely by volunteers. Yet we were able to engage these EJ communities far more effectively and encourage more participation and consensus than the March JPA. A public agency created to repurpose public land for the good of the community can, and should, do better. I urge the JPA to go into the EJ communities and really listen to what the residents have to say about where they live and the effect of your land use decisions on their lives. The truth will be hard to hear, as your insistence to upzone the majority of your land to industrial warehouses have added to a disproportionate environmental burden to these communities. During my canvassing in Green Acres, I met a veteran of the Air Force who had served 36 years in 80 countries and was sickened by the way the March JPA had surrounded his home with warehouses. These residents deserve better!

At bare minimum, do not dismiss the 168 signatures we have gathered telling you these communities do not want more warehouses. Our signatures represent a significant portion of a relatively small population, and we gathered them after only a couple hours at each site. To claim that projects such as the West Campus Upper Plateau fulfills the requirements of an EJ policy is to completely ignore the purpose of SB 1000 as it adds

to the pollution burden of these communities and is in direct opposition to your most vulnerable residents' stated concerns and desires.

Content

The draft EJ element's content is also sorely lacking. It is clearly cut and pasted from the Riverside County policy as evidenced by the fact that many of these policies cannot be implemented by the March JPA. For instance, how will the JPA "monitor changes to the Salton Sea" even though the Salton Sea is not under their jurisdiction (HC 16.1)? Am I really to believe that with seventeen months left in existence and limited staff, the JPA is going to "cooperate with transit providers… to provide whole grain, low fat, low salt and fresh and cooked vegetable options to these communities" (HC 17.1)? Or that they will "pursue funding" for various EJ needs (HC 16.2 - 16.4) when the JPA has no staff devoted to the EJ element and will likely sunset before any of the funding could be obtained? These are clearly elements copied from the County that do not apply. Why draft a policy knowing full well you will not implement it? What is the point of communities trying to impact a policy when you will only cherry pick which of the policies you choose to follow? Doesn't that defeat the purpose of the policy to begin with?

RI-253.28 Cont.

It is as if the JPA has plagiarized its roommate's history paper and turned it into their English class. The JPA has missed the point of the assignment. If an EJ element is meant to address the unique and specific needs of particular EJ communities, how can we accept a policy that was so clearly drafted for another area and will clearly not be followed?

Moreover, the March JPA has demonstrated in the past two years that they will do the *opposite* of what this policy says. As a clear example, HC 16.23 says "Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments." And yet, in the REIR for the West Campus Upper Plateau, ***the March JPA is currently using the draft EJ policy to justify a giant industrial warehouse project with "significant and unavoidable" air quality impacts*** in an area surrounded by residential homes, a pre-school, and a mega-church.

RI-253.29

It is disingenuous to claim that the project is consistent with HC 16.23 as you do in the REIR. In your own REIR (4.2-31), you state: "Specific Plan operational-source emissions would exceed SCAQMD standards for VOC, NOX, CO, PM10, and PM2.5, and Project impacts would be significant and unavoidable." How can you go on and claim that this project is consistent with HC 16.23 in Table 4.10-1. You are cherry picking

your data and excluding its overall conclusions. This gives the impression that your consultants were hired to put lipstick on a pig. Their task was to decide which data could be tweaked to claim consistency and which could be conveniently ignored.

RI-253.29 Cont.

You are also trying to push through a project in spite of near-unanimous and consistent opposition from the community. HC 15.3 says they will "work with local community-based organizations and environmental justice focus groups to promote civic engagement activities." But R-NOW has submitted thousands of petition signatures, given hours of public comment, and sent thousands of emails, and the JPA refuses to act on any of our requests (e.g. Community Advisory Board, looking into non-industrial alternate plans). We are treated with suspicion, and our communication has always been one way. We are shouting into a void, and it is falling on deaf ears. It is no wonder that your consultants did not analyze this part of the EJ policy for your REIR. You would have been found lacking, and it is clear that they are only highlighting areas for which they feel they can make an, albeit totally unconvincing, argument for consistency.

At your 1/11/2024 JPA meeting, Christina Miller, a resident of your EJ community of Westmont Village, gave public comment pointing out this discrepancy. She noted that you can have a legitimate EJ policy or you can have new warehouses. You cannot realistically have both.

RI-253.30

The EJ policy language gives the impression that you are actively trying to avoid accountability. On page 3, the policy states (emphasis added):

> To be clear, the General Plan is a document consisting of goals and policies. Such goals and policies are **evaluated as a continuum of direction within broad interpretation parameters**…. EJ Policies are evaluated in the same manner as all other General Plan goals and policies - **subject to interpretation with appropriate determinations of compliance.**

This vague language intentionally leaves loopholes the size of million square foot industrial buildings. It means that once a policy is passed, you have no obligation to fulfill any of its requirements and that you can interpret them in any way you see fit. Your "broad interpretation" has already become apparent in the REIR for the West Campus Upper Plateau when you claim that a warehouse project with Amazon-sized mega-warehouses and "significant and unavoidable impact" on air quality fulfills this EJ policy for a Census tract in the 98th percentile of CalEnviroScreen. This language flies in the face of EJ elements and their purpose. A policy is supposed to strengthen

protections of a community and create specific and concrete benchmarks, not obscure goals and timelines to allow for inaction.

To quote from the AG best practices document referred to above:

> V. Characteristics of Effective EJ Elements and Policies
> The best policies share several characteristics—they are complete, specific, concrete, and targeted, and they are binding, use mandatory language, and contain implementation measures….
>
> C Binding Policies with Mandatory Language and Implementation Measures" "The goal of using mandatory language such as "shall" and including implementation measures is to ensure that the policy results in action. Policies cannot be vague. Policies should include clear defined terms. To be binding, policies should include timelines, identify the entity responsible for implementing the policy, and when necessary or applicable identify a funding source….
>
> One approach to ensuring the policies meet the standards is to establish a tracking system. For example, an implementation matrix that identifies each policy, the priority level for each policy and action, a timeframe for implementation, and performance metrics to measure progress toward achieving the goals. Local governments should ensure that community members are also able to track performance and provide input on implementation….
>
> The language used can also indicate whether a policy is clear and binding. Whenever possible, local governments should use action-oriented language such as "implement," "develop," and "shall" and avoid ambiguous language such as "promote," "encourage," "work towards," or "explore opportunities. (p.13-14)

RI-253.30 Cont.

An EJ element is supposed to include specific language and implementation policies, but the current draft has weak and general statements. For example, Policy HC 16.5 reads: "Evaluate the compatibility of unhealthy and polluting land uses being located near sensitive receptors…. Similarly, encourage sensitive receptors, such as housing, schools, hospitals, clinics, and childcare facilities to be located away from uses that pose potential hazards to human health and safety." Verbs like "evaluate" and "encourage" are too vague to actually have an impact because they do not commit the JPA nor the developer to any specific, impactful action. The noncommittal and vague language is what allows your consultants to spin the REIR to say it is consistent with your EJ policy,

Indeed, in your justification, the consultant claims consistency with HC 16.5 because it points to studies done to evaluate potentially harmful effects. But evaluation and encouragement does not actually protect people. For example, I can say that I will "evaluate the likelihood that an anvil will break your skull if dropped on your head" and "encourage domestic abusers to stop hitting their wives," but this will in no way reduce the potential harm. If someone chooses to drop an anvil on your head, I can say, "well, it went according to my calculations" or "it was much worse than I feared," but as i had no responsibility to prevent this from happening and no requirement to pay for your medical bills once it does. I have no motivation to act in your interests, especially if the person dropping the anvil pays my salary. The entire purpose of an EJ element is to take actions to protect your most vulnerable populations. As it is, your vague language allows a few researchers and consultants to make money but does not actually meaningfully impact the populations the policy claims to serve.

RI-253.30 Cont.

I also take issue with your claim in your justification of HC 16.10 that " housing is incompatible with airfield uses adjacent to the planning area." In our call for you to consider non-industrial alternatives, R-NOW has dispelled this false claim for two years. Much of the land where you are building is zoned C2, which is the same zoning of my neighborhood. You *can* build residential as long as it is low density. You may not *want* to build residential because it doesn't make you as much money, but that is not the same as saying it is incompatible. How can it be "incompatible" when the area you are building on is literally surrounded by homes by over 305 degrees?

Your false claim also conveniently allows you to ignore HC 18.12 which states: "Prioritize the development of safe and affordable housing in EJ Communities while at the same time minimizing the displacement of existing residents consistent with the March JPA Housing Element and the County Housing Element, Goal 2, Action 2.1h and as may be amended by the 6th Cycle Housing Element. Affordable housing projects should include various housing types that respond to community priorities and input." You have never considered housing in this land area, despite the fact that R-NOW has proposed this as an alternate land use for two years. It is also the most consistent land preference I heard from vets at the Veterans Village when I was gathering signatures for non-industrial uses. But you have chosen not to "respond to community priorities and input."

RI-253.31

My earlier argument that the JPA cut and pasted the County's document may reveal why the EJ policy includes such vague, non committal statements. The AG wrote a comment letter in 2021 pointing out the same issue for the County policy.[5] In it, the

RI-253.32

[5] AG Comment Letter to County of Riverside per their EJ policy: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/sb1000-letter-riverside-022421.pdf

Attorney General states: “To meet these requirements, an EJ element should include specific and targeted measures that implement the policies in a local government’s EJ element. These implementation measures are essential for ensuring that a government’s environmental justice-related plans translate into actual improvements for disadvantaged communities.” He also states: “ Public participation is a crucial step to developing effective and meaningful EJ policies and implementation measures. As such, the County should present its EJ Implementation Plan to the public now, when community members are already considering and commenting on the EJ Policies. ***The Implementation Plan should include target deadlines for the implementation measures and performance standards to encourage accountability***” (emphasis added). Both of these statements also apply to the March JPA draft EJ element, which is unsurprising since it was copied from the County and would therefore contain all the same problems and errors of its plagiarized source. Do not simply regurgitate a document that did not fulfill its assignment. Seek to do better — include implementation strategies and deadlines in your EJ element and to engage the community as you craft them.

During the December 19, 2023 public meeting, Dan Fairbanks admitted that no staff at the JPA are appointed to implement the EJ element and that the JPA will sunset in July 2025. He also admitted that they do not have the ability nor intention to implement the majority of the policies put forth in the document. This was the stated reason he sought our input to help them “prioritize” with our dot poll. If there is little chance that any policies drafted will be implemented, why draft it in the first place?

RI-253.32 Cont.

It appears as though the JPA is hastily adopting an EJ policy at this final hour as a paper exercise because they feel they are legally obligated.[6] The process by which they have done this and the deficient content of the actual policy reveal that the JPA has no intention of reducing the compounded health risks for, or engaging with, their EJ communities. In other words, the March JPA wants to claim they completed the assignment without actually making meaningful changes.

If the EJ policy is flawed and problematic, and the analysis for the REIR is also flawed and problematic.

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[6] Indeed, the JPA ought to have amended their General Plan with an EJ element long ago. Since SB 1000 went into effect in 2018, the JPA has made five General Plan amendments without an EJ element:

- JPA 18-03 Freeway business center (next to Old 215 and the 215 and the runway)
- JPA 18-19 The small business center on west of Meridian and north of Van Buren
- JPA 18-24 South Campus (100 acres)
- JPA 20-28 Target warehouse (VIP 215)
- JPA 21-03 South Campus (50 acres plus Village West Drive Extension)

In summary, I ask that the JPA

1) rescind the current problematic EJ policy and pursue a policy according to the Attorney General best practice guidelines, which includes establishing a community advisory committee and specific, concrete policies with implementation timelines.

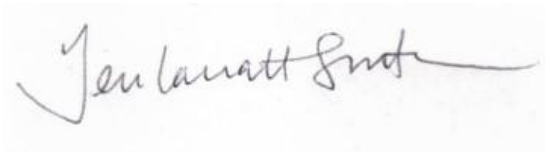
2) hold off on analyzing how the West Campus Upper Plateau does or does not meet its criteria until the policy is finalized.

3) stop cherry picking your data and provide an honest statement of the ways the current project is consistent or not consistent with your policies. To claim that a project that the REIR finds to have “significant and unavoidable” air quality impacts meets criteria for HC 16.23 shows your entire analysis to be a farce.

RI-253.32
Cont.

Thank you for the opportunity to provide comments on the REIR. Please feel free to contact me with any questions.

Sincerely,



Jennifer Larratt-Smith

RI-253

Jen Larratt-Smith
February 23, 2024

RI-253.1 This transmittal email is noted. It does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-253.2 This comment expresses disappointment that the Recirculated Draft EIR did not make substantive alterations to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits, under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections. The comment also includes an introductory statement that outlines the topics that are covered in the commenter's subsequent comments, which are responded to below.

RI-253.3 This comment that introduces the commenter's critique of the Project Objectives that follows and expresses the commenter's opinion regarding the Project is noted. The comment does not raise any specific comments, questions or concerns about the environmental analysis included in the Recirculated EIR sections.

RI-253.4 This comment restates Project Objective, "Provide increased job opportunities for local residents through the provision of employment generating businesses." The comment refers also to the commenter's previously submitted comments on the Draft EIR related to jobs and the logistics industry. The commenter's previously submitted letter is included in this Final EIR as Letter I-790. As such, please see Responses I-790.28 through I-790.35. See also, Topical Response 5 – Jobs.

RI-253.5 This comment quotes from a 2023 SCAG report related to the industrial economy and job growth. The comment states that while the industrial sector is seeing an employment decrease, the region is planning to double the industrial footprint over the next ten years, and states opposition to development of another warehouse. As the industrial market is returning from the supply chain issues realized during the COVID-19 pandemic, current vacancy rates are at a market normal of approximately 5.4% across the Inland Empire market. The market will continue to evolve due to larger nationwide and global geo-political challenges, however, the Project will still be in high demand due to its location and variety of product size and options. In response, please see Topical Response 5 – Jobs for a discussion on local unemployment.

RI-253.6 This comment states the average salary of a warehouse employee in the City of Riverside and states the fair market rent and median home price for the zip code 92508 and disputes that Project jobs would be for "local residents". The comment's sources are job boards and Zillow (or links that go to search engines without specific data) which are not official statements of income or home prices.

According to the California Employment Development Department, for the third quarter of 2023, the average weekly pay in the Transportation and Warehousing sector in Riverside County was $1,076, or $55,952 annually.[4]

Zip code 92508 is comprised of the Orangecrest and Mission Grove neighborhoods, other residential neighborhoods within the City of Riverside, and the March JPA Planning Area west of I-215. Using U.S. Census data,[5] the following table provides the median home price and gross rent (not limited to 1-bedroom apartments) for zip code 92508 and the other zip codes adjacent to March ARB.

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

Regarding jobs for local residents, Topical Response 5 – Jobs, discusses local unemployment rates in the communities surrounding March ARB.

RI-253.7 This comment states the commenter's concern that the EIR assumes that local residents would be employed by the warehouses, specifically with regard to VMT and March JPA General Plan consistency. The VMT analysis in Section 4.15, Transportation, and Appendix N-1 used RIVCOM to estimate VMT as recommended by WRCOG. The RIVCOM model utilizes socio-economic data (e.g., population, households, employment, etc.) instead of land use information for the purposes of vehicle trip estimation. Please refer to Topical Response 5 – Jobs, for discussion of local unemployment in the communities surrounding March ARB. The comment's opposition to warehouse use is noted.

RI-253.8 This comment states the Recirculated EIR sections do not consider proposed alternative use plans submitted by the public. Chapter 6, Alternatives, of the Final EIR considers 5 alternatives, pursuant to CEQA Guidelines (14 CCR 15126.6[a]), including a non-industrial alternative. Please see Topical Response 8 – Alternatives, for a discussion of alternate plans suggested by community members and the evaluation of Alternative 5, Non-Industrial Alternative.

RI-253.9 This commenter's opinion that the Project is not the highest and best use of the project site is noted.

RI-253.10 This comment restates the Project Objective, "Provide open space amenities to serve the region" and notes that the Conservation Easement is required per the 2012 CBD Settlement Agreement. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2,

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

5 https://data.census.gov/

March JPA General Plan Existing and Proposed Land Use Designations. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. In addition to the 445.43-acre Conservation Easement, the Project would also include 17.72 acres of open space for trails and passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. As such, the features of the proposed Project meet the stated Project Objective to provide open space.

RI-253.11 This comment restates the Project Objective, "Provide an active park consistent with the 2009 Safety Study prepared by March JPA." The comment questions whether the Park will be built. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The Landscaping and Lighting Maintenance District will be responsible for the maintenance of the Park once complete. For purposes of the analysis within the EIR, buildout of the Park was evaluated to ensure that Park development is environmentally cleared under CEQA.

RI-253.12 This comment restates the Project Objective, "Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue." The comment questions this objective as inconsistent with the General Plan Transportation Element and suggests a separate CEQA process would be required to amend General Plan. Contrary to the comment's suggestion, CEQA does not preclude project objectives on the basis of requiring environmental review or a statement of overriding considerations. Pursuant to the CEQA Guidelines, the project description in an EIR must include "[a] statement of the objectives sought by the proposed project." (CEQA Guidelines, Section 15124(b)). As stated in CEQA Guidelines Section 15124(b), the project objectives help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings and/or a statement of overriding considerations.

As clearly stated in Recirculated Chapter 3, Project Description, the Project includes a General Plan Amendment, including an amendment to the Transportation Element of the General Plan, which is analyzed as part of the EIR. The proposed General Plan Amendment would update the General Plan to incorporate the following changes:

- Extend Cactus Avenue west to Airman Drive, with a gated emergency vehicle access roadway extending to Barton Street.
- Extend Barton Street from Alessandro Boulevard to Grove Community Drive.
- Extend Brown Street from Alessandro Boulevard to Cactus Avenue.
- Add Arclight Drive, Linebacker Drive, Bunker Hill Drive, and Airman Drive.

With the approval of the General Plan Amendment, the Transportation Element would be amended to allow for these changes to the roadway network. The potential effects of the transportation changes were analyzed as part of the proposed Project in the EIR and consistent with the requirements of CEQA and no other CEQA review is needed.

RI-253.13 This comment restates the Project Objective, "Remove and redevelop a majority of the former munitions storage area of the March AFB." The comment suggests the munition bunkers should be analyzed as cultural resources and their proposed removal should not be a project objective. The comment suggests this action should require a statement of overriding considerations. Contrary to the comment's suggestion, CEQA does not preclude project objectives on the basis of requiring environmental review or a statement of overriding considerations. Rather, the CEQA Guidelines simply require that the project description in an EIR include "[a] statement of the objectives sought by the proposed project." (CEQA Guidelines, Section 15124(b)). As stated in CEQA Guidelines Section 15124(b), the project objectives help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings and/or a statement of overriding considerations.

Section 4.4, Cultural Resources, of the EIR and the Weapons Storage Area (WSA) report (Appendix E-2) erroneously stated the WSA igloos were the only United States Air Force-associated munitions storage igloos in California. Travis Air Force Base includes munitions storage igloos as part of the Travis AFB ADC Readiness National Register Historic District Area. Munitions bunkers are also found at Beale Air Force Base in Marysville and Edwards Air Force Base in Edwards. Further, the WSA igloos are not unique or distinctive examples of munitions storage igloos in California or the local region and are among the most common military-related weapons storage constructions. For example, similar igloos are regionally found at Fallbrook Ammunition Depot, Naval Weapons Station Seal Beach, and Marine Corps Air Station El Toro. Additionally, Concord Naval Weapons Station in San Francisco includes a larger weapons storage area that features various underground and overground bunkers constructed in different periods and styles. Sierra Army Depot in Herlong includes over 800 munitions storage igloos and igloos remain from the closed Benicia Arsenal in Benicia. Section 4.4, Cultural Resources, of the EIR and the WSA report have been revised to accurately describe the state and regional context for the WSA igloos. The WSA and its individual buildings were determined not eligible under NRHP, CRHR, or MJPA CEQA Guidelines criteria for historic resources at the national, state, or local level. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated EIR sections. As such, a statement of overriding considerations would not be required.

RI-253.14 This comment restates the Project Objective, "Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient, and comfortable." The comment suggests vehicle travel would increase as a result of the Project, and bicycle lanes would not be safe modes of transportation. As explained in Section 4.15, Transportation, the Specific Plan Area's proposed roadway network includes Class II (on-street, striped) bike lanes along all roadways, a 10-foot-wide multipurpose trail along the western side of Barton Street fronting the open space and the Park, and recreational trails. Recreational trails would be retained and maintained within the open space areas of the Specific Plan Area. In conjunction with the 5-foot bike lanes on all Specific Plan Area roadways, there would also be 6-foot sidewalks to promote walkability. All these connections within the Specific Plan Area would enhance connectivity to the existing Metrolink Station approximately 1.2-miles to the east on Meridian Parkway and travel to and from recreational amenities within the Project

from other surrounding existing residential developments in close proximity to the Project. Sidewalks and bike lanes would provide direct access to the proposed Specific Plan Area uses.

RI-253.15 This comment restates the Project Objective regarding the CBD Settlement Agreement and questions why the 2003 Settlement Agreement is not considered an objective. As discussed in Topical Response 4 – Project Consistency, the 2003 Settlement Agreement specifically focused on the North Campus and South Campus portions of the March Business Center. The 2003 Settlement Agreement established terms for the buildout of these two campuses within the March Business Center and did not apply to the development of the proposed Project on the West Campus Upper Plateau site. Please see Topical Response 4 – Project Consistency, for an evaluation of the Project's consistency with the terms of the 2003 Settlement Agreement, which is also included as Appendix S-2 of the EIR.

It is noted that the comment requests the Conservation Easement be considered separate from the industrial warehouses. The Project consists of the Specific Plan Area and the Conservation Easement.

RI-253.16 This comment is a summary statement of the previous points made about the Project Objectives and the statement that other land uses could achieve the Project Objectives. This comment summarizes the points addressed in the commenter's preceding comments. As such, please see Responses RI-253.3 through RI-253.15 above.

RI-253.17 This comment discusses generally the munitions bunkers on the Project site and Recirculated Section 4.8, Hazards and Hazardous Materials. As discussed in Recirculated Chapter 2, Introduction, Section 4.8 was recirculated to provide further public disclosure of additional analyses of potential hazards on the Project site. As outlined in Recirculated Section 4.8, Hazards and Hazardous Materials, there have been extensive studies performed on the WSA, none of which identified any radiologically impacted materials or burial pits and concluded that no further action for surface soils or subsurface investigation of burial sites in the WSA is recommended based on historical information and the results of geophysical, radiological, and subsurface investigations (Cabrera 2006). Further, this report was reviewed by the Regional Water Quality Control Board (RWQCB), the relevant oversight agency, which stated "[w]e concur with your finding of no release at the site, and the recommendation for no further action for the Weapons Storage Area." Based on the conclusions of the above-discussed reports, and relevant regulatory agencies, there is no evidence of potential radioactive contamination anywhere within the Specific Plan Area. The fact that this information was included in the Recirculated EIR rather than the Draft EIR does not, as comment asserts, imply that the JPA is "ignoring or hiding" anything, but rather ensuring the public is provided with a full picture of the extensive hazardous materials analyses that have been completed on the Project site since the realignment of March Air Force Base.

RI-253.18 This comment expresses concern regarding potential radiation associated with the Weapons Storage Area beneath the surface at the proposed depths of construction. As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, of the EIR, multiple studies and physical surveys were conducted to evaluate the potential for radiological contamination. Surveys evaluated both surface storage and the potential for subsurface anomalies. Studies were completed and reviewed by private consultants, military agencies, and state and federal regulatory agencies. Findings in each report were consistent and did not find evidence of storage or disposal of biological or chemical weapons, buried anomalies, nor radiological contaminations. Based on this evidence, there is no indication of the potential for surface level or buried radiation. The comment incorrectly asserts that "the surveys in Cabrera (2006) appear only to have tested surface level radiation." As identified in the PA/SI for the

WSA, ground penetrating radar (GPR) recordings "may be thought of as a cross section of the earth to depths of up to approximately 12 feet." (Cabrera, 2006). The two test pits were excavated to approximately 4 feet to further investigate findings from the geophysical surveys. (Cabrera 2006). Moreover, as noted above, the expert agency with jurisdiction over the Project Site, the RWQCB concurred with the "finding of no release at the site, and the recommendation for no further action for the Weapons Storage Area." With respect to comment's concern regarding why only the WSA was studied for the potential for radiological contamination, there is no evidence that weapons of any kind were stored in any other part of the Specific Plan Area. Please see Topical Response 3 - Hazards for further discussion. CEQA does not require speculation. As such, no testing outside the WSA was warranted. Given the foregoing, the Project would not result in a foreseeable upset or accident condition. Further testing is not required.

R-253.19 This comment expresses concern regarding potential hazards associated with blasting in relation to a natural gas pipeline and requests analysis of the effects of the planned demolition as well as mitigation measures that protect the safety of surrounding communities during construction. The gas line is specifically discussed in Recirculated Chapter 3, Project Description: "buildout of the Specific Plan Area would require the relocation of several existing on-site utilities, including a 30-inch gas line, owned and operated by the Southern California Gas Company (SoCal Gas), that traverses the Project site. As part of grading activities for the Specific Plan Area, the alignment of the gas line would be adjusted to be consistent with the grading activities completed at the Project site. SoCal Gas will be responsible for carrying out the pipeline improvements; however, this EIR will provide the environmental review and clearance for SoCal Gas to proceed with the adjustment of the grade of the gas line to the proposed finished grading surface."

The use of explosives is highly regulated under multiple ordinances and codes. Title 19 CCR Division 1 Chapter 10 – Explosives, and HSC 12101 requires permits prior to use of explosives. Use permits require review by the fire department and other overseeing agencies, and plans, as necessary, would be prepared to protect surrounding residences from blast impacts. 19 CCR Chapter 10 also addresses the sale, transportation, storage, use, and handling of explosives in California. Requirements for obtaining permits from the local fire chief having jurisdiction and blasting guidelines (such as blasting times, warning devices, and protection of adjacent structures and utilities) are also explained. Health and Safety Code (HSC) 12101 regulates health and safety related to explosives use, and states "no person shall manufacture, sell, furnish, give away, receive, store, possess, transport, use, or otherwise handle explosives without a permit." As noted in section 4.8.2, Relevant Plans, Policies, and Ordinances, of Recirculated Section 4.8, Hazards and Hazardous Materials, CCR, Title 8, Division 1, Chapter 4, Subchapter 4, Construction Safety Orders, includes rules for demolition, excavation, and explosives work. Further, pursuant to PDF-NOI-2, no blasting shall occur within 1,000 feet of any residence or other sensitive receptor.

With regard to pipelines, California Dig Law (Title 1, Division 5, Chapter 3.1, Article 2, Section 4216) requires the excavator to delineate the area to be excavated so subsurface utilities can be identified and marked. Excavation includes "any operation in which earth, rock, or other material in the ground is moved, removed, or otherwise displaced." Section 51014.6 of the California Government Code does not allow construction or placement of structures or obstructions on pipeline easements other than the pipeline operator, and the State Fire Marshal, Pipeline Safety Division requires pipeline operators to have physical access to allow visual assessment of pipeline conditions at any and all times. Thus, in coordination with the California Dig Law, would require location and protection of subsurface pipelines

prior to all excavation and earth moving activities. Compliance with all applicable laws will ensure impacts related to a foreseeable upset or accident condition in connection with the gas pipelines will be less than significant. No changes to the EIR are required in response to this comment.

RI-253.20 This comment notes the commenter is not an expert. The commenter's general reference to the air quality analysis and discussion related to Valley Fever, citing background information from the California Department of Public Health, is noted. For a response to Valley Fever, please see RI-253.21 below.

RI-253.21 This comment requests that March JPA test the soil for Valley fever if possible and include mitigation to limit the spread of dust particles in the air during Project construction (specifically blasting and digging). Based on analysis by the Centers for Disease Control, the Southern San Joaquin Valley and Central Coast regions have the highest consistent Valley fever (coccidioidomycosis) incidences in California, and the hot, dry climate and environment in these regions is known to be suitable for Coccidioides proliferation; predictive ecological niche modeling has indicated that Coccidioides could expand to other areas[6]. Although increasing case counts in the Southern San Joaquin Valley have contributed most to the overall increases in statewide coccidioidomycosis incidence, these regional analyses indicate that the largest increases in incidence occurred outside the Southern San Joaquin Valley, particularly in the Northern San Joaquin Valley and Southern Coast, and, since 2014, in the Central Coast. During this time, coccidioidomycosis outbreaks were infrequently reported (approximately one or two per year) and would not have affected overall surveillance trends. The most recent data (year 2022) show the County of Riverside reporting a total of 349 cases of Valley fever and an incident rate of 14.3 cases per 100,000 people[7], although CDPH indicates this may be a potentially unreliable rate due to a relative standard error of 23% or more. Statewide, the incident rate of Valley fever was 19.1 cases per 100,000 people. The regions above that are considered endemic for Valley fever have incidence rates above 25 per 100,000 people. As such, Riverside County is not considered endemic to Valley fever. Regardless, measures to reduce emissions of particulate matter during construction will help prevent any Coccidioides spores from becoming airborne. The Project is required to comply with SCAQMD Rule 403 to use best available control measures to reduce visible particulate matter from crossing the property line. Similarly, Policy 9.1 of the March JPA General Plan requires all feasible fugitive dust reduction techniques to be utilized during construction activities. Finally, the Project has incorporated the following mitigation measures to minimize fugitive dust generation during construction activities: MM-AQ-2: minimize areas of active ground disturbance; and MM-AQ-3: restricting grading to acceptable air quality days. Therefore, with Valley fever not being endemic to the County and the inclusion of fugitive dust minimization techniques onsite during construction, the risk of Valley fever exposure is low for the Project.

RI-253.22 This comment states generally that the Land Use analysis does not analyze consistency of the Project with all of the policies of the March JPA General Plan, omits data, and favors some policies over others. As outlined in Threshold LU-1 in Recirculated Section 4.10, Land Use and Planning, evaluation of land use and planning impacts is specifically focused on "conflict with any applicable land use plan, policy or regulation adopted for the purposes of avoiding or mitigating an environmental effect." The analysis in Table 4.10-1 identifies, and includes a consistency evaluation, for each of the applicable General

6 Centers for Disease Control. Regional Analysis of Coccidioidomycosis Incidence — California, 2000–2018. https://www.cdc.gov/mmwr/volumes/69/wr/mm6948a4.htm?s_cid=mm6948a4_e.

7 California Department of Public Health. Valley Fever in California Dashboard. https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/ValleyFeverDashboard.aspx.

Plan goals and policies identified in the EIR sections 4.1 through 4.18. Consistent with the requirements of CEQA, a lead agency must disclose inconsistencies but need not explain consistency with every single policy in a General Plan. Pursuant to the applicable threshold, the relevant policies are those adopted for the purposes of avoiding or mitigating an environmental effect.

RI-253.23 This comment questions the Project's consistency with March JPA General Plan Land Use Goal 1. The comment refers to a portion of the analysis in Table 4.10-1, Project Consistency with March JPA General Plan Goals, in Recirculated Section 4.10, Land Use and Planning, which states that the Project is consistent with Land Use Goal 1 because development of the Project would occur in a logical pattern of growth through the guidance of the proposed Specific Plan, compatible with adjacent land uses to the east and northeast. The comment suggests that the analysis omits the surrounding residential uses. To the contrary, the next sentence in the EIR's analysis of the Project's consistency with Land Use Goal 1, is: "Consistent with the vision of the March JPA General Plan, the Project would develop employment-generating land uses for the Project site's vicinity that is largely residential, such as those to the north, south, and west." Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of the EIR. Further, the Conservation Easement will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses.

RI-253.24 This comment questions the Project's contribution to the balanced jobs-housing ratio and asserts that using the Project site for job creation rather than housing will create greater imbalance. In response to this comment, please see Topical Response 5 -Jobs, for a discussion about the jobs-housing balance. Regarding the potential for constructing residential land uses on the Project site, please see Topical Response 8 – Alternatives.

RI-253.25 This comment questions the Project's consistency with March JPA General Plan Land Use Goal 2. The comment incorrectly identifies the Project land use square footage. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

The comment questions the purpose of the Industrial General Plan land use designation, given that Business Park includes warehousing. The March JPA General Plan divides land use designations into four general classifications: Industry, Commerce, Special, and Public. Business Park is grouped with Industrial under the Industry classification with the following introduction:

> "Two industrial land use designations are established to complement the aviation and employment generating uses. Due to the location of the March JPA Planning Area within the region, available and· planned street access, and availability of rail service to the area, industrial designations in the Land Use Plan include industrial businesses, and research and development companies as well as large scale manufacturing uses. The land use designations include Industrial and Business Park which will allow for both large and small scale businesses, light manufacturing and assembly, storage, warehousing, research and development and related uses."

Uses allowed under General Plan land use designations are not mutually exclusive. The Industrial land use designation under the General Plan does allow for more intensive uses, such as fuel storage and solid/liquid waste facilities. Please note, however, those uses are not permitted under the proposed Specific Plan.

The comment suggests March JPA is pushing the boundaries of what is 'allowable' to justify building warehouses. During the public comment period on the Draft EIR, numerous comments were received alleging the Project site was never intended for development. In Recirculated Section 4.10, Land Use and Planning, March JPA included additional discussion of the planning history for the Project site. Since the March JPA General Plan was first adopted in 1999, the Project site has been designated Business Park, Industrial, and Park/Recreation/Open Space as shown in Figure 3-2. Since the General Plan Business Park definition includes warehousing, Recirculated Section 4.10, Land Use and Planning, explains that warehousing would be a potential land use under the current General Plan land use designations. This provides clarification regarding what could be developed under the current General Plan land use designations.

The comment alleges industrial uses were not originally intended for the Project site. As discussed above, the General Plan groups the Business Park and Industrial land use designations under the Industry classification. The Master EIR for the March JPA General Plan acknowledged that operations and activities within Business Park could include limited industrial. In addition to warehousing, the Business Park definition includes industrial uses such as light manufacturing and research and development centers. This Business Park definition and the designation of the Project site as Business Park, Industrial, and Park/Recreation/Open Space were included in the March JPA General Plan and Master EIR when it was adopted at a noticed public meeting in 1999.

The comment states March JPA is upzoning the Project site without saying so. This is incorrect. Providing the planning history, the current General Plan land use designations, and the potential allowed uses is not upzoning. The current March JPA Development Code expressly identifies 'wholesale, storage and distribution' as allowed uses within the Business Park Zoning District. The March JPA Development Code was originally adopted in June 1997. Two extremely similar land uses are identified in the Development Code: 1) Storage and Distribution, wholesale; and 2) Wholesale, Storage and Distribution. The "standard" Business Park zoning district has allowed for both of these uses in the Business Park Zone, as a permitted use since it was adopted in 1997. Similar to the March JPA General Plan, the Development Code was adopted and amended in publicly noticed meetings. Recirculated Chapter 3, Project Description, outlines exactly how General Plan land use designations are proposed to change:

- Increase Parks, Recreation and Open Space from approximately 122 gross acres to 523.43 gross acres
- Eliminate approximately 622.5 gross acres of Business Park
- Eliminate approximately 63 gross acres of Industrial
- Adopt the Meridian West Upper Plateau Specific Plan (SP-9) on approximately 369.6 gross acres approving a mix of Business Park (65.32 acres), Industrial (143.31 acres), Mixed Use (42.22 acres), Public Facility (2.84 acres), Streets (37.91 acres) and Open Space (78 acres).

The comment questions how the Project minimizes land use conflict or achieves maximum land use compatibility. Under the current General Plan land use designations that were adopted in 1999, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of the EIR. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. Contrary to the comment's assertion, the Project does not propose development adjacent to residential neighborhoods. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses.

The comment argues that the Project's significant and unavoidable air quality and land use impacts are inconsistent with Land Use Goal 2's direction to "minimize land use conflict." As detailed in Recirculated Section 4.2, Air Quality, the Project would exceed the project-level thresholds for regional VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ emissions during operation. However, the EIR also evaluated air quality impacts to sensitive receptors. With mitigation incorporated, the Project would have less than significant impacts under localized significance thresholds, which evaluate potential impacts to sensitive receptors during operation. Further, as mitigated, the Project would not cause a significant human health or cancer risk to adjacent land uses because of Project construction and operational activity. Regarding on-site operational noise, Section 4.11, Noise, determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant. The EIR evaluates a buildout scenario based on the most intensive uses proposed in the Specific Plan to provide the decision makers and public with a full picture of the Project's potential environmental impacts.

The comment suggests the Project is a competing land use with residential. However, this provision of Land Use Goal 2 refers to economic competition. The concept of a competing land use is further identified under Policy 2.3 (under Goal 2), which identifies, "Support land uses that provide a balanced land use pattern of the Planning Area, and discourage land uses that conflict or compete with the services and or plans of adjoining jurisdictions." This policy was intended to discourage March JPA from economic competition with the member jurisdictions, as might occur, for instance, if March JPA approved a major home improvement store in proximity to a site that was planned for such in a member jurisdiction.

The comment also states that neighbors have opposed the Project for the last two years. The comments received during the public review periods have been responded to in this Final EIR.

RI-253.26 This comment's analogy to state opposition to warehouse use is noted.

RI-253.27 This comment is a concluding statement that refers to the commenter's prior comments. As such, please see the responses to comments above. The comment also requests the consideration of non-industrial alternatives. Please see Topical Response 8 – Alternatives, for a discussion of alternate plans suggested by community members and the evaluation of Alternative 5, Non-Industrial Alternative.

RI-253.28 This comment reiterates the commenter's comments on the March JPA Draft Environmental Justice Element, which is not part of the proposed Project. The commenter's comments on the Draft Environmental Justice Element were separately included in the administrative record for the Draft Environmental Justice Element. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area. March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-253.29 This comment disagrees with the EIR's analysis of the Project's consistency with Draft Environmental Justice Element Policy HC 16.23. As stated Recirculated Section 4.10, Land Use and Planning, the Project is consistent with Policy HC 16.23 because it does not propose any agricultural uses that would produce significant quantities of toxic emissions. With regard to industrial uses, MM-AQ-1 through MM-AQ-27 are included to reduce identified air quality impacts. MM-HAZ-2 prohibits facilities located within 0.25 miles of an existing school from storing, handling, or using toxic or highly toxic gases at quantities that exceed threshold levels established by California Health and Safety Code 25532. Incorporation of lot-specific, post-construction low-impact development best management practices, as outlined in MM-HYD-2, would ensure effective control of incidental releases to the environment of pollutants of concern associated with the Project's proposed land uses, such as sediment, oil and grease, nutrients, heavy metals, and certain pesticides. Furthermore, the Health Risk Assessment, included as Appendix C-2 and summarized in Section 4.2, Air Quality, prepared for the Project did not identify any significant health risk impacts associated with Project construction or operation.

RI-253.30 This comment questions compliance with Draft Environmental Justice Element Policy HC 15.3 and public engagement. As explained in footnote 1 of Table 4.10-1 in Recirculated Section 4.10, Land Use and Planning, Policy HC 15.3 does not apply to development projects. March JPA and the applicant conducted multiple public outreach efforts for the Project, including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices.

RI-253.31 This comment disagrees with the EIR's analysis of the Project's consistency with Draft Environmental Justice Element Policy HC 16.10. As stated Recirculated Section 4.10, Land Use and Planning, the Project is consistent with Policy HC 16.10 because the March JPA General Plan limits residential land uses within the March JPA planning area because housing is incompatible with airfield uses adjacent to the planning area. The proposed Project does not include residential land uses. For further evaluation of residential uses, please see Topical Response 8 – Alternatives.

The comment inaccurately states the Project site is zoned C-2. The March JPA General Plan designates the Project site as Business Park, Industrial, and Park/Recreation/Open Space. The Project site has not been assigned a zoning designation per the official March JPA Zoning Map, as shown on Figure 3-3, March JPA Zoning Designations, of the Draft EIR. The comment may be referencing the Project site's

compatibility zone under the March ARB/IPA Airport Land Use Compatibility Plan (ALUCP). Under the ALUCP, the Project site is located within the C1 Primary Approach/Departure Zone and C2 Flight Corridor Zone. The ALUCP provides noise and safety policies governing development of compatible future land uses in areas within the airport influence area.

The comment further questions compliance with Draft Environmental Justice Element Policy HC 18.12. As explained in footnote 1 of Table 4.10-1 in Recirculated Section 4.10, Land Use and Planning, Policy HC 18.12 does not apply to development projects.

RI-253.32 This comment raises concerns about the March JPA Draft Environmental Justice Element, which is not part of the proposed Project. The commenter's comments on the Draft Environmental Justice Element were separately included in the administrative record for the Draft Environmental Justice Element. In response, please see Response RI-253.28, above.

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Friday, February 23, 2024 4:46 PM
To: Dan Fairbanks
Cc: Jennifer Larratt-Smith
Subject: public comment letters on record for SCH 2021110304 Recirculated Draft EIR
Attachments: LandUse_REIR.pdf; PretendPark_REIR.pdf; ProjectDescription_REIR.pdf; unstableRIR_plan_REIR.pdf; AirQuality_REIR.pdf; EnvironmentalJusticeElement_REIR.pdf; Hazards_REIR.pdf

Mr. Fairbanks,

Good Afternoon. I hope your Friday is going well.

Attached please find seven public comment letters on the Recirculated Draft EIR for the West Campus Upper Plateau. RI-254.1

Please confirm your receipt of this email at your earliest opportunity.

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

February 23, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project (the Project). The Project would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. RI-254.2

This comment letter focuses on the Revised and Recirculated descriptions in section 4.10 on Land Use and Planning. This section is recirculated to include a draft Environmental Justice element that has received no input from communities and is neither an adopted policy; as such it is inherently unstable. This section also selectively omitted multiple important goals and policies of the General Plan. These omissions systematically remove key context from the planning process that illustrate the bias towards the developer preferred industrial land-use and away from the community preferred existing land-use identified in the Final Reuse Plan, General Plan, the 2010 Draft General Plan, and the Settlement Agreements constraining land use in the area. RI-254.3

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include: RI-254.4

- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304, recirculated technical appendices C-1, C-2, C-3a, C-3b, J-1, J-2, J-3, J-4, J-5, J-6, T and Appendices A-S, December 27, 2023 (REIR)
- GP 23-02: Draft March JPA Environmental Justice Element - November 29, 2023
- General Plan of the March Joint Powers Authority[1], assumed 1999 date – last updated 3/07/2023 (General Plan, 1999)
- Draft Vision 2030 –General Plan of the March Joint Powers Authority, Draft March 2010
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003
- Joint Powers Agreement forming the March Joint Powers Authority Proposed Amendment #14 – accessed through City of Riverside Agenda 2/28/2023
- Draft EIR Comment letter titled 'PlanningDocs.pdf' dated March 9, 2023 sent by Mike McCarthy in the first EIR comment period.

[1] https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf

- Draft EIR Comment letter titled 'Summary.pdf' dated March 10, 2023 sent by Mike McCarthy in the first EIR comment period.
- Revised West Campus Upper Plateau Specific Plan 6th Screencheck dated July 31, 2023.

RI-254.4 Cont.

Omissions

4.10.1- Existing Conditions

- **Open space** - Open space passive recreation is omitted as an existing land-use, largely because the MJPA does not actually pay attention to the community members who comment on the project. In both verbal and written comment, people have noted how the land is currently used to go for walks, mountain bike, hike, run, and commune with nature. It is being used as described in the 2012 CBD Settlement Agreement – for 'passive' recreation – although I dispute that running, biking, hiking, and walking is passive. Nonetheless, it is important to note that the existing condition of the land is an important open space for both the local and regional community and not merely a storage bin for fireworks.
- **Settlement Agreement Conditions –** Both the 2012 and 2003 Settlement Agreements impose conditions on the Project Site – conservation easement, open space, and the 60 acre park. Please include for completeness of 'existing conditions'.

RI-254.5

4.10.2 – Relevant Plans, Policies and Ordinances

- **City of Riverside GNG and WRCOG GNG –** Residential homes adjacent to the site are in City of Riverside, which has its own GNG policies. Dr. Martin stated to the City Council of Riverside that all City of Riverside GNG would be met or exceeded. Additional, planning director Mr. Fairbanks promised me that the project would be analyzed relative to WRCOG GNG in email correspondence. Please include these policies as promised in written and verbal correspondence to City officials and residents.
- **SB 379 – Climate Adaptation –** The safety element of a general plan must be updated by January 1, 2022 to address climate adaption and resiliency strategies applicable to the city or county. As a joint powers authority, it is not clear if the MJPA has formally adopted these strategies within its planning area or is incorporating one or more of its member agencies polices. Given the direct impacts of the project on climate due to its high truck VMT, it is important to identify whether this is compliant with climate adaptation strategies. Please address as I do not see any MJPA climate adaptation strategies or resilience mentioned in the General Plan.

RI-254.6

RI-254.7

4.10.4 – Impacts Analysis

- **Specific Plan Area and Conservation Easement** – the MJPA voluntarily agreed in 2012 to reduce land use as part of the omitted 2012 Settlement Agreement 'Existing Condition'. Please add how much the land use is reduced relative to the constrained Settlement Agreement 'Existing conditions' in addition to the 1999 General Plan allocation.
- **Table 4.10.1** – large numbers of General Plan policies, and even some goals are omitted. By my count, at least 163 policies and goals are omitted. Most of these omissions appear to be policies that I consider either partially inconsistent or inconsistent. Please explain why they were omitted and provide a comprehensive explanation of why some policies are shown and others are being

RI-254.8

RI-254.9

omitted that encompasses the subjective rules for inclusion/exclusion that were developed for this comparison.

- **LAND USE – 108 goals and policies – 41 were omitted**
  - Omitted policies 1.1 through 1.7 (inconsistent with 1.1, 1.2, 1.3, 1.5, 1.6, and 1.7)
  - Omitted policies 2.1 through 2.4 (inconsistent with 2.1 through 2.4)
  - Omitted policies 4.1 through 4.3 and 4.5 through 4.7 (inconsistent with 4.1 through 4.3, 4.5, 4.6)
  - Omitted policies 5.1 through 5.5 (inconsistent with 5.2, 5.3, 5.4, and 5.6)
  - Omitted policies 6.1, 6.3, 6.5, 6.6 – 6.8) – no inconsistencies
  - Omitted Goal 7 and policies 7.1 – 7.3 and 7.5 - 7.8 – Mostly consistent but indicates that none of the commercial cargo airport effects on air quality, climate, or hazards are included in the cumulative impacts analysis. These are explicit goals of the MJPA and are not analyzed for our community.
  - Omitted policies 8.1, 8.3, and 8.4 – inconsistent with 8.3 and 8.4.
  - Omitted policies 9.1 and 9.3 – The WSA would be a nice addition to the March Air Field Museum and the WSA should be designated a historic district and preserved – Inconsistent with the entire objective of this project.
  - Omitted policy 11.2 – parks are public services which are not funded or provided for under this project – inconsistent.
- **TRANSPORTATION – there are 110 policies and goals – 51 were omitted**
  - Omitted transportation policies 1.1 – 1.9 – inconsistent with 1.3, 1.4, 1.8. Again ignores airport impacts on community from commercial cargo from commulative impacts in 1.9.
  - Omitted transportation policy 2.8 – inconsistent
  - Omitted transportation policy 3.6 – inconsistent
  - Omitted transportation policies 4.1, 4.2, and 4.6 – all inconsistent
  - Omitted transportation policies 5.1, 5.2, 5.3 – all inconsistent especially 5.2 since this project yields 12+ vehicle trips per employee per day. That is ridiculously high
  - Omitted polices 6.3 and 6.5 – policy 6.3 is inconsistent – not sure about 6.5
  - Omitted policies 7.1 through 7.6 – inconsistent with 7.3, 7.5, and 7.6.
  - Omitted policies 8.1 through 8.7, 8.9 and 8.10 – inconsistent with 8.1 and 8.6
  - Omitted policies 9.4 and 9.5 – goods movement VMT associated with the project is extremely high – 12 trips per employee per day. This neither reduces VMT nor meets goals to reduce peak demand.
  - Omitted policies 11.1 – 11.5 – parking for open space and active park not designated or described – inconsistent for 11.1 and 11.4
  - Omitted policies 12.1 – 12.4 and 12.6 – inconsistent with 12.1, 12.2, 12.3, 12.4, and 12.6 – this project is terrible for bikes and pedestrians because it is a mega-warehouse project blocking access to a train station. It is not safe and it is not accessible, and it is not encouraging its use for commute or recreational purposes.

RI-254.9 Cont.

- Omitted policies 13.1- 13.4 – consistent with cargo commercial airport operations which are not analyzed as part of this project.
- Omitted policy 15.2 – inconsistent

- **AIR QUALITY – there are 52 goals and policies – 26 were omitted**
  - Omits Goal 1 and Policies 1.1-1.5 – inconsistent with goal and all policies
  - Omitted policies 2.1-2.3 – inconsistent with 2.2 and 2.3 – project is extremely high VMT (12 trips per day) per employee.
  - Omitted policies 3.1 – 3.5 – Inconsistent with 3.1, 3.2. Again – extremely high VMT and land-use that is unsafe and incompatible with a truck arterial.
  - Omitted policies 4.1-4.5 – Given the speculative nature of the warehouses and tenants the domicile rule may have no impact – many warehouses use independent contractors or domicile fleets in multiple locations. This is inconsistent – no leadership, no R&D, no funds or grants.
  - Omits policies 5.2 – 5.5 – The MJPA is the poster-child for bad transit-oriented development. The catchment area for the train station is an air force base, a freeway, and a bunch of warehouses – useless. All efforts of this agency have degraded and undermined air quality and have had significant and unavoidable impacts. The MJPA is actively undermining air quality through its land-use decisions and harming the local community and delaying the attainment of NAAQS. Inconsistent.
  - Omits policy 6.7 – inconsistent because of the land-use choice, of course. Don't want preschoolers hanging out next to a bunch of warehouses.
  - Omits policy 8.2 – siting of sensitive receptors near toxics!!! Haha – inconsistent.
  - Omits policies 9.2 and 9.4 – not sure about consistency.
- **Other – RESOURCES, SAFETY, HAZARDOUS MATERIALS, CRITICAL FACILITIES, AVIATION FACILITIES, DISASTER MANAGEMENT, and CLIMATE ADAPTATION – mostly included**
  - Omits resources policy 5.3 – consistent?
  - Omits resources policy 7.3 and 7.4 – inconsistent – destroys the March WSA
  - Omits resources policies 10.1 through 10.5 – Inconsistent with 10.1, 10.2, and 10.3– no scenic vistas were considered or preserved as part of this project. Aesthestics of the hilltop will be significantly degraded, as will personal property views, views from Orange Terrace Park, views from remaining open space trails, pretend park, and the Grove Church.
  - Omits safety policies 3.1 – 3.7 – inconsistent with 3.4, 3.6, and 3.7
  - Omits safety policies 4.2, 4.3, 4.5-4.7 – probably consistent
  - Omits hazardous materials policies 5.2, 5.3 – 5.6 – Inconsistent with 5.3 (explosives for blasting in an unexploded ordnance area) and 5.4 – no restrictions on hazardous materials at industrial sites
  - omits critical facilities policies 6.1-6.4 but probably consistent
  - omits aviation facilities policies 7.1, 7.3, and 7.4 – probably consistent
  - Omits disaster management policies 8.3, 8.4, 8.7-8.11 – Inconsistent with 8.9 and 8.10 for the local planning area
  - Climate Adaptation required as part of General Plan as of January 1, 2022 – Omitted because General Plan not updated - Inconsistent

RI-254.9 Cont.

- **DRAFT ENVIRONMENTAL JUSTICE ELEMENT – 77 draft policies – omits 45 individual policies and multiple goals.**
  - Omits *Civic Engagement goal* and draft policies HC 15.1 – HC 15.7 – Emphatically inconsistent in both the crafting of the EJ element and the actual project community engagement.
  - Omits Pollution Exposure polices HC 16.2, 16.3, 16.5, 16.7-16.9, 16.11 – 16.13, 16.17, 16.19 – 16.21, and 16.26 – Inconsistent with 16.3, 16.4, 16.5, 16.8, 16.9, 16.11-13, 16.19, and 16.20
  - Omits Food Access Policies 17.1, 17.4 – inconsistent
  - Omits Safe and Sanitary Home Policies – 18.1-18.6 – no water policies for dealing with PFAS/PFOS contamination from March AFB – inconsistent
  - Omits Physical Activity Policies 19.1, 19.3-19.5, 19.8, and 19.9 – Inconsistent
  - Omits Public Facilities Policies 20.3, 20.5-20.9 – inconsistent for 20.3, 20.5, 20.7, and 20.8
  - Omits *Other EJ related goal* and policies 22.1-22.5 – Inconsistent with 22.1 (no climate action plan consistency check), 22.3 (community solar), 22.4 (community outreach), and
    - 22.5 – New Specific Plans or existing specific plans that include a substantial revision that are within 'disadvantaged communities' as identified by CalEPA should address Environmental Justice goals and include appropriate policies similar to this section – Specific Plan July 31, 2023[2] revision doesn't include any mention of environmental justice at all. Inconsistent.

RI-254.9 Cont.

- **Good Neighbor Policy Consistency Check –** as noted earlier, March JPA staff promised in writing and in formal public comment to 'meet or exceed' GNG for City of Riverside and evaluate the project with respect to WRCOG GNGs. However, the MJPA Table 4.10-2 only considers the County of Riverside GNGs despite these public assurances. Please uphold the promised commitments for the CEQA document to evaluate all relevant GNGs for the project – as this project is affecting City of Riverside homes and the 2012 CBD Settlement agreement specifically claimed all projects met WRCOG guidelines.

RI-254.10

4.10.7 – Cumulative Effects

The proposed project omits reasonable cumulative effects analysis on both local and regional scales for air quality, jobs, land-use mix, and its analysis of the Specific Plan within an Environmental Justice policy context. It is a significant and unavoidable impact. It claims that the proposed project would be 'generally consistent with the goals and policies in the General Plan and draft Environmental Justice Element'. This is false. The census tract is in the 99.8th percentile of warehouse density in all of Southern California – this project will exacerbate and add more disproportional impacts to any area already highly impacted by warehouses. The project is completely inconsistent and no mitigation measures proposed can reduce its impacts on communities already suffering from the callous and harmful development policies of the March Joint Powers Authority.

RI-254.11

[2] https://marchjpa.com/wp-content/uploads/2023/08/WCUP-SP-6th-Draft-Clean-2023-07-31v2.pdf

Moreover, the proposed project cumulative land-use effects analysis on the Camino del Sol neighborhood, which will be surrounded on three sides by industrial land-use. Every project undergoing CEQA review is required to assess the surrounding land-uses – if multiple land-uses surrounding an existing land-use are inconsistent (e.g., three industrial land-uses surrounding residential) it is more likely that the central land-use will be converted for consistency. Thus, the Camino del Sol neighborhood is likely to be targeted by predatory real estate developers looking to buy up homes, tear them down, and convert the south side of Alessandro to more industrial land-use for consistency purposes. RI-254.12

Conversely, the proposed project is inconsistent with adjacent land-use on more than three sides, thus causing more harm than a project which is only inconsistent on one side. Given the proposed upzoning of the land-use from Business Park and open space to Industrial Park and open space, this project is especially egregious from a consistency standpoint. This project is a keystone project that surrounds homes on three sides and thus the inconsistency is at a tipping point – allowing industrial here sets for the stage for residential rezoning to industrial and is incompatible with the housing crisis policies, RHNA, and a host of other policies. RI-254.13

The assertion that the PDFs and Mitigation Measures will reduce air quality, hazardous, fire, and traffic effects to less than significant is completely false. It is merely paper exercise – no actual non-industrial alternatives have been considered because the entire project has been pre-decisional in nature throughout. March JPA has abdicated its responsibility to consider less impactful non-industrial development alternatives. RI-254.14 RI-254.15

Errors

4.10.1- Existing Conditions

- **Surrounding land use** - The directions of the Project Site (not Specific Plan area – please include the entirety of the project) relative to residential use is inaccurate. The project site is also east of residential (e.g., along Clover Creek Rd, Bakal Dr, and Golden Poppy Rd). Only a tiny arc (~30 degrees) of the Specific Plan Area doesn't have residential in a direct line from the internal industrial portions of the project. RI-254.16
- **School distances** - Distances to each of the schools and sensitive receptors in Section 4.10.1 is based on the 'Specific Plan Area' rather than the Project area. We note that is inconsistent with the construction boundaries and the shorter distances to construction area is the correct distance for considering the entirety of the Project as a single action. For example, the Grove preschool is ~440 feet from Barton Rd where construction will occur, and its sports field is less than 200 feet from Barton Rd. Also excludes after-school daycare at Orange Terrace Park which will be affected by construction emissions on Grove Community Dr. RI-254.17 RI-254.18

4.10.2- Relevant Plans, Policies and Ordinances

- **General Plan** – The General Plan designates business park as a separate land use than industrial – this project is an industrial park with more than 50% of the developable land in the industrial land-use which is inconsistent with business park designation – a business park zoned warehouse is not the same land-use as an industrial zoned warehouse under the General Plan or Specific Plan for this project and the planners at the March JPA should not conflate these two categories as a consistent land-use. RI-254.19

- **Transportation Plan** – JPA #21-02 states in writing that it 'the Commission adopted Ordinance # JPA 17-06…implementing the objectives of the "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities" distributed and promoted by the Western Riverside Council of Governments.' The WRCOG GNGs are not implemented or evaluated in this project – especially as it relates to the 1,000 foot setbacks for warehouses recommended in policy 1 of that document – 1,000 foot setbacks were applied piecemeal to individual industrial parcels for the project but not for the entirety of the 4.7M SQ FT of warehouses allowed by the project as required by CEQA.
- **Draft EJ Element** – This is not an existing condition or policy – please remove. This policy has not been adopted, reviewed by the March JPA commission, or commented on by community members. It is not an 'existing condition' for land use.

RI-254.20

RI-254.21

4.10.3 – Thresholds of Significance

- **LU2 – '**Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.' Given that the March JPA is a joint powers authority – it is possible to interpret this as stating that any of the individual member agencies have jurisdiction. Specifically the City and County have jurisdiction due to adjacent land-uses and voting rights. Moreover, the County of Riverside is likely the correct lead agency since it will carry out the project due to the sunsetting of the MJPA in 2025 – yet the project has not been vetted for consistency with County of Riverside policies. Please revise the impacts analysis or address the lead agency and jurisdiction issues.

RI-254.22

RI-254.23

4.10.4 – Impacts Analysis

I dispute the findings of consistency in Table 4.10-1 for a wide range of these issues as mentioned in previous EIR letters. Additionally, the definitions of consistency are 'conformity, accuracy in the application of something' – in this case the goals and policies of the General Plan. No definition or criteria are provided for evaluating of 'consistency' or 'partial consistency' and literally zero policies or goals are found to be 'inconsistent' in Table 4.10-1. Given the 150+ policies evaluated and 150+ policies omitted– that seems extremely improbable for such a large project.

It is my opinion that there are one hundred plus policies that are 'inconsistent' or 'mostly inconsistent' with the General Plan and draft EJ element policies. I summarize the inconsistent goals and policies – full descriptions are available in the cited documents

RI-254.24

Inconsistent or Mostly Inconsistent Land Use Goals and Policies:

- Goal 1: Balanced mix of land-uses while insuring compatibility throughout the planning area and with regional plans
    - 1.3 – Provide for patterns of land-use which can be supported by public facilities and infrastructure improvements that will preserve the MJPA fiscal capacity
    - 1.7 – Develop active and passive open space areas that offer community recreational opportunities and open land for public enjoyment.
- Goal 2: Locate land-uses to minimize land use conflict or competing land uses
    - 2.2 – Encourage facility reuse and land uses to conforming land uses

- 2.3 – Support balanced land use patterns and discourage land uses that conflict with adjacent jurisdictions
- 2.4 - Protect the interests of and existing commitments to residents, property owners, and local jurisdictions in planning land uses.

- Goal 3: Manage growth to avoid adverse environmental and fiscal effects
  - 3.3 – Use finance mechanisms to assure new development constructs public facilities
  - 3.4 – Assess fiscal impacts of proposed developments to determine actual costs of providing services.
  - 3.5 – Permit development of service facilities ancillary to primary development (i.e., childcare, food service)
- Goal 4: Develop and foster quality development within the Planning Area
  - 4.1 – Develop and maintain a land use plan which proposes compatible land uses to create distinct, identifiable *historic*, commercial, industrial, public, and aviation areas.
  - 4.2 – Enhance and preserve natural and man-made features for distinct geographic portions of the planning area.
  - 4.3 – Maintain character of existing development having desirable image and design characteristics, such as *historic significance, pedestrian scale and orientation…*
  - 4.5 – Encourage development that creates a sense of place through a cohesive and well-balanced environment and setting.
  - 4.7 – create a balanced business community to serve the work force, commerce, and industry of the region.
- 5.3 – support development of educational and specialized facilities that train persons for new and improved employment opportunities
- Goal 8: Preserve natural beauty, enhance environmental resources, and scenic vistas
  - 8.2 – Sensitive biological resources, cultural resources, view shed areas shall be protected where practical
- Goal 9 : Preserve the integrity of historic and cultural resources and provide for their enhancement
- Goal 10: Avoid undue burdening of public facilities and services by requiring new development to contribute to improvement
  - 10.1 – Fair share costs
  - 10.2 – Locate commercial and industrial development in areas where right-of-way are available and sufficient infrastructure and public services.
- Goal 11 – Plan for location of convenient and adequate public services
  - 11.1 – Preserve appropriate and adequate sites for public facilities
- Goal 12 – Plan and provide adequate infrastructure, including planning, financing, and implementation
  - 12.2 – Require new construction to pay its 'fair share' – including fee assessment districts or other financing mechanisms
- 17.7 – Seek to preserve drainage courses in their natural condition

RI-254.24
Cont.

Business Park Uses are not consistent with an allowed Use in this Case

In multiple areas of the revised document, the March JPA make a new assertion about the existing Business Park General Plan land use being consistent with the proposed Specific Plan industrial park use. Specifically, here is the new text:

'Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space (Figure 3-2). The March JPA General Plan includes warehousing in the definition of Business Park uses (March JPA 1999a). Moreover, wholesale, storage, and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code (March JPA 2016). Thus, the Project designates more land for non-development uses and does not introduce new designated uses.'

RI-254.25

As the MJPA is aware, the General Plan land use designation is not the sole constraining existing condition on the project. The 2012 CBD Settlement Agreement set aside 445 acres for conservation easement which the MJPA and Meridian West LLC are required to implement by 2027 – regardless of this project being development. Therefore, the General Plan alone is not the existing constraint on the development of this area – it is the binding 2012 CBD Settlement Agreement which allows 304 developable acres on the upper campus and requires 445.4 acres of conservation easement.

The Project is developing 292 acres out of the 304 allowed by the 2012 Settlement Agreement – or 96% of the available space as constrained by the existing obligation the March JPA and developer have entered. To state that only 45% of the Project site is proposed for development is deceptive and misleading.

Secondly, the project significantly upzones the intensity of the development in two ways relative to the General Plan.

1. The General Plan acreage for industrial zoning in the Upper Campus is 47.2 acres all located east of Brown St. The Project increases that to 143.3 acres and moves it closer to residential areas. Industrial land-uses are more intense and larger than business park uses as seen by Table 3-2 in the REIR; high-cube warehouses are not allowed in the Business Park category.

RI-254.26

2. The General Plan acreage allowed for 649.8 acres of business park adjacent to residential zoning. However, due to the Good Neighbor Guidelines (County, City, and WRCOG) – much of that zoning would not be allowed to be warehouses. Restricting warehouse development within 300 feet of homes per County guidelines, or 800 feet of homes per City of Riverside guidelines would drastically reduce the 649.8 acres to a maximum of 429 acres or 212 acres respectively, as shown in **Figure 1**. Figure 1 – left - shows the County 300 foot setback and Figure 1 – right - shows the 800 foot setback based on the original General Plan Business Park designation with the original Park/Recreation/Open Space area around the March WSA. This does not include the required 60 acres of active park.

RI-254.27

3. The project plans to develop 95+ of available developable acreage as warehouses. In the original business park planning, the intent was to do an actual business park with offices and other non-heavy-duty truck uses. See the PlanningDocs.pdf letter from March 9th 2023 EIR letter which documents how there is no history of proposed industrial or even warehouse use.

RI-254.28

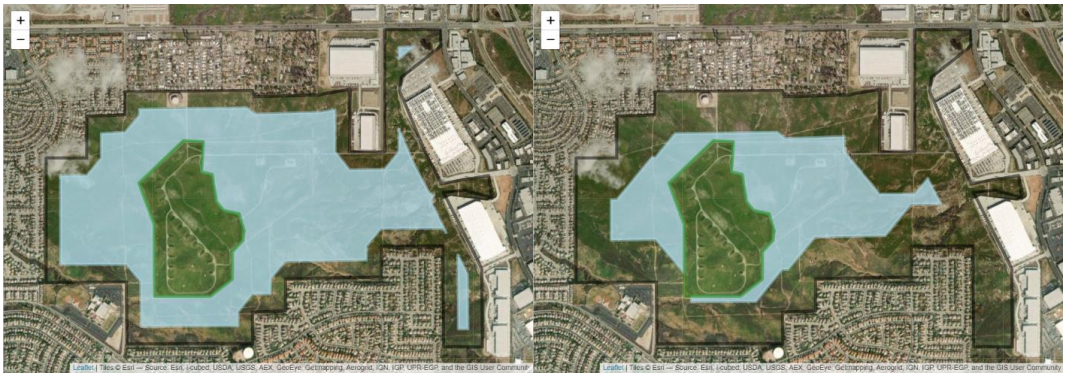


Figure 1. March JPA General Plan Business Park zoning allowed for warehouse use under (left) County 300 foot Good Neighbor Guidelines and (right) City 800 foot Good Neighbor Guidelines.

RI-254.29

As a result of the additional restrictions – the developable land for warehouse land uses is almost 25% higher than the City guidelines would allow. Moreover, industrial land use allows significantly larger building sizes and more environmentally damaging uses than the proposed business park land use does. The land swap is not better than what the General Plan would allow when combined with the City of Riverside Good Neighbor Guidelines the CEO of the MJPA has promised to meet or exceed.

RI-254.30

Summary

The land use section of the REIR is a hodgepodge of *post hoc* rationalizations that the clearly incompatible project is, in fact, the inevitable and preordained project considered since the Final Reuse Plan and General Plan. The March JPA staff are presenting a misleading, inaccurate, and inconsistent vision of the area which does not reflect any of the planning documents guiding the buildout of this area. The warehouses are an incompatible land-use. They are surrounded on more than three sides by residential homes. The proposed road network shows it is an incompatible land-use because it restricts access of residents to the freeway and and access of trucks to the community. As mentioned in the Governor's Office of Planning and Research CEQA guidance document,

> *'CEQA should not just be a post hoc rationalization of decisions that have already been made.' (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal. 3d 376, 395).*[3]

RI-254.31

Does the MJPA lack the integrity of planning to recognize that the significant environmental problems this proposed project will cause merit change? All indications to date show that this is the case.

Our community has told the MJPA that this isn't even a SimCity level of planning sophistication. Going through the 300+ policies and rationalizing them as consistent is merely gaslighting and mansplaining in a manipulative way. It is obvious that the community does not want this land-use – but the MJPA is intent on ramming it through over widespread opposition.

RI-254.32

At the very least, identify why land-use policies are chosen for display in your table, identify your rubric for 'consistent', 'partially consistent', and the theoretical but never mentioned 'inconsistent' in the

RI-254.33

[3] https://opr.ca.gov/docs/OPR_C10_final.pdf

magical land-use section where a significant and overriding impact is somehow still consistent with the General Plan.

RI-254.33
Cont.

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses
92508

February 23, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project (the Project). The Project would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed pretend park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. RI-254.34

This comment letter focuses on the pretend proposed park and the multiple ways the project REIR (and EIR before it) claim the benefits of the park for the community while omitting the lack of funding, schedule, and timeline for creating an active recreation park. In this letter, I will focus on four areas, including: RI-254.35

- The omission of the CAREE/CCAEJ 2003 Settlement agreement mandating a park as part of the development of the March Business Center (1,290 acres – not including the West Campus Upper Plateau).
- MJPA meeting minutes and presentations showing that there is no plan to build an active recreation park in MJPA documents.
- The MJPA lack of a fund or funding stream to build and maintain a 48-acre park as part of the project or other MJPA funding streams.
- The multiple claims that the active recreation park meets consistency with various MJPA policy goals – despite the lack of intention to provide an active recreation park in this project

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include: RI-254.36

- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304, recirculated technical appendices C-1, C-2, C-3a, C-3b, J-1, J-2, J-3, J-4, J-5, J-6, T and Appendices A-S, December 27, 2023 (REIR)
- GP 23-02: Draft March JPA Environmental Justice Element - November 29, 2023
- General Plan of the March Joint Powers Authority[1], assumed 1999 date – last updated 3/07/2023 (General Plan, 1999)
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003

[1] https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf

- Joint Powers Agreement forming the March Joint Powers Authority Proposed Amendment #14 – accessed through City of Riverside Agenda 2/28/2023
- Revised West Campus Upper Plateau Specific Plan 6th Screencheck dated July 31, 2023
- March JPA Parks Subcommittee meeting minutes dated May 9, 2022
- March JPA Technical Advisory Committee meeting presentation and video/audio from August 7, 2023 agenda item 6b.

RI-254.36 Cont.

All comments on the described 60.28 park (with Active and Passive uses) described in the REIR throughout the document will hereafter be referred to as the 'pretend park'.

RI-254.37

Omission of the 2003 CAREE/CCAEJ Settlement Agreement

In September 2003, the March JPA, Riverside LNR, Community Alliance for Riverside's Economy & Environment (CAREE) and Center for Community Action and Environmental Justice (CCAEJ) entered into a settlement agreement. CAREE and CCAEJ alleged violations of CEQA by March JPA in granting the approvals for the 1,290 acre March Business Center in GP 02-01 (identified below in **Figure 1** – North and South Campus). Multiple provisions were required components of the Settlement Agreement, including reductions in truck emissions, alternate fuels use, land use provisions, truck routes, and provision of public amenities. Specifically:

> *2.3 Assure attractive development and views from Orangecrest*
>
> *2.6.1 March JPA shall provide for active recreation in the form of a community park. The park is to consist of 48-acres initially with potential expansion to 60-acres.*
>
> *2.6.2 Specific use of the Park shall be for softball, soccer, or football field for youth or adult recreation or other appropriate uses as determined through a parks feasibility study.*
>
> *2.6.3 MJPA and LNR to provide a site for Riverside County Fire Station*
>
> *2.6.4 MJPA and LNR to provide site for City of Riverside Police Station.*

RI-254.38

As of January 2024, the promised park has not broken ground and no fees have been collected for funding the park despite the 1,290 acre March Business Center being almost fully built out, entitled, and/or under construction as shown in the **Figure 2** aerial imagery with warehouse overlays in the Warehouse CITY open data product v1.17[2].

Finally, I note that Section 5.11 of the Settlement Agreement states explicitly that 'This Agreement may be amended only by written agreement signed by all of the parties hereto.' CAREE executive director Catherine Barrett-Fisher and CCAEJ executive director Ana Gonzalez have not been contacted by the MJPA and/or Meridian West LLC representatives to amend the 2003 Settlement Agreement.

[2] https://radicalresearch.shinyapps.io/WarehouseCITY/

Figure 1. March Business Center Specific Plan areas included in 2003 CAREE/CCAEJ Settlement Agreement. Slide from August 8, 2023 TAC committee meeting materials (not posted on March JPA meetings as of December 30, 2023).

RI-254.39

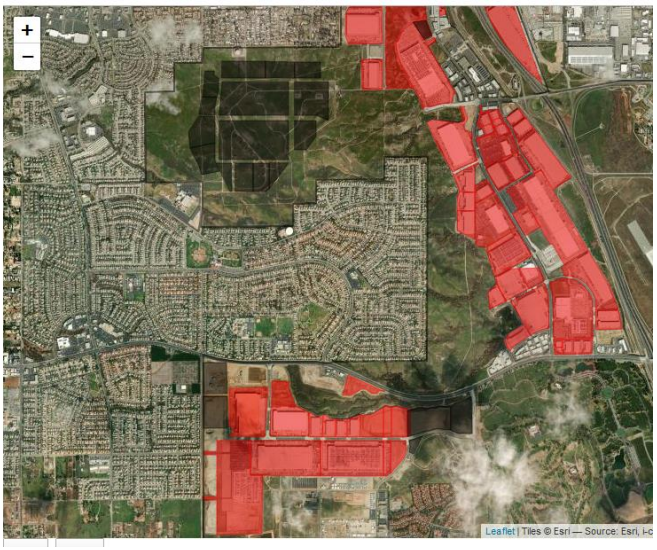


Figure 2. Aerial imagery of March Business Center warehouses – existing warehouses are outlined in red, planned, and approved warehouses are outlined in black. The location of the Grove Warehouses is also shown relative to the surrounding residential communities. Image from Warehouse CITY v1.17.

RI-254.40

The omission of the 2003 CAREE/CCAEJ Settlement Agreement is confusing since it is clearly a constraint affecting the Project. The pretend park and fire station are described in the Development Agreement (p.3-24 of REIR), but their origin from the settlement agreement is omitted purposefully. The Pretend Park is listed as a specific 'community benefit' for the current project even though it is a settlement agreement requirement agreed upon for a different section of the March JPA planning area (and apparently included in a separate EIR). In contrast, the 2012 CBD Settlement Agreement is listed and

RI-254.41

discussed at length in the Project Description as a constraint on development boundaries and is included as Appendix S in the draft EIR.

RI-254.41 Cont.

MJPA and Meridian West LLC do not Intend to Build a Park

March JPA park subcommittee meeting minutes from May 2022 (the most recent subcommittee meeting), Technical Advisory Committee verbal statements from August 2023, and the development agreement in the REIR clearly indicate that the MJPA and master developer did not consider actually building a 48-acre active park.

RI-254.42

The Park Subcommittee minutes[3] lay out the history of the Regional Park over the last 27 years. My bulletized version:

- The 1996 MJPA redevelopment plan incorporated planned funding for up to $21,000,000 for Parks and Recreation Facilities for a "New Regional Park" (p.7).
- The 1999 General Plan map planned for a 200 acre regional park south of Van Buren and a 122 acre open space area for the March WSA (p.8)
- The 2003 Settlement Agreement with CAREE/CCAEJ reduced the 200 acre regional park to a 48 to 60-acre regional park for active recreational sports (p.9)
- A 2011 Safety study recommended the regional park site be in the West Campus for safety reasons (p.9)
- The 2012 CBD Settlement Agreement agreed on a 60 acre net park area on the West Campus west of the proposed Barton Drive cut-through (p.10)
- In 2016-17 the MJPA commission hired a consultant (Willdan Financial Services) to prepare a parks development impact fee (DIF) study but the study was 'not completed, and development impact funds have not been collected for the community park.' (p.10)
- In 2022 the Grove Warehouses project was proposed and the master developer identified two options 'regarding their participation in the planned 60-acre park' (p.11)
    - Grade a 10-acre improved park and leave the other 50 acres ungraded – (as shown in the original Initial Study site plan for the Project)
    - Grade the 60-acres, stub utilities, and pay $500,000 for the MJPA for use by the 'assuming jurisdiction' (as shown in current maps for the Project in the REIR).
- The City of Riverside provided comments on the proposed application, including (p.14)
    - using the State Park's Department Guide *pursue community input*
    - provide conceptual plans for the park
    - if the park is to become City of Riverside property, comply with City standards
    - provide a fuel management plan

RI-254.43

In personal conversation with Alisa Sramala at the City of Riverside in Fall of 2023, I was told that no further conversations with MJPA staff had happened since the parks division comment on the draft EIR in March 2023. However, the City and County Parks teams met with MJPA staff in December 2023 and January 2024 to discuss the park and proposed land transfer. An email request for any minutes was met with a comment from the CEO of the March JPA that the meetings were 'informal' and 'no minutes were kept'.

RI-254.44

[3] https://marchjpa.com/wp-content/uploads/2022/09/050922-Parks-Subcommittee-Meeting.pdf

In an August 8, 2023 Technical Advisory Committee meeting, the master developer's project lead (Adam Collier) made verbal comments that the decision had been made to grade 60 acres and provide $3.5M in funding for a park feasibility study. The park would not be completed because the County of Riverside has no interest in overseeing a community park – the county runs regional parks. The City of Riverside cannot annex the land until 2041 without significant financial penalties. Thus, no park until at least 2041.

These comments are in writing in the REIR under the development agreement section (p. 3-24), stating that '*The Community Benefits include the following*:

> *Park: Grading of a minimum of 60 acres of the Park site, funding and preparation of a Park Feasibility Study, and construction of Park improvements up to $3,500,000.'*

The current Specific Plan posted on the project website includes the following description identifying this same plan, p.2-8, dated July 2023:

> *An Open Space area approximately 60 acres in size will be located in the western segment of the Specific Plan Area, west of and adjacent to Barton Street. This area will be designated for hiking trails and other active uses. The 60-acre active use park site will be graded with utilities stubbed at the border. A conceptual park design is provided in Figure 2-4, Conceptual 60-Acre Park Design.*
>
> *The park will provide both active and passive recreation amenities, however, the final design and amenities will be based on a Parks Feasibility Study.*

RI-254.45

In summary, the MJPA and Master Developer appear to have committed to grade and stub a 60-acre parcel and fund a 'Parks Feasibility Study'. And according to Google, a parks feasibility study purpose is to '*determine the overall viability of a facility, park, or service area, from a financial, competitive, and utilization perspective. It represents a decision-making tool to determine the return on investment in the allocation of financial resources.*'

There is a need for active recreational parks in our community – football leagues are going bankrupt paying for fields and the city of Riverside AYSO soccer fields are now a site for more warehouses. The region needs active sports fields.

Funding for a 48-acre Park

As noted in the previous section, the 1996 redevelopment plan included $21,000,000 in funding for a regional park, which is a current value of $41,150,000 when accounting for inflation[4]. The parks subcommittee also started considering a parks development impact fee but ended up not completing a study or actually collecting any fees when entitling and approving the March Business Center South Campus.

RI-254.46

The City of Riverside Parks Deputy Director Randy McDaniel sent an email to Dan Fairbanks, Planning Director of the MJPA, in July 2022 on the cost of parks. He quoted a cost of $27/SF to build an active

[4] https://www.bls.gov/data/inflation_calculator.htm

recreation park based on a quote from Studio MLA.[5] Specifically, he stated the cost would be approximately *'$12,000,000 for the 10 acre park. In comparison to Paterson Park (excluding grading and street improvements), a 4.3 acre park, we received a grant for $7,150,000, which totals $1,663,000/acre ($1.8 million per acre in 2024). $12 million sounds like a lot, but is on the lower end for an active park.'*

Scaling that 2022 quote up to a 48-acre park would yield an estimated $56,000,000 cost, within 40% of the inflation-adjusted $41.1M that was planned for regional parks development back in 1996. The $3.5M commitment from the developer would be insufficient to provide even a 3 acre active park. Thus, the March JPA needs to provide approximately $50 million to meet their commitments from the 2003 Settlement Agreement to the community.

RI-254.46 Cont.

We note that the March JPA CEO did hand out oversized checks for $3.875 million to each member agency of the MJPA in July of 2023 and has a plan to distribute over $13M per year in revenues to member agencies starting in 2025, based on the 14th amendment money sharing plan shown to the Riverside City Council. The money is available, just not for public amenities promised over 20 years ago to the community.

Claiming Benefits and Consistency from the Pretend Park

The March JPA and Master Developer cannot claim the project is consistent with MJPA goals and policies based on a park they have no intention of funding or building in the next 15 years. As such, all land-use consistency checks and claims of a park in the Specific Plan are currently speculative since there is no guarantee of a future revenue stream to provide the capital for a $50M park or the ongoing maintenance fees for a 48-acre active park (likely more than $1M annually).

There are a few options for the REIR to address this specifically.

(1) Provide a specific timeline and funding mechanism for the park that demonstrates that the park will be built at the same time as the first warehouses and funded for the entirety of the period it will be overseen by the March JPA and its successor Agency.
(2) Change all language regarding the '60.28-acre park (with Active and Passive uses)' to describe it as a 'graded and stubbed parcel zoned for park/recreation/open space use' and re-evaluate all consistency checks for the land-use policy that depend on the pretend park being built.

RI-254.47

For completeness, we will list the inconsistencies in Table 4.10-1 that depend on the unfunded assertion by MJPA that an active recreational park will be developed because of this project. Specifically there are 2 types of claims: Fiscal responsibility and Public services and facilities. I define both categories below, then indicate which of either or both are unmet by the current project consistency table by either failing to provide the funding for the facility or the facility itself.

(1) Fiscal responsibility – The unfunded park and maintenance of the park is a fiscal liability. This project needs to identify how it will pay for the park's construction and maintenance over the next 20 years as the park goes from MJPA to County of Riverside to City of Riverside.
(2) Public services and facilities – The failure to provide a plan for an active park in the next fifteen years undermines any claims that this project provides public services or facilities in the form of an active park.

[5] Email correspondence from Randy McDaniel to Dan Fairbanks, dated July 26, 2022, obtained through public records request.

- Goal 1 – 'balanced mix of land uses' – **Public services and facilities**
- Goal 3 – Manage Growth and development to avoid adverse environmental and fiscal effects
    - Policy 3.1 – 'provide for an acceptable level of public facilities and services' – **Public services and facilities**
    - Policy 3.3 – 'Use finance mechanisms such as benefit assessment districts, development fees…' – **Fiscal Responsibility**
    - Policy 3.4 – 'Assess the fiscal impacts (service costs and revenues) … to determine actual cost of services' – **Fiscal Responsibility**
- Goal 10 – Avoid under burdening of infrastructure, public facilities, and services by requiring new development to contribute to the improvement and development of the MJPA planning area
    - Policy 10.1 - **Fiscal Responsibility**
    - Policy 10.4 – Facility provision of public services – **Fiscal Responsibility**
- Goal 11 - Plan for the location of convenient and adequate public services to serve the existing and future development of March JPA planning area. - **Public services and facilities and Fiscal Responsibility**
- Goal 12 - Ensure, plan, and provide adequate infrastructure for all facility reuse and new development, including but not limited to, integrated infrastructure planning, financing, and implementation. – **Fiscal Responsibility**
    - Policy 12.2 – pay its fair share – **Fiscal Responsibility**
- Transportation Policy 2.7 – On-street parking shall be minimized – **Public Services and Facilities** (parking not described for active park)
- Resource Management Goal 8 – Develop and maintain recreational facilities - **Public Services and Facilities and Fiscal Responsibilities**
    - Policy 8.1 – Provide active and passive park and recreational facilities - **Public Services and Facilities and Fiscal Responsibilities**
    - Policy 8.2 – Encourage involvement of private investment in development of recreational facilities - **Fiscal Responsibilities**
    - Policy 8.3 – Seek out and pursue all forms of federal, state, local, private foundation, and endowment support to assist in the development and programming of park and recreational resources… **Fiscal Responsibilities**
    - Policy 8.4 – Coordinate with other recreational programs and agencies in providing regional recreational facilities in the area - **Public Services and Facilities**
- Resource Management Goal 9 – 'provide active and passive recreational use' - **Public Services and Facilities**
- Draft EJ Element HC 16.5 - **Public Services and Facilities**
- Draft EJ Element Physical Activity Policies – **Public Services and Facilities**
    - HC 19.2 – High quality parks - **Public Services and Facilities**
    - HC 19.7 – recreational amenities - **Public Services and Facilities**

To be clear, I believe that each of the policies that relies on the Pretend Park and funding yet-to-be determined is Inconsistent with the March JPA general goals and policies. There are 12 false consistency claims of providing Public Services and Facilities, and 10 false consistency claims of being fiscally responsible. Please address these inconsistencies.

RI-254.48

Inaccurate Analysis of the Pretend Park

Lastly, the pretend park description is inconsistent with the 2003 Settlement Agreement. On p.3-10 of the REIR, this is the description of the buildout scenario.

*For buildout scenario analysis throughout this EIR, the 78 acres of park/recreation/open space is analyzed as **42.2 acres of Active Park use** (with sports fields) and **35.8 acres of park/open space use**, including trails with cardio stops. As a Condition of Approval for this Project, an updated Parks Needs Assessment Report will be prepared to finalize the design and amenities included within the 60.28-acre park. For purposes of the analysis within this EIR, the most intensive park uses are assumed in order to provide a conservative estimate of potential environmental impacts associated with construction and operation of the park.*

RI-254.49

The requirement of the 2003 CAREE/CCAEJ project is a minimum of a 48-acre active park. There has been no updated 'Parks Need Assessment Report' or any associated action to show that there is any intention to build a park compliant with the settlement agreement. Additionally, the park was not included in multiple assessments of noise, wildland fire, and other impacts.

RI-254.50

Summary

The March JPA is in breach of the 2003 Settlement Agreement with CAREE/CCAEJ. The March JPA cannot merely pretend that it is providing a public facility that there is no mechanism to fund or maintain. The Project needs to lay out how this park will be funded and include detailed drawings and a completed feasibility study before it is approved. Anything less will be insufficient to convince the public that the March JPA is serious about providing the promised facilities it has failed to deliver for 21 years.

RI-254.51

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses
92508

February 23, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project (the Project). The Project would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed pretend park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. RI-254.52

This comment letter focuses on the Project Objectives and Description section of the EIR. The March JPA project objectives are a mishmash of goals that can be met in other ways with lower impacts. Some of the project objectives are significant CEQA harms to cultural and environmental resources that require significant and overriding considerations to implement. And many of the project objectives are clearly harmed by development of this project over the no project alternative. RI-254.53 Additionally, the MJPA fails to list known areas of controversy identified by the public in letters on the EIR on a variety of thresholds of significance; this is required to be disclosed in CEQA in the NOA phase and was omitted from the NOA and the REIR Project Description. RI-254.54

Project Objectives

The March JPA lists the project objectives on p. 3-3. I will list them here and include comments on each as sub-bullets.

Provide increased job opportunities for local residents through the provision of employment -generating businesses.

- Local is often defined as neighborhood scale. The Neighborhoods of Orangecrest and Mission Grove already have easy access to over 100 warehouses providing employment within 3 miles. The local housing costs in these neighborhoods are among the most expensive in the region – these are not affordable on warehouse wages. Increased job opportunities need to be in a diversified mix of businesses that include high quality jobs, high paying jobs that provide benefits.
- Please see my letter on JobsPopHousing dated March 9, 2023 and make sure that all comments on that are noted, as well as public comments on the transition to work-from-home businesses and other small business opportunities that are harmed by this project. RI-254.55

Provide open space amenities to serve the region.

- The existing conditions for the project area has significantly more open space amenities than the project. Thus, the project will reduce open space amenities, reduce the utility of the existing open space amenities, reduce the value of the open space amenities by placing it adjacent to industrial land-uses and roads, and decrease accessibility to open space amenities for the entirety of a 5-year construction period. RI-254.56
- The project is completely inconsistent with providing open space amenities, relative to the baseline conditions of the 2012 CBD Settlement Agreement and 2003 CAREE/CCAEJ Settlement Agreement which were agreed upon one or two decades ago. This project provides almost exactly what was already agreed upon by the MJPA – and nothing more. RI-254.57

Provide an active park consistent with the 2009 Safety Study prepared by March JPA.

- The project has not secured or described funding or financing for an active park. The project cannot claim the benefit for an active park valued at more than $50 million without a specified funding source.
- The 48-to-60 acre park is a required outcome of the 2003 CAREE/CCAEJ Settlement Agreement for allowing the construction of the March Business Center (north and south campus) – that prompted the 2009 Safety Study. It is a deliberate deception inconsistent with the May 2022 Parks Subcommittee meeting minutes on the history of the regional park dating back to 1996 to state that the 2009 Safety study is the criteria establishing the need for a park. RI-254.58
- See PretendPark.pdf letter for more details.

Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.

- Barton Street and Brown Street are inconsistent with the General Plan Circulation map – they were not identified in the 1999 transportation plan and were not modeled in the General Plan EIR. Cactus Avenue was not designated as a truck arterial west of Camino del Oro in the same plan. RI-254.59
- General Plan inconsistency is a CEQA environmental impact – this is a significant and unavoidable impact that has not been analyzed for traffic impacts for cut-through traffic on Barton and fails to address the environmental impacts of the buildout of these road impacts within any March JPA documents. RI-254.60
- Therefore, this project objective is a discretionary action that requires a statement of overriding considerations by the March JPA commission. Including it as a project objective is not allowable.

Remove and redevelop a majority of the former munitions storage area of the March AFB.

- The former munitions storage area (weapons storage area – WSA) is a significant local cultural resource. It is the only example of an Air Force WSA in the state of California. The WSA represents an area with a rich historical significance and a significant longitudinal military history exemplifying Air Force weapons storage igloos present during the cold war. They are a unique military-related munitions storage structure in the county of Riverside and state of California; no other igloos were part of the Strategic Air Command in the state. RI-254.61

- The general plan and preferred final reuse plan both designated the WSA for open space and specifically named it as a central feature of future designs for the area. The goal in both 1996 and 1999 was to preserve these structures.
- The WSA currently retains integrity of design, materials, setting, and place (cultural standards integrity criteria). These will be destroyed thus causing a significant and unavoidable cultural impact.
- This projective objective is therefore both a General Plan inconsistency and a cultural resources significant and unavoidable impact – both of which require a statement of overriding considerations. Including this as a project objective is not allowable.

RI-254.61 Cont.

Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient, and comfortable.

- As noted in earlier letters, the circulation system for this project adds significant danger to the community by providing only class II bicycle lanes (striping) rather than class IV bicycle lanes (separated bikeway) adjacent to truck arterials. As can be witnessed on any given day on Meridian Parkway, people don't like biking next to trucks as it is dangerous[1] and uncomfortable. Pedestrian fatalities are at 40 year highs and have grown by 80% since 2009 because of circulation planning like this project that puts pedestrians and cyclists adjacent to truck arterials.

RI-254.62

- The land-use itself is inconsistent with this goal. The alternative modes of travel are disincentivized by putting industrial land-uses in these area near one of the 7 metroLink stations in the County. This is a multi-modal transit case study in incompatible land-use; the catchment area for the metroLink should not just be warehouse complexes.

RI-254.63

- The Specific Plan fences and walls indicates that it may not even be possible to access the internal circulation routes to access the pedestrian and bike routes from Barton – which is a condition of the 2012 CBD Settlement Agreement. Please ensure that the project connectivity is accessible for both planned and existing roads.

RI-254.64

Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in Center for Biological Diversity v. Jim Bartel, et al. to preserve open space through establishing a Conservation Easement.

- The conservation easement and development has been done piecemeal to date.
    - The Specific Plan Area is the 304 acres of West Campus plus 91 acres of Park plus the 445 acres of conservation easement north of Balak Dr.
    - The 120 acres of the West Campus Lower Plateau have already been fully built out in a piecemeal fashion. No conservation easement land from the 2012 CBD Settlement Agreement was conserved or rezoned as part of that ordinance (JPA #17-04).
    - The 185 acres of the conservation easement north of Van Buren and south of Balak Dr and the West Campus Upper Plateau project site were entered into a conservation agreement by the MJPA in 2013-14, along with a non-wasting endowment of $1.07M.[2]

RI-254.65

RI-254.66

RI-254.67

- The terms and conditions of the 2012 CBD Settlement Agreement do not require any development. Per term B.7, '*LNR Riverside agrees that the non-wasting endowment will be fully*

RI-254.68

[1] https://www.npr.org/2023/11/14/1212737005/cars-trucks-pedestrian-deaths-increase-crash-data
[2] Jan 16, 2013 MJPA commission meeting minutes – agenda 12a(7).

funded at a level of $2 million before the last grading permit for the Development Area is issued or April 1, 2027, whichever is earlier.' Meridian West LLC is the successor agency to Riverside LNR and has an obligation to fully fund the conservation easement endowment regardless of whether the area is developed. The March JPA has agreed to the 445 acre conservation easement. No additional actions of development are required or necessary for implementation.

- Therefore, adding this as a project objective is simply greenwashing the bad impacts of this Project under the auspices of a previously reached conservation easement with multiple third parties.
- It is possible for the March JPA and developer to pursue the rezoning, general plan amendments, and endowment for the conservation easement separately, which the community will certainly not oppose.
- Lastly, please note that terms and conditions of CBD Settlement Agreement - Appendix B do not all appear to be implemented, including the pedestrian and bike connectivity – as seen in the Specific Plan.

RI-254.68 Cont.

RI-254.69

RI-254.70

In summary, most of the project objectives are not real objectives. Two of them (remove bunkers, circulation plan) should be removed as they require statements of overriding considerations to be implemented. The Pretend Park should be removed as it has no funding to be implemented. The open space amenities are reduced by this project and alternative modes of travel are discouraged by adding more trucks and delivery vehicles to our roads and creating a disconnected circulation network with no accessibility for local communities to the Cactus Avenue extension – thus increasing VMT. The 2012 Settlement Agreement terms and conditions can be implemented separately and without controversy. Only one of the project objectives is a direct goal of this project, and that is a secondary goal.

RI-254.71

Omission of Areas of Known Controversy from NOA and Project Description

NOA (notice of application) forms for CEQA documents are required to specify areas of known controversy. This is important to the CEQA goals of informing decision makers and the public about potential significant environmental impacts and identifying whether project alternatives can prevent significant, avoidable damage to the environment.

RI-254.72

Members of the public, including members of R-NOW and other agencies, have identified multiple areas where the public disagrees with the MJPA about thresholds of significance, determination of significant and unavoidable impacts, and interpretations of General Plan consistency. These comments have been made verbally and in writing over the course of two years. The March JPA has neither acknowledged nor documented these areas of known controversy – most importantly the breadth and depth of community opposition to the project. General Plan policy 2.4 states – 'Protect the interests of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses.'

Ninety-nine percent of written and verbal comments on the project have been in opposition. The community is essentially unanimously opposed to this land use – yet it isn't so much as acknowledged by the March JPA in this REIR. Please take corrective action and list all areas of known controversy where there is reasonable disagreement - specifically general plan inconsistency or a threshold of significance as identified by members of the public. It is important for the public to see how the MJPA staff are inconsistent with common sense interpretations of their own policies (e.g., stating that there are no significant impacts on viewsheds in Aesthetics when that is patently ridiculous from a layperson perspective).

RI-254.73

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses
92508

February 23, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project (the Project). The Project would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas. RI-254.74

This comment letter focuses on the continued instability of the REIR in three specific areas. First, the REIR documentation is unstable, with multiple versions of maps and text descriptions of the project that are inconsistent across the REIR and its recirculated technical appendices. RI-254.75 Second, the REIR incorporates a draft Environmental Justice (EJ) element of the General Plan as a key new component of multiple sections of the REIR. This is highly irregular, since neither the Technical Advisory Committee nor the MJPA commissions were briefed on the new EJ element prior to it being incorporated into the REIR. RI-254.76 Given that community members were neither informed nor incorporated in the development of this new EJ element, it clearly does not reflect community input or vision. Finally, the REIR makes many references to mitigations, entitlement, permitting, and enforcement actions that the MJPA will undertake, despite the MJPA sunsetting in July 2025. The County of Riverside will be the responsible agency for almost every oversight role, given that the project cannot conceivably break ground in 2024 and will almost certainly be delayed well into 2025. However, the REIR does not mention the sunset of the MJPA nor the change in its oversight role, nor the inherent instability created by switching agencies responsible for oversight as a result of the sunsetting of the MJPA. As a result, there appears to be no consultation or cooperation with the future County agencies that will be responsible for this project, should it be approved. This makes the future mitigation and enforcement actions unstable, questionable, and possibly unenforceable. RI-254.77

As noted, the REIR documentation is unstable in multiple ways, with multiple versions of project site, construction boundaries, and specific plans that are inconsistent in important ways for evaluating the impact of the project on the environment. Moreover, the new draft EJ element and the sunsetting of the MJPA make the stability of the General Plan consistency and the oversight and enforcement agency confusing and irregular. RI-254.78

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include: RI-254.79

- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304, recirculated technical appendices C-1, C-2, C-3a, C-3b, J-1, J-2, J-3, J-4, J-5, J-6, T and Appendices A-S, December 27, 2023 (REIR)
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- GP 23-02: Draft March JPA Environmental Justice Element - November 29, 2023
- General Plan of the March Joint Powers Authority[1], assumed 1999 date – last updated 3/07/2023 (General Plan, 1999)
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003
- Joint Powers Agreement forming the March Joint Powers Authority Proposed Amendment #14 – accessed through City of Riverside Agenda 2/28/2023
- Draft EIR Comment letter titled 'unstableEIR_plan.pdf' dated March 9, 2023 send by Mike McCarthy in the first EIR comment period.
- Revised West Campus Upper Plateau Specific Plan 6th Screencheck dated July 31, 2023

RI-254.79 Cont.

Map and Text Inconsistencies in REIR

Project Site or Project Boundary Map

The Project Location map is used to display the boundaries of the Project Site and an example is shown in Figure 3-1 of the draft REIR. There are a couple of small discrepancies between Figure 3-1 and later figures which also include 'Project Site' boundaries as shown in Figures 3-2, 3-3, and 3-5. The easiest feature discrepancy to note is that Figure 3-1 includes the recycled water tank which is in the City of Riverside and this feature is not included in Figure 3-2, 3-3, and 3-5.

RI-254.80

In addition to the minor discrepancy of the Water Tank, multiple construction activities occur outside of the 'Project Site' boundaries in Figures 3-7b (potable water), Figure 3-7c (reclaimed water), and Figure 3-11 (construction limits). CEQA defines a project as 'the whole action subject to a public agencies discretionary funding or approval that has the potential to either (1) cause a direct physical change in the environment or (2) cause a reasonably foreseeable indirect physical change in the environment'. Thus, to accurately describe the 'project location' the MJPA may need to include the entirety of the affected construction activity locations within the 'Project Site' maps. If not, it at least needs to consistently describe why construction activities off-site are not part of the Project Site and consistently describe the environmental consequences of off-site construction activities on residents. This includes the development agreement construction of a Fire Station on Meridian Parkway – if this is part of the Project it should be included specifically within the EIR as a part of the project site/maps/boundaries; to exclude it is piecemealing and disallowed under CEQA.

RI-254.81

RI-254.82

[1] https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf

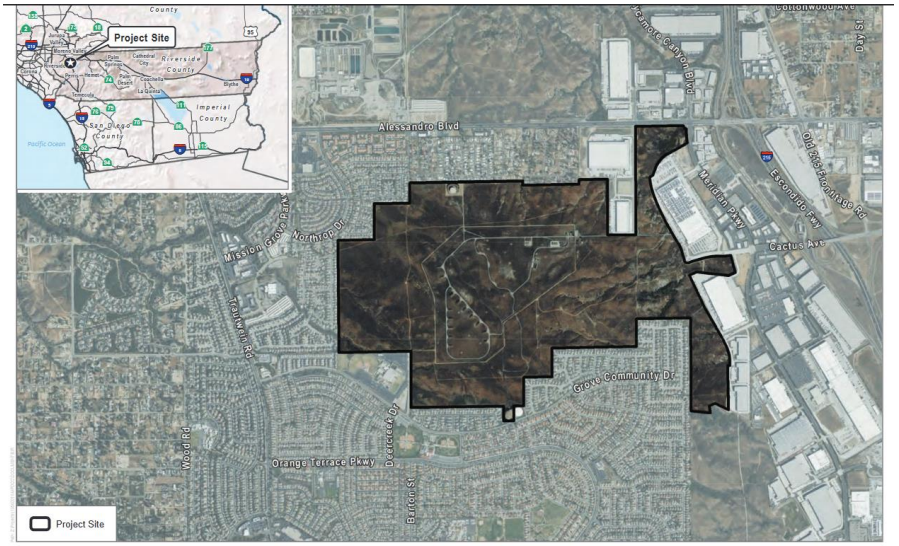


FIGURE 3-1
Project Location
West Campus Upper Plateau EIR

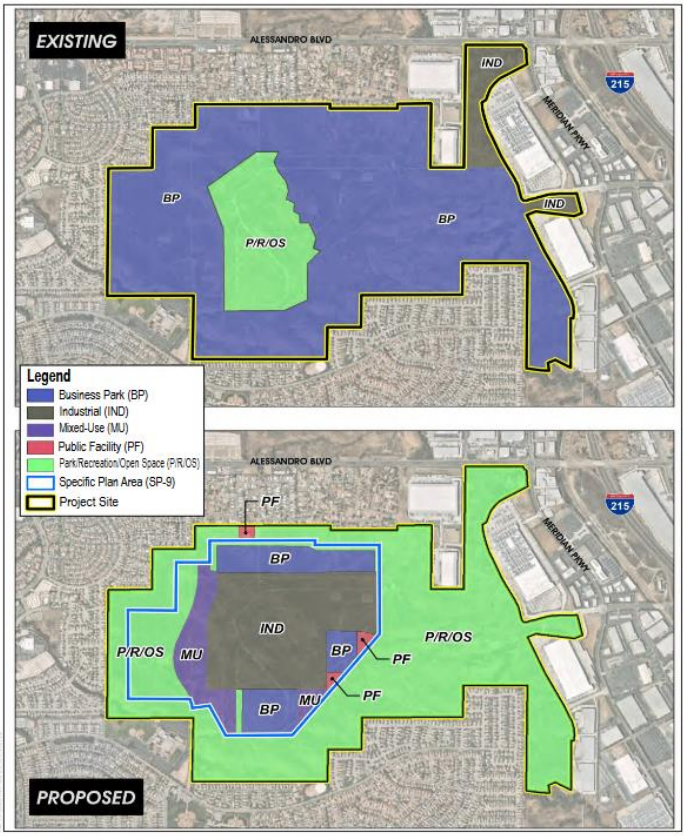
Specific Plan Map

The Specific Plan Area and Project Site boundaries are specified in **Figures 3-2** and **3-3** in the EIR and REIR. The Specific Plan Area (SP-9) is outlined in blue and the Project Site boundaries are also clearly outlined in a dark black line with a yellow highlight color. Figure 3-2 from the REIR is reproduced below.

Note that there are still multiple maps that identify different Specific Plan boundaries than those shown in Figures 3-2 and 3-3. Figure 3-6 showing the Truck Routes still shows the incorrect old NOP specific plan with an incorrect number of business park and mixed-use parcels. Figure 3-11 and Figure 4.10-1 both show Specific Plan boundaries that include the roads (Barton, Cactus, Brown); these road components are not included in the Specific Plan Figures 3-2, 3-3, or 4.2-1. Roads and circulation elements are described in the Specific Plan, but are apparently sometimes included and sometimes not when describing the Specific Plan area. Please determine whether the roads are included within the SP-9 are or are excluded for the purposes of defining the area. Also, please do this in light of the land transfer that clearly included the land segments in JPA-SA #22-02, approved by the MJPA commission October 26, 2023, map on p.232.

RI-254.83

RI-254.84



SOURCE: ESRI, March JPA General Plan (2017), Nearmap (2021)

FIGURE 3-2

March JPA General Plan Existing and Proposed Land Use Designations

West Campus Upper Plateau EIR

DUDEK

Construction Boundaries Map

The third map used inconsistently throughout the EIR is the Construction boundaries. A new map was added to the REIR in **Figure 3-11** showing explicitly the construction boundaries and Specific Plan Area. Unfortunately, this map does not help to clarify things because the red dashed 'Specific Plan Boundary' is inconsistent with the SP-9 area shown in Figure 3-2 as it includes the road network. Moreover, the construction limits now show that construction will occur along Barton Drive and Grove Community Drive outside the Project Site boundaries identified in Figure 3-1. Given that the construction, trenching, and pipe-laying of the recycled water tank are clearly part of the Project description, it is unclear why it is not included in the Project Site map in Figure 3-1.

RI-254.85

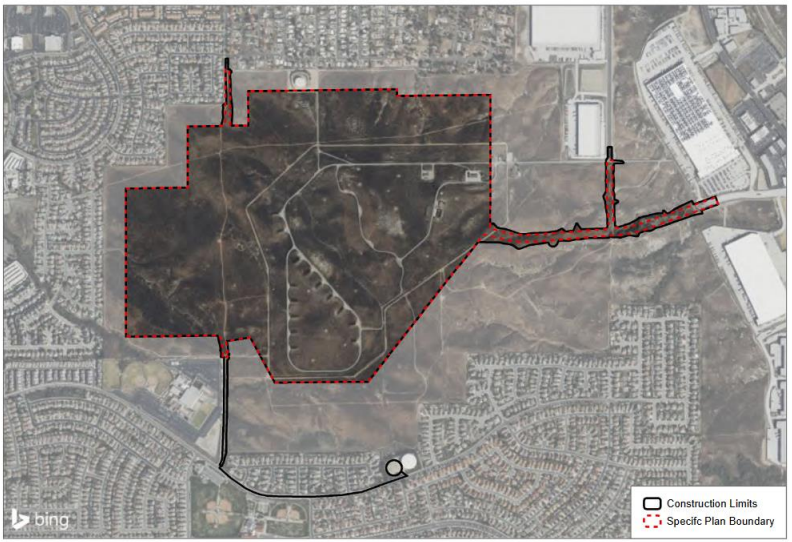


FIGURE 3-11
Construction Limits
West Campus Upper Plateau EIR

This inaccuracy is continued in the revised **Appendix C-2 REIR Exhibit 2-B and Table 2-4.** The IS/NOP version of the project is still the basis for the health risk assessment modeling with inaccurate descriptions of the number of buildings, number of trucks, distribution of TRUs, and allocations of operational emissions with inaccurate dock door descriptions for both the cold storage warehouse, business park warehouses on the north side of the project, and incorrect truck trip rates. I specifically noted these inaccuracies in my March 9th, 2023 letter and the revised REIR lazily tried to paper over these issues but didn't address any of the spatial allocations of emissions for the project. This is an unstable EIR planning issue. Please model the proposed project.

RI-254.86

Given the inadequacy and continued inconsistency of the revised maps, text, and analyses in the REIR as documented above, I am skeptical that the sections of the EIR commented on in my letter from March 9, 2023 have been adequately addressed. Hopefully those sections were addressed with greater attention to detail than those released in the REIR.

RI-254.87

GP 23-02: MJPA Environmental Justice Element

On November 29, 2023 the MJPA released information on their website and through mailed notifications or emails to members of the Westmont Village, Green Acres, and Veteran's Village communities within the MJPA planning area that an Environmental Justice (EJ) Element was under consideration[2]. The draft EJ element was drafted with no input from community members, no review by formal bodies of the MJPA Technical Advisory Committee, and no input from the MJPA Commission through formal agendized discussion.

The EJ element is likely a response to my EIR comment letter dated March 9, 2023 titled 'EnvironmentalJustice.pdf' noting that the draft EIR contained no mention of EJ issues in its 1,000+

RI-254.88

[2] https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification_.pdf

pages, despite the MJPA planning area containing a 98th percentile impact census tract and being adjacent to a 99th percentile census tract.

RI-254.88 Cont.

Riverside Neighbors Opposing Warehouses (RNOW) members were not included in the original notification or mailing list for the EJ element, despite having brought it up in formal comment as part of the CEQA process. When we asked why we weren't notified, the CEO of the MJPA responded on November 30th, 2023:

"*…Please note that the EJ Element is NOT a part of the West March Upper Plateau Project so we would not notice it as such. A public presentation with general information on this item is scheduled for the upcoming TAC meeting next Monday*…" (excerpt from 11/30/2023 email from CEO Dr. Grace Martin of the MJPA.

RI-254.89

However, this description from the CEO of the MJPA is inconsistent with the REIR description of the rationale for recirculation on p. 2-1, under section 2.1 Recirculation. Emphasized sections that contradict the MJPA CEO's communication with community members are in **bold font**.

"This document includes the recirculated sections of the Draft Environmental Impact Report (EIR) for the proposed West Campus Upper Plateau Project (Project). The Draft EIR for the proposed Project was circulated by the lead agency (March Joint Powers Authority [JPA]) for a 60-day public review and comment period from January 9, 2023, to March 10, 2023, in compliance with the California Environmental Quality Act (CEQA) Guidelines Section 15085. During this time, numerous comment letters were received from government agencies, interested parties, and private individuals. ***Additionally, March JPA prepared a Draft Environmental Justice Element for the 1999 March JPA General Plan****. As such, this recirculated Draft EIR includes the following:*

- *Chapter 2.0, Introduction*
- *Chapter 3.0, Project Description*
- *Section 4.2, Air Quality*
- *Section 4.8, Hazards and Hazardous Materials*
- *Section 4.10, Land Use and Planning*

RI-254.90

Section 15088.5(a) of the CEQA Guidelines states, "[a] lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification." Section 15088.5(a) further states that "new information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect." ***Because March JPA has prepared a Draft Environmental Justice Element for the 1999 March JPA General Plan****, and because additional analysis of impacts related to air quality and hazardous materials has been completed,* ***select portions of the Draft EIR are being recirculated to provide the public with a meaningful opportunity to comment on these environmental topics.****"*

Moreover, multiple revisions are described in the REIR revisions overview including the

- explanation of the draft EJ element of the 1999 March JPA General Plan in the Project Description - Section 3

- addition of draft EJ element policies to the Air Quality analysis – Section 4.2
- discussion of the draft EJ element in the Land Use and Planning section – Section 4.10
- a consistency checklist with the draft EJ element in the Land Use and Planning section – Section 4.10

RI-254.90 Cont.

It is unclear to me how the CEO of the MJPA can claim that the new EJ element is 'NOT' a part of the REIR with the explicit consistency checks and wholesale adoption of this draft EJ element into the fabric of this revised document.

The unstable nature of this is that the draft EJ element is undergoing a parallel comment process with the community. The REIR was released December 2, 2023 – but had been in process since April 2023. The environmental consultants and developer had access and information about the plan to implement an EJ element for many months to prepare a consistency checklist for the REIR. In contrast, the first community workshop on the draft EJ element was held December 19, 2023. Thus, the community was neither notified nor informed of the brand new EJ element until months after the developer and environmental consultants; community input into a brand new EJ policy was not first included in any formal manner until more than 3 weeks after it had been fully incorporated into a released REIR. This completely undermines the consistency and purpose of an EJ element which stresses community participation and engagement through meaningful involvement in the *development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.* Since the community members in MJPA planning area had zero input on the draft EJ policies that are being checked for consistency in the REIR, the REIR is an empty ritual performed by environmental consultants paid by the MJPA with zero consultation, or even notification, by the MJPA that it was occurring. This is NOT environmental justice.

RI-254.91

On a second point, I believe that the MJPA is required to go through a CEQA process for amending its General Plan to include an EJ element. As of February 20, 2024, the MJPA has not sent out any notification for having initiated the CEQA process on CEQANET. Given that the community would like to add specific language regarding industrial zone setbacks from residential neighborhoods to the EJ policy, and potentially ask to prohibit further industrial zoning within the MJPA planning area, it is not clear how this could possibly be incorporated into the current REIR process which presumes that the community within and adjacent to the MJPA is not 99% opposed to additional warehouse development within the planning area. Finally, no research has been done to examine the cumulative impacts of development to date (almost all industrial) on the vulnerable communities within the MJPA and how to prevent additional impacts.

Finally, I would like to add that the draft EJ element, with zero community input and zero community participation, has no legitimacy for comment within a REIR process. As a result, the REIR process is unstable because it put itself out for review prior to allow community to shape the potential EJ element. Since community members had no meaningful input on the draft EJ element, has not been reviewed by MJPA formal bodies, and has not been adopted as a final policy, it cannot be the basis for comment within the REIR. That is an unstable REIR process that prevents *providing the public with a meaningful opportunity to comment*.

RI-254.92

Sunsetting of the March JPA

The last unstable EIR element is the March JPA itself. In Spring 2023, the March JPA member agencies of the cities of Moreno Valley, Perris, and Riverside and the county of Riverside adopted the 14th amendment to the Joint Powers Agreement for the Formation of the March JPA. In it, the MJPA amended the agreement to reflect a '*refinement and reduction of duties of the MJPA, anticipated future completion of the land use redevelopment phase of the agreement…'*. In Section 1, the MJPA 14th amendment explicitly states that the agreement ends June 30, 2025 for the MJPA to be the land-use authority.

Within the REIR, there are many references to the MJPA role as the Lead Agency. Within the REIR there are mitigation measures, project-design features, a mitigation monitoring and reporting program, hours of construction, enforcement, permitting, and other oversight activities. However, the MJPA will not exist when these activities occur. The County of Riverside will be the successor agency responsible for all these activities. However, no mention is made of this transfer of responsibilities or oversight in the entire REIR. No mention is made of the consistency of the policies by the MJPA to its successor agency. No mention is made of the rationale for one agency permitting a project as it is riding off into the sunset for another agency to oversee. However, the REIR does manage to include a development agreement (p. 3-24) with a 15-year sole source agreement with Meridian West LLC with two potential 5-year extensions. This is absurd for an agency that will cease to exist in 17 months and an unreasonable sole-source add-on for the Waypoint Property Group and Lewis Group of Companies that has had an exclusive contract with the March JPA that was bought/transferred in 2015. It is completely inconsistent with current guidance for public contracting to extend contracts for 30+ year exclusive terms.

RI-254.93

Lastly, given the key nature of the County of Riverside as a Responsible Agency, and potentially as the Lead Agency in *carrying out the project*, it is unclear why the MJPA is writing this REIR without explicitly describing the County of Riverside as the agency responsible for all oversight of the project. The inherent instability of a project that is approved by one agency that immediately ceases to exist and hands it off to another jurisdiction is clearly apparent. The California Code of Regulations title 14 § 15051 states

when two or more public agencies will be involved with a project, the determination of which agency will be the lead agency shall be governed by the following criteria:

(a) *If the project will be carried out by a public agency, that agency shall be the lead agency even if the project would be located within the jurisdiction of another public agency.*

(b) *If the project is to be carried out by a nongovernmental person or entity, the lead agency shall be the public agency with the greatest responsibility for supervising or approving the project as a whole.*

RI-254.94

Obviously, the MJPA has decided it has the responsibility for approving the project as a whole, but it has almost no responsibility for supervising the project. Given the wide and deep public opposition to the Project, it is entirely possible that the project will not be entitled by the MJPA before the MJPA sunsets June 30, 2025.

Despite this looming deadline and legal inconsistency, nothing is documented in the Project Description, mitigation, PDFs, or permitting in terms of how this specific project will be implemented by the County of Riverside in this project documentation. As a member of the public trying to understand how this project might be implemented, I find it confusing and opaque. I ask that the MJPA clarify the roles of the two agencies and potentially substitute the County of Riverside as the Lead Agency since it will clearly be the agency responsible for 'carrying out the project'. Alternatively, follow the legal language in 14 § 15051(d) that the two agencies '*by agreement designate an agency as the lead agency. An agreement may also provide for cooperative efforts by two or more agencies by contract, joint exercise of powers, or similar devices.*' A binding description should be added in the REIR to describe how all oversight responsibilities will be transferred to the County of Riverside and that the County of Riverside approves of all decisions by the MJPA in the permitting and entitlement of the project.

I note that Senate Bill 994 was introduced by Senator Roth on January 31, 2024 and will proceed to committee subsequent to the close of the REIR public comment period. SB 994 would provide a framework for transferring the project to the County from the MJPA. It has not been adopted or reviewed by any committees at this point. Should it be adopted as written, it will address most of the successor agency issues. However, it is not adopted at this point and should not be assumed as the transition plan in the REIR – please describe the plan should it not be adopted as written or if amendments proposed by community members alter the proposed legislation.

RI-254.95

Summary

The Project is unstable. The REIR documentation remains inconsistent and unstable in terms of what the 'Project' is and where it will occur and how that impacts the residents adjacent to it. The REIR has been revised to include a draft EJ element provided to the developer and environmental consultants to 'assess consistency' for the purpose of addressing CEQA deficiencies, but not provided or even revealed to community members within the MJPA planning area or the members of the public who commented on the CEQA deficiency. Finally, the MJPA will not be the Lead Agency responsible for carrying out the project; the MJPA has an expiration date of June 30, 2025 while the development agreement is for a minimum of 15 years with two optional 5-year extensions. It is not appropriate for the MJPA to be the Lead Agency when it will not exist during the development of the project. The REIR inconsistencies, amendments to the General Plan, and even the Lead Agency make this project documentation completely unstable and preclude giving the public a meaningful opportunity to comment on the project.

RI-254.96

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses
92508

February 23, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project (the Project). The Project would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed pretend park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500-foot range of residential homes. RI-254.97

This comment letter focuses on the revised Air Quality section. As part of my background, I have a PhD in chemistry from UC Berkeley with a focus in atmospheric chemistry, I have over 20 years of professional experience as an environmental consultant. My expertise includes near-road pollution gradients, health-risk assessments, spatio-temporal variability, source apportionment, emissions characterization, climate change, air toxics, and isotopic compositions. I typically apply statistical analysis and geospatial visualization methods to quantify and characterize air quality issues. My resume[1] and a short publications list[2] indicate that I am an expert in air quality, specifically near-road air quality and health-risk assessments. Therefore, I submit this letter not only as a resident of the community, but as an expert in the field providing expert opinion on the project's impacts. RI-254.98

My comments reflect documents available publicly on the March JPA website, journal articles, and other environmental agencies which to the best of my knowledge are the most recent available to me. These documents include: RI-254.99

- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304, recirculated technical appendices C-1, C-2, C-3a, C-3b, J-1, J-2, J-3, J-4, J-5, J-6, T and Appendices A-S, December 27, 2023 (REIR)
- GP 23-02: Draft March JPA Environmental Justice Element - November 29, 2023
- General Plan of the March Joint Powers Authority[3], assumed 1999 date – last updated 3/07/2023 (General Plan, 1999)
- EPA description of Gasoline Mobile Source Air Toxics[4]

[1] http://radicalresearch.llc/resume.html
[2] http://radicalresearch.llc/pubs.html
[3] https://marchjpa.com/wp-content/uploads/2023/03/General-Plan_03-07-2023.pdf
[4] https://www.epa.gov/gasoline-standards/gasoline-mobile-source-air-toxics

- California Air Resources Board – Gasoline Service station Industrywide Risk Assessment (2022)[5]
- McCarthy et al., *Characterization of the Chronic Risk and Hazard of Hazardous Air Pollutants in the United States using Ambient Monitoring Data,* 2009, Environmental Health Perspectives (117) **5**, p. 790-796[6]

RI-254.99 Cont.

My primary comments are that the health-risk assessment in revised appendix C-2 and summarized in the REIR applies arbitrary and incorrect methods for estimating the cumulative cancer risk.

1. It omits exhaust emissions from light-duty passenger vehicles from the health-risk assessment based on the confidently incorrect statement that 'light-duty passenger cars are not considered a significant source of mobile source TAC emissions and there is no evidence that exposure to gasoline causes cancer in humans.' (p.4.2-8). This is completely incorrect. Gasoline contains benzene, a known human carcinogen[7]. Gasoline exhaust includes benzene, 1,3-butadiene, formaldehyde, and acetaldehyde – all of which are known or probable human carcinogens.
2. The REIR inaccurately allocates construction emissions from outside the Specific Plan area, based on an assertion that they are 'negligible' (p.4.2-39), despite being tens of feet from residential homes. It also omits nearby construction emissions from other projects by the MJPA and City of Riverside.
3. The REIR applies a '1,000 foot evaluation distance' for traffic related emissions impacts. This is scientifically invalid for air quality dispersion modeling and ignores the plain language definition of how to treat cumulative impacts in CEQA. EPA air toxics dispersion modeling guidance[8] recommends emissions sources should be modeled out to approximately 50 km or a gridded background should be added. The REIR continues to omit the 215 Freeway and multiple truck arterial routes in its health-risk assessment. This fails to account for the Cumulative Impacts of past, present, and future project and these affects are cumulatively considerable, as indicates by MATES V modeled average cancer risk for zip codes 92508 and 92518.
4. The MJPA REIR still does not model the right number of warehouse buildings or trucks for the project, despite comments on the draft EIR about these issues. It also inaccurately disperses TRUs across 3 separate parcels rather than modeling a single 500,000 SQ FT cold storage warehouse as described in the project description. This will inaccurately allocate project emissions, dilute the cold storage warehouse impacts on the sensitive receptors at the pretend park.
5. There are also several other smaller issues that are added as errata.

RI-254.100

In summary, the Air Quality HRA is making several assertions that systematically bias the HRA cancer risk low by at least a factor of 3. These arbitrary cutoffs are unjustified by the science of health risk assessments, the well understood dispersion of air pollution, and the CEQA guidance for cumulative impacts. The March JPA consultant has created arbitrary, inaccurate, and unjustified boundaries for a cumulative impact HRA to keep the result below the 10-in-a-million cancer risk level. The result is to misinform the decision makers at the MJPA about the cumulative impacts of warehouses on the community adjacent to its projects.

RI-254.101

[5] https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_Gas_Station_IWG_Supplemental_%20Policy_Guidance.pdf
[6] https://ehp.niehs.nih.gov/doi/full/10.1289/ehp.11861
[7] https://www.epa.gov/system/files/documents/2021-09/chronicfinaloutput_9_29_2021-12-46-18-pm_0.pdf
[8] US EPA, *Dispersion Modeling of Toxic Pollutants in Urban Areas* (1999) - https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=2000DWS6.PDF

Gasoline Exhaust from Passenger Vehicles is Carcinogenic

Gasoline exhaust from passenger light-duty vehicles is carcinogenic. Gasoline includes multiple carcinogens – most notably benzene. Gasoline exhaust that comes out of the tailpipe includes incomplete combustion byproducts that are not fully oxidized by the catalytic converter – most notably 1,3-butadiene, acetaldehyde and formaldehyde.

The U.S. Clean Air Act Amendments regulated 187 hazardous air pollutants (air toxics) that are associated with a wide variety of adverse health effects, including cancer, neurologic effects, reproductive effects, and developmental effects. Cars are a major source of cancer risk in the U.S. and Southern California based on measurement[9,10] and modeling studies[11,12]. A traffic-related air pollution meta-analysis from the Health Effects Institute summarizing 353 health studies identified high confidence in all-cause mortality, circulatory mortality, ischemic heart disease mortality, and moderate to high confidence in lung cancer mortality, asthma onset, and acute lower respiratory infections associated with traffic-related air pollution exposure.[13]

The U.S. EPA has a mobile source air toxics program which lists rules controlling hazardous air pollution from gasoline vehicles, a list of compounds in gasoline-vehicle exhaust, and many other sources of this information.

RI-254.102

Given that gasoline exhaust contributes to cancer risk, it is important to model it in a health-risk assessment. This should have been identified in the hazard identification stage of the HRA where the list of potential health problems that a chemical can cause are listed[14]. It is certainly true that gasoline powered vehicles have a smaller per vehicle impact than the heavy-duty trucks, but there 30,000 passenger vehicle trips associated with this project per day. It is important to include their cumulative emissions of benzene, 1,3-butadiene, acetaldehyde, and formaldehyde in the HRA for completeness since the passenger trips outnumber truck trips by a factor of 15.

Additionally, it should be noted that all passenger vehicle trips associated with warehouse uses surrounding the communities should be included. Please include trips from County of Riverside, City of Riverside, and MJPA warehouses on Alessandro, Van Buren, Krameria, and Meridian Parkway in the analysis.

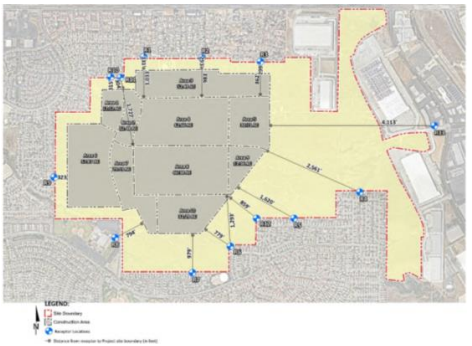
Construction Emissions Modeling Is Inaccurately Allocated

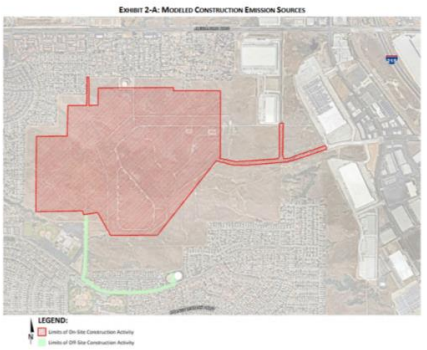
Figure 4.2-1 shows the 'Construction Areas' modeled in the HRA and the selected Sensitive Receptors alongside the project boundaries. Exhibit 2-A in Revised Technical Appendix C-2 shows a different set of modeled construction activity boundaries. Both are shown below for completeness. I can't tell from the description in the text (REIR or appendix) how emissions are actually allocated within the project area, but the text in the REIR states that on p.4.2-24 'Because this construction would be limited in scope, short-term, and intermittent in nature, and cease upon completion, and resulting health impacts to

RI-254.103

[9] https://ehp.niehs.nih.gov/doi/full/10.1289/ehp.11861
[10] http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v
[11] https://www.epa.gov/system/files/documents/2023-01/2019%20AirToxScreen%20Risk%20Drivers.pdf
[12] https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CCancer-Risk
[13] https://www.healtheffects.org/system/files/hei-special-report-23_6.pdf
[14] https://ww2.arb.ca.gov/resources/documents/health-risk-assessment

nearby sensitive receptors would be negligible related to construction of the proposed Project and would not materially affect the determination of the maximum exposed individual receptors for the purposes of this health risk assessment.' There are no quantified values for the duration, extent, or intermittent construction phase emissions nor any actual modeling to assess exposure for homes within 10 feet of construction activity. It is not reasonable to assert those emissions and exposures are negligible *a priori*. This is attempting to piecemeal the project; omitting portions of the project violates the principle of considering the 'entirety of an action'.





Secondly, the distances shown in Figure 4.2-1 are incorrect, because they are taken from the Specific Plan construction zone, rather than the actual construction areas, as shown in Exhibit 2-A. A few key examples are identified.

RI-254.103 Cont.

- Receptor R8 is identified as 794 feet from Area 7. It is 150 feet from Barton Drive construction zone in Exhibit A-2.
- Receptor R13 is identified as 979 feet from Area 10. It is 277 feet from the Recycled Water Tank pad and 350 feet from Grove Community Dr construction areas.
- Receptor R11 is identified as 304 feet from Area 1. It will be less than 5 feet from the Barton Drive extension.
- There are at least 30 homes along Greenock Way, Barton Drive, and Grove Community Drive which have property lines adjacent (within 25 feet) of the construction areas. This is also true for The Grove Church, which is adjacent to the proposed construction zone on Barton Drive.
- The Development Agreement p.44 mentions the construction of a Fire Station on Meridian Parkway and Opportunity Way which was evaluated piecemeal under a separate EIR. An existing commitment cannot be considered a 'community benefit' or part of this project unless it is evaluated for its environmental impacts in this EIR. This is piecemealing the benefits to this project REIR while piecemealing its impacts to the previous EIR – not allowed under CEQA.

Even if the grading, digging, trenching, filling, building, and paving activities along the roadways are transient, they are clearly part of the construction phase and need to be modeled explicitly to assess maximum exposed individual receptors. Given that the Air Quality section claims to be 'conservative' in its assumptions, it needs to include modeling assumptions which incorporate emissions from construction that will be within 10 feet of residential property along Grove Community Drive and Barton Drive. Asserting that these emissions are 'negligible' is not sufficient, especially given the proximity to homes. Construction emissions right on top of people's homes will be a large part of the exposure for

these residents. Emissions drop off exponentially in the first few hundred feet; construction emissions will be within 10 feet and likely to be at least 3 to 10 times higher concentration than emissions modeled at 300 to 800 feet.

In addition to failing to properly model the construction emissions from the project by spatially allocating emissions away from sensitive receptors and within the specific plan area, the construction emissions modeling omits known construction sites that are cumulatively considerable, including the Sycamore Hills Distribution center project across Alessandro Blvd, Meridian West Building 4 on Meridian Parkway, and South Campus Buildings F, G, H, I, 3, and 4. These construction related emissions are occurring both within the March JPA planning area and across the street within the City of Riverside. The Sycamore Hills distribution center is within 1,000 feet of residential homes in the Camino del Sol neighborhood, with maximum receptors being in the north of the neighborhood. The cumulative impact of construction emissions from the multiple projects needs to be included – as this community is impacted by construct emissions sources to the East, North, and South of the project that are .

RI-254.103 Cont.

The construction omissions and incorrect boundaries for spatial allocation appear deliberate, as all of these issues were brought up in my March 9th 2023 letter on the EIR. As an expert in air quality with multiple papers evaluating the validity of the AERMOD model near line sources of emissions, it is my expert opinion that these omissions will substantially underestimate true exposures for sensitive receptors and will potentially misidentify maximum exposed individual receptors.

There is no Scientific Rationale for a 1,000 Foot Evaluation Distance for the HRA

The HRA consultant arbitrarily decided that pollution effects of emissions sources like Freeways, warehouses, and truck arterial routes should not be evaluated beyond 1,000 feet based on a misinterpretation of the secondary literature on Land Use. The only citation for that decision is the CARB Air Quality and Land Use Handbook (2005). In the handbook, associations of health impacts from living near freeways were found within 1,000 feet, and were strongest within 300 feet, as expected for any pollution gradient near an emissions source. Distribution Centers with TRUs were found to have increased cancer risk out to 3,300 feet in Figure 1-2 from the CARB handbook, not 1,000 feet. Figure 1-3 shows the relationship between distance and relative concentration from an area emissions source drops off by a bit more than 80% by 1,000 feet, and down by about 96% by 2,000 feet. However, total concentrations are still not down by 99% at even 6,000 feet from the emissions source. Concentration drop-offs near emissions sources are asymptotic but will still be cumulatively considerable if (1) any of the emissions sources are large and (2) if there are many small emissions sources contributing.

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In the case of the West Campus Upper Plateau, there are both (1) large emissions sources nearby (the 215 Freeway and March Air Reserve Base) and (2) many small emissions sources contributing (the more than 20 million square feet of existing warehouses within 1 mile of the Project Location; see Table 2 from Cumulative Impacts letter on the Draft EIR dated March 9, 2023). This ignores tens of millions of square feet of warehouses and their truck and passenger car impacts in the City of Riverside, March JPA planning area, Mead Valley, Moreno Valley, and Perris. These are obviously cumulatively considerable – just look at the 215 Freeway (omitted from the HRA), which has 15,000 trucks northbound and 14,000 trucks southbound daily based on Caltrans truck AADT counts.

Air pollution dispersion modeling clearly indicates that pollution goes beyond 1,000 feet and needs to be evaluated within the specific context of urban air toxics modeling. Urban air toxics modeling guidance

from the US EPA recommends including sources out to 50 km or including it as background.[8] The arbitrary 1,000 foot boundary is a faulty analysis that would suggest that a facility like the Port of Los Angeles has no impact on nearby communities because it is setback more than 1,320 feet from residential receptors. Cumulative magnitude of emissions is the key factor and setting an arbitrary boundary for the scope of the analysis at a value of 1,000 feet is clearly not conservative.

Choosing to omit cumulatively considerable sources of emissions from the HRA is tantamount to admitting the cumulative impacts are significant and unavoidable. And the data from the 2018 MATES V modeling[15] study clearly shows that the cumulative impacts are cumulatively considerable –

- Zip Code 92518 has a population-weighted average inhalation cancer risk of 359 per million – 70.8% (254 per million) of which is from diesel PM, 9.5% of which is from benzene, and 7.0% of which is from formaldehyde.
- Zip Code 92508 has a population-weighted average inhalation cancer risk of 331 per million – 69.5% (231 per million) of which is from diesel PM, 10% from benzene, and 7.3% from formaldehyde.

RI-254.104 Cont.

It is not clear how the MJPA can possibly explain how residents are exposed to an average diesel PM cancer risk exceeding 200 per million based on their novel 1,000 foot exposure distance analysis. The only way to come up with an answer below 10 per million risk is to exclude sources that are cumulatively impactful by arbitrarily excluding the cumulatively considerable impacts of land-use on the area. And as I have extensively noted and documented in multiple letters, the MJPA is excluding sources both large and small from their cumulative impacts analyses.

Inaccurate Number of Buildings and Allocation of TRU Emissions

In my March 9, 2023 draft EIR letter on Air Quality titled 'AQ.pdf', I clearly noted that there are many errors in the project description because the air quality model inaccurately showed the wrong number of dock doors and buildings. Rather than fix this issue, the lazy modeler just fixed the underlying figure but did not change anything about substantive about the spatial allocation of emissions. The MJPA doubled down on the inaccurate AQ modeling and are insisting that the inaccurately modeled dock doors were fine for the project. Exhibit 2-B shows only 3 industrial buildings, 5 mixed-use warehouses, and 7 business park warehouses. As described in the project, there are 4 (not 3) industrial buildings, and there are 10 business park warehouses (not 7). Spreading the emissions around in accordance with the IS/NOP project plan buildings is inaccurate and again demonstrates the instability of the project REIR.

RI-254.105

Appendix C-2 Table 2-4 shows exactly how that error plays out. There are 3 industrial parcels (A, B, and C) and 7 business park parcels (D, E, F, G, H, J, and K) modeled explicitly – the buildings themselves are not accurately modeled. In addition to the inaccurate spatial allocation of emissions, it also results in an undercounting of the number of dock doors, the emissions rates, and truck trips associated with the buildings – this is a direct underestimate of the emissions and an inaccurate spatial allocation of the peak emissions location.

[15] https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A380&views=Click-tabs-for-other-data%2COverview

Specifically, the truck trips per day in Table 2-4 are inaccurate, the dock doors for Building A and many of the business park buildings in the north of the project are inaccurate, as are the TRU allocations which should be restricted to Building A only (the cold storage warehouse).

- Building B - 1,250,000 SQ FT high cube fulfilment center warehouse is about 0.51 (640 trips per day)
- Building C – 587,000 SQ FT high cube fulfilment center warehouse is about 0.49 (290 trips per day)
- Business Park warehouses – 1,280,400 SQ FT of business park warehouses is about 0.39 (513 trips per day)
- Mixed Use warehouses – 482,800 SQ FT of business park mixed-use warehouses is about 0.39 (194 trips per day)
- Building A = 500,000 SQ FT cold storage warehouse **and** 725,600 SQ FT of high-cube fulfilment center warehouse is about **0.33** (418 trips per day).

RI-254.105 Cont.

The high-cube fulfilment center should have a truck trip rate of ~0.5 truck trips per 100k SQ FT/day, consistent with Building B and Building C rates. The high-cube cold storage warehouse truck trip rate in the ITE Trip Generation Manual, 11th edition is 0.75 truck trips per 100k square feet. Equation 1 shows the number of truck trips per day in the two warehouses in building(s) A should be 738 truck trips per day.

Equation (1) --- 500k * 0.75 + 725.6k * 0.5 = 738 Truck trips per day

Thus, the number of daily truck trips is underestimated by about 320 trips per day and is spatially allocated incorrectly. Yet again, each and every one of the errors systematically biases the truck trips low.

Errata

- Draft EJ element policies including in the Air Quality Section are invalid because the community has not had the opportunity to provide formal feedback on these policies and these policies have not been adopted by the March JPA through a formal CEQA process. As such, the community cannot meaningfully comment on draft policies which were not included in the formulation of a project retroactively.

RI-254.106

- As noted in the previous EIR letters submitted in March 2023, the County GNG policy is not consistent with the WRCOG GNG policy and it is a continued misrepresentation by the MJPA to assert that is the case.

RI-254.107

- The project is still not consistent with City of Riverside Good Neighbor Guidelines. See my Draft EIR letter on GNGs.
- Why build a natural gas backbone (Fig 3-7H) if the project won't use any natural gas (PDF-AQ-1)? If the intent is to build a natural gas backbone (Fig 3-7H) then it makes sense to model its emissions (GHGs, air quality) as it can be used in the future. Alternatively, remove the natural gas backbone from the project. The PDF-AQ-1 is inconsistent with the intent to build a gas backbone.

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- The business park and mixed-use components of the project are modeled as 'Office Park' in CalEEMod. Office Park is defined as a 'office buildings and support services, such as banks, restaurants, and service stations.' This is not consistent with the industrial land use of Business Park and Mixed Use (warehouse enterprise) described in the March JPA general plan. Please use

RI-254.109

Industrial Park or General Light Industry or justify why Office Park is the most appropriate land use type.

- Omitted the loss of soil carbon accumulation by existing land use in CalEEMod table 4.10.1 and 4.10.2
- Omitted the disturbance of soil carbon sequestration by grading land in CalEEMod table 4.10.1 and 4.10.2
- P.4.2-5 - The project is not within the SR-60 NO_2 nonattainment area for California Ambient Air Quality Standards, but the project will contribute vehicle trips and emissions to SR-60 that will impact the nonattainment status. Warehouses are an indirect source that attracts pollution, thus the warehouse ISR rule.
- P.4.2-12 – the most recently adopted AQMP is 2022, not 2016. This is relevant because there was little progress made between 2016 and 2022 in the ozone nonattainment program because of the growth in emissions activity and trips of trucks due to projects like this one.
- P.4.2-13 - The 2022 AQMP builds on Connect SoCal 2020 - the adopted RTP/SCS for transportation for the region that was fully adopted at the time of the NOP for this project. Please explain why the out-of-date 2016 RTP/SCS is being referred to instead of the relevant planning document that should be referenced for air quality and transportation planning. Connect SoCal 2024 is even underway and under PEIR review as of January 2024.
- P.4.2-23 – Are MJPA noise standards and hours of operation at least as stringent as County of Riverside regulations (and adjacent City of Riverside regulations)? Given that the County will be enforcing these standards and the MJPA will not exist, it is important to check for consistency.
- P.4.2-25 – Cumulatively, about 25% of inhalation cancer risk in Southern California is due to benzene, formaldehyde, acetaldehyde, and 1,3-butadiene as shown in MATES V Figure ES-2[16]; 50% of cancer risk is from diesel PM. The gasoline exhaust pollutants are excluded from the HRA and haven't been added in response to my comments in the draft EIR. Please explain why these pollutants are not analyzed given the 30,000+ daily passenger vehicle trips predicted for this project and the increased exposure of residents near Barton Dr.
- Exhibit 2-B from appendix C-2 –
    - Truck movements and dock door locations make no sense for the FOUR industrial buildings described in the Project Description. Specifically, the Building C and Building B floor plans in Figure 3-9 and 3-10 are specific to two parcels. Therefore, the remaining two industrial buildings are PLANNED to be split into the third industrial parcel in a 500,000 sq.ft. cold storage warehouse and a 725,000 sq ft high cube warehouse. Please model it accordingly as shown by the divide on Figure 3-7D with dock doors that reflect separate warehouses.
    - Why are dock door locations and cold storage locations identified for each of the industrial buildings when they can only be in a single 500,000 square foot area? This is not a conservative approach because distributing the emissions spatially throughout the three industrial parcels DILUTES the spatial impact of having them all located at a single 500,000 SQ FT warehouse, which is most likely to be closest to the pretend park as shown in Fig 3-7D. This will concentrate TRU emissions on the kids – nice job MJPA!

RI-254.109 Cont.

RI-254.110

RI-254.111

RI-254.112

RI-254.113

RI-254.114

RI-254.115

RI-254.116

[16] http://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report-9-24-21.pdf?sfvrsn=6

- Missing an emergency generator for the fourth industrial building north of Cactus Avenue and west of Linebacker Drive.

RI-254.117 Cont.

- Truck movements from the project are again incorrect as shown in Exhibit 2-C Modeled Off-site emissions.
  - No trucks take Brown St to Alessandro Blvd. And no trucks take Alessandro Blvd to the 215 Freeway, as if Cactus Ave will never be backed up. Please model ALL allowed truck routes or justify why zero percent of trucks will go on Brown St to Alessandro Blvd in real-world traffic conditions.
  - Please model off-site MJPA and City/County Truck Arterial routes. Again, the project excludes Brown St., Alessandro Blvd, 215 freeway, Van Buren, Krameria, etc.

RI-254.118

- Passenger vehicle movements from the project still don't sum to 100. Why do only 98% of the passenger vehicle trips originate through Cactus Ave?
  - Please model cancer-risk HRA analysis for passenger vehicle trips from the 30,000 passenger vehicles in the project. There are 15x more passenger trips daily than truck trips – they need to be accounted for.

RI-254.119

- P.4.2-30 – While business park does include warehouse enterprise uses as an allowed use, it does not REQUIRE warehouse uses and it is a bait and switch to use 1999 assumptions that did not assume that 75% of business park uses would be warehouse uses as an excuse to upzone to industrial zoning which is far more intense. Moreover, the March JPA Development Code and updated in 2016 and 1999 General Plan was not applicable when community input was last solicited on preferred land-use patterns in from 1993-1996. The community has told the March JPA repeatedly in writing and verbal feedback to not upzone this parcel to industrial land-use and the MJPA is ignoring this feedback, and even recirculating the EIR while omitting community feedback. The MJPA is insisting on being a bad neighbor instead of working with community on beneficial development patterns.

RI-254.120

- Table 2-4 and 2-5 TRU calcs
  - Why are TRU emissions rates not consistent on a per-truck basis across Bldg. A, B, and C? Emission rates in Bldg. A TRUs are 20-40% higher than Bldg. B or C TRUs. TRUs should not vary by building with the same idling times on a per-truck normalized basis, but they do. Maybe the TRUs are unevenly allocated in a weird way? Your text says you did it on a per-truck basis by square footage, but the emissions show that isn't true.
  - TRU on-site travel TRU emissions should be in the same ratio as the on-site travel exhaust emissions but are not. Honestly, they should all be in Bldg. A, but you botched that and spread them across every building and now somehow the ratios are very weird and inconsistent if it was just allocated on a per truck basis.

RI-254.121

- Appendix C-2, Exhibit 2-D - Receptor location for exposed individual in the pretend park is not displayed on map, nor is distance from nearest warehouse displayed. I

RI-254.122

- Description of HRA for 'Proposed Park' – The author asserts that it is not required under CEQA to assess the risk for children at the park, despite parks being commonly listed as sensitive receptors under good neighbor guidelines promulgated by CARB, the City of Riverside, the County of Riverside, and WRCOG. It seems important to characterize the risks associated with project actions, but maybe the callous folks at MJPA just do not believe in looking before they leap. Additionally, passenger vehicles and their emissions are excluded from the HRA. Please

RI-254.123

include and specify the assumed age distribution of children at the proposed park for breathing rates.

- P. 1157 of recirculated appendices – Preschool construction and operational emissions are spatially allocated incorrectly and omit passenger vehicle traffic associated with cars on the newly constructed Barton Dr. Please revise distances and exposures.
- P. 1167 of recirculated appendices – existing conditions of diesel PM cancer risk is 250 per million on average in the zip code – please see response above. Benzene risk is ~35 per million. Formaldehyde risk is ~ 25 per million.
- P. 1166 – cancer risk at Rubidoux is over 700-in-a-million, even though you cut off the zero axis.
- P. 1167 - Again, there is no basis for a 1,000 foot boundary when considering an industrial land-use planning area surrounded by existing and under construction warehouse uses that send trucks – which are known emitters of cancer causing pollution that drive all over the place – throughout the local planning area. The cumulative impact of diesel PM on our communities is well understood and the cumulative action of the March JPA and its member agencies is to increase the total cancer risk of community members well above the baseline 100-in-a-million cancer risk level. The MJPA has added over 8,000 truck trips per day into our neighborhood. Adding another 2,500 more is cumulatively considerable. And that excludes member agencies like the County and the City of Riverside which have added their own hundreds and thousands of truck trips. This cutoff is arbitrary and a tantamount admission that the impacts of MJPA warehouses on our community is cumulatively considerable and larger than the MICR of 10-in-a-million.
- Table 4.2-16 is not a complete list of projects because it omits key buildings and MJPA cumulative truck routes. Figure 1 below shows the project site, a 1,000 foot project site buffer (dark red) a 1 km or ~3,000 foot buffer in orange, and a 1 mile (5,280 foot) buffer in yellow. Existing warehouses are overlaid in red, while planned/approved/under construction warehouses are in black. Truck routes are shown in blue.

RI-254.123 Cont.

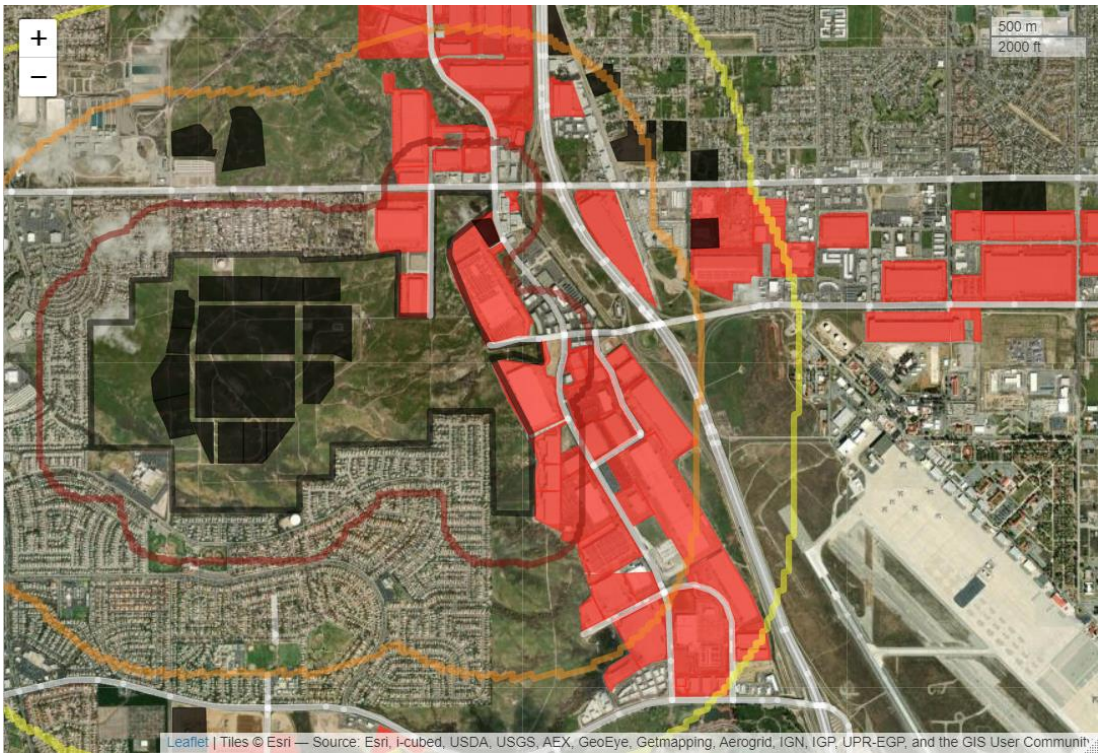
RI-254.124

RI-254.125

RI-254.126

RI-254.127

RI-254.128



RI-254.128 Cont.

Figure 1 – Map of project site with a 1,000 foot buffer (brown), 1 km buffer (orange), 1 mile buffer (yellow). Existing warehouses are highlighted in red, planned/approved/under construction warehouses are in black, and truck arterials or freeways are highlighted in white.

- Table 4.2-16 and Exhibit 3-B is incomplete and omits multiple warehouses, arterial truck routes, and the 215 Freeway. It accomplished this by drawing a 1,000 foot buffer around the *Specific Plan area*, rather than the Project Site boundaries. The most minimalist interpretation of the 1,000 foot boundary is undercounted by over 4M SQ FT of warehouses. Using the entirety of the Project Site and a 1,000 foot buffer shows omitted warehouses and truck routes.
    - It omits warehouses and truck arterial routes within 1000 feet of the project site–
        - RC1 (APN 297080016 and 297080015)
        - Warehouses within the MJPA planning area that are part of the March Business Center North Campus – APN 297232005, 297232004, 297231016, and 297231006
        - Warehouses in the City of Riverside - APN 263060044, 263250075, 263250054, and 263250053
        - Truck arterials of Alessandro Blvd and Brown St
    - Additionally, it omits warehouses that contribute truck traffic to truck arterials that come within 1,000 feet of the Project Site
        - R9 – Sycamore Hills distribution center – 600,000 SQ FT under construction that will add to Alessandro truck trips

- March JPA March Business Center North Campus warehouses that contribute trucks to Meridian Parkway – key buildings include APN 29464001, 294640034, 29465003, 29465002 which include over 2M SQ FT of local warehouses.

RI-254.128 Cont.

- If the buffer was extended merely to 1 km from the Project site which would be more likely to capture any local gradients of pollution from individual sources that may have declined by 95% at that point, there are multiple additional truck route arterials that would need to be included to adequately model the area cumulatively. When one does that, the clear and most important thing to include is the I-215 Freeway (29,000 trucks daily as of 2021). The key thing about the I-215 Freeway segment is over 5,000 of those daily truck trips are to/from the March JPA planning area. All 5,000 of those trucks go from a dead stop to accelerating to 65 mph and emit large quantities of diesel PM pollution in the process. It is a cumulatively considerable impact adding to a significant background of truck trips going to other warehouses permitted and entitled by MJPA planning agencies (Perris, Moreno Valley, County, City).

RI-254.129

- P.4.2-48 and 49 – While the electrification requirement is welcome, this is essentially toothless given the speculative nature of the warehouse tenants (these are spec warehouses). Domiciling requirements do not impact independent contractors and large operators can simply shuffle fleets around to avoid electrification by staying under the 70% requirements.

RI-254.130

- Air Quality Goals 2 and 3 are inconsistent – the project is inconsistent with air quality plans because it is selecting the highest intensity use, failing to consider less intense alternatives, and has an extraordinarily high VMT/employee ratio of trips (over 12 vehicle trips per employee per day!!!). That is not reducing VMT or GHG emissions. \

RI-254.131

- The project does not mention the increasing frequency of Valley Fever (*coccidioidomycosis)* – an increasingly prevalent fungal infection that grows in soil and dirt in California[17]. The cause of Valley Fever is inhalation of dust and its incidence has been increasing – with 349 cases in Riverside County in 2022 from the CDPH Valley Fever dashboard. Given the amount of blasting, grading, and soil disturbance involved in this project it is important to address the dust mitigation necessary to avoid Valley Fever during blasting and grading activities.

RI-254.132

- The U.S. EPA lowered the annual $PM_{2.5}$ national ambient air quality standard from 12.0 to 9.0 $\mu g/m^3$ on February 7, 2024[18]. Please update all tables (4.2-1) to reflect the lower standard. Riverside County is one of only 20 counties that will need to take additional emissions reductions actions to meet the new NAAQS and needs the highest emissions reductions of any county in the entire country to meet the new standards (Table ES-9 – US EPA – *Final Regulatory Impact Analysis for the Reconsideration of the NAAQS for PM*, 2024). This project will delay attainment of the new lower NAAQS.

RI-254.133

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses
92508

[17] https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Coccidioidomycosis.aspx
[18] https://www.epa.gov/pm-pollution/national-ambient-air-quality-standards-naaqs-pm

February 23, 2024

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

RE: Public comment on record for Recirculated Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the GP 23-02: March JPA (MJPA) draft Environmental Justice Element (draft EJ element). As an adjunct professor in the Department of Environmental Analysis at Pitzer College, my course on Environmental Data Visualization focuses on environmental justice in Southern California. It is disappointing to see the MJPA make this unserious attempt to comply with the legal requirements of SB 1000 to pursue more warehouses in its planning area.

RI-254.134

This comment letter focuses on the draft Environmental Justice element, its inclusion into a recirculated EIR prior to community notification, the illegitimate process the March JPA has undertaken to adopt this policy without meaningful involvement of community members, and the distinct lack of commitment to implement any real EJ policies. It focuses on three primary areas: process, policy, and implementation.

On November 29, 2023, the MJPA released information on their website and through mailed notifications or emails to members of the Westmont Village, Green Acres, and Veteran's Village communities within the MJPA planning area that an Environmental Justice (EJ) Element was under consideration[1]. A paid consultant drafted the EJ element with no input from community members (or even notification that an EJ element was under consideration), no agendized review by the MJPA Technical Advisory Committee, and no agendized input from the MJPA Commission. It also has not undergone any formal CEQA review, as required for a general plan amendment. In contrast, the master developer and environmental consultants were given multiple months of access to incorporate this draft policy into the SCH 2021110304 Recirculated EIR to retroactively proclaim that a warehouse complex was 100% compliant with the draft EJ policy unseen by the community. The draft EJ element is a flawed policy, developed by a flawed process, and with no intention for actual implementation of targeted, achievable, and concrete goals. It is merely a paper exercise to address a CEQA deficiency stopping the MJPA from building more warehouses.

RI-254.135

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- GP 23-02: Draft March JPA Environmental Justice Element - November 29, 2023
- General Plan of the March Joint Powers Authority[2], assumed 1999 date – last updated 3/07/2023 (General Plan, 1999)

RI-254.136

[1] https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification_.pdf
[2] https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf

- County of Riverside General Plan, Healthy Communities Element (Revised September 2021)[3]
- SB 1000 Implementation Toolkit: Planning for Healthy Communities (2018) – California Environmental Justice Alliance and PlaceWorks[4]
- Best Practices for Implementing SB 1000 (2023)– California Department of Justice[5]
- CalEnviroScreen4.0[6] data for affected census tracts.
- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304, recirculated technical appendices C-1, C-2, C-3a, C-3b, J-1, J-2, J-3, J-4, J-5, J-6, T and Appendices A-S, December 27, 2023 (REIR)
- City of Riverside EJ policies[7]
- City of Moreno Valley EJ policies[8]
- City of Perris EJ policies[9]
- Governor's Office of Planning and Research documents on Environmental Justice[10], Community Engagement[11], and General Plan amendments[12]

RI-254.136 Cont.

Background on Environmental Justice at March JPA

In my EIR comment letter dated March 9, 2023 titled 'EnvironmentalJustice.pdf', I noted that the draft EIR contained no mention of EJ issues in its 1,000+ pages, despite the MJPA planning area containing a CalEnviroScreen4.0 98th percentile impact census tract and being adjacent to a 99th percentile census tract (60605042505). In the best practices for implementing SB 1000, the DoJ recommends that the agency 'Define Unique or Compounded Health Risks of Disadvantaged Communities'. Below is my cursory effort which is more than the MJPA has done to date.

Census tract 6065046700 – 98th percentile cumulative impact score, population 4,721 – includes Westmont Village, Green Acres, Veteran's Village, and the eastern edge of the Edgemont community of Moreno Valley. Scores for individual CalEnviroScreen4.0 variables above the 80th percentile rank are shown in **Table 1.**

RI-254.137

Table 1. CalEnviroScreen4.0 scores for individual pollution and population characteristics above the 80th percentile in the March JPA census tract. Data from CalEnviroScreen4.0 (released 2021).

Tract	variable	Percentile rank (0-100)	Description
6065046700	CIscoreP	98	CalEnviroScreen Impact Score
6065046700	PolBurdP	95	Pollution Burden Score
6065046700	PopCharP	95	Population vulnerability characteristics Score

[3] https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-Ch10-HCE-092121.pdf
[4] https://caleja.org/2017/09/sb-1000-toolkit-release/
[5] https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf
[6] https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[7] https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/2021/Housing_Element/2021-09%20EJ%20-%20City%20Council%20Draft.pdf
[8] https://moval.gov/cdd/documents/general-plan-update/draft-docs/GP-Elements/08.pdf
[9] https://www.cityofperris.org/home/showpublisheddocument/15026/637807115505230000
[10] https://opr.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf
[11] https://opr.ca.gov/docs/OPR_C3_final.pdf
[12] https://opr.ca.gov/docs/OPR_C10_final.pdf

6065046700	OzoneP	98	Summer Ozone concentration (2017-19)
6065046700	TrafficP	82	Traffic Volumes - 2017
6065046700	CleanupP	83	Hazardous waste sites - 2021
6065046700	GWThreatP	98	Groundwater pollution threats - 2021
6065046700	HazWasteP	88	Hazardous Waste generators and facilities - 2018-20
6065046700	SolWasteP	85	Solid Waste Sites and Facilities - 2021
6065046700	LowBirWP	97	Low Birth Weight Infants - 2009-15
6065046700	CardiovasP	87	Cardiovascular Disease - 2015-17
6065046700	EducatP	82	Population over age 25 with less than a high-school education 2015-19
6065046700	Ling_IsolP	83	Percentage of limited English-speaking households - 2015-19
6065046700	PovertyP	89	Percent of population living below two times federal poverty level (2015-19)
6065046700	UnemplP	81	Percent of population over 16 that is unemployed and eligible for labor force (excludes retirees, students, active military) - 2015-19

March JPA communities are exposed to elevated levels of pollution, including 98th percentile high ozone pollution and groundwater pollution (PFAS spills, see hazards letter). Communities are exposed to 80th+ percentile quantities of hazardous waste generators and facilities, solid waste facilities, high traffic, and an ongoing Superfund cleanup site. These environmental hazards are burdening communities that are vulnerable across a variety of population indicators.

RI-254.137 Cont.

In addition, census tract 06065046700 already contains at least 40 existing warehouses estimated at over 20 million square feet of cumulative space, most of which were built or completed after January 1, 2018 when SB 1000 went into effect. Another 10 warehouses are entitled and/or under construction within the census tract (and March JPA), cumulatively adding another 3 million square feet. Census tract 06065046700 is ranked the 8th highest out of 3747 census tracts within Southern California counties of Orange, Riverside, Los Angeles, and San Bernardino for warehouse footprint and has the highest CalEnviroScreen4.0 impact score of any top 15 tract. This is clearly a disproportionate burden compounding the existing risk in the area. Adding the REIR project would put the cumulative total within the census tract at approximately 27 million square feet cumulatively, in the **99.8th** percentile regionally.

The communities within the MJPA planning area are subject to compounded health risks due to their proximity to the March ARB, the industrial development being implemented by the MJPA, and the surrounding industrial development by March JPA member agencies in Moreno Valley, Perris, Riverside, and Mead Valley. The March JPA has not attempted to engage with its communities in any meaningful policy development, has failed to pursue aggressive mitigation strategies, and has chosen to pursue a policy of upzoning to more intense polluting development at every opportunity over the last 20 years.

Process

Best Practices of Community Engagement

The California Department of Justice, Governor's Office of Planning and Research, and SB 1000 implementation Toolkit lists some best practices for community engagement. I ask that the MJPA engage in these practices.

1. EJ Advisory Committee
2. Partnering with Local Community Organizations
3. Tribal Consultation
4. Meeting Times, Locations, and Childcare
5. Language Access
6. Metrics

R-NOW members are willing to participate in an EJ Advisory Committee. I am happy to volunteer to craft a reasonable policy. The best practice for an EJ policy is that it be community led (SB 1000 Implementation Toolkit, DoJ). RI-254.138

Instead of following best practice, the MJPA has engaged a large engineering/architectural firm (Michael Baker International) to lead the EJ policy development and released a draft EJ policy without any community notification, much less engagement.

Michael Baker International is the lead environmental consultant on over ten warehouse projects in southern California, including the I-15 Logistics Center in Fontana and the Southern California Logistics Center 44 in Victorville. It is not clear what qualifications in Environmental Justice they have, as there are no example projects on their website focused on EJ issues beyond environmental compliance for mega-projects. There are multiple environmental consultants or nonprofit organizations that could have been hired to help in this process that would not have this apparent conflict of interest.

Early Access for Developer within the REIR – No Notification for Community

The MJPA violated the core principle of Environmental Justice – meaningful involvement in policy development – in its development of its drafted Environmental Justice Element. Community was not notified at all until the draft EJ element was released. Community was not onboarded until a draft EJ policy had been incorporated in an REIR. In contrast, the master developer and environmental consultants working on the REIR were given early access to the policy and fully incorporated it into an REIR released 3 days after the draft EJ element was released to the public.

On November 29, 2023, the MJPA released information on their website and through mailed notifications or emails to members of the Westmont Village, Green Acres, and Veteran's Village communities within the MJPA planning area that an Environmental Justice (EJ) Element was under consideration[13]. MJPA staff and consultants created the draft EJ element with no input from community members, no review by the MJPA Technical Advisory Committee (TAC), and no input from the MJPA Commission. MJPA staff did not notify community members in any manner, post it on CEQANET, or in any published agendas of MJPA commission or TAC committee meetings from March through November RI-254.139

[13] https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification_.pdf

2023. MJPA Staff, its consultants, and the master developer drafted the EJ element behind closed doors without input from community – that is not a legitimate process of community engagement.

On December 2, 2023, the MJPA staff released the REIR for the West Campus project, which fully incorporates the draft EJ element released 3 days prior. The following sections of the REIR rely on the draft EJ element released to the public for 3 days.

- explanation of the draft EJ element of the 1999 March JPA General Plan in the Project Description - Section 3
- addition of draft EJ element policies to the Air Quality analysis – Section 4.2
- discussion of the draft EJ element in the Land Use and Planning section – Section 4.10
- a consistency checklist with the draft EJ element in the Land Use and Planning section – Section 4.10

RI-254.139 Cont.

To incorporate the draft EJ element in each of these sections, it was necessary for multiple environmental consultants and the master developer to have access to the draft EJ policies months before the REIR was released. Community members received no notification and were certainly not consulted or engaged in the crafting of the draft EJ element. This is notable not only for its inconsistency with best practice as identified by CEJA and DoJ, but for its deliberate withholding of responses to CEQA comment on the draft EIR that I made on March 9, 2023. MJPA staff know that the community wants to be engaged in this public agency and its environmental policymaking but choose not to allow collaborative participation, but the MJPA staff rejects meaningful involvement by community in crafting environmental policies affecting its planning area.

This is not a legitimate EJ element until it reflects community voice.

I will end this section with a quote from the OPR Chapter 10 CEQA guidelines, with my emphasis in bold.

'Information developed as part of the CEQA process should influence the development of general plan policies. CEQA should **not just be a post hoc rationalization of decisions that have already been made**. (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal. 3d 376, 395 ("**the later the environmental review process begins,** the more bureaucratic and financial momentum there is behind a proposed project, thus providing **a strong incentive to ignore environmental concerns** that could be dealt with more easily at an early stage of the project")).'

RI-254.140

EJ Workshops Railroaded Policy Options

I attended both EJ workshops hosted by the March JPA on December 19, 2023 and February 20, 2024. In both cases, the format was identical. Introductions, a ~20 minute presentation on the EJ element, a dot plot poll on the 77 existing policy options in the draft EJ element, a public comment period, and then a question and answer session.

In the first event, I asked for the public to be allowed to propose policies and vote on them in the dot poll. This was ignored, and the process was the same on the second event. Thus, the community votes were constrained to a realm of 'allowable' policies that were based on the County policies.

RI-254.141

In contrast, the community, in both sessions, asked for a warehouse moratorium. There was a general consensus that there are more than enough warehouses, both locally and regionally.

Unfortunately, the process of engaging with the March JPA is infused with a feeling of insincerity and inauthenticity. I do not trust the March JPA to act in the best interests of our community and continue to feel that the March JPA staff and commissioners distrust the community and doubt the wisdom or realism of our solutions.

RI-254.141 Cont.

Policy

The Draft EJ Element is Neither Specific, Targeted, Concrete, nor Achievable

The MJPA chose as its draft EJ element to wholesale copy-paste the County of Riverside EJ element incorporated in the Healthy Communities section of the County of Riverside General Plan[14]. The justification for this adoption is that the County of Riverside will be the successor agency to the MJPA in July of 2025. However, this choice is not defensible because the time, financial resources, jurisdiction, and specific issues of the two land-use agencies are completely different. The March JPA needs to examine its own planning area, general plan, and communities to create an EJ element that is specific to the needs of the community members who live there and the land-use decisions and policies that govern the MJPA planning area.

The County of Riverside EJ element includes 77 policies, many of which are long-range goals. However, the March JPA is sunsetting in 17 months. It has limited staff and time. It cannot achieve long-range planning objectives for the planning area. Adopting the County policies lead to an absurd number of policies that that make no sense. For example:

- The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7)
- The March JPA has no jurisdiction over the Salton Sea (policy HC 16.1)
- The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC 16.8), and rejects community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10)
- The March JPA will not coordinate with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7)
- The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13)
- The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

RI-254.142

At a minimum, a proposed EJ element needs to incorporate MJPA priorities, exclude inapplicable county policies, and describe community priorities through an active (and hopefully formal) community engagement process. This copy-paste of County policy is neither Specific, Concrete, nor Targeted and it is devoid of community input. Adopting a General Plan amendment with more than a dozen policies that the MJPA has no intention of implementing is dishonest, poor governance, and a litigation risk. Incorporating the draft EJ element into a REIR prior to receiving any community feedback introduces an unstable EIR element (consideration of a draft policy) and removes the opportunity of the community to

[14] https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-Ch10-HCE-092121.pdf

help craft the policies affecting our neighborhoods – thus rendering meaningful involvement moot. This is an attempt to bypass community involvement in the planning process and is in conflict with the EJ element.

EJ Element Background and Application is Inaccurate and Inconsistent with General Plan

In the draft EJ element there are a host of inaccuracies and inconsistencies.

1. P. 2 - Adjacent communities in Moreno Valley, City, and County of Riverside are also affected by MJPA land-use policies and the effects of land-use decisions should include adjacent jurisdictions, consistent with the existing JPA General Plan policies.
2. P.2 - The EJ element will hopefully not contain the full list of County of Riverside EJ policies – many are not applicable – see above.
3. P.2 - The MJPA is currently unincorporated county, right? The March JPA is a land-use authority but is not incorporated as a city. '14th amendment to the March Joint Powers Agreement , the March JPA will be recognized as *unincorporated territory* within the County of Riverside…'
4. P.2 - The MJPA includes **three** residential communities – not two. Leaving out the US VETS community is an embarrassing oversight that shows what happens when a non-local consultant writes the EJ element with zero community input. The MJPA staff oversaw the installation of the US VETS facility and should not have omitted this key community. Please update text and Exhibit 7-1 accordingly.

In addition to the errors above, the description of the General Plan in the draft EJ element contradicts the text of the General Plan describing itself. Here's the description from the draft EJ element – with my emphasized sections in bold. Quote from p.3 of the draft EJ element.

RI-254.142 Cont.

> *The General Plan represents the build-out vision of March JPA. It not only addresses what March JPA envisions to be achieved from new development, it also provides a framework for the collective living and working environment of its residents. Policies applicable to new development will be implemented by March JPA. Other policies to be implemented require cooperation with non-profits, community-based organizations, foundations, other government agencies, as feasible.*
>
> *To be clear, the General Plan is a document consisting of goals and policies.* ***Such goals and policies are evaluated as a continuum of direction within broad interpretation parameters.*** *They are not regulations in the manner that a zoning code consists of regulations with which compliance must be achieved****. Goals and policies are interpreted and if the direction set by the goal or policy is met, a level of compliance is achieved such that the direction set by the goal or policy is met within a continuum framework. EJ Policies are evaluated in the same manner as all other General Plan goals and policies - subject to interpretation with appropriate determinations of compliance.***

And here's the comparison from the 'Purpose of the General Plan' p. v-vi of the General Plan, 1999, again, with my emphasized sections in bold.

> *Preparing, adopting, implementing, and maintaining* ***a general plan serves to link community values to actual physical decisions****. The* ***plan identifies the community's***

***land use, circulation, environmental, economic, and social goals, and policies as they relate to land use and development**. The General Plan establishes goals and policies to reach long-term objectives, and establishes long-term policy for day-to-day decisions, based upon those objectives. The General Plan provides a basis for local government decision making, including a nexus to support development exactions.*

*In essence, a **general plan serves as the blueprint for future growth and development…The goals and policies of the General Plan serve as the constitutional framework for March JPA**; provide planning direction for JPA operations and programs, and function as guidelines for all decision-making concerning use and development of the area.*

I can't reconcile the two descriptions. The General Plan description is clear – it is the constitutional framework, blueprint, and link with community values. In contrast, the EJ element of the General Plan is a wishy-washy legalese description, with many caveats indicating it probably will be minimized and 'evaluated' within a 'continuum'. The EJ element description gives the impression that the polices will not be implemented or actionable. This section needs to be modified to be consistent with the General Plan's description of itself – a clarion call description of the moral values of the agency linking land-use to community values.

The problem is the MJPA is not reflecting community values in its land-use decisions and amending the General Plan with an EJ element will add to that dissonance.

EJ Elements from other member agencies

RI-254.142 Cont.

The cursory and hasty adoption of the County of Riverside EJ policy ignores that there are four member agencies of the MJPA, each with adopted EJ elements. Many of the city policies are applicable but were not considered by the MJPA in their policy list. I request a comparative analysis of the EJ policies of all four member agencies.

City of Riverside

A few policies from the City of Riverside stuck out to me. Please consider these specifically.

- Policy LU-EJ-2.0 – Public Engagement – ensure the citywide community engagement policy provides community members to participate in decisions that affect their environment and health
- Policy AQ-EJ-1.0 – Air Quality – Ensure that land use decisions, including enforcement actions, are made in an equitable fashion to protect residents and workers in EJ communities from the short-term and long-term effects of air pollution
- Policy AC-EJ-1.0 – Arts and Culture – Promote equitable distribution of arts and culture facilities across the city.
- Policy HP-EJ-1.0 – Historic Preservation – Encourage identification and preservation of historic and cultural resources associated with communities whose histories and historical contributions are not well documented.

R-NOW members have specifically asked for land-use that meets each of these policy objectives in our dialogue and correspondence with the MJPA. The REIR project will destroy historical resources that are not well documented, remove the opportunity to preserve a cultural facility in the Mission Grove and

Orangecrest neighborhood – an area lacking in those facilities. The MJPA has disproportionately burdened the EJ community with pollution spewing trucks, and the MJPA has repeatedly rejected public engagement in its activities.

City of Moreno Valley

Multiple census block groups within the census tract 6065046700 are within the City of Moreno Valley. Given the proximity and shared responsibility, it is important to consider any Moreno Valley EJ Actions that overlap to make sure they address issues in a coordinated manner.

- EJ.1 – A – Use the Climate Action Plan to guide City actions and investments aimed at reducing GHG emissions community-wide
- EJ.1 – C – Consider establishing a fee to be paid by new development to assist in the funding of local projects that contribute to enhancement of air quality, particularly in disadvantaged communities.
- EJ.2 – D – Explore development and monitoring of indicators of displacement and use of this data to identify at-risk neighborhoods and target programs and resources to prevent homelessness.
- Map EJ-2 – Census Tract 46700 is a low-vehicle access community.
- EJ.4-1 – Encourage inclusive, participatory City processes that emphasize the collaborative exchange of ideas by all segments of the community.
    - Holding public meetings and outreach activities at culturally appropriate neighborhood gathering places or community events when feasible
    - Employing a wide range of outreach methods and activities, including pop-up events, focus groups, community workshops, and online surveys, in various languages.
    - Encouraging participation of disadvantaged communities in civic process by providing transportation vouchers, translation services, childcare, food, or monetary compensation.

RI-254.142 Cont.

City of Perris

- Goal 1.1 – A high degree of transparency **and inclusion** in the decision-making process.
- Goal 3.1 – A community that reduces the negative impacts of land use changes, environmental hazards, and climate change on disadvantaged communities.
- Goal 3.2 – A community that **actively works** to reduce the impacts of poor air quality.
- Goal 5.1 – Neighborhoods designed to promote safe and accessible connectivity to neighborhood amenities for all residents.
- Goal 6.1 – A diverse housing stock that preserves and enhances housing affordability in the community.

Policy Recommendations-

Community Engagement

Form a Municipal Advisory Council (MAC) or Community Advisory Council (CAC) through the County District Supervisor's office to formally engage with MJPA community members on policies pertaining to land-use, development, policies, and facilities within the area. Give the community a voice in the future of their community as it transitions to unincorporated county.

Reduce Pollution Exposure

I ask that the MJPA modify its EJ policy to reflect an achievable set of short-term policies with a minimal set of policies that can be implemented in the remaining 17 months of its existence. I recommend a **moratorium on new industrial and warehouse developments** within the MJPA planning area until a Good Neighbor Policy can be crafted that reflects stakeholder feedback. That is achievable, targeted, specific to the agency, and concrete.

Promote Public Facilities

I ask that the MJPA fund and build the 48-60 acre park that the MJPA agreed to build 21 years ago. That is achievable, targeted, specific to the agency, and concrete.

Promote Food Access

I ask that the MJPA establish at least one grocery store or health food option within its planning area. To data it only favors established chain fast-food restaurants (Chipotle, In-N-Out, Starbucks, Jersey Mike's Subs, Farmer Boys, 7-Eleven, Cupcake & Espresso Bar, Waba Grill, Pizza Factory, El Rey Taco Mexican Grill) at its strip plaza developments. That is achievable, targeted, specific to the agency, and concrete.

Promote Safe and Sanitary Homes

Mitigate the impacts of older buildings at Green Acres and Westmont Village to promote healthy living environments for its residents. That is achievable, targeted, specific to the agency, and concrete.

Address Unique or Compounded Health Risks

The MJPA needs to directly address its own warehouse and distribution center planning activities and development on the communities within its planning area. Warehouses and their trucks disproportionately impact MJPA communities. The warehouse moratorium would achieve that goal.

Summary

Warehouse land use in the MJPA planning area disproportionately added to the burden of MJPA communities. MJPA staff continue to pursue an industrial land-use policy with minimal mitigation measures. MJPA has been out of compliance in updating its General Plan to address SB 1000, with over 5 general plan amendments since 2018 that included no mention of environmental justice. It is time for the MJPA to take bold action and empower and protect its residents by pledging to focus on the communities it serves. The March JPA is out of alignment with its General Plan and is failing to reflect community values in its land-use decisions. It is time to change course and rededicate the MJPA as a public agency serving the public interest – instead of merely the interests of a for-profit master developer that refuses to consider non-industrial land-uses.

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses
92508

RI-254.142
Cont.

February 23, 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project (the Project). The Project would site up to 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed pretend park, and reserved passive recreation areas. RI-254.143

This comment letter focuses on the Hazards and Hazardous Materials Section of the REIR. As part of my background, I have a PhD in chemistry from UC Berkeley with a focus in atmospheric chemistry, I have over 20 years of professional experience as an environmental consultant. My expertise includes near-road pollution gradients, health-risk assessments, spatio-temporal variability, source apportionment, emissions characterization, climate change, air toxics, nuclear chemistry, and isotopic compositions. In college, I received a full-ride fellowship to attend nuclear chemistry summer school at San Jose State University and in the following summer I had a paid summer research experience at Lawrence Livermore National Laboratory overseeing the implementation of a mobile radionuclide laboratory for use in the national nuclear weapons stockpile program. Additionally, I was an expert witness in three litigation cases[1] involving PFAS/PFOS/PFOA compounds in the northeastern United States. My resume[2] and a short publications list[3] indicate my qualifications as an environmental consultant exploring the fate and transport of hazardous materials in the environment. Therefore, I submit this letter not only as a resident of the community, but as a domain expert. RI-254.144

The Hazards and Hazardous materials sections remains deficient in multiple areas – primarily in its assertion that this project will not (1) disturb contaminated soil (2) create a significant hazard through reasonably foreseeable upset and accident conditions and (3) expose people, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires.

Disturbance of Contaminated Soil

As noted in previous letters to the MJPA, there is significant concern among community members that the MJPA and master developer have not performed their due diligence in assessing the existing RI-254.145

[1] Baker v. Saint-Gobain Performance Plastic Corp et al.,; Sullivan et al., v. Saint-Gobain Performance Plastic Corp; and Brown et al., v Saint-Gobain Performance Plastic Corp et al.,
[2] http://radicalresearch.llc/resume.html
[3] http://radicalresearch.llc/pubs.html

conditions on the site. Specifically, this is an ex-military base used to house nuclear weapons, dump waste, and test ordnance. Since BRAC, the Weapons Storage Area (WSA) igloos have been used to store fireworks and pyrotechnics. As a result of these previous use conditions the following contaminants are likely to be present.

RI-254.145 Cont.

- **PFAS/PFOS/PFOA** – Per- and Polyfluoroalkyl Alkyl Substances are a group of chemicals used to make fluoropolymer coatings and products. They do not break down in the environment, bioaccumulate, and can move through soils to contaminate drinking water. There is known contamination on the March AFB in both water and soil. There is ongoing cleanup of soils and water on the base due to its use as an Aqueous Film Forming Foam (AFFF) in military firefighting. In addition, PFAS/PFOS/PFOA compounds are present in munitions[4,5], although quantification of impacts in areas with exploded or unexploded munitions is poor. Specifically, Site 3 and Site 25 have contaminated soil and water as shown in the Air Force PFAS cleanup brochure. No testing has been done on the West Campus area. This contamination may have migrated through the soil or been disturbed in the past 30 years since the BRAC closure. Additionally, Figure 4.8-1 from the REIR indicates areas the US Air Force investigated and there are multiple uninvestigated areas that may have exploded or unexploded munitions. A full gridded survey of the grading area is needed to demonstrate that no contamination has occurred beyond the IRP site 3 and Site 25 and adjacent to the areas of known munitions residues.

RI-254.146

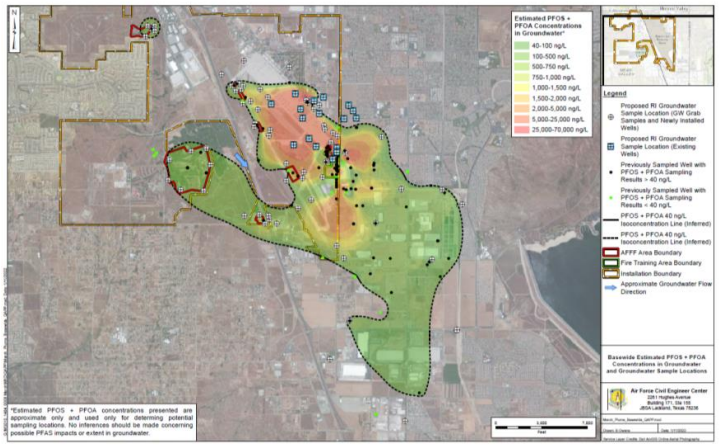


Figure 1. Air Force PFOS/PFOA contamination plume and sampling locations as of January 2022.

- **Radionuclides** – the March WSA stored nonconventional weapons for decades. New sections describe the EarthTech MARSSIM and Cabrera radionuclide analysis, but no maps are shown to demonstrate that these surveys were comprehensive for the entirety of the proposed project area. Both Cabrera 2006 and EarthTech 2000 specifically focus on surveys in and around WSA igloos and maintenance buildings and are not comprehensive of the entire project grading area. No radionuclide analysis is documented for anything outside of the buildings in any of the three

RI-254.147

[4] https://setac.onlinelibrary.wiley.com/doi/full/10.1002/ieam.4672
[5] https://apps.dtic.mil/sti/citations/ADA554432

documents provided. It is not sufficient to point to what previous surveys have shown if they are not comprehensive of the proposed project area and soil disturbance. Please perform a radionuclide survey of the areas that will be graded as part of this project, especially since depleted uranium was first used in the late 1970s through the Gulf War when the WSA was used for munitions. Given the additional use of the WSA and the described unexploded ordnance surveys, it is important to measure before disturbing the soil.

RI-254.147 Cont.

- **Perchlorate –** Current use of the WSA includes storage of fireworks by Pyro Spectaculars, Inc. Fireworks are a primary cause of environmental perchlorate contamination.[6] The California Department of Toxic Substances Control regulates perchlorate as an environmental contaminant[7]. Additionally, perchlorate is used in rocket fuel[8] and in other munitions[9]. Despite the existing use as a fireworks storage facility and the previous use as a weapons storage area – there are zero mentions of perchlorate as an environmental contaminant of concern. The REIR is deficient. It is necessary to test for perchlorate contamination in and around the WSA igloos and in and around any ordnance or munitions areas.

RI-254.148

- **PCBs –** EPA guidelines indicate that PCBs can migrate into porous surfaces – wipe samples are inadequate. Core samples are necessary prior to demolition of WSA igloos to avoid release of these contaminants through blasting and/or jackhammering.

RI-254.149

- **Valley Fever -** The project does not mention the increasing frequency of Valley Fever (*coccidioidomycosis)* – an increasingly prevalent fungal infection that grows in soil and dirt in California[10]. The cause of Valley Fever is inhalation of dust and its incidence has been increasing – with 349 cases in Riverside County in 2022 from the CDPH Valley Fever dashboard. Given the amount of blasting, grading, and soil disturbance involved in this project it is important to mitigate and create a plan to minimize soil disturbance during the project.

RI-254.150

Creating Significant Hazards

Threshold HAZ-2. Would the Project create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Unexploded Ordnance and residual munitions – Unidentified ordnance within the grading or blasting area may be set off blasting or grading activities considered by the project. The project relies entirely on the claims the Air Force of no significant unexploded ordnance that were not considering the specific development on this area. While Estrada's communication is an expert opinion, it is not sufficient to prove that the likelihood of buried ordnance is negligible. Given the proximity of the residential homes a church, and the 24 inch gas line, the low possibility of a catastrophic unplanned explosion does not appear to have been considered by the developer or the MJPA in this planning process. Please demonstrate through a diligent process that there is a negligible chance of unanticipated explosions.

RI-254.151

[6] https://pubmed.ncbi.nlm.nih.gov/25004859/
[7] https://dtsc.ca.gov/perchlorate-fact-sheet/
[8] https://aec.army.mil/application/files/9315/0099/7260/PercPoster_8x11.pdf
[9] https://pubmed.ncbi.nlm.nih.gov/24035798/
[10] https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Coccidioidomycosis.aspx

Blasting – The use of explosives is discussed for rock handling in the construction phase. Explosives are hazards or hazardous materials. There is a foreseeable chance of accidents or upset conditions. Additionally, there is no description of the blasting being restricted around the gas line, areas of unexploded ordinance or residual munitions areas, or the chance of chain reactions with unidentified residual munitions. Given the lack of diligence in characterizing the area and lack of description of blasting around potentially explosive areas it appears the developer and MJPA are not adequately prepared to ensure the safety of the surrounding residents.

RI-254.152

Threshold HAZ-3 – Emitting hazardous materials within one-quarter mile of schools

The REIR incorrectly identifies the project boundaries and omits the construction phase emissions adjacent to the Grove Community Preschool and the Orange Terrace Park after-school day care. Both schools and daycares are within a few hundred feet of construction boundaries which will emit hazardous diesel PM, aldehydes, and naphthalene from construction equipment. Additionally, the asphalt used in the road repaving will give off toxic hydrogen sulfide gas, Polycyclic Aromatic Hydrocarbons (PAHs) and other carcinogens.

RI-254.153

Wildland Fires

Threshold HAZ-5 – Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The MJPA claims on this threshold are inaccurate with regards to current insurance conditions in the region. Insurance companies are leaving the state in droves, especially in areas like the project area which is considered wildland urban interface (WUI). Policies are being non-renewed or rates are being increased by over 20% to cover the increased risk identified by insurance companies responsible for paying out. CalFire may not consider it a high severity zone, but insurance companies are coming to very different conclusions – and they have money on the line. A local Goosehead Insurance representative stated at a Lake Mathews Neighborhood Association meeting that most non-renewals in the area are due to wildland fire concerns by insurance underwriters[11].

Additionally, the destruction of native forb through grading and stubbing of utilities is more likely to result in invasive flammable species. Thus the western portion of the project which will be graded and stubbed will be more susceptible to wildland fires. Given the lack of funding for an actual park to be built, it is likely that 60 acres will remain an area for invasive grasses which will render the area more susceptible to future fires for the foreseeable 20 year future. That is unacceptable and unmitigated risk that the project will impose on residents of Mission Grove and Orangecrest.

RI-254.154

Test Sample Detection Limits and Spike Recovery indicate Poor Quality Control Insufficiently Sensitive to identify Contaminants at EPA RSLs

Appendix J-6 indicates the soil testing and hazardous materials testing results. Vista Environmental Laboratory Certificates of Analysis indicate PQL levels, results, and surrogate recovery levels.

As a chemist and environmental scientist, I've reviewed thousands of individual sample certificates to identify potential quality control issues and to ensure that the sampling protocol is sufficiently robust and sensitive to identify contaminants of concern. In this sampling protocol, spike recovery levels in

RI-254.155

[11] Personal Communication - January 17th Residents Association of Greater Lake Mathews Community Meeting – Video of zoom meeting may be available.

appendix J-2 for Aroclor PCBs are typically well below the 70-130% target levels for samples with a 30% level of accuracy. In fact, none of the Aroclor surrogate levels are above X% with multiple samples at levels 25-30%. For example on p. 362 of Appendix J-2, a spike of 16.67 μg/kg was measured as 3.77 for Decachlorobiphenyl and 6.485 for Tetrachloro-m-xylene. The percent recovery values were 22.6% and 38.9%, respectively. This indicates that a known quantity of sample was not recovered to within a factor of 5X and 2.5X, respectively. This is a non-quantitative recovery – indicating serious Quality Control and Quality Assurance failure on that sampling day. All samples from that sampling run should be considered invalid.

Vista Environmental Quality Control Certificates indicate that the Matrix Spike samples and Laboratory Control were significantly underestimated and should not be considered a reliable measurement for Aroclor. Surrogate percent recovery rates were 22.6% and 38.9%. The laboratory control sample a percent recovery of 49.7% for Aroclor 1016 and 50.8% for Aroclor 1260. The Matrix Spike indicated and duplicate indicated a percent recovery rate of between 28.7% and 34.5% for Aroclor 1016 and 1260.

RI-254.155 Cont.

These recovery rates are not reliable – indicating a systematic issue with sampling.

The reported primary quantitation levels (PQL) for the Aroclor samples were 480-490 μg/kg – that is above the residential soil screening level of 240 μg/kg for Aroclor 1260. As a result the measurements are insufficiently sensitive to identify screening levels of concern and are incapable of reporting and are systematically underreporting actual concentrations by a factor of 2 to 5 times.

Additional samples taken January 17th, 2022 and analyzed in February and March 2022 in Appendix J-6 indicate similar analytical issues with systematic surrogate reporting levels below 70% (e.g., sample W-1, TW-1, TW-2, TW-3, W-2, etc.). QA analysis of Aroclor 1016 showed matrix spike recovery rates of 29% at levels a factor 10 higher than reported PQLs on 2/24/2022 and recovery rates of 53.7% and 59.2% for Aroclor 1016 and 1260 respectively on March 2, 2022. Matrix Spike levels were between 29.7% and 47.7%. This sampling is not reliable nor quantitative.

In addition, the semivolatile organic compound quality control also routinely showed recovery levels as low as 3%, with surrogates having lower bound values of 23, 3, 18, 34, 16, 31, 23, and 14% respectively. A quality control matrix spike analyzed on February 28, 2022 showed a complete lack of sample recovery for over 20 compounds on the SVOC list and with recovery rates of other compounds of over 900%. That indicates a significant non-quantitative sample failure and all samples taken on this day should be flagged as suspect/invalid.

RI-254.156

The analytical laboratory results are demonstrably not quantitative based on the QA/QC Certificates of Analysis. Please re-sample and re-analyze with acceptable QA/QC levels to prove that the project area is not contaminated.

ERRATA

- The Pentachlorophenol measurements in Appendix J-6 were well above RSLs for residential soil and industrial soil.
- **Metals –**

RI-254.157

- Chromium testing in Appendix J-6 was done on total chromium and did not measure Chromium VI, often assumed to be 1-2% of the total chromium[12]. Based on the total values is likely that the concentrations of Cr VI exceed residential soil and air RSLs - 0.3 mg/kg and $1.2x10^{-5}$ $\mu g/m^3$, respectively. RI-254.158
- Arsenic testing in Wood communications poles in Appendix J-6 was well above residential soil screening levels of 0.68 mg/kg. RI-254.159

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses
92508

[12] https://www.epa.gov/national-air-toxics-assessment

RI-254

Mike McCarthy
February 23, 2024

RI-254.1 This comment is a transmittal email for six attached letters, each of which are responded to below. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

LAND USE AND PLANNING

RI-254.2 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.3 This comment notes that the focus of this letter is on Recirculated Section 4.10, Land Use and Planning and summarizes the letter's comments. These comments are addressed below in Responses RI-254.4 through RI-254.33.

RI-254.4 This comment lists the publicly available documents reviewed by the commenter. The comment lists the March JPA Draft Vision 2030, but this document was never adopted. The comment also lists the commenter's previously submitted comment letters titled "PlanningDocs.pdf" and "Summary.pdf", which are Comment Letter I-833 and Comment Letter I-930, respectively, in the Final EIR. Please see Responses I-833.1 through I-833.15 and Responses I-930.1 through I-930.28. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.5 This comment asserts that the description of Existing Conditions in Recirculated Section 4.10, Land Use and Planning, does not identify the Project site as open space used by the public. Recirculated Chapter 3, Project Description, states: "The CBD Settlement Agreement identified publicly accessible trails in areas of the Project site that would be within the Conservation Easement (Appendix S). This area has been utilized by the public for passive recreation for more than 10 years." For clarification purposes, this information is added to Recirculated Section 4.10, Land Use and Planning. The comment also states that the description of Existing Conditions in Recirculated Section 4.10, Land Use and Planning, should acknowledge that both the CBD and 2003 Settlement Agreements impose conditions on the Project site to include a conservation easement, open space, and a 60-acre park. Consistent with the requirements of CEQA, the general purpose of "Existing Conditions" is to provide a description of the physical state of the Project site. Implementation of the CBD Settlement Agreement is included as a Project Objective. As discussed in Topical Response 4 – Project Consistency, the 2003 Settlement Agreement specifically focused on the North Campus and South Campus portions of the March Business Center. The 2003 Settlement Agreement established terms for the buildout of these two campuses within the March Business Center and did not apply to the development of the proposed Project on the West Campus Upper Plateau site. Please see Topical Response 4 – Project Consistency,

for an evaluation of the Project's consistency with the terms of the 2003 Settlement Agreement (included as Appendix S-2 of the EIR), and the CBD Settlement Agreement (included as Appendix S-1).

RI-254.6 This comment requests that the Project's consistency with the City of Riverside Good Neighbor Guidelines and the WRCOG Good Neighbor Guidelines be evaluated. In response to this comment, please see Topical Response 4 – Project Consistency, which includes consistency evaluations with each of these sets of guidelines.

RI-254.7 This comment questions the March JPA General Plan's compliance with SB 379. SB 379 was passed in 2015 and amended Government Code section 65302(g) to require cities and counties to review and update the safety element of their General Plan "***as necessary*** to address climate adaptation and resiliency strategies applicable to the city or county." Government Code section 65302(g)(4) (emphasis added). March JPA reviewed the climate adaptation and resiliency vulnerability assessment[8] that was prepared for the Western Riverside Council of Governments (WRCOG). March JPA is a non-voting member of WRCOG, and the WRCOG vulnerability assessment covered the entirety of the March JPA Planning Area. The vulnerability assessment evaluated impacts of climate change on agricultural pests and diseases, air quality, drought, extreme heat, flooding, human health hazards, landslides, and wildfire. The March JPA Planning Area is not in an area identified with a risk of flooding, landslides or wildfire in the WRCOG assessment. The March JPA Planning Area is not identified as having any climate change impacts to agricultural pests and diseases, air quality, drought, extreme heat, or human health hazards that differ from all of WRCOG, and more specifically it is the same as for Riverside County. Based on review of the WRCOG's vulnerability assessment, March JPA determined it was not necessary to update the March JPA Safety/Risk Management Element.

WRCOG's vulnerability assessment indicating that there are not climate change safety risks particular to March JPA Planning Area is consistent with the vulnerability assessment prepared by Riverside County and included in its General Plan safety element (see Figures 1 through 14[9]). Although the County of Riverside does not have direct authority over the Project, it is anticipated that in June 2025, March JPA's land use authority will revert back to Riverside County, which will assume full land use control over the March JPA Planning Area. As such, March JPA also reviewed the vulnerability assessment prepared by Riverside County and determined it was not necessary to update the March JPA Safety/Risk Management Element because, in addition to not being located in any area of specific climate risk, the March JPA Planning Area will transfer to the County before the timeframe of any generalized climate change safety risk occur. For example, the County's General Plan notes:

- "According to the California Energy Commission, the number of extreme heat days is projected to, where the average year could include approximately 25 to 35 extreme heat days between 2041 and 2060, and 40 to over 60 extreme heat days per year between 2070 and 2099. Overall, unincorporated Riverside County is expected to see an increase in the average daily high temperatures."

8 Available online here: https://wrcog.us/DocumentCenter/View/7478/Western-Riverside-Adaptation-and-Resiliency-Strategy_Vulnerability-Assessment

9 Available online here: https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-2021-elements-Ch06-Safety-092821.pdf

- "Climate change is expected to cause an increase in intense rainfall, which is usually associated with strong storm systems. This means that unincorporated Riverside County could see more intense storms in the coming years and decades, possibly causing an increase in the frequency of severe weather events and any associated hazards."

In addition, the WRCOG's vulnerability study notes:

- "Even with the accelerated nature of the current rate of climate change, differences to the climate may be indistinguishable from one year to the next and are generally only discernible when compared across multiple decades."
- For increased wildfire risks, "The yellow color on Figure 5 indicates that there will be less than a 25-acre increase in acres burned from 2070 to 2099 compared to historic annual acres burned. The red color shows a 75 to 100-acre increase in acres burned from 2070 to 2099 compared to historic annual acres burned."
- "On average, some studies indicate that 20–30 percent more atmospheric river storms will strike the state by the middle of the century and that the number of years that see the most atmospheric river storms (15 to 20 or more) will double."

Finally, the Project is compliant with the Riverside County Climate Action Plan as detailed in Section 4.7, Greenhouse Gas Emissions, and is also compliant with the County of Riverside General Plan Safety Element's climate change-related hazards policies that apply to development projects, none of which are mandatory:

S 7.9 Encourage new developments and existing property owners to incorporate sustainable, energy-efficient, and environmentally regenerative features into their facilities, landscapes, and structures to reduce energy demands and improve on-site resilience. Support financing efforts to increase community access to these features.

- Development within the Project would comply with this policy by utilizing energy-efficient equipment and design. Additionally, implementation would include energy conservation features and recycling programs, such as drought-resistant vegetation. MM-AQ-6 requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent. MM-AQ-7 requires all buildings to be designed for passive heating and cooling with the inclusion of natural light. MM-GHG-1 requires the installation of a rooftop solar photovoltaic system, and MM-GHG-7 requires each Project site plan to provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. As demonstrated in Section 4.5, Energy, all energy-related impacts would be less than significant, and no mitigation is required. See Section 4.5, Energy, for more discussion on energy consumption.

S 7.11 Promote and expand the use of drought-tolerant green infrastructure, including street trees and landscaped areas, as part of cooling strategies in public and private spaces.

- This Policy is similar to March JPA Environmental Justice Element Policies HC 18.9.d and 18.9.n. The Project's landscaping plan would comply with this Policy, and serves the dual purpose of providing visual appeal and being sensitive to the environment and climate by using drought-tolerant materials that will be irrigated with reclaimed water that will comply with March JPA's low water use landscape efficiency ordinance. The landscape design guidelines in

the proposed Specific Plan require the use of drought-tolerant materials. In addition to parkway landscaping within the public right-of-way and buffer tracts, on-site landscaping is required on 10% of the lot area for Industrial and Business Park development and 20% of site area for Mixed Use development.

S 7.15 Encourage the use of high-reflectivity pavement in new or significantly retrofitted large-scale paving projects, such as parking lots.

- Development of the Project would be consistent with this policy based on compliance with MM AQ-10, which requires "cool surface treatments to all drive aisles and parking areas or [that] such areas shall be constructed with a solar-reflective cool pavement such as concrete."

RI-254.8 This comment requests an acreage comparison of the Proposed Project and the CBD Settlement Agreement. Implementation of the CBD Settlement Agreement is included as a Project Objective. As shown in Figure 3-4, the CBD Settlement Agreement designated 304 acres for development for West Campus Upper Plateau, along with a 60-acre proposed park area. The Project also includes 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. This represents an additional 6% of open space. Please see Topical Response 4 – Project Consistency, for an evaluation of the Project's consistency the CBD Settlement Agreement (Appendix S-1).

RI-254.9 This comment questions the omission of specified March JPA General Plan goals and policies from Recirculated Section 4.10, Land Use and Planning, and states the commenter's belief the Project is inconsistent or partially inconsistent with them. As outlined in Threshold LU-1 in Recirculated Section 4.10, and consistent with CEQA, evaluation of land use and planning impacts is specifically focused on "conflict with any applicable land use plan, policy or regulation adopted for the purposes of avoiding or mitigating an environmental effect." The analysis in Table 4.10-1 identifies, and includes a consistency evaluation, for each of the applicable General Plan goals and policies identified in the EIR sections 4.1 through 4.18. Consistent with the requirements of CEQA, a lead agency need not evaluate consistency with every single policy in a General Plan. Pursuant to the applicable threshold, the relevant policies are those adopted for the purposes of avoiding or mitigating an environmental effect. Similarly, regarding the Environmental Justice Element, as explained in footnote 1 of Table 4.10-1 in Recirculated Section 4.10, Land Use and Planning, the analysis focused on policies that are applicable to development projects.

RI-254.10 This comment requests that the Project's consistency with the City of Riverside Good Neighbor Guidelines and the WRCOG Good Neighbor Guidelines be evaluated. In response to this comment please see Topical Response 4 – Project Consistency, which includes consistency evaluations with each set of guidelines.

RI-254.11 This comment disagrees with the cumulative effects analysis and significance determination in Recirculated Section 4.10, Land Use and Planning, within the environmental justice context. The comment states that the Project would exacerbate and add disproportional impacts to an area already highly affected by warehouses. The analysis throughout the EIR, the evaluation of impacts to surrounding residential uses, as well as the additional discussion of cumulative impacts included within Topical Response 7 – Cumulative Impacts, demonstrates that, with the exception of operational air

quality impacts, impacts to archaeological and tribal cultural resources, and operational noise impacts along one non-noise sensitive roadway segment, Project impacts would be reduced to less than significant with implementation of mitigation. To address the significant and unavoidable air quality impacts, mitigation measures MM-AQ-1 through MM-AQ-27 are included to reduce emissions to the maximum extent feasible. To address impacts to archaeological and tribal cultural resources, mitigation measures acceptable to the tribes involved have been incorporated into the Project.

The Project's census tract is large and includes all of the March Air Reserve Base (ARB) and the March JPA jurisdiction along with three blocks within the City of Moreno Valley, which appear to have been mapped as part of the March JPA. Residential uses within the Project's census tract are limited to the Westmont Village retirement community off of Village West Drive, which was originally developed for retired military housing; Green Acres, which consists of 111 homes as part of the March Field Historic District; the US Veterans transitional housing facility; and the residential block surrounding the Cottonwood Golf Center; as well as a few scattered residences in blocks of Moreno Valley included in the census tract. These residential uses within the March ARB census tract are located approximately two miles from the Project site, the residents in the retirement community are to the south of Van Buren Boulevard and the residents in Moreno Valley are to the east on the opposite side of the 215 Freeway. These residences are also located outside the area where the Project's truck route will emit TACs as evaluated in the Project Health Risk Assessment (See Recirculated Section 4.2, Air Quality). As such, the proposed Project is not proximate to these residences such that it will increase their pollution burden.

The census tracts adjacent to the Project site (6065042012, 6065042014, and 6065042013), which include the Mission Grove neighborhood, the residences located in Riverside County to the north of the Project site, and the Orangecrest neighborhood south of the Project site, are not identified as disadvantaged or overburdened with pollution.

RI-254.12 This comment claims that cumulative land use effects on the Camino del Sol neighborhood would occur by real estate developers purchasing homes to tear down and construct more industrial land uses. This comment is speculative and not specific to the proposed Project.

RI-254.13 This comment asserts that the Project is upzoning land and that the proposed land uses are inconsistent with the surrounding residential land uses on three sides. The March JPA General Plan includes warehousing in the definition of Business Park uses. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses than under the March JPA General Plan and does not introduce new designated uses. It is speculative to state that this Project sets the stage for residential rezoning to industrial.

RI-254.14 This comment asserts, without specificity, that the analysis states that project design features and mitigation measures would reduce air quality, hazards, fire and traffic effects to less than significant and notes the commenter's disagreement with such determination. To clarify, as stated in Recirculated Section 4.2, Air Quality, the analysis demonstrates that even with the inclusion of project design features and mitigation measures, operational air quality impacts would remain significant and unavoidable. The EIR demonstrates that impacts related to hazards, fire, and traffic can all be reduced to less than significant levels through mitigation measures.

RI-254.15 This comment states that no non-industrial alternatives have been considered. In response, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

RI-254.16 This comment states that the description of the Project site in Section 4.10.1 of the EIR relative to residential uses is inaccurate. The commenter asserts that the Project site is also east of residential and refers to the area of the Orangecrest neighborhood. As shown in Figure 3-5, the Orangecrest neighborhood is generally south of the Project site, with a portion of the Conservation Easement wrapping around the western end of the neighborhood.

RI-254.17 This comment questions why distances to sensitive receptors are based on the Specific Plan Area rather than the Project site or offsite improvements. As explained in Response RI-254.103 below, the EIR evaluates construction activities in the Specific Plan Area, construction of the road extensions, and construction of the offsite improvements. The Final EIR and Project HRA (Appendix C-2) include updated figures that show the distances to sensitive receptors used in the construction health risk assessment.

RI-254.18 This comment notes that Barton Street construction is closer to Grove Preschool and that Project construction would also affect the after-school daycare program at Orange Terrace Park. Please see Response RI-254.103, below, which addresses an expanded version of this comment.

RI-254.19 This comment notes that the March JPA General Plan designates business park and industrial as separate land uses and suggests the Project is not a consistent land use. The Project proposes a General Plan amendment to have both land uses via the proposed Specific Plan. The comment states a business park zoned warehouse is not the same as an industrial zoned warehouse. The warehousing permitted in the Business Park zoned parcels under the proposed Specific Plan is limited to Business Enterprise (200,000 square feet or less). More intensive warehousing uses (Medium, Heavy, High Cube, Cold Storage) are limited to Industrial parcels only. This comment does not raise any specific comments, questions or concerns about the environmental analysis included in the Recirculated Draft EIR sections.

RI-254.20 This comment suggests that the Project is inconsistent with the WRCOG Good Neighbor Guidelines. In response to this comment please see Topical Response 4 – Project Consistency, which evaluates the Project's consistency with the WRCOG guidelines. March JPA adopted Truck Route Ordinance #JPA 17-06, which references the implementation of one or more objectives of the WRCOG Good Neighbor Guidelines. However, the WRCOG Good Neighbor Guidelines themselves were not adopted by March JPA. The comment also incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use.

RI-254.21 This comment requests the removal of the Draft Environmental Justice Element as a relevant plan, policy, and ordinance in Recirculated Section 4.10, Land Use and Planning. The discussion of the Draft Environmental Justice Element explained it was in draft form and not yet adopted as of the release of the Recirculated Section 4.10, Land Use and Planning. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element.

RI-254.22 This comment suggests that member agencies of March JPA have land use authority. In response to this comment, please see Topical Response 9 – Long-Term Project Implementation and Enforcement for a discussion about the Joint Exercise of Powers Act (Government Code Section 6500, et seq.), the history of the formation of March JPA, and the reversion of March JPA's land use authority to the County of Riverside.

RI-254.23 This comment asserts that the County of Riverside should be the lead agency for the Project site and consistency with County policies should be considered. March JPA is the lead agency and has land use jurisdiction over the Project site. While March JPA will sunset on June 30, 2025, as cited in CEQA Guidelines Section 15051(c), "where more than one public agency equally meet the criteria in subdivision (b), the agency which will act first on the project in question will normally be the lead agency." As such, it is appropriate, as the approving agency, for March JPA to serve as the Lead Agency for the Project. The commenter is referred to Topical Response 9 – Long-Term Project Implementation and Enforcement for further information regarding March JPA's land use authority. Where appropriate, the EIR has evaluated the Project's consistency with County of Riverside policies. The adopted Environmental Justice Element directs projects to address consistency with the County's Good Neighbor Guidelines. Recirculated Section 4.10, Land Use and Planning, evaluated the Project's consistency with the County's Good Neighbor Guidelines and determined the Project would be generally consistent. Section 4.7, Greenhouse Gas Emissions, evaluates the Project's consistency with the County's Climate Action Plan (CAP) and includes MM-GHG-1 through MM-GHG-10 and MM-GHG-12 to ensure compliance with the County CAP. Section 4.11, Noise, evaluates the Project's noise impacts in relation to the County's noise and vibration standards.

RI-254.24 This comment questions the consistency analysis in Table 4.10-1 and raises concerns about how consistency is evaluated as well as omitted goals and policies. The comment lists goals and policies that the commenter believes the Project to be either inconsistent or mostly inconsistent with but does not provide any explanation. The analysis in Table 4.10-1 identifies, and includes a consistency evaluation, for each of the applicable General Plan goals and policies identified in the EIR Sections 4.1 through 4.18. Consistent with the requirements of CEQA, a lead agency need not evaluate consistency with every single policy in a General Plan. Pursuant to the applicable threshold, the relevant policies are those adopted for the purposes of avoiding or mitigating an environmental effect. As such, no revisions are required in response to this comment.

RI-254.25 This comment states the EIR should discuss the developable acreage under the CBD Settlement Agreement in addition to the developable acreage of the Project site under the General Plan. As stated in the EIR and referenced in the comment, the development acreage utilized in the EIR discussion compares Project buildout to what would have been allowed under the General Plan. Please see Response RI-254.8 for an acreage comparison of the Project with the CBD Settlement Agreement. No changes are required in response to this comment.

RI-254.26 This comment refers generally to intensity of development. The comment incorrectly describes the change in industrial acreage under the proposed land use designations. The Project site currently includes 63 gross acres of Industrial under the March JPA General Plan and the Project proposes 143.3 acres of Industrial under the Specific Plan. The comment claims the Project moves warehousing closer to residential areas. As discussed in Response RI-254.13, above, business park development, which could include warehousing, would be immediately adjacent to the surrounding residential uses under the current General Plan. Under the Specific Plan, there is a minimum 300-foot buffer between the residential uses and any business park use.

The comment also correctly notes that high cube warehouses are not allowed within Business Park areas under the proposed Specific Plan. As discussed in Response RI-254.19, above, the proposed Specific Plan limits warehousing in the Business Park zoned parcels to Business Enterprise (200,000 square feet or less). The EIR analyzed business enterprise warehousing in the Business Park zones areas, and analyzed more intensive warehousing uses (Medium, Heavy, High Cube, Cold Storage) on the Industrial parcels. The Project's Industrial parcels are surrounded by Business Park and Mixed Use parcels, providing further buffer to residential areas. To further ensure that Business Park parcels within the Specific Plan are developed within the parameters studied in the EIR, MM-AQ-5 requires that, prior to approval of each site plan, the applicant must submit documentation confirming the site plan's environmental impacts do not exceed the impacts identified and disclosed in this EIR. This documentation will include site-specific trip generation, noise, and air quality impacts. Absent such documentation, additional environmental review shall be required. This comment does not raise any specific comments, questions or concerns about the environmental analysis included in the Recirculated Draft EIR sections.

RI-254.27 This comment, along with the figures in Comment RI-254.29, provides the commenter's application of setbacks for warehouses under the County of Riverside's Good Neighbor Guidelines and the City of Riverside's Good Neighbor Guidelines to the existing General Plan designations for the Project site. However, the Good Neighbor Guidelines apply to warehouses and, as the commenter has pointed out, other uses beyond warehousing are permitted under the Business Park General Plan land use designation. These other uses would not be subject to the setbacks set forth in the Good Neighbor Guidelines. This comment does not raise any specific comments, questions or concerns about the environmental analysis included in the Recirculated Draft EIR sections.

RI-254.28 This comment states the Project will develop "95+" of developable acreage as warehouses. For purposes of this response, it is assumed the comment is discussing percentages. The EIR evaluates a buildout scenario based on the most intensive uses proposed in the Specific Plan to provide the decision makers and public with a full picture of the Project's potential environmental impacts. Under the buildout scenario for the Campus Development, the EIR evaluates 86% warehousing, 11% office, and 3% retail square footage. With the exception of Buildings B and C, however, no specific development is proposed at this time.

The comment further asserts that the original intent of the Business Park General Plan designation was to develop offices and other non-heavy-duty truck uses. Warehousing has been considered as an appropriate Business Park use since the General Plan was adopted in 1999. The March JPA General Plan divides land use designations into four general classifications: Industry, Commerce, Special, and Public. Business Park is grouped with Industrial under the Industry classification with the following introduction:

> "Two industrial land use designations are established to complement the aviation and employment generating uses. Due to the location of the March JPA Planning Area within the region, available and planned street access, and availability of rail service to the area, industrial designations in the Land Use Plan include industrial businesses, and research and development companies as well as large scale manufacturing uses. The land use designations include Industrial and Business Park which will allow for both large and small scale businesses, light manufacturing and assembly, storage, warehousing, research and development and related uses."

The March JPA General Plan includes warehousing in the definition of Business Park. The Master EIR for the March JPA General Plan acknowledged that operations and activities within Business Park could include limited industrial. In addition to warehousing, the Business Park definition includes industrial uses such as light manufacturing and research and development centers. This Business Park definition and the designation of the Project site as Business Park, Industrial, and Park/Recreation/Open Space were included in the March JPA General Plan and Master EIR when it was adopted at a noticed public meeting in 1999. Moreover, wholesale, storage and distribution are expressly identified as allowed uses within the Business Park Zoning District, as identified in the March JPA Development Code. The comment also refers to a letter dated March 9, 2023, provided by the commenter, which is included as Letter I-833. Please see Responses I-833.1 through I-833.15.

RI-254.29 This comment includes two figures prepared by the commenter showing where Business Park uses would be allowed based on setbacks for warehouses under the County of Riverside's Good Neighbor Guidelines and the City of Riverside's Good Neighbor Guidelines. Please see Response RI-254.27, above. No revisions are required in response to this comment.

RI-254.30 This comment states that industrial land uses are more environmentally damaging uses than the proposed business park land uses and asserts that the City of Riverside's Good Neighbor Guidelines should be complied with. Please see Topical Response 8 – Alternatives, for an evaluation of an office park, non-industrial alternative. As shown in the analysis included in Topical Response 8, an office park alternative would not result in fewer environmental impacts when compared to the proposed Project. The Project has been designed to comply with the City of Riverside's Good Neighbor Guidelines. A consistency analysis with the City of Riverside's Good Neighbor Guidelines is included in Topical Response 4 – Project Consistency.

RI-254.31 This comment alleges Recirculated Section 4.10, Land Use and Planning, is a post hoc rationalization for the Project and reiterates the commenter's belief that warehousing is an incompatible use. To the contrary, consistent with the requirements of CEQA, the purpose of the EIR is to identify the significant effects on the environment of the Project, to identify alternatives to the Project, and to indicate the manner in which those significant effects can be mitigated or avoided (CEQA Section 21002.1(a)). As set forth in CEQA, "[i]f economic, social, or other conditions make it infeasible to mitigate one or more

significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency if the project is otherwise permissible under applicable laws and regulations." The environmental analysis thus informs decisions that have not yet been made. Please see Recirculated Section 4.10, Land Use and Planning, for a discussion of the planning history and the Project's consistency with the March JPA General Plan, including its compatibility with surrounding land uses.

The comment further alleges the Project's proposed road network would restrict access of residents to the freeway and access of trucks to the community. However, as shown in Figure 3-5, Site Plan, the Project's circulation system would not restrict residential access to I-215, nor would Project trucks have access to residential areas. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue.

RI-254.32 This comment expresses opposition to the Project and does not raise any specific comments, questions or concerns about the environmental analysis included in the Recirculated Draft EIR sections.

RI-254.33 This comment requests an explanation of the consistency analysis with the General Plan goals and policies. Please see Response RI-254.24, above.

PROPOSED PARK

RI-254.34 This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. Regarding the proposed Park, please see Responses RI-254.37 through RI-254.51, below.

RI-254.35 This comment states the letter's focus on the proposed Park and summarizes the arguments. As such, in response, please see Responses RI-254.37 through RI-254.51, below.

RI-254.36 This comment lists publicly available documents reviewed by the commenter. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.37 This comment characterizes the proposed 60.28-acre park as the "pretend park." Under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The Landscape Lighting and Maintenance District (LLMD) will be responsible for the maintenance of the Park once complete. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.38 This comment discusses the 2003 Settlement Agreement background and select terms from it. The comment also notes that the park development required under the 2003 Settlement Agreement has not occurred. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.39 This comment is a slide from the August 8, 2023 Technical Advisory Committee meeting about the 2003 Settlement Agreement. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.40 This comment is an image of the March JPA Planning Area with red and black outlined boxes of what the commenter claims to be existing, planned, and approved warehouses. However, portions of the areas identified as warehouses are Business Park use and not necessarily industrial development. Additionally, the figure identifies existing warehousing immediately to the south of Van Buren Boulevard, but this area is Park/Recreation/Open Space under the South Campus Specific Plan. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.41 This comment questions the omission of the 2003 Settlement Agreement from discussions in the EIR. As discussed in Topical Response 4 – Project Consistency, the 2003 Settlement Agreement specifically focused on the North Campus and South Campus portions of the March Business Center. The 2003 Settlement Agreement established terms for the buildout of these two campuses within the March Business Center and did not apply to the development of the proposed Project on the West Campus Upper Plateau site. See Topical Response 4 – Project Consistency, for a discussion of the Project's consistency with the 2003 Settlement Agreement, which is now included as Appendix S-2 of the EIR.

The comment further suggests the Park and Meridian Fire Station should not be included as community benefits. Section 2.6.3 of the 2003 Settlement Agreement only required March JPA and the developer to provide a site for a fire station. March JPA previously reserved a 2.12-acre parcel in North Campus at the northeast corner of Meridian Parkway and Opportunity Way to the County of Riverside. Thus, the commitment to fund and construct the Meridian Fire Station goes beyond the obligations in the 2003 Settlement Agreement. Additionally, March JPA is obligated to construct the park under the 2003 Settlement Agreement. The Project is undertaking this action.

RI-254.42 This comment alleges the developer does not intend to build a 48-acre active park. Regarding the Park development, please see RI-254.37, above. For purposes of the analysis within the EIR, buildout of the Park was evaluated to ensure that Park development would be in compliance with CEQA.

RI-254.43 This comment is a summary of March JPA park subcommittee meeting minutes and history of park planning activities. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.44 This comment details personal discussions with the City parks division regarding its comments on the Draft EIR. This comment is included as Letter A-9, and responses to all comments in Letter A-9 are provided in this Final EIR. This comment also notes that informal meetings between City and County Parks teams and March JPA staff were held in December 2023 and January 2024. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.45 This comment states that at the August 8, 2023 Technical Advisory Committee meeting, it was stated that the Project applicant would grade 60 acres and provide $3,500,000 in funding for a park feasibility study, and asserts that no park can be created until at least 2041. It is not necessary for the City of Riverside to annex the Park for it to be built. Under the proposed Development Agreement, within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. See Response RI-254.37 for a discussion of the funding for the proposed Park. For purposes of the analysis within the EIR, buildout of the Park was evaluated to ensure that Park development is compliant with CEQA. The comment indicates the need for a Park. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.46 This comment discusses past projects and funding that would be needed for a park. The comment also extrapolates from some costs of existing parks to estimate what the cost would be for the proposed Park. These estimates are not based on analysis of the Project site or specific factors related to the proposed Park. Thus, the conclusion that the proposed Park would cost about $50,000,000 is not supported. See Response RI-254.37 for a discussion of the funding for the proposed Park. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.47 This comment asserts that findings regarding the Project's consistency with March JPA General Plan goals and policies is incorrect and that revisions are needed because funding and construction for the Park is not fully identified. The comment also asserts that no plan has been presented for the Park, which undermines claims that a park will indeed be created. The EIR explains that the exact design of the Park will be dependent on the results of the Park Feasibility Study. See Response RI-254.37 for a discussion of the funding and timing for the proposed Park. The Project, as proposed, contemplates full buildout of a 60-acre Park with active and passive recreational uses. For purposes of evaluating the whole of an action, as required under CEQA Guidelines Section 15378, full buildout of all components of the Project are evaluated, including the proposed Park. To eliminate evaluation of the Park within the analysis would constitute piecemealing. As such, no revisions are required in response to this comment.

RI-254.48 This comment asserts that the consistency analysis regarding the Park in Table 4.10-1 needs to be revised with respect to a list of goals and policies because the Park represents a fiscal liability and that failure to provide a timeline to build the Park undermines discussion of public services and facilities. Under the proposed Development Agreement, within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. See Response RI-254.37 for a discussion of the funding and timing for the proposed Park. No revisions are required in response to this comment.

RI-254.49 This comment asserts that the proposed Park is not consistent with the terms of the 2003 Settlement Agreement requiring a 48-acre active park. Recirculated Chapter 3, Project Description, describes the Park as follows: "The 60.28-acre parcel would be developed as an Active Park, including a playground, multi-use sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users." Because the ultimate design of the Park will be determined through the Park Feasibility Study, the technical studies evaluated the Park as 42.2-acre active park and 18.08-acre public park (see Table 4.15-1, for example). This does not mean that only a 42.2-acre active park will be built. The Project is consistent with the terms of the 2003 Settlement Agreement.

RI-254.50 This comment asserts that the Park was not included in multiple assessments of noise, wildland fire, and other impacts. This comment is incorrect, as throughout the EIR, including Sections 4.11, Noise, and Section 4.18, Wildfire, analysis of the Park is included as part of the Project.

RI-254.51 This comment summarizes earlier comments and makes concluding statements. As such, in response, please see Responses RI-254.37 through RI-254.50, above.

Project Objectives

RI-254.52 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. Regarding the proposed Park, please see Responses RI-254.37 through RI-254.51, above. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.53 This comment explains that the comments that follow are focused on the Project Objectives and Project Description section of the EIR. This comment asserts that the Project Objectives could be met in other ways and that some of the objectives themselves are CEQA impacts that will require overriding considerations to implement. CEQA does not prohibit selection of project objectives on the basis of potential impacts requiring environmental review or a statement of overriding considerations. Rather, the CEQA Guidelines simply require that the project description in an EIR include "[a] statement of the objectives sought by the proposed project." (CEQA Guidelines, Section 15124(b)). As stated in CEQA Guidelines Section 15124(b), the project objectives help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings and/or a statement of overriding considerations.

RI-254.54 This comment states that March JPA failed to list known areas of controversy identified by the public in letters on the EIR and alleges this is required to be disclosed in the Notice of Availability and Recirculated Chapter 3, Project Description. Section 15088.5 of the CEQA Guidelines outlines the process required when recirculation of an EIR prior to certification occurs. As discussed therein, the lead agency shall comply with the requirements of Public Resources Code Section 21092.1, which requires that the lead agency send a notice of recirculation to every agency, person, or organization that comments on the prior EIR, per 15088.5(h)(3). The Notice of Availability (NOA) of the Recirculated EIR sections complied with Section 15088.5(h)(3), as well as CEQA Guidelines Section 15087(c), which identifies what is required to be included in the NOA:

- A brief description of the proposed Project and its location.
- The start and end dates for the review period and the manner by which the lead agency will receive comments.
- The date, time, and place of any scheduled public meetings or hearings to be held on the Project known at the time of notice by the lead agency.
- A list of the significant environmental effects anticipated to result from the Project.
- The address where copies of the EIR and all documents incorporated by reference will be available for public review.

- The presence of the site on any of the lists of sites listed under Section 65962.5 of the Government Code.

CEQA does not include a requirement that areas of known controversy or a summary of previously submitted comments be included in the NOA or the project description. However, as required by CEQA Guidelines Section 15123(b)(2), the EIR does include a discussion of Areas of Known Controversy in Section 1.5 of Chapter 1, Executive Summary.

RI-254.55 This comment questions the Project Objective of providing increased job opportunities for local residents. The comment states that the types of jobs that would exist at the Project are not the types of jobs the local population needs. The comment also references a letter submitted by the commenter on March 9, 2023, which is included in the EIR as Letter I-830. In response to this comment, please see Topical Response 5 – Jobs, as well as Responses I-830.1 through I-830.14.

RI-254.56 This comment questions the Project Objective to provide open space amenities to serve the region. The comment raises concerns regarding the loss of recreational open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.57 This comment states that, in relation to open space amenities, the Project provides what was already agreed upon by March JPA under the 2003 Settlement Agreement and CBD Settlement Agreement. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.58 This comment questions the Project Objective to provide an active park consistent with the 2009 Safety Study prepared by March JPA. The comment further questions available funding is available for the park and references the comments submitted by the commenter about the park. Please see Responses RI-254.34 through RI-254.51 above.

RI-254.59 This comment questions the Project Objective to complete the buildout of the roadway infrastructure in the Specific Plan Area. The comment states that Barton Street and Brown Street are inconsistent with the General Plan Circulation map and were not identified in the 1999 transportation plan. The comment also states that Cactus Avenue was not designated as a truck arterial west of Camino del Oro in the 1999 transportation plan. As discussed in Recirculated Chapter 3, Project Description, the Project includes a General Plan Amendment, including an amendment to the Transportation Element, which is analyzed as part of the EIR. The proposed General Plan Amendment would update the General Plan to incorporate the following changes, :

- Extend Cactus Avenue west to Airman Drive, with a gated emergency vehicle access roadway extending to Barton Street.
- Extend Barton Street from Alessandro Boulevard to Grove Community Drive.
- Extend Brown Street from Alessandro Boulevard to Cactus Avenue.
- Add Arclight Drive, Linebacker Drive, Bunker Hill Drive, and Airman Drive.

With the approval of the General Plan Amendment, the Transportation Element would be amended to allow for these changes to the roadway network.

RI-254.60 This comment states the Project Objective to complete the buildout of the roadway infrastructure in the Specific Plan Area is not allowable as a Project objective because it requires a General Plan Amendment, environmental review, and a statement of overriding considerations. CEQA does not prohibit selection of project objectives on the basis of requiring entitlements, environmental review, or a statement of overriding considerations. Pursuant to the CEQA Guidelines, the project description in an EIR must include "[a] statement of the objectives sought by the proposed project." (CEQA Guidelines, Section 15124(b)). As stated in CEQA Guidelines Section 15124(b), the project objectives help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings and/or a statement of overriding considerations. The potential effects of the transportation changes were analyzed as part of the proposed Project in the EIR, consistent with the requirements of CEQA, and no other CEQA review is needed.

RI-254.61 This comment questions the Project Objective to remove and redevelop a majority of the former munitions storage area. The comment suggests the munition bunkers should be analyzed as cultural resources and their proposed removal should not be a project objective. The comment suggests this action should require a statement of overriding considerations. CEQA does not prohibit selection of project objectives on the basis of requiring environmental review or a statement of overriding considerations. Rather, the CEQA Guidelines simply require that the project description in an EIR include "[a] statement of the objectives sought by the proposed project." (CEQA Guidelines, Section 15124(b)). As stated in CEQA Guidelines Section 15124(b), the project objectives help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings and/or a statement of overriding considerations. As explained in more detail below, the EIR analyzed the potential impacts associated with removal of the munition bunkers and concluded there would be a less than significant impact to cultural resources.

The comment also states that both the 1996 Final Reuse Plan and 1999 General Plan envisioned retaining the former munitions storage area and having open space in the vicinity. This is not accurate. The 1999 General Plan envisions Business Park uses and open space uses in the vicinity of the former munitions storage area (WSA). The parks and open space area shown in the 1999 General Plan is in the center of the WSA, likely because at the time it was thought to be too expensive to redevelop. For example, as stated in the March Joint Powers Redevelopment Agency Report for the March Air Force Base (AFB) Redevelopment Plan:[10] "all of the accouterments of the military mission will have to be removed from the Base Territory in order to prepare it for civilian use. Clearly the large weapons storage area west of Freeway 215 will involve exorbitant costs to remove and return the land to developable condition." The former WSA was cleared for unrestricted use by multiple regulatory agencies (see Recirculated Section 4.8, Hazards and Hazardous Material) and the fact that redevelopment may have been expensive is not evidence that it was never contemplated or is not allowed. Moreover, the Specific Plan simply shifts the open space to be closer to the residential use, thereby creating an undeveloped buffer between the Project and the residential uses. As a result of the Project, the Project site now has approximately 480 more acres of parks and open space than what was envisioned in the 1999 General Plan.

[10] https://www.marchjpa.com/documents/docs_forms/redevelopment_1996.pdf

Additionally, this comment raises concerns that the WSA igloo structures are the only one of their kind in California. Section 4.4, Cultural Resources, of the EIR, and the WSA report (Appendix E-2) erroneously stated the WSA igloos were the only United States Air Force-associated munitions storage igloos in California. Travis Air Force Base includes munitions storage igloos as part of the Travis AFB ADC Readiness National Register Historic District Area. Munitions bunkers are also found at Beale Air Force Base in Marysville and Edwards Air Force Base in Edwards. Further, the WSA igloos are not unique or distinctive examples of munitions storage igloos in California or the local region and are among the most common military-related weapons storage constructions. For example, similar igloos are regionally found at Fallbrook Ammunition Depot, Naval Weapons Station Seal Beach, and Marine Corps Air Station El Toro. Comparatively, Concord Naval Weapons Station in San Francisco includes a larger weapons storage area that features various underground and overground bunkers constructed in different periods and styles. Sierra Army Depot in Herlong includes over 800 munitions storage igloos and igloos remain from the closed Benicia Arsenal in Benicia. The text within Section 4.4, Cultural Resources, of the Final EIR as well as the WSA report have been revised to accurately describe the state and regional context for the WSA igloos. The WSA and its individual buildings were determined not eligible under NRHP, CRHR, or the March JPA CEQA Guidelines criteria for historic resources at the national, state, or local level. With regard to the WSA, the Project's impacts to cultural resources are less than significant and no mitigation is required.

RI-254.62 This comment questions the Project Objective about encouraging the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system. The comment raises concerns that bike lanes would increase safety hazards and cites an NPR article regarding pedestrian crash data in relation to taller cars and trucks. As explained in Section 4.15, Transportation, the Specific Plan Area's proposed roadway network includes Class II (on-street, striped) bike lanes along all roadways, a 10-foot-wide multipurpose trail along the western side of Barton Street fronting the open space and the Park, and recreational trails. Recreational trails would be retained and maintained within the open space areas of the Specific Plan Area. In conjunction with the 5-foot bike lanes on all Specific Plan Area roadways, there would also be 6-foot sidewalks to promote walkability. All these connections within the Specific Plan Area would enhance connectivity to the existing Metrolink Station approximately 1.2-miles to the east on Meridian Parkway and travel to and from recreational amenities within the Project from other surrounding existing residential developments in close proximity to the Project. Sidewalks and bike lanes would provide direct access to the proposed Specific Plan Area uses. Further, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. As analyzed in Section 4.15, Transportation, with implementation of PDF-TRA-1, MM-TRA-1 and MM-TRA-2, the operations of the Specific Plan Area would not increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses in the Specific Plan Area and impacts would be less than significant with mitigation incorporated. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.63 This comment alleges the Project is inconsistent with the Project Objective about encouraging the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system and expresses the commenter's disagreement with citing warehouses near a Metrolink station. In response, see Response RI-254.62, above. Also, as explained in Section 4.15, Transportation, the Specific Plan Area's proposed roadway network, including the proposed bike lanes, trails, and sidewalks, would enhance connectivity to the existing Metrolink Station approximately 1.2 miles to the

east on Meridian Parkway and travel to and from recreational amenities within the Project from other surrounding existing residential developments in close proximity to the Project. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.64 This comment states that the fences and walls identified in the Specific Plan may inhibit access to the internal circulation routes to access the pedestrian and bicycle routes and requests connectivity. However, the comment does not provide any additional explanatory details. As explained in Section 4.15, Transportation, the Specific Plan Area's proposed roadway network, including the proposed bike lanes, trails, and sidewalks, would enhance connectivity to the existing Metrolink Station approximately 1.2 miles to the east on Meridian Parkway and travel to and from recreational amenities within the Project from other surrounding existing residential developments in close proximity to the Project.

RI-254.65 This comment questions the Project Objective about implementing the terms of the CBD Settlement Agreement. The comment asserts that the Conservation Easement and development have been piecemealed to date. The CBD Settlement Agreement covers more acreage than is included in the Project site, and it did not require the Conservation Easement, West Campus Lower Plateau, and West Campus Upper Plateau to be handled as a single project. The commenter incorrectly notes that the Specific Plan Area is the 304 acres of West Campus, 91 acres of Park, and 445 acres of Conservation Easement. As explained in the EIR, the Project Site consists of the approximately 369.60-acre Specific Plan Area and the 445.43-acre Conservation Easement; the Conservation Easement is not a part of the Specific Plan.

RI-254.66 This comment discusses the buildout of the West Campus Lower Plateau, which is a separate project that underwent its own CEQA analysis. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.67 This comment identifies that 185 acres north of Van Buren and south of Balak Drive were entered into a conservation easement in 2013-2014, along with the establishment of an endowment. This action is discussed in Recirculated Chapter 3, Project Description. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.68 In relation to the Project Objective about implementing the terms of the CBD Settlement Agreement, the comment states that the terms and conditions of the Settlement Agreement do not require any development and that Meridian West LLC has an obligation to fully fund the conservation easement endowment regardless of whether the area is developed. While development is not required to achieve this specific Project Objective, it is one of many for the Project that need to be considered as a whole. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.69 This comment asserts that the Project Objective about implementing the terms of the CBD Settlement Agreement is greenwashing the bad impacts of the Project and that it is possible for March JPA and the developer to move forward separately with the Conservation Easement. The CEQA Guidelines require that the project description in an EIR include "[a] statement of the objectives sought by the proposed project." (CEQA Guidelines, Section 15124(b)). As stated in CEQA Guidelines Section 15124(b), the project objectives help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings and/or a statement of overriding considerations.

See also Response RI-254.68, above. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.70 This comment questions the implementation of the terms and conditions of the CBD Settlement Agreement Appendix B. Exhibit B of the Settlement Agreement identifies the Mitigation Measures for Any Development in the Developable Area. Each one of these mitigation measures is incorporated, either as a component of the Specific Plan, as a Project Design Feature identified in the EIR, or as a mitigation measure identified in the EIR. Please see Topical Response 4 – Project Consistency, for an evaluation of the Project's consistency with the terms of the CBD Settlement Agreement. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.71 This comment summarizes the commenter's preceding comments regarding the Project Objectives, as described in detail in the previous comments. As such, please see Responses RI-254.55 through RI-254.70, above.

RI-254.72 This comment states that the notice of application (NOA) is required to specify areas of known controversy. It should be noted that the correct notice name for the NOA is the Notice of Availability. Please see Response RI-254.54 for a discussion of what CEQA requires to be included in an NOA; there is no requirement to identify areas of known controversy. Chapter 1, Executive Summary, includes a discussion of areas of known controversy as required by CEQA Guidelines Section 15123(b)(2).

RI-254.73 This comment characterizes opposition to the Project, the thresholds of significance, and the significant and unavoidable impact conclusions and alleges these issues are not acknowledged in the Recirculated EIR sections. There is no requirement under CEQA Guidelines Section 15088.5 to identify in a Recirculated EIR previously identified known areas of controversy. Chapter 1, Executive Summary, includes a discussion of areas of known controversy as required by CEQA Guidelines Section 15123(b)(2). As required under CEQA Guidelines Section 15088, this Final EIR includes comments received on the Draft EIR and Recirculated EIR sections as well as responses to each environmental comment received.

Recirculated EIR Stability

RI-254.74 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.75 This comment is introductory in nature and identifies that the following comments allege instability of the Recirculated EIR sections. Please see Responses RI-254.76 through RI-254.96. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.76 This comment questions the inclusion of the Draft Environmental Justice Element consistency analysis within the Recirculated EIR sections, in particular because neither the Technical Advisory Committee nor the March Joint Powers Commission were briefed on the Draft Environmental Justice Element. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-254.77 This comment questions how the County of Riverside will enforce the mitigation measures when it regains land use authority upon the sunsetting of March JPA. Please see Topical Response 9 – Long-Term Project Implementation and Enforcement, which explains how the County will step into the place of March JPA and enforce the mitigation measures. The comment further alleges the Recirculated EIR sections do not mention or discuss the reversion of March JPA's land use authority to the County. This is incorrect as the reversion is discussed in Recirculated Chapter 3, Project Description (p. 3-25), Recirculated Section 4.2, Air Quality (p. 4.2-15, 4.2-17), Recirculated Section 4.8, Hazards and Hazardous Materials (p. 4.8-22), and Recirculated Section 4.10, Land Use and Planning (p. 4.10-10). This discussion is also included in Section 4.7, Greenhouse Gases (p. 4.7-27). The change in land use authority for March JPA is long planned and does not create any instability.

RI-254.78 This comment asserts that the Recirculated EIR sections are unstable, objects to the inclusion of the Draft Environmental Justice Element consistency analysis, and questions what will happen upon the JPA sunsetting. Please see responses RI-254.76 and RI-254.77, above. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.79 This comment lists the publicly available documents reviewed by the commenter. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.80 This comment states that the figures included in Recirculated Chapter 3, Project Description, depict inconsistent Project site boundaries, and gives an example that the Water Tank portion of the Project is only shown in Figure 3-1 and not in Figures 3-2, 3-3 and 3-5. The water tank is an offsite improvement and is not part of the Project site. Figure 3-1 shows the Project Location and has been updated to remove the Water Tank site as part of the Project site. Figure 3-2 shows the existing and proposed General Plan land use designations for the Project site, and Figure 3-3 shows the existing and proposed zoning for the majority of the Project site. The Water Tank site is not located within March JPA's jurisdiction, and as such, is not identified as having existing and proposed land use designations or zoning. The comment does not specify any other inconsistencies between the referenced figures or provide any basis for how the error impacted the analysis and this minor error does not make the Recirculated EIR sections unstable.

RI-254.81 This comment states that the Project site boundaries are incorrect because utility improvements would be occurring outside of the identified Project site boundaries. As correctly noted in Recirculated Chapter 3, Project Description, the EIR explains that these utility improvements and connections are off-site improvements and are not within the Project site boundaries. The locations of these utility improvements relative to the Project site itself are shown in Figures 3-7A through 3-7H. However, notwithstanding their off-site location, the potential environmental impacts of all utilities installation and off-site improvements, such as the reclaimed water tank, are evaluated in every section of the EIR as part of Infrastructure Improvements.

RI-254.82 This comment states that the construction of Meridian Fire Station should be considered part of the Project and should be identified as part of the Project site. The comment states that its omission is piecemealing. In response to this comment, please see Topical Response 6 – Meridian Fire Station, which explains that the fire station was previously evaluated under CEQA. Funding of an already approved project that has already been reviewed under CEQA is not piecemealing, nor does it require additional CEQA review.

RI-254.83 This comment alleges inconsistent Specific Plan boundaries with regard to the inclusion of the roadway extensions (Barton, Cactus, Brown) between Figure 3-2, Figure 3-3, Figure 3-11, Figure 4.2.1 and Figure 4.10.1, As described in Table 3-1, Project Components, the Specific Plan includes the roadway extensions within the Project site. However, not every figure includes the roadway extensions, depending on the information being conveyed. Figures 3-2 and 3-3 depict existing and proposed General Plan land use designations and existing and future zoning designations for the entire Project site. Neither the March JPA General Plan nor zoning map depict the circulation system. Figure 3-11 illustrates the limits of construction, which includes the roadway extensions. Revised Figure 4.2-1a includes the roadway extensions in illustrating the sensitive receptor distances to construction areas. Revised Figure 4.2-1b does not depict the roadway extensions because the outlined area of the Specific Plan is where operational emissions would be most concentrated. Figure 4.10-1, identifies the noise contours associated with flights from the nearby March Inland Port Airport as overlayed on the Project site and Specific Plan Area, including the roadway extensions.

As noted by the comment, Figure 3-6, Proposed Truck Routes, utilizes a former site plan with four Business Park parcels along the northern portion of the Specific Plan Area. The underlying site plan shown in Figure 3-6 does not change the analysis in the EIR nor change the purpose and intent of this particular figure, which is to demonstrate the intended truck routes. However, Figure 3-6 has been updated to reflect the correct site plan in the Final EIR.

These figures each demonstrate different aspects of the Project and impacts associated with the Project. The roads and circulation components within the Specific Plan Area are identified in Figure 3-5, Site Plan.

RI-254.84 This comment asks about the land transfer that included land segments in JPA-SA #22-02, as approved by the March Joint Powers Commission on October 26, 2023. However, as shown in the meeting agendas and minutes on the March JPA website, no meeting occurred on October 26, 2023 (https://marchjpa.com/2023-meeting-archives/). Assuming the commenter is referring to the meeting held on October 26, 2022, please see Topical Response 10 - West March Development and Disposition Agreement for a discussion about the land transfer.

RI-254.85 This comment states that the new Figure 3-11 added in Recirculated Chapter 3, Project Description, is inconsistent with other figures. Figure 3-11 is intended to show the limits of all construction activities, both on- and off-site, which is why the infrastructure improvements along Barton and Community Grove Drive, as well as the reclaimed water tank, are included. See also revised Figure 4.2-1a (Sensitive Receptor Locations – Construction) in the Final EIR. Regarding Figure 3-2, please see Response RI-254.83, above. Contrary to commenter's statement, the project description does include all offsite infrastructure.

RI-254.86 This comment states that the incorrect site plan was used in the analysis in Appendix C-2 of the Recirculated EIR sections. The commenter cites Exhibit 2-B and Table 2-4. This comment is addressed in Response RI-254.105, below.

RI-254.87 This comment refers to concerns raised in the commenter's letter dated March 9, 2023 about inconsistencies in maps, text, and analyses in EIR sections that were not recirculated. The commenter's letter dated March 9, 2023 is included as Letter I-832. As such, and in response to comments raised in Letter I-832, please see Responses I-832.1 through I-832.12.

RI-254.88 This comment is about the Draft Environmental Justice Element. The comment cites a previously letter submitted by the commenter, which is included as Letter I-829. As such, in response to this comment, please see Responses I-829.1 through I-829.8. See Response RI-254.76, for a discussion on the development of the Draft Environmental Justice Element. This comment does not raise any questions, comments or concerns about the environmental analysis in the Recirculated EIR sections.

RI-254.89 This comment questions why public notification of, and communications about the Draft Environmental Justice Element were not sent to individuals interested in the Project. The Environment Justice Element is separate from the Project; please see Response RI-254.76, above, for additional discussion. This comment does not raise any questions, comments or concerns about the environmental analysis in the Recirculated EIR sections.

RI-254.90 This comment questions why the Recirculated Draft EIR sections include the Draft Environmental Justice Element and suggests the element is part of the Project. As discussed in Response RI-254.76, above, March JPA is required to prepare the Environmental Justice Element of the General Plan independent from the Project and the Environmental Justice Element applies to the entirety of March JPA Planning Area. March JPA included discussion and analysis of the Draft Environmental Justice Element in the Recirculated EIR sections to analyze the Project's consistency with the draft Environmental Justice Element of the General Plan, but the Environmental Justice Element is not part of the Project. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-254-91 This comment raises concerns that about the drafting and public review of the Draft Environmental Justice Element and requests a full CEQA process for the Environmental Justice Element. In response, please see Response RI-254.76 for a discussion of the Environmental Justice Element process, including CEQA review. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-254.92 This comment asserts that the Recirculated EIR sections are unstable because consistency with the Draft Environmental Justice Element policies is included. The Environmental Justice Element underwent public review and the commenter can and has commented on that process. The commenter can and has commented on the Project's consistency with the Environmental Justice Element. Please see Response RI-254.76 for a discussion of the Environmental Justice Element process, including CEQA review. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-254.93 This comment raises concerns about the sunsetting of March JPA on June 30, 2025 and the return of land use authority to the County of Riverside. In response to this comment, please see Topical Response 10 - Long-Term Project Implementation and Enforcement. March JPA's land use authority will revert back to Riverside County, which will assume full land use control over the March JPA Planning Area. The change in land use authority for March JPA is long planned and does not create any instability.

RI-254.94 This comment states the EIR should list the County as the lead agency and cites a portion of CEQA Guidelines Section 15051 – Criteria for Determining the Lead Agency. In its entirety, Section 15051 states:

> Where two or more public agencies will be involved with a project, the determination of which agency will be the lead agency shall be governed by the following criteria:
>
> (a) If the project will be carried out by a public agency, that agency shall be the lead agency even if the project would be located within the jurisdiction of another public agency.
>
> (b) If the project is to be carried out by a nongovernmental person or entity, the lead agency shall be the public agency with the greatest responsibility for supervising or approving the project as a whole.
>
> (1) The lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose such as an air pollution control district or a district which will provide a public service or public utility to the project.

(2) Where a city prezones an area, the city will be the appropriate lead agency for any subsequent annexation of the area and should prepare the appropriate environmental document at the time of the prezoning. The local agency formation commission shall act as a responsible agency.

(c) Where more than one public agency equally meet the criteria in subdivision (b), the agency which will act first on the project in question will normally be the lead agency.

(d) Where the provisions of subdivisions (a), (b), and (c) leave two or more public agencies with a substantial claim to be the lead agency, the public agencies may by agreement designate an agency as the lead agency. An agreement may also provide for cooperative efforts by two or more agencies by contract, joint exercise of powers, or similar devices.

While the March JPA will sunset on June 30, 2025, as cited in Section 15051(c), above, it is appropriate, as the approving agency, for March JPA to serve as the Lead Agency for the Project. For additional information about the sunsetting of March JPA, please see Topical Response 10 - Long-Term Project Implementation and Enforcement.

RI-254.95 This comment continues to discuss the sunsetting of March JPA and the role of the County of Riverside. The comment also references Senate Bill 994, which the comment states would provide a framework for transferring obligations with respect to the Project from March JPA to the County. SB 994, as amended on March 19, 2024, is limited to clarifying the process by which March JPA can transfer jurisdiction over any landscaping and lighting maintenance districts (LLMD) and community facilities districts (CFD) to the County of Riverside. This may include a LLMD or CFD applicable to the Project. In response to this comment, please see Responses RI-254-93 and RI-254.94, above, as well as Topical Response 10 – Long-Term Project Implementation and Enforcement.

RI-254.96 This comment is a concluding statement summarizing what was raised in Comments RI-254.75 through RI-254.95. As such, in response, please see Responses RI-254.75 through RI-254.95, above.

AIR QUALITY

RI-254.97 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. Regarding the proposed Park, please see Responses RI-254.37 through RI-254.51, above. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.98 This comment provides the commenter's background information and represents himself as an expert regarding air quality. March JPA has not independently verified the commenter's qualifications and has relied on its expert air quality consultants, whose resumes are attached to Appendix C-4 of this Final EIR. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.99 This comment lists the publicly available documents reviewed by the commenter. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.100 This comment summarizes the comments made in the letter. Please see Responses RI-254.102 through RI-254.133.

RI-254.101 This comment summarizes the comments made in the letter. Please see Responses RI-254.102 through RI-254.133.

RI-254.102 This comment states that gasoline emissions are carcinogenic and questions the omission of light-duty passenger cars exhaust emissions from the Project HRA (Appendix C-2). The EIR and Project AQIA cite the Agency for Toxic Substances and Disease Registry's September 1996 ToxFAQs regarding automotive gasoline. However, this authority is focused on gasoline fumes, not gasoline emissions. This statement has been removed and additional information regarding toxic air contaminants from gasoline-powered vehicles can be found at: https://www.epa.gov/gasoline-standards/learn-about-gasoline. The EPA implements a number of programs that reduces toxic contaminates in gasoline. (Appendix C-4)

Diesel particulate matter (DPM) has been identified as the top contributor to cancer risk-weighted emissions, contributing more than 85% of the total carcinogenic potential of emissions. Carcinogenic compound contributions from gasoline-powered cars and light duty trucks include 1,3-butadiene (4%) and benzene (3%). According to a study conducted by the Bay Area Air Quality Management District (BAAQMD), five compounds—DPM, 1,3-butadiene, benzene, formaldehyde, and acetaldehyde— were found to be responsible for more than 90% of the cancer risk attributed to emissions.[11] While passenger vehicles do emit some TACs, the inclusion of passenger vehicle emissions in the EIR's analysis would not alter the findings. For example, based on the BAAQMD data cited above, even if the Project operational risk estimates were increased by 15%, this would result in a risk of 5.23 in one million for the unmitigated scenario and 2.56 in one million for the mitigated scenario, both of which are well below the applicable threshold of 10 in one million. In addition, the BAQMD data is from 2014 when there were a limited number of electric vehicles available compared to current and future EV usage.[12] The increasing trend toward electric passenger vehicles will reduce the volume of gasoline related emissions and will further reduce any health risks associated with gasoline powered passenger vehicles. Therefore, compared to gasoline-powered passenger vehicles, diesel truck emissions pose a significantly greater health risk. Additionally, passenger vehicles and trucks differ in their speeds and behavior while visiting the Project site and on surrounding roadways. Passenger vehicles typically travel at higher speeds, and would presumably arrive at the site, park, and be turned off. Alternatively, trucks travel more slowly, spending a greater amount of time on the Project site and off-site roadways. Truck engines would also be operating for longer periods of time on the Project site while checking in at the facility, maneuvering, and parking at Project loading docks. Although CARB anti-idling requirements

11 Bay Area Air Quality Management District, 2014, *Improving Air Quality & Health in Bay Area Communities, Community Air Risk Evaluation Program Retrospective & Path Forward (2004 to 2013)*. https://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE_Retrospective_April2014.ashx?la=en

12 See https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/light-duty-vehicle. In Riverside County alone, there was an increase from 0.23% EVs on the road in 2014 to 2.64% in 2022. This trend will continue to increase given California's Advanced Clean Cars II regulations that mandated all new passenger cars, trucks, and SUVs sold in California will be zero-emission vehicles by 2035. https://ww2.arb.ca.gov/resources/documents/cars-and-light-trucks-are-going-zero-frequently-asked-questions#:~:text=As%20part%20of%20the%20Advanced,Advanced%20Clean%20Cars%20II%20regulations.

restrict idling to no more than 5 minutes, the analysis conservatively assumed that, unmitigated, trucks would idle for 15 minutes at building loading docks. (Appendix C-4)

Diesel truck exhaust poses a greater health risk than gasoline passenger vehicles, because trucks "behave" differently at the Project site in a manner that would produce more emissions. Diesel truck exhaust is the primary driver of health risk for facilities such as the proposed Project. (Appendix C-4)

The Project HRA (Appendix C-2) was prepared in accordance with SCAQMD's *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*[13] and was comprised of all relevant and appropriate procedures presented by the U.S. EPA, California EPA and SCAQMD. Consistent with SCAQMD guidance and standard CEQA analyses, the Project HRA analyzed emissions from both on-site and off-site truck trips, truck idling emissions, and emissions that would occur from TRU operation both on- and off-site, as well as emissions that would result from the use of operational on-site cargo handling equipment. The analysis concluded that any impacts would be less than significant. This analysis satisfies the requirements of CEQA. (Appendix C-4)

Furthermore, the International Agency for Research on Cancer (IARC), which is part of the World Health Organization (WHO), has classified diesel engine exhaust as "carcinogenic to humans" (Group 1) based on sufficient evidence of its carcinogenicity to humans. This classification is in contrast to gasoline engine exhaust, which is classified as "probably carcinogenic to humans" (Group 2A) due to limited evidence in humans and strong evidence in experimental animals.[14] (Appendix C-4)

The comment further states that all passenger vehicle trips associated with warehouse uses in the surrounding communities should be included in this analysis. HRAs prepared for warehouse projects typically do not include risk from passenger vehicle emissions, as risk from diesel truck exhaust is the primary driver of risk for these projects. Similarly, projects such as large shopping centers that attract similar numbers of passenger vehicles but relatively few trucks are not required to prepare health risk assessments. Thus, information to quantify cumulative risk from passenger vehicle exhaust is not readily available. The comment further requests the inclusion of passenger vehicle trips associated with existing development in surrounding communities. Since these projects are already built out, they represent the existing condition, and emissions related to these projects would be included in SCAQMD's latest MATES study. Regarding cumulative projects, as noted above, even if 15% were added to the risk estimates of cumulative projects consistent with the methodology noted above, the Project's cumulative total would remain significantly less than the cumulative threshold of 100 in one million used by EPA and March JPA. (Appendix C-4)

RI-254.103 This comment questions why distances to sensitive receptors are shown from the Specific Plan Area and not off-site improvements such as the reclaimed water tank. The comment includes two figures: Figure 4.2-1 of the EIR, which identifies sensitive receptor locations in relation to the Specific Plan Area and Exhibit 2-A detailing the modeled construction emissions sources. The construction HRA assumed that construction-source emissions would occur over the Project site (denoted by the area in red in Exhibit 2-A) over the entirety of the 4.35 years of construction. Exhibit 2-A has been updated to include the distances from the sensitive receptors to the modeled construction emissions sources. Figure 4.2-1b of the EIR (also Exhibit 2-D of the Project HRA) has been updated to clarify that the distances are provided for

13 https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis

14 https://www.iarc.who.int/wp-content/uploads/2018/07/pr213_E.pdf

operational emissions. Although not modeled separately, the offsite construction emissions are included in the overall Project DPM emissions as stated in the Project HRA. (Appendix C-4)

As shown on the revised Exhibit 2-A (Figure 4.2-1a of the Final EIR), the closest sensitive receptor (Receptor 11) is 32 feet from construction activities, specifically the northern Barton Street extension and the Mixed Use parcels of the Specific Plan Area. This distance is conservative; although the comment states that construction activities would occur less than 5 feet of Receptor R11, Receptor R11 was placed at the edge of the backyard facing construction activities, and the analysis assumes that a newborn would be outside and exposed to construction emissions daily for 4.35 years. The mitigated construction health risk at Receptor R11 is 0.56 in one million, well below the SCAQMD significance threshold of 10 in one million. As noted in Recirculated Section 4.2, Air Quality, and Project HRA (Appendix C-4), TACs generally dissipate with distance from the source. Compared to Receptor R11, all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project construction-source emissions. Therefore, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than identified for Receptor R11 herein. This includes the homes along Greenock Way near the northern Barton Street extension as these homes are further away from the Campus Development construction compared to Receptor R11. Additionally, Receptor R7[15] and the homes along Grove Community Drive and Barton Drive in the vicinity of the offsite construction activity[16] would not be exposed to construction source emissions to the extent or duration compared to Receptor R11 – the mitigated construction health risk would be below 0.56 in one million. Offsite construction would occur over a significantly shorter duration than construction of the Project itself. As such, since the mitigated construction health risk at Receptor R11, the maximally exposed individual receptor (MEIR), is well below the SCAQMD significance threshold, the Project will not cause a significant human health or cancer risk to nearby residences from any on-site or off-site construction activity. (Appendix C-4)

As shown on the revised Exhibit 2-A (Figure 4.2-1a of the Final EIR), construction sources were placed along the Barton southern extension for a distance of approximately 1,250 feet south of the Campus Development, which places these sources within 80 feet to the preschool at Receptor R8. At the maximally exposed individual school child (MEISC), the maximum incremental cancer risk impact attributable to the Project construction activity is 0.05 in one million, which is less than the significance threshold of 10 in one million. The analysis conservatively assumed that these sources would be active the entire 4.35 years of Project construction, even though actual construction activities in this area would be significantly shorter. (Appendix C-4)

The receptors selected represent the individual residences in these communities that would experience the highest pollutant concentrations, and thus risk, during construction and operation of the proposed Project. Because none of these locations would experience risk greater than the SCAQMD significance threshold of 10 in one million, risk resulting from construction of the proposed Project would result in a less than significant impact. (Appendix C-4)

15 The comment identifies Receptor R13, but this is a worker receptor 4,113 feet east of the Project. Receptor R7 is located 979 feet from Campus Development construction activities.

16 Offsite construction includes an aboveground 0.5-million-gallon prefabricated, bolted steel tank on a poured concrete slab next to an existing water tank on an already disturbed and graded site and installation of a waterline along Grove Community Drive.

As noted in the Project HRA (Appendix C-2), construction emissions were modeled using volume sources covering the site to represent on-site construction equipment emissions, and line volume sources to represent off-site on-road vendor and haul truck traffic. The red area presented on Exhibit 2-A (Figure 4.2-1a of the Final EIR) accurately presents the placement of volume sources on the site. Sources were placed in locations where construction activities would occur, including those in locations near sensitive receptors. (Appendix C-4)

Regarding construction activities on other projects in the area, the schedule of construction activities for other projects is not known at this time. However, due to the distance between the proposed Project and other cumulative projects in the area, the short-term nature of construction activities, as well as the likelihood that these construction activities would not overlap, and the fact that the proposed Project's MEIR and MEISC risk is well below the SCAQMD significance threshold of 10 in one million, Project construction emissions would not result in a significant cumulative health risk impact. (Appendix C-4)

The comment questions the omission of nearby approved and planned projects from the construction phase HRA analysis. In response, please see Response I-827.10(1). (Appendix C-4) The comment further references the commenter's March 9th, 2023 letter, which is Letter I-827. In response, please see Responses I-827.1 through I-827.28.

RI-254.104 This comment questions the use of a 1,000-foot evaluation distance for cumulative health impacts. As detailed in Recirculated Section 4.2, Air Quality, and the Project HRA (Appendix C-2), SCAQMD does not have an approved methodology for evaluating cumulative TAC health impacts. The EIR and Project HRA used the EPA's guidance for air toxic analyses at the community scale and the threshold of a cancer risk of 100 in a million or less. As stated in the EIR and Project HRA, the 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources. To support the 1,000-foot evaluation distance, Recirculated Section 4.2, Air Quality, and the Project HRA references traffic-related studies, CARB and SCAQMD emissions and modeling analysis, the Waters Bill, and the 2021 report *Evaluating Siting Distances for New Sensitive Receptors Near Warehouses*, prepared by the Ramboll Group. (Appendix C-4)

Additionally, significant emission-reduction standards for TRUs have been implemented since CARB's 2005 Land Use Handbook was published, most notably CARB's Airborne Toxic Control Measure for TRUs. As such, given the significant reduction in emissions that has occurred and will continue to occur as new regulations and emission standards take effect, the 3,300 feet distance cited in the comment is outdated. (Appendix C-4)

Regarding Figure 1-3 in CARB's Land Use Handbook, the figure demonstrates that risk reduces rapidly with distance from the source and appears to be asymptotic, approaching but not reaching zero risk at 6,000 feet. However, for purposes of determining the significance of cumulative health impacts, this reinforces that risk drops rapidly with distance from the source. It has been demonstrated that the Project would have less than significant health impacts for sensitive receptors located near the Project site. Based on this figure, it is expected that the risk introduced by other similar facilities located further from the Project site would be minimal and considered less than significant. (Appendix C-4)

Regarding the SCAQMD MATES study health risk data, it should be noted that the estimated background risk presented in this study represents existing conditions and includes contributions from emission sources located throughout the basin, including heavy industrial facilities, power plants, refineries, gas stations, and mobile and stationary sources. DPM emissions that contribute to the background cancer risk are not attributable to any specific facilities or uses and are the result of diesel-powered vehicles traveling on roadways throughout the basin. (Appendix C-4)

While SCAQMD does not provide specific guidance for evaluating cumulative health risk impacts beyond the use of the incremental cancer risk threshold of 10 in one million on an individual project basis, BAAQMD utilizes a 1,000-foot zone of influence approach for evaluating cumulative health risk impacts and a threshold of 100 in one million that is supported by the EPA.[17] March JPA therefore used this methodology that was approved by an expert air district to respond to comments related to cumulative health impacts. The analysis in the EIR demonstrates that Project emissions would not result in a significant cumulative health impact. (Appendix C-4).

RI-254.105 This comment questions the modeling of Project buildings in the Project HRA (Appendix C-2). As part of this Project, there are only site plans for Buildings B and C. However, for modeling purposes, the analysis assumed buildings on the remaining parcels and placed dock doors and loading areas in compliance with the development standards in the proposed Specific Plan. The number of idling trucks and TRUs is based on the Project Traffic Analysis and the building square footage, not the number of loading docks, thus the number of loading docks or dock doors would not affect the analysis. Contrary to the comment, the Project does not include four industrial buildings. There are three industrial parcels and therefore, three industrial warehouse buildings were modeled and analyzed, not four as the comment asserts. The comment makes the inaccurate assumption that, the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would be two separate buildings on the remaining industrial parcel. (Appendix C-4)

The modeling of the Project's Business Park square footage was based on an earlier site plan that included four business park parcels at the northern end of the Specific Plan Area, with the same square footage and mix of uses as is included in the current site plan. In response to this comment, Urban Crossroads analyzed seven business park parcels at the northern end of the Specific Plan Area, for a total of 10 business park buildings. Please see Exhibit 2-B, Table 2-4, and AERMOD modeling outputs presented in Attachment A for additional information in support of this response. (Appendix C-4)

The results of this analysis indicate that cancer risk at the MEIR would be 4.55 in one million at Receptor R2 without mitigation and 2.23 in one million at Receptor R12 with mitigation. Risk at the MEISC, the preschool at Receptor R8, would be 0.65 in one million without mitigation and 0.33 in one million with mitigation. The EIR is overly conservative as the cancer risk at the MEIR previously disclosed would be 5.26 in one million without mitigation, the request by the commenter actually results in a reduced risk estimate of 4.55 in one million without mitigation as previously discussed. (Appendix C-4)

The comment makes the inaccurate assumption that, for purposes of air quality analysis, the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would only be situated on the remaining industrial parcel. Under the Specific Plan, the remaining industrial

[17] https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-a-thresholds-of-significance-justification_final-pdf.pdf?rev=d35960ec035546629124ae2a25fb1df9&sc_lang=en

parcel could have a building up to 1,225,600 square feet. Up to 500,000 square feet of cold storage would be allowed on Industrial parcels, including Buildings B and C. The analysis accounts for the possibility that, while the allowed square footages on each parcel would remain the same, the ultimate uses (cold storage or high-cube fulfillment) could shift. As previously noted, the Project HRA (Appendix C-2) is consistent with the Project Traffic Analysis (Appendix N-2), which only breaks out truck trips for Buildings B and C (both of which have proposed site plans). The remaining truck trips are split between high-cube cold storage warehouse, remaining industrial: high-cube fulfillment, business park warehouse, and business park mixed-use land uses. Additionally, because it is not known at this time in which buildings the high-cube cold storage warehouse uses would be placed, these truck trips were allocated between Buildings B, C, and the one building on the remaining industrial parcel based on the square footage for each building, proportional to the overall cold storage space allowed. As such, it is expected that the truck trip rates vary for each building based on the intended use of the building and allocation of cold storage trips. The analysis accounts for all daily truck trips identified in the analysis, and the manner in which these are apportioned between the various buildings would not alter the results of the analysis. (Appendix C-4)

RI-254.106 This comment questions the inclusion of the Draft Environmental Justice Element policies related to air quality because the policies have not been reviewed by the public. Although not adopted at the time of the release of the Recirculated EIR sections, March JPA included a consistency analysis with the proposed Draft Environmental Justice Element policies for public disclosure purposes. As discussed in Response RI-254.76, the Environmental Justice Element was adopted on April 24, 2024, and is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element.

RI-254.107 This comment states the County's Good Neighbor Guidelines are not consistent with the WRCOG Good Neighbor policy and questions the Project's consistency with the City of Riverside's Good Neighbor Guidelines. Please see Topical Response 4 – Project Consistency, which includes a consistency evaluation of the Project with the WRCOG Good Neighbor policy and the City of Riverside's Good Neighbor Guidelines.

RI-254.108 This comment questions the installation of a natural gas backbone. As stated in Response I-827.18, SoCal Gas, as a public utility, will be notified prior to the start of construction and offered the opportunity to install a natural gas backbone within public roadways; however, as detailed in PDF-AQ-1, the Project will not connect to it. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP.

RI-254.109 This comment questions the use of Office Park in CalEEMod for the business park and mixed-use components of the Project. The business park and mixed-use parts of the Project were modeled in CalEEMod as "office park" as CalEEMod does not include business park or mixed-use land types. As such, the office park land use was utilized. However, because the trip rates in CalEEMod were updated to reflect those utilized in the Project Traffic Analysis, the modeling accurately accounts for the trips and emissions associated with this portion of the Project, and the selection of this land use category would not affect the mobile source emissions calculated by the model. However, it should be noted that CalEEMod default energy usage factors are based on the land use type that is selected. In the model, default energy usage factors for the Office Park and Industrial Park land uses are identical, and these energy usage factors for Office Park are higher than the defaults for the General Light Industry

and Unrefrigerated Warehouse land uses. Thus, because warehouse uses are allowed in the Business Park, the selection of the Office Park land use in CalEEMod is conservative. (Appendix C-4)

The trip generation rates utilized for the Project AQIA (Appendix C-1) are shown in Table 4-1 of the Project Traffic Analysis (Appendix N-2). These rates are obtained from the ITE Trip Generation Manual (11th Edition, 2021) and the WRCOG High Cube Warehouse Trip Generation Study (WSP, January 2019) for the industrial uses. These sources are the industry standard in determining the proposed Project trip generation, as they are based on data from similar use facilities. The land uses evaluated in the Project Traffic Analysis are the most similar land use types to the function and operations of the proposed Project. Based on the ITE description for Business Park, the average mix is 20 to 30 percent office/commercial and 70 to 80 percent industrial/warehousing. As such, 30% of the business park area has been designated as office related uses, while the remaining 70% of the business park area has been allocated to warehousing uses. This 30/70 split is not intended to reflect office space within a warehouse but rather to capture other foreseeable uses allowed with the Business Park land use designation under the proposed West Campus Upper Plateau Specific Plan. (Appendix C-4)

RI-254.110 This comment contends loss of soil carbon accumulation and disturbance of soil carbon sequestration should have been included in the CalEEMod modeling. Carbon accumulation in soil and carbon sequestration is the process of capturing and storing atmospheric carbon dioxide. CalEEMod does include options in the modeling to account for loss of soil carbon accumulation and carbon sequestration. However, many factors affect the amount of soil carbon accumulation and carbon sequestration from soil and vegetation (soil type, vegetation type, the amount of water the vegetation receives, the age of the vegetation). As noted in Table 4.3-7, Vegetation Communities and Land Uses Project Impacts within the Study Area, the majority of the acreage to be impacted by the Project is non-native grasslands and other disturbed vegetation communities. MM-BIO-8 and MM-BIO-9 require mitigation ratios to account for Project impacts to upland vegetation communities and riparian communities. To further increase carbon sequestration, in addition to the Conservation Easement, a 120-foot landscaped buffer interface on the north side of the Specific Plan Area is included (see Figure 4-17 of the proposed Specific Plan). As required by the Specific Plan, roadways would include trees and landscaping along sidewalks. Section 4.5.5, Landscape Design Guidelines, of the Specific Plan and March JPA Development Code Section 9.17.040(D) require 40 feet on center tree spacing, a minimum size of 24-inch box for trees in public right-of-way, and on-site landscape trees to be a minimum of 60% 24-inch box trees and 40% 15-gallon trees. Finally, on-site trees shall be a minimum of 80% evergreen and no more than 20% deciduous. Table 7-1 of the proposed Specific Plan outlines the maintenance responsibilities for the common area landscaping, which will be managed through either a Landscape and Lighting Maintenance District or a Community Facilities District. Because of the numerous variables that go into quantifying carbon sequestration and the wide range of factors that can be used in quantifying carbon sequestration, any estimates quantifying the net change would be highly speculative. Therefore, quantifying a change in carbon accumulation in soil and carbon sequestration would be very unlikely to result in any meaningful information that would alter the findings of the Recirculated Draft EIR sections. (Appendix C-4)

RI-254.111 This comment alleges the Project will contribute vehicle trips to SR-60 that will impact the nonattainment status. While the Project will likely contribute some amount of vehicle trips to SR-60, it would be overly speculative to estimate the trips and emissions that would traverse the nonattainment section of SR-60. It should be noted that the proposed Project, as well as other warehouses in the vicinity that are 100,000 square feet or greater, would be required to comply with SCAQMD Rule 2305, the Warehouse Indirect Source Rule. This rule requires warehouse operators to directly reduce nitrogen oxide and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities.

RI-254.112 This comment states that the most recently adopted SCAQMD air quality management plan (AQMP) is from 2022, not 2016 and is the relevant planning document for the Project. Recirculated Section 4.2, Air Quality, discusses both the 2016 and 2022 SCAQMD AQMPs. No revisions are needed in response to this comment.

RI-254.113 This comment questions if the March JPA construction noise standards meet or exceed the City of Riverside's and the County of Riverside's noise standards. Table 4.11-7 of Section 4.11, Noise, summarizes the construction noise significance thresholds for all three jurisdictions. As discussed in Threshold NOI-1, the Project's construction noise level increases would be less than significant.

RI-254.114 This comment reiterates the question of including gasoline vehicles in the HRA. Please see Response RI-254.102, above, for a response to this comment. While 50% of cancer risk in the basin may be attributed to DPM emissions, this does not mean that 25% of cancer risk is attributable to passenger vehicle emissions as stated in the comment. It should be noted that diesel vehicle exhaust also contains benzene, formaldehyde, acetaldehyde, and 1,3-butadiene and contributes to the basin-wide cancer risk from these chemicals as well.[18] The risk from these compounds is included in the risk calculated for DPM from the Project's trucks and emergency generators. Stationary sources, including power plants, refineries, manufacturing facilities, boilers, and gas stations are also significant contributors to basin-wide cancer risk. As such, the analysis does not significantly underestimate risk. (Appendix C-4)

The comment mentions potential increased exposure of residents near Barton Street. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The majority of the Project's passenger vehicle trips will utilize Cactus Avenue (see Exhibit 4-2 of the Project Traffic Analysis – Appendix N-2). Only approximately 1-2% of passenger vehicle trips will access Barton Street. (Appendix C-4)

Additionally, it should be noted that the contributions to cancer risk cited in the comment represent an average for the South Coast Air Basin as a whole. Per the MATES-V study, in the vicinity of the proposed Project, diesel particulate matter contributes approximately 70.8% of the cancer risk, while benzene and formaldehyde contribute 16.5%. However, diesel particulate matter emissions are not limited to truck travel alone, and includes other sources such as construction equipment, stationary engines, power plants, etc. Similarly, benzene and formaldehyde emissions are not limited to gasoline exhaust, as these pollutants are emitted by heavy industrial facilities and gas stations as well. (Appendix C-4). The City of Perris prepared a study titled "Air Quality, Greenhouse Gas Emissions, and Environmental

[18] https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health

Noise Conditions Study for Industrial Developments" in July 2022. As seen in the table below taken from the study, none of the 20 warehouse projects approved in the last 20 years had significant health risk impacts.

REPRESENTATIVE WAREHOUSE PROJECTS APPROVED IN THE CITY OF PERRIS SINCE 2010

Project	Size (square feet)	Significant Impacts After Mitigation				
		Regional Construction Emissions	Regional Operational Emissions	Construction LST	Operational LST	Health Risks
Optimus Logistics Center	1,455,781	No	**Yes**	No	No	No
IDI Rider 2 & 4	1,352,736	**Yes**	**Yes**	No	No	No
Rados Distribution Center	1,191,080	**Yes**	**Yes**	No	No	No
Duke at Perris & Markham	1,189,860	No	**Yes**	No	No	No
Optimus Logistics Center 2	1,037,811	No	**Yes**	No	No	No
Integra Perris Distribution Center	864,000	No	**Yes**	No	No	No
Duke at Patterson & Markham	811,620	No	**Yes**	No	No	No
Duke at Indian and Markham	668,681	No	**Yes**	No	No	No
Pelican Industrial	600,000	No	No	No	No	No
IDI - Indian and Ramona Warehouse	428,730	No	No	No	No	No
Perris Gateway Commerce Center	380,000	No	No	No	No	No
First Industrial at Rider & Redlands	324,147	No	No	No	No	No
First Industrial Warehouse at Wilson	303,228	No	No	No	No	No
Perris and Morgan Industrial Park	286,179	No	No	No	No	No
IPT Perris DC III Western/Nandina	251,504	No	No	No	No	No
Core5 Rider Business Center	248,483	No	No	No	No	No
First Perry Logistics	241,000	No	No	No	No	No
Walnut and Indian Industrial	205,830	No	No	No	No	No
First Harley Knox Industrial	154,250	No	No	No	No	No
First Industrial Warehouse 2 at Wilson	154,558	No	No	No	No	No

RI-254.115 This comment states that the truck movements and dock door locations do not reflect the splitting of the industrial buildings. The Project does not include four industrial buildings. There are three industrial parcels and therefore, three industrial warehouse buildings were modeled and analyzed, not four as the comment alleges. The comment makes the inaccurate assumption that, the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would be two separate buildings on the remaining industrial parcel.

RI-254.116 This comment questions the distribution of cold storage among the industrial parcels in the HRA analysis. While the total cold storage use within the Specific Plan Area is limited to 500,000 square feet, these uses could be spread between Buildings B and C, and the one building on the remaining industrial parcel, rather than incorporated into a single building. Although the cold storage uses may be spread between multiple buildings, they would be restricted to the industrial portion of the Specific Plan Area, as was modeled in the analysis, and would not be placed in the mixed use or business park areas such as those nearest the park because Business Enterprise warehousing, the only warehousing use allowed in the Business Park zone, does not allow for cold storage. Placing the Project's cold storage uses on each industrial parcel does not "dilute" the emissions over a larger area; instead by modeling the cold storage uses between Buildings B and C and the one building on the remaining industrial parcel, the analysis conservatively evaluates cold storage uses as being placed closer to the edges of the Project site than may otherwise be occur if the cold storage uses were all placed in a single building located on the remaining industrial parcel. (Appendix C-4)

RI-254.117 This comment assumes there would be four industrial buildings and suggests there were not enough emergency generators modeled. As discussed above, the Project does not include four industrial buildings. The comment makes the inaccurate assumption that, the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would be two separate buildings on the remaining industrial parcel. The model assumed 3 industrial buildings – Buildings B and C and one on the remaining industrial parcel. Therefore, one emergency generator was modeled at this location as shown the Health Risk Assessment (See Exhibit 2-B: Modeled On-Site Emission Sources, Pg 21 of Appendix C-2). (Appendix C-4)

RI-254.118 This comment questions why no trucks were modeled on Brown Street or Alessandro Boulevard. The truck routes modeled in the Project HRA are consistent with those identified in Exhibit 4-1 in the Project Traffic Analysis, which identifies the most logical and direct truck routes. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. As such, only the park and open space amenities will be accessible off Barton Street, and the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Boulevard and Brown Street is channelized and signed to prevent trucks from turning left and traveling west on Alessandro Boulevard. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, past the next cross-street, Meridian Parkway. (Appendix C-4)

Consistent with standard practice, the Project HRA analysis models off-site truck travel that would occur on nearby surface streets, as detailed in Exhibit 2-C. Once trucks enter the state highway system they can go to various locations, and because their destinations are not known, it would be speculative to include this in the modeling. Results of the modeling indicate that the highest concentrations of diesel particulates would occur in the vicinity of the Project site where travel speeds are slower, and idling would occur rather than on surrounding roadways where travel speeds are higher. (Appendix C-4)

RI-254.119 This comment questions the passenger vehicle trip distribution. As shown in Exhibit 4-2 of the Project Traffic Analysis (Appendix N-2), while 98% of passenger vehicle trips are anticipated to use Cactus Avenue, approximately 1-2% of the passenger vehicle trips would utilize the Barton Street extension, to access the Park for example. The comment further requests inclusion of passenger vehicle emissions in the Project HRA (Appendix C-2). In response, please see Response RI-254.102, above.

RI-254.120 This comment asserts that the Project would upzone the Specific Plan Area by switching Business Park and Industrial, and business park uses are not solely warehousing. The EIR evaluates a buildout scenario based on the most intensive uses proposed in the Specific Plan to provide the decision makers and public with a full picture of the Project's potential environmental impacts. The comment further suggests the March JPA General Plan and Development Code were updated without community involvement or input. Contrary to the comment's suggestion, the 1993-1996 March AFB Final Reuse Plan was not "when community input was last solicited." As explained in Recirculated Section 4.10, Land Use and Planning, the March General Plan is a 'living' document. The adoption of the March JPA General Plan in 1999, when the Project site was shown as Business Park, which would include warehousing, was done at a noticed public meeting. This has not changed in 25 years. The Development Code allows for warehousing in the Business Park zoning district and all revisions to the March JPA Development Code also occurred at noticed public meetings.

RI-254.121 This comment questions the distribution of cold storage among the industrial parcels. The comment further makes the inaccurate assumption that, for purposes of air quality analysis, the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would only be situated on the remaining industrial parcel. Under the Specific Plan, the remaining industrial parcel could have a building up to 1,225,600 square feet. Up to 500,000 square feet of cold storage would be allowed on Industrial parcels, including Buildings B and C. The analysis accounts for the possibility that, while the allowed square footages on each parcel would remain the same, the ultimate uses (cold storage or high-cube fulfillment) could shift. The analysis apportioned cold-storage related trips to Buildings B and C and the one building on the remaining industrial parcel based on the square footage of each building, resulting in 71 TRUs being assigned to the one building on the remaining industrial parcel per day, 83 to Building B, and 34 to Building C for a total of 188 TRUs associated with 376 two-way cold storage truck trips per day, consistent with the Project Traffic Analysis. The analysis utilized an identical gram per hour per TRU emission rate for each building and roadway segment analyzed. As shown on the table below, each building utilized identical TRU emission rates obtained from EMFAC 2021. (Appendix C-4)

TRU Idling Emissions

Building	TRU Emission Rate (g/hr/TRU)	TRUs/day	TRU Emissions (g/day)	
			Without Mitigation[1]	With Mitigation[2]
B	0.57	83	97.52	23.64
C	0.57	34	40.33	9.78
Remaining	0.57	71	83.59	20.26
	Total	188	221.44	53.68

1 Assumes each TRU operates for 2.1 hours while parked at building loading docks.
2 Assumes each TRU operates for 30 minutes while parked at building loading docks.

The on-site travel TRU and truck exhaust emissions differ because different numbers of truck and TRUs are assigned to each building based on the Project Traffic Analysis (Appendix N-2) and the building square footage, as each building could include both cold storage and non-refrigerated uses. As noted above, an identical gram per hour exhaust rate was utilized for each TRUs, and these differences are based on the number of TRUs that were assigned to each building. The table below presents the emission rate and assumptions used for calculating TRU emissions that would occur during on-site and off-site travel. (Appendix C-4)

TRU On-Site and Off-Site Travel Emissions

Road Segment	TRU Emission Rate (g/hr/TRU)	Segment Travel Distance (miles)	Travel Speed (mph)	TRU Trips/day	TRU Emissions (g/day)
On-Site Travel					
Bldg. B On-Site	0.57	0.94	5	166	17.87
Bldg. C On-Site	0.57	0.54	5	68	4.25
Remaining Bldg. On-Site	0.57	0.91	5	142	14.70
Off-Site Travel					
Cactus Ave. 40%	0.57	0.45	25	150	1.53
Cactus Ave. 100%	0.57	1.05	25	376	9.04
Airman Dr./Arclight Dr. 25%	0.57	0.42	25	94	0.90
Linebacker Dr./Arclight Dr. 30%	0.57	0.45	25	113	1.17
Airman Dr./Bunker Hill Dr. 15%	0.57	0.46	25	56	0.60
Linebacker Dr./Bunker Hill Dr. 30%	0.57	0.45	25	113	1.15
Sycamore Cyn Blvd. 5%	0.57	1.80	25	19	0.77
Meridian Pkwy. 10%	0.57	2.28	25	38	1.96
Cactus Ave. 85%	0.57	0.52	25	320	3.82
Cactus Ave. 3%	0.57	0.99	25	11	0.25

(Appendix C-4)

RI-254.122 This comment states that the Park is not displayed on Exhibit 2-D of Appendix C-2, and neither is its distance from the nearest warehouse. As discussed in Recirculated Section 4.2, Air Quality and Revised Appendix C-2, while not required under CEQA, the proposed *onsite* Park was included in the health risk assessment. The analysis concluded that both cancer risks and non-cancer risks for users of the proposed Park are less than significant. The proposed Park is part of the Project and its location is properly shown on Figure 3-5 of the Recirculated Chapter 3, Project Description. Exhibit 2-D of Appendix C-2 shows offsite receptors evaluated in the health risk assessment. Because the proposed Park is part of the Project, it was properly not included in this exhibit.

RI-254.123 This comment asserts that risks to users of the proposed Park – in particular children – should be analyzed and requests that the assumed age distribution of children at the park be included in the Recirculated EIR. Please see Response to Comment RI-254.122. Cancer and non-cancer risks to Park users were analyzed and determined to be less than significant. The age distribution of the children assumed at the Park was included in Appendix 2.4 of Revised Appendix C-2 of the Recirculated EIR and shows the Park was evaluated from the 3rd trimester of pregnancy through age 30 for the conservative scenario and ages 4-13 for the likely scenario. As such, this information is included in the EIR. The

comment further requests inclusion of passenger vehicle emissions in the Project HRA. In response, please see Response RI-254.102, above.

RI-254.124 This comment disagrees with the stated distances between the preschool and the Project site for emissions purposes and requests inclusion of passenger vehicle emissions in the Project HRA. In response, please see Responses RI-254.102 and RI-254.103, above.

RI-254.125 This comment discusses cancer risk for DPM, benzene, and formaldehyde. In response, please see Response RI-254.104, above, which addresses an expanded version of this comment.

RI-254.126 This comment addresses cancer risk at Rubidoux. The chart provided for cancer risk at the Rubidoux monitoring station was pulled directly from SCAQMD's MATES V study. As shown on the chart, cancer risk has been reduced significantly and continues to decline, from a cancer risk of 4,449.7 in one million in 1998, to 771 in one million in 2018. (Appendix C-4)

RI-254.127 This comment questions the basis for a 1,000-foot boundary around the Project and states that impacts should be considered cumulatively considerable. In response please refer to Response RI-254.104, which addresses an expanded version of this comment.

RI-254.128 This comment questions the list of projects in Table 4.2-16 as omitting planned/approved/under construction and existing warehousing and March JPA truck routes. The warehouses noted in the comment are already constructed, and as such are representative of existing conditions. Accordingly, emissions from these facilities would be included in SCAQMD's MATES V study. The cumulative projects list includes projects that have been approved but not yet completed, and as such would not be captured by the SCAQMD MATES V study. The comment provides a figure showing 1,000-foot, 1-km, and 1-mile buffers around the Project site. However, those buffers are artificially inflated by including the Conservation Easement, as an area with Project emissions. Figure 4.2-2 (Exhibit 3-B of the Project HRA) correctly uses the Specific Plan boundary, which is conservative given it includes the proposed Park to the west. Please see cumulative analysis in Recirculated Section 4.2, Air Quality, the Project AQIA (Appendix C-1) and HRA (Appendix C-2). (Appendix C-4)

RI-254.129 This comment alleges the Project HRA omits adjacent projects and regional cumulative truck impacts to I-215, and suggests that the analysis should be extended by 1 kilometer from the Project site. Recirculated Section 4.2, Air Quality, includes a discussion of cumulative air quality impacts, including along truck routes. Please also see Response RI-254.128, above for further discussion about cumulative projects and cumulative impacts. The comment provides no basis for extending the zone of analysis by 1 kilometer. Please see cumulative analysis in Recirculated Section 4.2, Air Quality, the Project AQIA (Appendix C-1) and HRA (Appendix C-2). A 1,000-foot zone of influence is commonly used for evaluating cumulative impacts, as pollutant concentrations drop significantly beyond this distance. While SCAQMD does not provide specific guidance for evaluating cumulative health risk impacts beyond the use of the incremental cancer risk threshold of 10 in one million on an individual project basis, BAAQMD utilizes a 1,000-foot zone of influence approach for evaluating cumulative health risk impacts and a cumulative threshold of 100 in one million.[19] Therefore, there is an established basis

[19] https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-a-thresholds-of-significance-justification_final-pdf.pdf?rev=d35960ec035546629124ae2a25fb1df9&sc_lang=en

for using a 1,000-foot radius and the 100 in one million threshold, and the Project HRA properly concludes that Project emissions would not result in a significant cumulative health impact.

RI-254.130 This comment suggests that the electrification requirement for heavy-duty trucks will be ineffective. MM-AQ-20 is consistent with the AG's Warehouse Best Practices and was modeled after similar measures adopted for such projects as Centerpoint Properties and Stockton Mariposa Industrial Complex. Through terms in the lease agreements or purchase and sales agreements, MM-AQ-20 requires heavy-duty trucks (Class 7 and 8) domiciled at the Project site to be model year 2014 or later from the start of operations and transition to zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to this comment, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed. As explained in MM-AQ-20, the requirement cannot be applied to independent contractors because it would be infeasible to prohibit access to the site by any truck that otherwise legally operates on California roads and highways. The comment predicts that future tenants will take action to circumvent the 70% domiciled threshold, which is speculative. In acknowledgement of the unknown nature of future emissions reductions from electrification of Project heavy trucks, the EIR does not take numeric credit for MM-AQ-20. California is working towards a goal to achieve carbon neutrality by 2045. MM-AQ-20 will support California's progress towards net zero.

RI-254.131 This comment states that the Project is inconsistent with Goals 2 and 3 of the Air Quality Element of the March GPA General Plan. As shown in Table 4.10-1 of the Recirculated Section 4.10, Land Use and Planning, the Project was found to be partially consistent with both Air Quality Element Goals 2 and 3. Goal 2 calls for reducing emissions associated with vehicle miles travelled (VMT) by enhancing the jobs/housing balance in the region. As discussed in Recirculated Section 4.10, Land Use and Planning, the Project would provide employment opportunities that would help to address the jobs/housing balance in western Riverside County by providing local employment opportunities. Although VMT impacts are anticipated to be less than significant, VMT would be further reduced because MM-AQ-21 requires all tenants to implement or otherwise participate in a Transportation Demand Management Program. Goal 3 aims to reduce air pollution through proper land use, transportation and energy use planning. As discussed with respect to Goal 2, the Project would improve the regional jobs/housing balance and include VMT-reduction measures consistent with this goal. However, because the Air Quality impacts of the Project would be significant and unavoidable, even with implementation of all feasible mitigation measures, the Recirculated Draft EIR sections concluded that the Project is only partially consistent with both Goals 2 and 3. For a complete discussion of consistency with the March JPA General Plan please see Table 4.10-1 in Recirculated Section 4.10, Land Use and Planning, of the EIR.

The comment further alleges the Project will have over 12 vehicle trips per employee per day and suggests this represents a high VMT/employee ratio. The commenter does not provide a basis for the presented number. It appears the commenter may have taken the Project's total trip generation of 34,116, removed the Park trips (2,200), and divided the remainder by the Project's estimated employee count. The VMT analysis does not include vehicle trips per employee, it reports the number of vehicle miles traveled by each employee. Here, the VMT per employee is 24.12, which is 5.30% below the WRCOG threshold. Moreover, not all Project trips are generated by employees. The Project's trip generation is comprised of a variety of trips depending on the land use, including, for example, customers accessing the retail and clients or contractors visiting offices and services. VMT is a distinct metric from trip generation. Section 4.15, Transportation, explains that the Project's retail component

will result in a net reduction of -0.29% for total VMT in the region. The Project has a less than significant VMT impact. Regarding the request for a less intense alternative, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

RI-254.132 This comment refers generally to the air quality analysis and discusses Valley Fever, citing background information from the California Department of Public Health and requests dust mitigation during blasting and grading activities. Based on analysis by the Centers for Disease Control, the Southern San Joaquin Valley and Central Coast regions have the highest consistent Valley fever (coccidioidomycosis) incidences in California, and the hot, dry climate and environment in these regions is known to be suitable for Coccidioides proliferation; predictive ecological niche modeling has indicated that Coccidioides could expand to other areas[20]. Although increasing case counts in the Southern San Joaquin Valley have contributed most to the overall increases in statewide coccidioidomycosis incidence, these regional analyses indicate that the largest increases in incidence occurred outside the Southern San Joaquin Valley, particularly in the Northern San Joaquin Valley and Southern Coast, and, since 2014, in the Central Coast. During this time, coccidioidomycosis outbreaks were infrequently reported (approximately one or two per year) and would not have affected overall surveillance trends. The most recent data (year 2022) show the County of Riverside reporting a total of 349 cases of Valley fever and an incident rate of 14.3 cases per 100,000 people[21], although CDPH indicates this may be a potentially unreliable rate due to a relative standard error of 23% or more. Statewide, the incident rate of Valley fever was 19.1 cases per 100,000 people. The regions above that are considered endemic for Valley fever have incidence rates above 25 per 100,000 people. As such, Riverside County is not considered endemic to Valley fever. Regardless, measures to reduce emissions of particulate matter during construction will help prevent any Coccidioides spores from becoming airborne. The Project is required to comply with SCAQMD Rule 403 to use best available control measures to reduce visible particulate matter from crossing the property line. Similarly, Policy 9.1 of the March JPA General Plan requires all feasible fugitive dust reduction techniques to be utilized during construction activities. Finally, the Project has incorporated the following mitigation measures to minimize fugitive dust generation during construction activities: MM-AQ-2: minimize areas of active ground disturbance; and MM-AQ-3: restricting grading to acceptable air quality days. Therefore, with Valley fever not being endemic to the County and the inclusion of fugitive dust minimization techniques onsite during construction, the risk of Valley fever exposure is low for the Project.

RI-254.133 This comment states that the Recirculated Section 4.2, Air Quality, should be updated to reflect the revised $PM_{2.5}$ national ambient air quality standard (NAAQS). Table 4.2-1 has been updated to include this information. The EPA reduced the NAAQS for fine particulate matter (PM2.5) from a level of 12 micrograms per cubic meter (µg/m3) to 9 micrograms µg/m3 on February 7, 2024 and footnote d in Table 4.2-3 of the Final EIR was revised to reflect this change. As explained in the EIR (Table 4.2-2), the South Coast Air Basin was out of attainment for PM2.5 prior to this change, as was Riverside County. Therefore, the revised NAAQS does not change any of the conclusions in the EIR. SCAQMD has not published revised ambient air quality standards for PM2.5, which are currently 10.4 µg/m3 for

[20] Centers for Disease Control. Regional Analysis of Coccidioidomycosis Incidence — California, 2000–2018. https://www.cdc.gov/mmwr/volumes/69/wr/mm6948a4.htm?s_cid=mm6948a4_e.

[21] California Department of Public Health. Valley Fever in California Dashboard. https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/ValleyFeverDashboard.aspx.

construction and 2.5 µg/m3 for operation). SCAQMD has also not revised its criteria pollutant threshold of significance for PM2.5.

The EIR relies upon the thresholds of significance promulgated by SCAQMD, the expert regulatory air agency in the region, which are supported by substantial evidence. The analysis in Recirculated Section 4.2, Air Quality, shows that mitigated peak day localized construction emissions of PM2.5 are 0.39 µg/m3, which is well below the SCAQMD Localized Significance Threshold (LST) of 10.4 µg/m3. It also shows that the maximum daily construction emissions of PM2.5 is 30.91 lbs/day, which is well below the SCAQMD threshold of 55 lbs/day. For operations, Recirculated Section 4.2, Air Quality, shows that the mitigated peak day localized operational emissions of PM2.5 are 0.63 µg/m3, which is well below the SCAQMD LST of 2.5 µg/m3. However, the mitigated maximum daily operational emissions is 152.42 lbs/day, which is above the SCAQMD threshold of 55 lbs/day. As such, Recirculated Section 4.2, Air Quality, concluded that construction air quality impacts are less than significant with mitigation, and operational air quality impacts are significant and unavoidable. These impact conclusions would not change based on the EPA's recent action. SCAQMD will develop a plan to achieve compliance with the revised NAAQS and will determine what measures are necessary to implement. Any SCAQMD measures that apply to the Project will be implemented pursuant to regulatory requirements.

ENVIRONMENTAL JUSTICE

RI-254.134 This comment is introductory and states that the following comments are about GP 23-02: March JPA Draft Environmental Justice Element. This comment does not raise any comments, questions or concerns about the environmental analysis in the Recirculated EIR sections.

RI-254-135 This comment is about the Draft Environmental Justice Element preparation and release process, which is separate from the proposed Project. As it relates to the Recirculated EIR sections, this comment alleges that the Recirculated EIR retroactively found the Project to be consistent with the Draft Environmental Justice Element. However, the Recirculated EIR was issued after the Draft Environmental Justice Element was released, so it is not retroactive. Please see Response RI-254.76, above, for a discussion of the Environmental Justice Element process. The comment raises no other questions or concerns about the environmental analysis in the Recirculated EIR sections.

RI-254.136 This comment lists the publicly available documents reviewed by the commenter. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.137 This comment references a letter provided by the commenter on March 9, 2023. This letter is included as Letter I-829; as such, see Responses I-829.1 through I-829.8. The remainder of this comment discusses background information about the communities within the March JPA Planning Area.

This comment provides CalEnviroScreen 4.0 information above the 80th percentile about census tract 6065046700, which contains March ARB, the March JPA Planning area, and the Project site. The comment includes a table which provides some information from CalEnviroScreen 4.0 but does not include the data for which the census track is below the 80th percentile including the information in the table below that provides the additional CalEnviroScreen 4.0 for census tract 6065046700.

Census Tract 6065046700 CalEnviroScreen 4.0 Ranking

Variable Name	Percentile rank (0-100)	Description
$PM_{2.5}$	60	Annual mean $PM_{2.5}$ concentrations
DPM	40	DPM emissions from on-road and non-road sources
Toxic Releases	64	Toxicity-weighted concentrations of modeled chemical releases to air from facility emissions and off-site incineration (from RSEI)
Pesticides	13	Total pounds of selected active pesticide ingredients (filtered for hazard and volatility) used in production-agriculture per square mile
Drinking Water	71	Drinking water contaminant index for selected contaminants
Housing Burden	60	Percent housing-burdened low-income households

The last three paragraphs of the comment further discuss the footprint of warehouses within Southern California census tracts and ranking information. However, it is unclear what the sources is for any of the data and rankings, so March JPA is unable to confirm its veracity or respond.

Finally, the comment makes general conclusory statements regarding historical public engagement, mitigation, and development within the March JPA Planning Area. This comment does not raise any comments, questions or concerns about the environmental analysis in the Recirculated EIR sections.

RI-254.138 This comment is about the process of preparing the Draft Environmental Justice Element. Please see Response RI-254.76, above, for a discussion of the Environmental Justice Element process. This comment does not raise any comments, questions or concerns about the environmental analysis in the Recirculated EIR sections.

RI-254.139 This comment questions the inclusion of the Draft Environmental Justice Element consistency analysis within the Recirculated EIR sections. As discussed in Response RI-254.76, above, March JPA is required to prepare the Environmental Justice Element of the General Plan independent from the Project and the Environmental Justice Element applies to the entirety of March JPA Planning Area. The EIR includes discussion and analysis of the Draft Environmental Justice Element in the Recirculated EIR sections, but the Environmental Justice Element is not part of the Project. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-254.140 This comment quotes Chapter 10 of the Office of Planning and Research's CEQA Guidelines about how the CEQA process should influence the development of general plan policies and that CEQA should not just be a post hoc rationalization of decisions that have already been made. The Draft Environmental Justice Element is separate from the Project and has undergone its own public review and environmental review process. No decisions have been made about whether or not the proposed Project would be approved. Decision makers will consider the information included in the EIR – including additions regarding the Environmental Justice Element – in deciding whether to approve the Project. Please see Response RI-254.76, above, for a discussion of the Environmental Justice Element process.

RI-254.141 This comment is about the Draft Environmental Justice Element process and not about the proposed Project. Please see Response RI-254.76, above, for a discussion of the Environmental Justice Element process. This comment does not raise any comments, questions or concerns about the environmental analysis in the Recirculated EIR sections.

RI-254.142 This comment is about the Draft Environmental Justice Element process and not about the proposed Project. Please see Response RI-254.76, above, for a discussion of the Environmental Justice Element process. The comment also includes conclusory statements summarizing previous comments from this comment letter. Please see Responses RI-254.134 to RI-254.141. This comment does not raise any comments, questions or concerns about the environmental analysis in the Recirculated EIR sections.

HAZARDS

RI-254.143 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. Regarding the proposed Park, please see Responses RI-254.37 through RI-254.51, above. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-254.144 This comment includes personal information and is introductory in nature. Commenter asserts that he submits this letter "not only as a resident of the community, but as a domain expert." Commenter has not provided sufficient credentials to indicate that he is an expert in the specific fields in which he comments. Because commenter is not an expert in these project areas, his comments do not constitute substantial evidence as expert opinion. *Cathay Mortuary, Inc. v. San Francisco Planning Com.* (1989) 207 Cal.App.3d 275, 281 (urban planning testimony on cultural impacts was not expert opinion); *Lucas Valley Homeowners Assn. v. County of Marin*, 233 Cal.App.3d 130, 157 (real estate agents unqualified to give expert opinions on project's effect on property values). March JPA has relied on its expert consultants, Leighton Consulting, Inc. and Vista Environmental Consulting, in its evaluation of the Project's impacts related to hazards and hazardous materials. (See Appendices J-1, J-2, J-5, J-6, and J-7) The comment generally challenges the conclusions in Recirculated Section 4.8, Hazards and Hazardous Materials, that the Project will not (1) disturb contaminated soil, (2) create a significant hazard through reasonably foreseeable upset and accident conditions, and (3) expose people, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires. Each of these assertions is addressed in further detail below.

RI-254.145 This comment is introductory and notes the Project site's former use as a military base and location for pyrotechnic storage. The comment asserts that "MJPA and master developer have not performed their due diligence in assessing the existing conditions on the site." As outlined in Recirculated Section 4.8, Hazards and Hazardous Materials, and Response to Comment FL-D.4, the Project applicant obtained a Phase I Environmental Site Assessment for the Project Site, followed by a Phase II Environmental Site Assessment and other follow-on sampling. A Phase I Environmental Site Assessment is the national standard for environmental due diligence on a property. In addition to these Project-specific environmental studies, the Project site has been extensively characterized and remediated for years under the oversight of applicable regulatory agencies. Multiple documents from relevant regulatory agencies have cleared the Project site for unrestricted use, including the Santa Ana Regional Water

Quality Control Board in 2006, which, with respect to the site investigation, stated its concurrence "with your finding of no release at the site, and the recommendation for no further action for the Weapons Storage Area." Please also see Responses FL-D.4 to FL-D.16 for a further discussion of site characterization.

RI-254.146 This comment states, in reference to Per- and Polyfluoroalkyl Substances (PFAS)/ Perfluorooctanesulfonic acid (PFOS)/perfluorooctanoic acid (PFOA), a full gridded survey of the grading area is needed to demonstrate no contamination has occurred beyond IRP Site 3 and Site 25 and adjacent to the areas of known munitions residues. With respect to PFAS, as detailed in Recirculated Section 4.8, Hazards and Hazardous Materials, the only place within the Specific Plan Area identified by the Air Force and all appropriate expert environmental agencies with the potential for PFAS contamination is the former Landfill No. 5 (Site 3).[22] The Air Force recently tested soils in the former Landfill No. 5 and found no detections of PFOA, PFOS, or perfluorobutanesulfonic acid (PFBS) above screening criteria. The Santa Ana Regional Water Quality Control Board concurred with the conclusion that no additional soil sampling is recommended in the former Landfill No. 5 area. Further, multiple documents from relevant regulatory agencies have cleared the Project site for unrestricted use, including the Santa Ana Regional Water Quality Control Board in 2006, which, responding to a site investigation, stated its concurrence "with your finding of no release at the site, and the recommendation for no further action for the Weapons Storage Area." As such, no further remediation or removal activities are required.

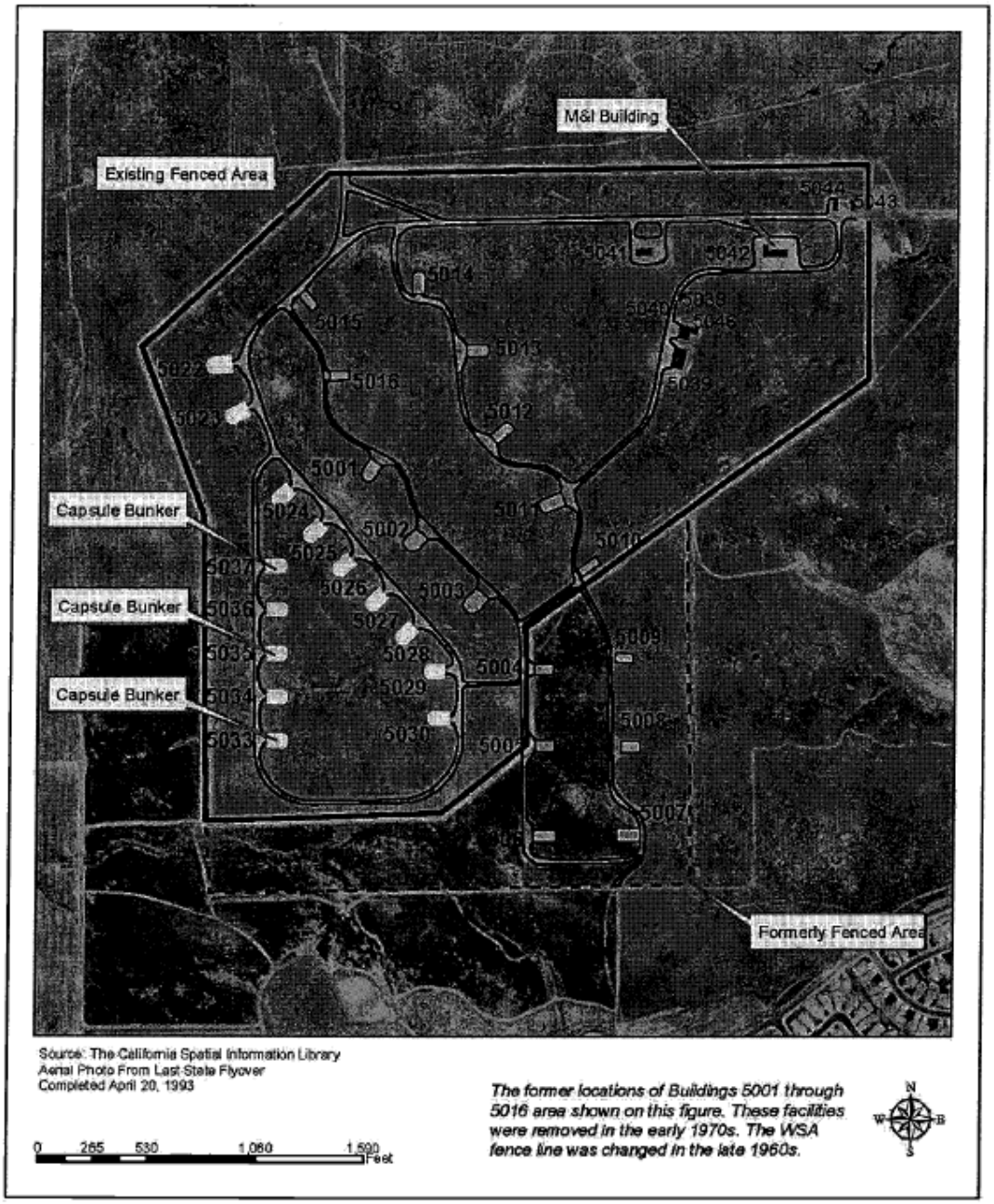
Recirculated Section 4.8, Hazards and Hazardous Materials (pp. 4.8-10 to -11), explains that based on a comprehensive evaluation of the March AFB, USAF did not identify any areas within the Specific Plan Area that require further munitions responses. In an email dated May 4, 2022, Robert Estrada, the Base Realignment And Closure environmental coordinator, concluded that "there is no basis to conduct any response action, including UXO survey." Please refer to Recirculated Section 4.8, Hazards and Hazardous Materials, and Topical Response 3 – Hazards, for further discussion of PFAS, radiological materials, unexploded ordinances, and biological and chemical weapons. The "ongoing cleanup of soils and water on the base due to its use as an Aqueous Film Forming Foam (AFFF) in military firefighting" to which commenter refers is the exact cleanup that studied which areas of the AFB had the potential for PFAS contamination. As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, the purpose of the AFCEC Final Quality Program Plan (QPP) for the Remedial Investigation of PFAS at the Former March AFB and ARB, California; memorandum dated May 10, 2022 (PFAS QPP) was to "[d]etermine the nature and extent of PFAS (perfluorooctane sulfonate [PFOS], perfluorooctanoic acid [PFOA], and perfluorobutane sulfonic acid [PFBS]) in soil and groundwater." It was this report that found that the only area with the potential for PFAS contamination within the Project site was the West March AFFF Area Landfill No. 5, which is also known as and referred to as Area 3. Groundwater, sediment, and surface water samples were collected at Landfill No. 5 to screen for potential residual PFAS compounds. The sediment and surface water samples of Landfill No. 5 were reported to contain no PFAS compounds exceeding their reported screening levels (AFCEC 2022). Soil samples were collected from three locations within the former Landfill No. 5 and there were "[n]o detections of PFOA, PFOS, or PFBS above screening criteria" and, as such, "[n]o additional soil sampling is recommended" (AFCEC

[22] AFCEC, 2022, Final Quality Program Plan (QPP) for the Remedial Investigation of Per- and Polyfluoroalkyl Substances (PFAS) at the Former March Air Force Base (AFB) and March Air Reserve Base (ARB), California; memorandum dated May 10, 2022.

2023). This testing was done in 2022 and represents direct evidence to the contrary of the comment's claim that "contamination may have migrated through the soil or been disturbed in the past 30 years since the BRAC closure."

RI-254.147 This comment requests a radionuclide survey of the areas that will be graded as part of this Project. The potential presence of radionuclides and previously conducted surveys are discussed under Response RI-254.146 and Topical Response 3, Hazards. The comment asserts that the MARSSIM and Cabrera report "are not comprehensive of the entire project grading area." The comment further asserts that "no maps are shown to demonstrate that these surveys were comprehensive for the entirety of the proposed project area." As indicated in Recirculated Section 4.8, Hazards and Hazardous Materials, both the MARSSIM and the Preliminary Assessment and Site Inspection (PA/SI) were completed for the WSA. Maps from each report are included below for reference:

Figure 2-3. Aerial Photograph – Weapons Storage Area



Source: The California Spatial Information Library
Aerial Photo From Last State Flyover
Completed April 20, 1993

The former locations of Buildings 5001 through 5016 area shown on this figure. These facilities were removed in the early 1970s. The WSA fence line was changed in the late 1960s.

CABRERA SERVICES RADIOLOGICAL · ENVIRONMENTAL · REMEDIATION WWW.CABRERASERVICES.COM	Aerial Photograph Weapons Storage Area March AFB, CA	Date: November 2004 Project #: 03-5001.08 File Name: Prepared By: JTH	Figure 2-3

PA/SI

MARSSIM

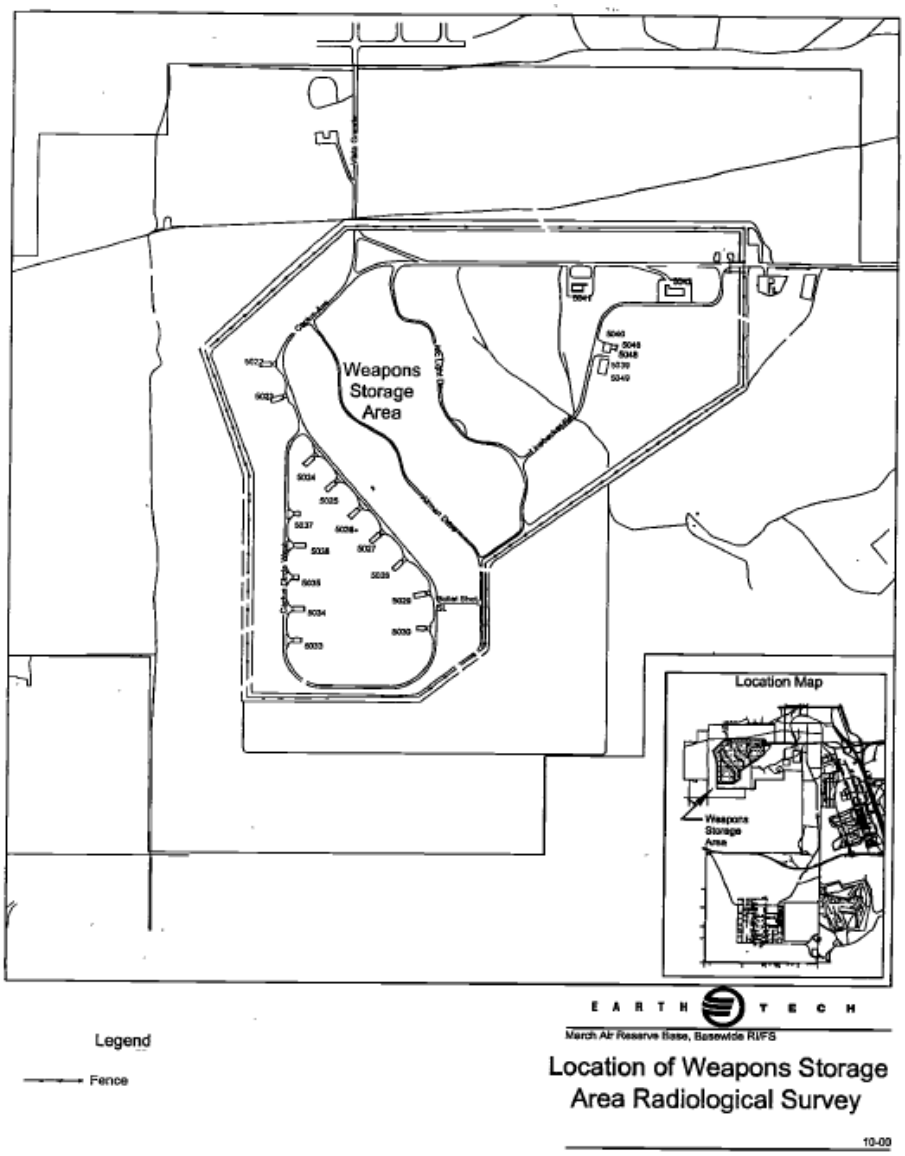


Figure 2-1

Both the PA/SI and the MARSSIM covered the WSA. The PA/SI did not identify any radiologically-impacted materials or burial pits and concluded that no further action for surface soils or subsurface investigation of burial sites in the WSA is recommended based on historical information and the results of geophysical, radiological, and subsurface investigations (Cabrera, 2006). There is no evidence that any ordnance was stored elsewhere within the Specific Plan Area. CEQA does not require speculation. *See, e.g. Laurel Heights Improvement Assn. v Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1137.

RI-254.148 This comment states it is necessary to test for perchlorate contamination in and around the igloos and any ordnance or munitions areas. With respect to perchlorate, there is no information that indicates perchlorate would be present in soil in the Specific Plan Area. As discussed in Recirculated Chapter 3, Project Description, the proposed Project is located in a former munitions storage area, in which munitions (and later fireworks) were stored indoors in secured concrete bunkers. As part of the Phase I, the concrete bunkers were inspected and the environmental professional noted that the "bunkers are constructed entirely of concrete" and that "[n]o evidence of floor pitting or staining was observed

in the bunkers, and the concrete flooring was noted to be in excellent condition." As such, there is no pathway for perchlorate to get into the soil. There is no information to indicate that munitions or fireworks were disposed of in the Specific Plan Area and no indication that fireworks were manufactured on site and, as such, there is no evidence indicating a release of perchlorate to soil. CEQA does not require speculation. *See, e.g. Laurel Heights Improvement Assn. v Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1137. Please refer to Recirculated Section 4.8, Hazards and Hazardous Materials, for further discussion of environmental characterization of the Specific Plan Area and for a discussion of munitions disposal investigations.

RI-254.149 This comment states wipe samples are insufficient to characterize potential PCB contamination. Five exploratory trenches were completed during the Phase II investigation at two electrical substation areas which had multiple former elevated electrical transformers (adjoining Building 2 and Building 4). Two exploratory trenches were also completed near pad-mounted transformers (adjoining Building 5 and at northeast edge of the Ordnance Storage Bunkers Area). The results of this investigation identified one sample location out of ten with PCBs at a concentration of 0.009 mg/kg, below the DTSC and USEPA soil screening levels for residential or commercial/industrial soil; and no PCBs in any soils sampled from pad mounted transformers.

DTSC, the expert agency in California that regulates hazardous wastes and materials "does not recommend sampling of building materials or surrounding media unless there is evidence of a PCB release that may lead to exposure.[23] As explained above, based on extensive testing, there is no evidence of a PCB release on the Project site that may lead to exposure.

As explained in Vista Environmental Consulting Responses to Comments (Attachment A of Leighton 2023 PCB issues memo, included in Appendix J-6), as well as within Recirculated Section 4.8, Hazards and Hazardous Materials, in situations where it is known or expected that PCBs were present, the standard protocol would include the collection of concrete samples and even soil samples beneath the concrete. For example, this protocol would be used to assess the leakage of oil from a transformer that had been previously tested and determined to contain PCBs. There is no evidence of a leak containing PCBs anywhere within the Specific Plan Area, therefore no sampling of the concrete, or any other building material is required. Had any detectable levels of PCBs been identified in any of the wipe samples that were collected, Vista would have recommended follow-on delineation sampling of the concrete or other substrate. However, the absence of PCBs in the wipe samples collected indicated that this step was unnecessary.

Per Vista's supplemental letter dated April 29, 2024 (Appendix J-7), "wipe sampling was a reasonable initial testing method for concrete surfaces with discoloration, even if the contamination had occurred more than 72 hours ago. In the event that there had been any PCBs detected in any of the subject wipe samples collected of discoloration on concrete pads, then it would be reasonable to assume that there had been a release of PCB-containing oil, and further assessment of the concrete and the soil beneath the concrete would be warranted. The fact that there was no PCB detected in the surficial contamination is indicative of the fact that there never had been a release of transformer oil containing

23 DTSC, 2020, Human Health Risk Assessment Note Number 8: Recommendations for Evaluating Polychlorinated Biphenyls (PCBs) At Contaminated Sites in California

PCBs at concentrations of 50 mg/kg, and therefore there was no need to perform testing of the concrete or the soil below."

Despite the absence of PCBs in all samples collected, with the exception of one, which was still well below the regulatory level of concern, the Project is required to comply with MM-HAZ-1, which requires that all wastes be evaluated at the Project site for hazardous waste characterization and disposed of at an appropriately licensed disposal facility.

RI-254.150 This comment states the Project requires mitigation for Valley Fever during soil disturbance activities. Please refer to Response RI-254.132, above for a complete response to this topic.

RI-254.151 This comment requests a demonstration that there is a negligible chance of unanticipated explosions due to unexploded ordnance ignition during blasting activities, and states previous reports and expert opinions (including BRAC environmental coordinator Robert Estrada) are insufficient to prove that the likelihood of buried ordnance is negligible. As discussed on page 4.8-9 of the Recirculated Section 4.8, Hazards and Hazardous Materials, the USAF MMRP conducted a comprehensive evaluation of the site in March 2013: "[t]he goal of the USAF MMRP is to make munitions response areas (MRAs) safe for reuse and to protect human health and the environment. The USAF MMRP addresses issues related to munitions and explosives of concern (MEC) and munitions constituents (MC) associated with MRAs, as well as evaluates actual or potential hazardous substances, pollutants, or contaminants on defense sites other than operational ranges."(USAF 2013). The Site Evaluation concluded further munitions response was not required. The final comprehensive site evaluation conducted by USAF MMRP in March 2013 concluded further investigation of the four potential munitions response areas (MRAs) was unnecessary, mainly because previous investigative and cleanup actions have taken place, which did not identify MEC or UXO. This was further confirmed in 2022 by Robert Estrada, BRAC environmental coordinator, in an email stating "there is no basis to conduct any response action, including UXO survey." The EIR has been revised to note that in the extremely unlikely event that previously unidentified or unsuspected UXO are present, MM-HAZ-1 requires oversight of all ground disturbing activities by workers trained to identify suspect contamination or other waste debris, including UXO. If encountered, the Air Force and/or overseeing agency will address noted wastes. With this mitigation in place, workers can be trained to identify likely wastes associated with the former land uses, including UXO or MEC, and it would be identified during excavation activities.

RI-254.152 This comment addresses concerns regarding the use of explosives during construction, and states there is a foreseeable chance of accidents or upset conditions. The use of explosives is highly regulated under multiple ordinances and codes. Title 19 CCR Division 1 Chapter 10 – Explosives, and HSC 12101 requires permits prior to use of explosives. Use permits require review by the fire department and other overseeing agencies, and plans, as necessary, would be prepared to protect surrounding residences from blast impacts. 19 CCR Chapter 10 also addresses the sale, transportation, storage, use, and handling of explosives in California. Requirements for obtaining permits from the local fire chief having jurisdiction and blasting guidelines (such as blasting times, warning devices, and protection of adjacent structures and utilities) are also explained. Health and Safety Code (HSC) 12101 regulates health and safety related to explosives use, and states "no person shall manufacture, sell, furnish, give away, receive, store, possess, transport, use, or otherwise handle explosives without a permit." As noted in section 4.8.2, Relevant Plans, Policies, and Ordinances, of Recirculated Section 4.8, Hazards and Hazardous Materials, CCR, Title 8, Division 1, Chapter 4, Subchapter 4, Construction Safety Orders,

includes rules for demolition, excavation, and explosives work. Further, pursuant to PDF-NOI-2, no blasting shall occur within 1,000 feet of any residence or other sensitive receptor.

With regard to pipelines, California Dig Law (Title 1, Division 5, Chapter 3.1, Article 2, Section 4216) requires the excavator to delineate the area to be excavated so subsurface utilities can be identified and marked. Excavation includes "any operation in which earth, rock, or other material in the ground is moved, removed, or otherwise displaced." Section 51014.6 of the California Government Code does not allow construction or placement of structures or obstructions on pipeline easements other than the pipeline operator, and the State Fire Marshal, Pipeline Safety Division requires pipeline operators to have physical access to allow visual assessment of pipeline conditions at any and all times. This, in coordination with the California Dig Law, would require the location and protection of subsurface pipelines prior to all excavation and earth moving activities. Compliance with all applicable laws will ensure impacts related to a foreseeable upset or accident condition in connection with the gas pipelines will be less than significant. No changes to the EIR are required in response to this comment.

RI-254.153 This comment states construction Project boundaries are within one-quarter mile of Grove Community Preschool and Orange Terrace Park after school day care, and these schools were not evaluated with regard to hazardous emissions during construction. As shown in Figure 4.2-1a of the Final EIR (revised Exhibit 2-A of the Project HRA – Appendix C-2), the analysis placed construction sources within 80 feet of the Grove Preschool (represented by Receptor R8), and the modeling conservatively assumed that construction would occur at these locations for the entire 4.35-year duration of Project construction, although construction on the southern Barton extension adjacent to the preschool would take place over a significantly shorter period of time. Regarding emissions of diesel particulate matter, aldehydes, and naphthalene, standard practice is to model diesel exhaust emissions as diesel particulate matter, as these and other toxic air contaminants typically adhere to particulates in diesel exhaust. While the asphalt used in road paving may result in emissions of toxic air contaminants, these emissions would be extremely limited, lasting only for a matter of days while asphalt is being applied. Because exposure duration is a significant factor in cancer risk, brief exposures to emissions that may occur during paving activities would result in minimal risk. For these reasons, toxic air contaminant emissions from paving activities are typically not considered in health risk assessments, as this risk is minimal compared to diesel particulate emissions generated by construction equipment. (Appendix C-4)

RI-254.154 This comment asserts the severity zones identified by CalFire are inconsistent with actual risks, based on wildland fire concerns related with homeowners insurance. The comment also states grading and stubbing of utilities will remove native forb, resulting in regrowth of invasive grasses that are more susceptible to wildland fire. CEQA requires analysis of wildfire impacts for projects located in or near state responsibility areas or lands classified as very high fire hazard severity zones. It does not require analysis relating to availability of homeowners insurance. As explained in Section 4.18, Wildfire, the Project site is not located in a mapped Fire Hazard Safety zone. The Project site would be considered within a State Responsibility Area, as the Project site is under Riverside County jurisdiction. Public Resources Code section 4291 requires homeowners to "maintain a defensible space of 100 feet from each side and from the front and rear of the structure." As discussed in Section 4.18, Wildfire, mitigation measure MM-FIRE-2 would require annual maintenance of open space, removal of undesirable combustible vegetation, and maintenance of the project site in compliance with the Project's Fire Protection Plan (FPP) and Riverside County Fire Department rules and requirements. Under this mitigation and compliance with PRC section 4291, regrowth of invasive and combustible grasses would be controlled and replaced with less combustible vegetation.

With respect to Park development, see Response RI-254.37 for a discussion of the funding and timing for the proposed Park. The LLMD will be responsible for the maintenance of the Park once complete. As such, the Park will not only be kept clear of combustible vegetation, but will be a landscaped and completed park that is subject to ongoing maintenance by the LLMD.

RI-254.155 This comment claims that, based on laboratory quality assurance/quality control (QA/QC) results, the PCB data provided in Appendix J-2 should be considered invalid because laboratory-conducted QA/QC did not fall within acceptable limits, and primary quantification levels (PQLs) were higher than residential screening levels for PCBs in soil.

As noted in the supplemental letter sent by Vista Consulting Services, dated April 29, 2024 (Vista Letter – Appendix J-7), with respect to the PQL, the samples were collected on buildings scheduled for demolition, and therefore wipe samples were used to characterize material for disposal in accordance with 40 CFR 761 (see page 15 of 37, Appendix J-2). 40 CFR 761.61 outlines requirements for cleanup and disposal of PCB remediation waste, including porous surfaces (concrete). 40 CFR 761.61(a)(4)(iii) states the cleanup level in high occupancy areas is 1 parts per million (ppm), while low occupancy areas is 25 ppm. The lab PQL of 490 parts per billion (ppb) is equal to 0.490 ppm, which is below the applicable screening level used in this evaluation.

With respect to QA/QC, all quality control results were within in-house limits, as well as the limits of the analytical methods employed (USEPA Methods 8082 and 9270), and no qualifiers were identified in the lab report that indicated unacceptable results.

RI-254.156 This comment states, based on laboratory QA/QC results, Polycyclic Aromatic Hydrocarbons (PAH) data provided in Appendix J-2 should be considered invalid because surrogate recoveries and matrix spike recoveries were unacceptable. As noted in the Vista Letter (Appendix J-7), the referenced data is in Appendix J-6, which was collected to characterize materials for disposal. While data quality issues were identified, these materials are scheduled to be removed from the project site. The report determined materials that contain PAHs (power poles) are to be handled and disposed of as Treated Wood Waste (TWW) under California HSC 25230 through 25230.18. Materials in question that contain PAHs will be removed and disposed of in accordance with state law.

RI-254.157 This comment states that Appendix J-6 pentachlorophenol measurements were above residential and industrial soil regional screening levels (RSLs). As noted in the Vista Letter (Appendix J-7) and in Response R-254.155, wood poles were tested for removal and disposal, and are to be handled as TWW under HSC 25230 – 25230.18. These do not represent concentrations in soil. No changes to the EIR are required in response to this comment.

RI-254.158 This comment states that chromium testing in Appendix J-6 did not speciate chrome III and chrome IV, and therefore chrome IV could be above residential soil RSLs. As noted in Response RI-254.155, wood poles were tested for removal and disposal, and are to be handled as TWW under HSC 25230 – 25230.18. These do not represent concentrations in soil. No changes to the EIR are required in response to this comment.

RI-254.159 This comment states that arsenic in wood poles in Appendix J-6 was above residential soil screening levels. As noted in the Vista Letter (Appendix J-7) and in Response RI-254.155, wood poles were tested for removal and disposal, and are to be handled as TWW under HSC 25230 – 25230.18. These do not

represent concentrations in soil. No changes to the EIR are required in response to this comment. In addition, as noted in Recirculated Section 4.8, Hazards and Hazardous Materials, while above the regulatory screening level, this result is below the background levels for arsenic in the region according to DTSC.[24]

[24] DTSC Human Health Risk Assessment (HHRA) Note Number 11 Southern California Ambient Arsenic Screening Level, dated December 28, 2020; available at: https://dtsc.ca.gov/wp-content/uploads/sites/31/2020/12/HHRA-11-Ambient-Arsenic-levels-in-SoCal-Final-A.pdf.

From: Ying Shen <yingyingshen@hotmail.com>
Sent: Saturday, February 24, 2024 4:59 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-255.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Ying Shen
92508

RI-255

Ying Shen
February 24, 2024

RI-255.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Carlos LLiguin <malinalli_1997@yahoo.com>
Sent: Sunday, February 25, 2024 2:19 PM
To: Dan Fairbanks
Cc: Carlos LLiguin
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-256.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Carlos Lliguin
92508

RI-256

Carlos Lliguin
February 25, 2024

RI-256.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Jerry Shearer <shearer32@verizon.net>
Sent: Sunday, February 25, 2024 2:23 PM
To: Dan Fairbanks
Attachments: PublicCommentWestCampusUP-REIR-S3.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project. Please find my comments in the attached letters. I look forward to your thoughts and responses, and appreciate your consideration. RI-257.1

Please reply to confirm receipt of this public comment to ensure it is part of the public record.

Sincerely,

Christopher Shearer
Riverside 92508

25 February 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the recirculated EIR for the March JPA West Campus Upper Plateau project. The updated project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. I must say, as a member of the local community, I am disappointed that you are continuing to push forward this abhorrent industrial project.

RI-257.2

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices, December 2, 2023
- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- March JPA Draft Environmental Justice Element, November 2023
- March JPA TAC Meeting Minute Notes from February 6, 2023, April 3, 2023, June 5, 2023, August 7, 2023, September 6, 2023, and December 4, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- General Plan of the March Joint Powers Authority, assumed March 11, 1997
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

RI-257.3

For the purposes of this comment letter, I will refer to the March Joint Power Authority (JPA) which includes the Commission members, the developer that is understood to be LNR Riverside, LLC, Meridian Park West, LLC, the Lewis Group of Companies (partners and subsidiaries), and member entities the cities of Riverside, Moreno Valley, and Perris, and the County of Riverside.

RI-257.4

The West Campus Upper Plateau is a unique piece of land. It is an extension of the Sycamore Canyon Park natural area geographically, historically, culturally, environmentally, and recreationally. It is a valuable part of the OrangeCrest community, value beyond how much money it can generate a few greedy people. There is no other place like it in western Riverside County. Any development of this land should complement the unique characteristics and value (human value, not just economic value) of this land not destroy it. Through the original draft EIR process, I and many members of the community wrote to you detailing alternate land use plans that accentuate the community, meet the JPA's goals for this project, and preserve large portions of the landscape for both passive and active recreation.

As much as the applicant via this draft and recirculated EIRs tries, this industrial development plan and land use zoning do not preserve the landscape even with the inclusion of the 2012 agreement that sets aside open space and a conservation easement and the "community benefit" of a fire department (which was always a requirement of settlements against the JPA) and park. Viewing this land from a land use map or a parking lot don't begin to do adequate justice to its human value. The public still does not understand your thoughts on taking this special piece of land away from residents of western Riverside County and turning it over for private development. The establishment of the 2012 settlement (why has it taken you 12 years to act on it?) does not adequately reflect how people value and enjoy this land currently. This warehouse project is not like other warehouse projects and it will have a significant negative impact on the community it borders regardless of the CEQA mandated mitigation efforts and applicant's hollow claims of community benefits. It is inconceivable to me why the JPA continues to allow the applicant to push forward this specific plan and project, especially after two years of widespread and uniform community opposition to it. Your effort thus far is repugnant.

RI-257.5

I am writing to submit comments on the recirculated draft Environmental Impact Report (REIR) for the proposed West Campus Upper Plateau. After reviewing the REIR, it continues to be clear that the March Joint Powers Authority (JPA) is scrambling to push through an unpopular project before it sunsets July 1, 2025. Changes to the project itself from the original EIR are negligible if not even more upsetting to the residents and communities surrounding the March JPA territory. Specifically, the following areas of the recirculated draft EIR appear to be unstable, dismissive, and predatory in nature.

RI-257.6

1. The yet-to-be adopted draft Environmental Justice (EJ) element is included extensively throughout the EIR, and the existing specific plan is assumed a priority to fit its objectives. Your process of adopting an EJ element and the REIR simultaneously and stating that one fulfills the other undermines the credibility of the community's ability to

RI-257.7

meaningfully impact either of them. The EJ should follow proper CEQA noticing and environmental review.

2. I, along with many community members, implore you to follow a CEQA process while adopting your EJ element. We also ask that you put a warehouse moratorium in place until the EJ element process is complete.
3. Page 3-24 of the REIR refers to community benefits, including a park. Simply put, this park is a work of fiction. The Developer has made clear they will only fund a "park feasibility study" and that neither they nor the County will be funding a park. The soonest the community might expect a park is in the year 2042 when the City of Riverside can annex this land. In other words, there is no park; and therefore, no community benefit.
4. Page 3-24 of the recirculated EIR also mentions the need for the JPA and applicant to agree to a 15-year development agreement with two potential five-year options. Not only do we object to you giving this unresponsive developer another 25-year license to build more warehouses surrounding March ARB, the federal government objects to such contracting practices. Federal Acquisition Regulations (FAR) Subpart 6.1 and 6.3 clearly identify how agencies are to grant contracts. This applicant does not offer the JPA best practices, lowest price, best value, or is the only source of a product or service that are required to offer a non-competitive contract like the proposed 15-year Development Agreement. This is especially disturbing and irresponsible considering the JPA will sunset July 1, 2025 yet will have agreed to a 15–25-year contract with a profit-driven business.
5. The lack of non-industrial alternative plans in the REIR is dismissive of clear and overwhelming public opposition to this project. For two years, residents have tried to understand why the JPA and applicant have been unwilling to discuss and plan for non-industrial land uses for the Upper Plateau, and the answer we keep returning to is greed. Without public notice, the JPA and applicant pushed through an agreement to transmit the land based on the construction of four large warehouses on October 26, 2022. This demonstrates a predetermined use for this land despite your continued insistence that the JPA and applicant have engaged with the public throughout this process. Your actions prioritize the pocketbooks of the applicant and the JPA member agencies instead of job growth and community development as you advertise on your website and within your public presentations.

By signing my name to this letter, I respectfully request that the elected representatives of the JPA commission and the JPA staff be accountable to the community surrounding the West Campus Upper Plateau. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document, not to amend it 16 months before sunsetting to push through one last warehouse project. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission.

RI-257.7 Cont.

RI-257.8

RI-257.9

RI-257.10

RI-257.11

I have previously submitted comments on this project, including a list of feasible mitigation measures and alternative land use ideas, so that the March JPA would include these measures or provide a reasoned explanation for why it has not included the requested mitigation measures, as required by CEQA. As mentioned previously, more than a thousand residents, community groups, and public agencies have submitted similar comments regarding the need for the March JPA and its applicant to include community preference as part of its plans for the West Campus Upper Plateau, but you have chosen not to include these feasible mitigation measures to mitigate this Specific Plan's significant environmental impacts as required by California law and CEQA.

RI-257.12

Therefore, I once again urge the March JPA Commission and Staff to reject this Specific Plan as currently designed, follow the CEQA process to form and approve an Environmental Justice Element plan to amend in the General Plan, engage local residents to determine their preference for land uses on the Upper Plateau, fully fund and adhere to the 2003 and 2012 Settlement Agreements before the JPA sunsets July 1, 2025, enact a warehouse moratorium until these actions are completed, and then revise the draft EIR so that complies with the applicable State of California project guidelines and requirements and the March JPA's General and Final Reuse Plans. Please don't allow one final grand act of greed and poor land use planning be your lasting legacy. I await your detailed response.

RI-257.13

Namaste (catch you later),

Christopher Shearer
Riverside, CA 92508
shearer32@verizon.net

RI-257

Christopher Shearer
February 25, 2024

RI-257.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-257.2 This comment is introductory in nature. This comment references the Project vicinity and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-257.3 This comment lists publicly available documents that were reviewed by the commenter. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-257.4 This comment identifies various entities involved with the Project. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-257.5 This comment describes the existing Project site and expresses the value it has, as currently undeveloped, for the community. This comment also questions why non-industrial alternatives suggested by the community have not been considered. In response to a non-industrial alternative, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. The comment also asserts that the landscape will not be preserved by the Project and that the CBD Settlement Agreement does not provide sufficient protection. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. Please see Topical Response 4 – Project Consistency, for analysis of the Project's consistency with the CBD Settlement Agreement.

RI-257.6 This comment expresses the commenter's belief that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-257.7 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, requests a CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without

adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-257.8 This comment questions the funding of the Park, citing the text on page 3-24 of Recirculated Chapter 3, Project Description. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The Landscaping and Lighting Maintenance District will be responsible for the maintenance of the Park once complete.

RI-257.9 This comment objects to the Development Agreement and references federal acquisition regulations. March JPA and the proposed Development Agreement are not subject to the referenced federal acquisition regulations. California Planning and Zoning Law and specifically, Government Code section 65864 et seq. governs the authority and contents of development agreements such as that proposed here. As explained in Topical Response 9, Long-Term Project Implementation and Enforcement, the County of Riverside will be implementing and enforcing the proposed Development Agreement after July 1, 2025.

RI-257.10 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, and the Final EIR for the evaluation of Alternative 5, Non-Industrial Alternative. The comment also raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts for the Project, including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. With regard to the October 26, 2022, agreement referenced in the comment, please see Topical Response 10, Development and Disposition Agreement.

RI-257.11 This comment states that March JPA and the applicant have a duty to adhere to the March ARB General Plan and engage the local communities and municipalities. It should be noted that the March Air Reserve Base does not have an adopted General Plan. The Project's consistency with the March JPA General Plan goals and policies is included in Recirculated Section 4.10, Land Use and Planning. March JPA and the applicant conducted multiple public outreach efforts regarding the Project including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation. Using a radius of 1,200 feet around the perimeter of the Project site, March JPA distributed 2,172 public notices. March JPA engaged with local jurisdictions and service providers (see, e.g., the traffic scoping agreement in Appendix N-2). With regard to the timing and development of the Environmental Justice Element, please see response to Comment RI-257.7, above. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-257.12 This comment states that the commenter previously submitted comments on the Project. This comment is included as Letter I-787. As such, see Responses I-787.1 through I-787.20.

RI-257.13 This comment is a concluding statement that refers to the commenter's prior comments. As such, please see Responses RI-257.2 through RI-257.12 above.

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From: The Harvilla Family <harvilla4@msn.com>
Sent: Sunday, February 25, 2024 8:54 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com; Jen L
Subject: Subject: Public comment for the West Campus Upper Plateau Project, Recirculated DEIR, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I believe the Recirculated Draft Environmental Impact Report (REIR) did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. RI-258.1

The objectives of the project, as stated in the REIR, include:

• *Provide increased job opportunities for local residents through the provision of employment generating businesses*

Yes, jobs will be created, but they are low-paying warehouse jobs, which can easily be eliminated, leaving empty buildings. United Parcel Service recently announced plans to lay off 12,000 people this year, on top of an ongoing series of shift closures at facilities around the country. The job cuts come only months after the ratification of a UPS contract with the Teamsters. RI-258.2

- *Provide open space amenities to serve the region*

The Upper Plateau is already an open space! Constructing millions of square feet of warehouses will only make it worse! This is a completely ridiculous/bogus objective.

- *Provide an active park consistent with the 2009 Safety Study prepared by March JPA*

The area as it currently exists is already acting as a de facto wilderness park. There are numerous existing sports facilities at the nearby Orange Terrace Park. RI-258.3

- *Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Development Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.*

The Orangecrest area has been just fine for the past 35 years without the Barton extension. In addition, there is no need for Cactus Avenue to be extended to the Upper Plateau. RI-258.4

• *Remove and redevelop a majority of the former munition's storage area of the March AFB*

Over the past 60 years, the bunkers have slowly become a part of the landscape. Virtually no one living in the area remembers the area before the bunkers were constructed. Demolishing these will require a lot of resources and the demolition jack hammers will be very noisy to the community and native animals. RI-258.5

• *Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient, and comfortable*

First of all, by extending Cactus and Barton, you are encouraging **more** cars to enter the area (induced demand). Please provide a study of the number of cars that you believe will be replaced by bicyclists and pedestrians. Please provide the number of employees at the **current** March JPA Warehouses who walk or ride bicycles to work, both in numbers and as a percentage of the total number of warehouse employees. I believe less than one percent of these employees currently ride bikes or walk to these massive warehouses.

RI-258.6

• *Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in Center for Biological Diversity v. Jim Bartel, et al. to preserve open space through establishing a Conservation Easement.*

RI-258.7

As already stated, this area is already open space, and building warehouses on it will only make the situation worse.

The March JPA will sunset in July 2025. Since the JPA has constructed so many warehouses to date (some of which are empty), why not consider, as a final act to the community, setting aside the West Campus Upper Plateau as a permanent wilderness park? The bunkers would eventually be taken over by nature, and would provide needed habitat for native species. This would be a wonderful gift to the community, which has endured the construction of dozens of warehouses over the past 15 years.

RI-258.8

Sincerely,

George Harvilla
Riverside, CA 92508

RI-258

George Harvilla
February 25, 2024

RI-258.1 This comment expresses the commenter's belief that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-258.2 This comment questions the Project Objective related to jobs, the types of jobs that would be created, who would be working at the Project site, and refers to layoffs at United Parcel Service. In response, please see Topical Response 5 – Jobs. The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-258.3 This comment questions the two Project Objectives related to open space amenities and an active park. The comment states that this open space land already exists and serves as a recreational amenity and that Orange Terrace Park has existing sports facilities. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-258.4 This comment questions the Project Objective about extending Cactus Avenue, extending Barton Street, and extending Brown Street. The comment states that there is no need for these roadway extensions. The City of Riverside General Plan Circulation Element identifies the extension of Barton Street, as a 66-foot Collector, to connect with the existing City of Riverside street network to the north and south of the Specific Plan boundary. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-258.5 This comment questions the Project Objective about removing and redeveloping the former munitions storage area. Please see Section 4.4, Cultural Resources, which determined the Weapons Storage Area is not eligible for listing under March JPA, CRHR, or NRHP criteria. The commenter asserts that demolishing these will require a lot of resources and the demolition jack hammers will be noisy to the community and native animals. The noise impacts associated with Project construction are evaluated

in Section 4.11, Noise, and Section 4.3, Biological Resources. As identified therein, construction noise impacts would be less than significant.

RI-258.6 This comment questions the Project Objective of encouraging the use of alternative modes of transportation through the provision of pedestrian and bicycle circulation systems. The comment suggests that the extensions of Cactus and Barton will encourage more cars to enter the area and requests that a study be prepared to determine the number of cars that would be replaced by bicyclists and pedestrians as well as provide the number of employees at current March JPA warehouses who bike and/or walk to work. As discussed in Section 4.15, Transportation, the "Specific Plan Area's proposed roadway network includes Class II (on-street, striped) bike lanes along all roadways, a 10-foot-wide multipurpose trail along the western side of Barton Street fronting the open space and the Park, and recreational trails. Recreational trails would be retained and maintained within the open space areas of the Specific Plan Area. In conjunction with the 5-foot bike lanes on all Specific Plan Area roadways, there would also be 6-foot sidewalks to promote walkability. All these connections within the Specific Plan Area would enhance connectivity to the existing Metrolink Station approximately 1.2-miles to the east on Meridian Parkway and travel to and from recreational amenities within the Project from other surrounding existing residential developments in close proximity to the Project. Sidewalks and bike lanes would provide direct access to the proposed Specific Plan Area uses. All the above-mentioned improvements would enhance public transit, roadway, bicycle, or pedestrian facilities. The Project would not include any improvements that would interfere with the construction of pedestrian or bicycle facilities in the future." The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-258.7 This comment questions the Project Objective about implementing the terms of the CBD Settlement Agreement. This comment states that the area is already open space and building warehouses would make things worse. Please see Topical Response 4 – Project Consistency, for analysis of the Project's consistency with the CBD Settlement Agreement. The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-258.8 This comment asks that March JPA consider leaving the West Campus Upper Plateau as a permanent wilderness park. The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections. However, with regard to alternatives to the Project, please see Topical Response 8 – Alternatives.

From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Sunday, February 25, 2024 1:35 PM
To: Dan Fairbanks
Subject: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: PublicCommentWestCampusUP-REIR-S1.pdf; MJPA-EJELetter-021224JS.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Recirculated Draft Environmental Impact Report (REIR) for the West Campus Upper Plateau Project. Please find my comments in the attached letters. I look forward to your thoughtful responses and discussing them with you further, and I appreciate your consideration and time during this process. RI-259.1

Please reply to confirm receipt of this public comment so that I know it is recorded as part of the pubic record.

Sincerely,

Jerry Shearer
Riverside 92508

11 February 2024

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

RE: Public comment on record for the draft Environmental Justice Element of the March JPA General Plan dated November 30, 2023

Attention Mr. Fairbanks:

Thank you for considering my comments on the draft Environmental Justice Element as an amendment to the March JPA's General Plan. This letter focuses on the inclusion of the draft Environmental Justice element as both a standalone amendment with comments as well as details incorporated into the recirculated draft EIR for the West Campus Upper Plateau project (SCH 2021110304), as well as my objection to the March JPA's characterization of the "Application of Environmental Justice Policies" as part of the March JPA's General Plan on page 3 of 14 of the PDF posted on your website.

Standard government contracting procedures allow for quick adoption of an agreement or contract because of pressing factors like public safety or timely acquisition by the government of a product or service at an advantageous price or offering. I do not see where in the government's guidance that the release of the Environmental Justice Element at the same time as including it as a part of a specific land development project meets the acquisition or contracting standards at the federal or state government level. The timing of your release of this policy is questionable. In addition, your interpretation that the March JPA General Plan (as approved and through this proposed amendment) contains goals and policies that "are evaluated as a continuum of direction within broad interpretation parameters" is no more than your attempt to interpret and construct the General Plan to meet your narrowly focused development practices and land use plans as the March JPA prepares to sunset in July 2025. You have consistently demonstrated your willingness to venture away from the original intentions of the General Plan and Final Reuse Plan at the whim of the profit-driven goals of your single source development partner and their greedy investors. The authors of the General Plan had a clear vision for how the land surrounding March ARB could be used to provide both blue and white-collar jobs, recreation and open-space areas, and community focused business opportunities for local entrepreneurs, military personnel, and college graduates. For example, under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." In addition, in your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions," and "Protect the interest of, and existing

RI-259.2

commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." And finally, the Final Reuse Plan (1996) describes how "the planning process was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse." But you have ignored these guidelines giving preference to a very narrow interpretation of how the repurposed land should be redeveloped. These founding organizational documents clearly indicate a preference for community preference in decision making and land use planning which you have largely ignored, dismissed, or purposefully excluded or marginalized increasingly over the past 15 years. Your willingness to overlook these clear objectives demonstrates your eagerness to serve private industry and predatory capitalism over the people living in the communities surrounding March ARB. I am curious to know why the March JPA staff, Commission, and your partners have excluded the public in every aspect of the redevelopment of public lands surrounding the base.

On November 29, 2023, the March JPA released information on their website and through mailed notifications and email to members of the Westmont Village, Green Acres, and Veteran's Village communities within the March JPA planning area that an Environmental Justice Element was under consideration. The March JPA included the draft Environmental Justice Element in two completely separate but concurrent business filings with no input from all impacted community members (and no public notification that an Environmental Justice Element was under consideration, a disturbing pattern), no review by the March JPA Technical Advisory Committee, and no input from the March JPA Commission. The Environmental Justice Element has not undergone any formal CEQA review, as required under CEQA for a general plan amendment. And you clearly shared drafts of this plan, if not the very draft published on your website, with your contractors and the applicant for the West Campus Upper Plateau prior to the public ever being made aware of your plans to establish an Environmental Justice Element. Why are you pursuing these two simultaneous yet wholly connected efforts now and in this manner? Why, for a policy that lives and dies with public engagement, did you exclude the public and include private contractors and for-profit commercial entities? What is your definition of stakeholders?

RI-259.2
Cont.

Whatever your responses, and I imagine they will be as insufficient as your justification for bastardizing the General Plan's language to meet your anti-community business objectives, it is about time you considered an Environmental Justice Element for the March JPA's General Plan. It concerns me, as I have mentioned, that the release of the draft at the end of November 2023 coincided with the recirculation of the draft EIR for the West Campus Upper Plateau project (and is included as part of this updated plan) that the local community (including more than 160 members from the most at-risk communities within the March JPA development territory) overwhelmingly rejects. It is frankly insulting to think that while the March JPA has existed since 1996, and have consistently built warehouses in communities that CalEnviroScreen 4.0 lists in the 98th and 99th percentile, the March JPA has chosen the last days of November 2023 to amend the General Plan for an organization that sunsets in July 1, 2025. It is farcical to think that the March JPA intends to actually carry through with this absurd and ambitious plan, and as a

member of an active community that opposes the land development practices of the March JPA, I don't believe this effort is genuine on your part. Your last minute draft Environmental Justice Element is clearly in response to comment letters submitted by the community in response to the draft EIR for the West Campus Upper Plateau, and rather than engage with the community and consider the comments in these letters, the March JPA is obviously placating to the applicant's greed and desire to push through a significantly controversial project despite unanimous opposition from the very communities that this copy-paste Environmental Justice policy intends to protect and represent.

Looking back to page 3 of the draft Environmental Justice plan online, the paragraphs addressing the "Application of Environmental Justice Policies" spells out the fact quite clearly: you do not intend to comply with this plan, only to use it as a way to measure the degree to which you are working toward "the direction set by the goal or policy is met, a level of compliance is achieved such that the direction set by the goal or policy is met within a continuum framework" to satisfy your behind the scenes effort to pass CA Senate Bill 994. Per the bill summary posted on www.fastdemocracy.com, the March JPA is seeking authority from the State of California to "authorize the authority to transfer jurisdiction over any landscaping and lighting maintenance districts and any community facilities districts, as specified, and to assign its contractual obligations relating to the use of land to the county … require the application of specified authority land use laws and entitlements, as specified, on and after July 1, 2025." Your attempts to manipulate the system in a way not available to the public in order to force through the unpopular West Campus Upper Plateau project even after the March JPA ceases to exist is a disturbing misuse of power and clearly is being done to cut out the public and our wishes for how the land surrounding the March ARB is repurposed. You have no intention of adhering to the goals or policies in the draft Environmental Justice Element. But what is worse is that you are developing a framework to lock out the public (exactly the opposite of aligning with the objectives stated in your draft policy) while negotiating with the County of Riverside to continue your pro-developer, anti-community policies and legal relationships after you close your doors for good. You need to amend the General Plan so that these policies are in place so you or your successor agency can continue to contract needless and unpopular warehouses on the remaining March JPA lands, and CA SB994 will ensure that the County of Riverside is obligated to grant the greedy applicant and its investors time and land to profit at the expense of people's health and life choices even as it inherits all of the costs of your destructive business decisions.

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Cont.

I have concerns with the process by which the JPA is going about this amendment to the General Plan, as you and your contractors have already inserted it into the revised draft EIR for the West Campus Upper Plateau project being recirculated currently. The policy in its current form reads as an unimaginative cut-and-paste from the County of Riverside, filled with policies that the March JPA has no ability or intention to follow through on in the 18 months it has left to exist. Maybe this is your intention. You plan to amend the General Plan with some form of the draft plan posted November 2023 and you will then attempt to amend the specific plan for the West Campus Upper Plateau while it is in the final stages of review or even possibly after the

Commission has voted on it. And if you succeed in getting CA SB994 approved by the State, your plan appears like it will work. When this area falls under the land permitting jurisdiction of the County of Riverside, it will be more capable of administering the Environmental Justice Element you have included, but how is it equipped to administer your unfunded obligations related to this policy? Please elaborate in detail your plan to actually implement this plan in regards to past and current specific plan amendments to the General Plan in a more meaningful way than measuring progress on an ongoing basis.

Diving a bit deeper, the draft policy posted on your website is a wholesale copy-paste of the County of Riverside Environmental Justice Element incorporated in the Healthy Communities section of the County of Riverside General Plan. Your justification for this adoption appears to be that the County of Riverside will be the successor agency to the March JPA in July 2025, though no written succession plan is available on your website today outside of revenue sharing detailed in the 14th Amendment to the General Plan and CA SB994 (not on the JPA website). This copied plan is desperate, reactionary management and decision-making on your part. Your choice to take this path is indefensible because the timeframes, financial resources, jurisdiction, accountability, and specific issues of the two land-use agencies are completely different. The March JPA needs to examine its own planning area and create an Environmental Justice Element that is specific to the needs of the community members who live in the surrounding communities; it should contain land-use policies that will govern the residents and neighbors of the March JPA planning area regardless of how long your organization has left to exist, not the County of Riverside.

RI-259.2 Cont.

The County of Riverside's Environmental Justice Element includes 77 policies, many of which are long-range goals. However, the March JPA is sunsetting in 18 months and cannot make long-range plans like those found in your draft Environmental Justice Element. The March JPA has limited staff, time, and resources to establish, monitor, and manage such a plan, and you cannot achieve or even work towards any long-range objectives for your planning area. Adopting the County of Riverside's objectives leads to an absurd number of policies that make no sense. Specifically, the policies that the March JPA has no ability or intention of fulfilling include:

1. The March JPA has no history of, and has repeatedly rejected the idea of coordinating with community-based organizations and community members to develop an outreach plan to increase public awareness and participation in the local planning process (HC 15.1), especially in relationship to Environmental Justice communities (HC 15.2-15.3).
2. The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7).
3. The March JPA has no jurisdiction over the Salton Sea (HC 16.1).
4. The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC

16.8), and rejected community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10).

5. The March JPA won't be coordinating with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7).
6. The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13).
7. The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

As I have mentioned, what concerns me is that the March JPA has decided to engage simultaneously with a draft Environmental Justice policy and the recirculation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304), though you consistently state the two "projects" are unrelated, and that the JPA references this not-yet-adopted policy extensively in the document. How meaningful are community comments for a General Plan amendment if it is already assumed that the agency will adopt the plan wholesale for even one specific plan before the process has started? As it stands, the public comment window for the recirculated draft EIR will close before you are able to officially adopt an Environmental Justice policy. How can a community officially comment on a project's draft EIR when it is contingent on policies in the General Plan have not been finalized, and the policies are wholly unresponsive to the specific Environmental Justice needs of the area? The March JPA's process communicates that it is not actually interested in meaningful feedback, that this is an exercise with a predetermined outcome, a process that fulfills a legal requirement rather than fulfills the JPA's responsibility to "protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses," and finally is exactly the opposite of the language and spirit of the civic engagement policies that the March JPA is trying to adopt and codify.

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The proposed Environmental Justice Element for the March JPA needs to incorporate March JPA priorities, exclude inapplicable County of Riverside policies, and describe community priorities through a formal and active community engagement process. This copy-paste of the County of Riverside policy is neither specific, concrete, nor targeted and it is devoid of all community input. Adopting a General Plan amendment with more than a dozen policies that the March JPA has no intention of implementing is dishonest, poor governance, leaves behind unfunded obligations, and is a litigation risk. Incorporating the draft Environmental Justice Element into an existing March JPA draft EIR as if it will be adopted without modification is also dishonest, unstable, and risks litigation. Is the County of Riverside aware of the unfunded obligations that the March JPA is leaving behind? Is the County of Riverside prepared to assume the legal responsibilities and liabilities left behind by the March JPA? If so, please provide written evidence of the communications stating their acceptance of these terms.

Around the country, but especially in the Inland Empire, urban planning (and those responsible for it) continues to have an uneasy relationship with Environmental Justice advocates and requirements. Poor planning decisions and discriminatory practices have historically heightened the burdens of environmental contamination in low-income neighborhoods and communities of color, in comparison to largely white, wealthy populations. This is why the residents of Irvine, Temecula, and Pasadena are able to assure their communities are not overrun by narrowly focused land uses like industrial and warehousing. Since the 1980s, activists have garnered some regulatory and scholarly support for changes to policy and planning processes, but urban planners have been slow to adopt an explicit Environmental Justice framework in land-use policies in more diverse, poorer, and less educated communities. The urban planning profession, however, has the task of helping ensure that future development does not repeat the unjust environmental injustices of the past.

Adopted in 2016 and implemented in 2018, California Senate Bill (SB) 1000 calls for local jurisdictions with disadvantaged communities to include Environmental Justice considerations in their general land use plans. CA SB1000 is intended to ensure transparency and community engagement in urban planning processes, mitigate the harm of living near environmental hazards, and facilitate equitable access to health-promoting amenities such as recreation, healthy and affordable food options, and safe and sanitary housing.

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Without support from elected officials, public agencies, and senior planning managers, progress toward Environmental Justice has been and will continue to be slow and uneven. Hence, the real work of Environmental Justice takes place in the implementation and enforcement of laws and policies, and the insistence of this implementation and enforcement by all residents and communities. Environmental Justice will not be fully realized without strong oversight and political leadership, and racial and economic diversification of urban planning institutions. It seems as if the March JPA is a bit late in its efforts to implement and enforce laws and policies that protect all residents and communities, and is quite unimaginative in its approach to addressing CA SB1000 a full six years after the State implementation of its guidelines.

Yet, there is guidance available to inform the public and land use authorities like the March JPA about how to engage with the public in this area. The California DoJ and SB1000 implementation toolkit lists some best practices for community engagement. As others before me have requested, I ask that the March JPA engage in these standard practices.

1. Form an Environmental Justice advisory committee (I volunteer for this every time I write or speak with you and you ignore or reject my overtures.)
2. Partner with local community organizations to form authentic goals
3. Consult with tribal groups to preserve culture and history
4. Stagger meeting times and locations to increase participation and offer childcare
5. Make meetings and documents accessible in many languages including ASL

The best practice for an Environmental Justice policy is that it is community led (CA SB1000 Implementation Toolkit, California DoJ). Instead of following this best practice, the March JPA engaged a large engineering/architectural firm (Michael Baker International) to lead the Environmental Justice policy development and you released a draft Environmental Justice policy without any community notification, much less public participation. Michael Baker International is the lead environmental consultant on more than six warehouse projects in southern California, including the I-15 Logistics Center in Fontana and the Southern California Logistics Center 44 in Victorville. It is not clear what qualifications in Environmental Justice they have, as there are no example projects focused on Environmental Justice issues on their website beyond environmental compliance for mega-projects. There are multiple environmental consultants or nonprofit organizations that could have been hired to help in this process that would not have this apparent conflict of interest. Aside from an existing relationship with Michael Baker International, what organizational qualifications does the March JPA believe this contractor has to benefit residents of Moreno Valley, Perris, Riverside, and Riverside County? How are they accountable to you to develop and implement a working Environmental Justice Element as an amendment to the General Plan? And how accountable to the public are you when they fail to develop a policy that meaningfully engages the residents of western Riverside County?

The March JPA has, as I have said previously, copied a plan that demonstrates desperate and reactionary management and decision-making practices on your part. However, one only needs to look down the 10 Freeway to find a better example of a functioning Environmental Justice plan at work. An example of an operational Environmental Justice policy is found in the Los Angeles Area Environmental Enforcement Collaborative. The densely populated communities closest to the I-710 freeway in Los Angeles County are severely impacted by pollution from goods movement and industrial activity, similar to the logistics dystopia the March JPA is creating in western Riverside County. However, in a multiyear effort, a unique collaboration of federal, state, and local governments and nonprofit organizations have been working together to improve the environmental and public health conditions for residents along this corridor. Working with local communities, members of the Collaborative:

- Partner with community leaders to identify pollution sources, “ground-truth” agency data sources, and develop plans for immediate action.
- Engage with community organizations to propose land use designations that integrate with and enhance neighborhoods, parks, and sensitive receptors.
- Improve compliance with environmental laws by targeting inspections and enforcement at the state, federal, and local levels to address the pollution sources of most concern to communities.
- Build on the existing community partnerships and the targeted enforcement efforts of CalEPA’s Department of Toxic Substances Control (DTSC).
- Sustain multi-year partnerships with communities, offering voluntary programs, tools, capacity-building grant opportunities, educational information, and training.

RI-259.2
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Through this policy, the Collaborative continues to work with community representatives and local, state and federal regulatory agencies (e.g., Waterboards, air quality and public health agencies, planning departments) to coordinate environmental pollution mitigating activities including inspection and enforcement activities, ground-truthing real sources of environmental pollution in and around communities and schools and sensitive receptors. This example is a good model of how business, government, and the public form a more collaborative relationship. This is in stark contrast to the March JPA and how you are conducting business with the simultaneous release of a draft Environmental Justice plan in two "unconnected projects," each required to follow the CEQA process of posting, review, and comment.

An example much closer to the March area of influence can be found in the City of Riverside's recently adopted public engagement policy (though they are struggling to implement their policy throughout all City departments). In order to have a functioning Environmental Justice Element, an agency like the March JPA would actually need to incorporate feedback from the community into their land use planning and decisions. Genuine civic engagement, like the type the City of Riverside is implementing today, is what a public engagement policy establishes, and what as governors of the public (which the March JPA Commission is supposed to be) you are tasked with doing. To date, the March JPA only engages with the public when forced to involve community wishes by a court mandate or settlement, and even then, the March JPA has shown that it only follows through on settlement terms that benefit your agency or the sole-source applicant that has had far too much influence in this region for far too long. For example, one of the unfunded obligations the March JPA will need to deal with prior to sunsetting July 2025 is the 2012 Center for Biological Diversity Settlement Agreement that requires the construction of a 60-acre park among other things. For more than a year, I and many other community members and organizations have asked the March JPA for involvement in planning for this park. In the February 14, 2024 March JPA Commission meeting agenda, it appears you have been meeting privately with the City and County of Riverside, "Meetings of parks officials and senior management from Riverside County and the City of Riverside were held on December 4, 2023 and January 18, 2024 to discuss the proposal for a park as a component of the West Campus Upper Plateau. Follow-up meetings are expected." It is quite clear that the March JPA has engaged far more meaningfully with JPA Staff, City and County staff, and the Lewis Group and its investors than you ever have with the public. These secretive meetings about an issue deeply important to the community surrounding March ARB demonstrates your lack of urgency to involve the public in ways that your draft Environmental Justice Element says you are going to engage with the public. Your efforts to covertly discuss the park is proof that you are only doing the minimum necessary to allow you to continue to build more warehouses around a community of retired military veterans and the final resting places that provide full military honors for our veterans! Your purposeful dismissal of public concern negates anything you write in your draft Environmental Justice plan.

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With the unannounced release of the draft Environmental Justice Element in two places or "projects", the March JPA violated the core principle of Environmental Justice – meaningful

civic engagement in policy development. Residents of the March JPA community were not notified at all until the draft Environmental Justice Element was released online. In contrast, the master developer and environmental consultants working with the March JPA were given early access to the policy and fully incorporated it into a recirculated draft EIR for the West Campus Upper Plateau released three days after the draft Environmental Justice Element was released to the public. The consideration of an Environmental Justice Element was not released via CEQANET notification, nor was it released to community members via published agendas of March JPA Commission or TAC Committee meetings occurring between March 2023 and November 2023. I know as I attended many of these meetings in person. Your consideration of the draft Environmental Justice Element was done behind closed doors by March JPA employees, staff, your consultants, and the master developer. Nothing says Environmental Justice like excluding the public from the creation and writing of this document. And now you are trying to backwards map your way into public engagement by hosting two public workshops to discuss the plan you copy-pasted in secrecy. Why have you chosen to work in this exclusionary manner? Does it have anything to do with the Lewis Group's insistence that you obligate the West Campus Upper Plateau project before expiring on July 1, 2025? Is that why you are pursuing a shady political approach of passing CA SB994 at the same time you are rushing to finalize the West Campus Upper Plateau warehouse project? How can you claim to be engaging with the public when your every action works against public interest?

RI-259.2
Cont.

To incorporate the draft Environmental Justice Element into an active recirculated draft EIR so extensively, it was necessary for multiple environmental consultants and the master developer to have access to the draft Environmental Justice policies months before the recirculation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304) was released, though allegedly these two "projects" are unrelated. In contrast, the community was not even notified, and certainly was not consulted or engaged during this same time. This is notable not only for its inconsistency with best practice as identified by CEQA and DoJ, it is also notable for its deliberate withholding of responses to CEQA comment on the draft EIR made on March 9, 2023, and for its inconsistency with the very words of the March JPA General and Final Reuse Plans. The March JPA staff knows that the community wants to be engaged in this public agency and its environmental policy-making but chooses not to allow collaborative participation, and thus this draft Environmental Justice Element is disingenuous, manipulative to those serving on and voting on the March JPA Commission, manipulative of the legal and political systems in the State of California, and insulting to the public.

For years now, the March JPA has disproportionately added to the burden of communities living within its planning area by choosing a heavy industrial land-use policy with minimal mitigation measures. I experience the negative impacts of this burden on a daily basis. You have also been derelict in updating your General Plan to address CA SB1000, with over five general plan amendments since 2018 that included no mention of environmental justice. It is ironic that California SB1000, which is codified in Government Code Section 63502(h), requires jurisdictions with disadvantaged communities to either include an Environmental Justice

Element in their general plan or incorporate Environmental Justice goals, policies, and objectives throughout other general plan elements, and the March JPA insists on forcing through this plan on two separate but connected "projects" while ignoring public sentiment on either of them. CA SB1000 is triggered when a jurisdiction concurrently adopts or revises two or more general plan elements if there is one or more disadvantaged communities within the jurisdiction. A "disadvantaged community" is an area identified by the California Environmental Protection Agency as such or that is a low-income area disproportionately affected by environmental pollution and other hazards that may lead to negative health effects or environmental degradation within its planning area. What has taken the March JPA so long to address this requirement? And why are you doing it now so hastily and without public involvement or participation? Why are you working covertly to move a draft Environmental Justice Element through with proper CEQA requirements? Why are you working covertly with private and government groups to push through a flawed and irrelevant policy and controversial industrial projects?

Please consider slowing down this process, listening to the community just as this proposed policy says you will do, and draft a sensible Environmental Justice Element to the March JPA's General Plan that responds to the community's needs, is realistic to the agency's capabilities and mission, includes metrics and milestones to measure progress toward and compliance with individual policies and goals (as any element of a "project" of this scope would do), and will transition to and benefit the County of Riverside once the March JPA sunsets in July 2025 (not one driven by greedy developers and investors or one that leave the County with unfunded obligations and liabilities). Please also consider pausing the release of the Recirculated Draft EIR for the West Campus Upper Plateau until the Environmental Justice Element General Plan amendment process is complete so that the community can meaningfully comment on a policy that has been approved by the March JPA and its Commission and thus will be relevant to the applicant's proposed project.

RI-259.2
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I close by offering once again to volunteer my time to serve on a community advisory board, working with the March JPA to draft and finalize an authentic Environmental Justice Element amendment to the General Plan, and then to consider and propose reasonable land uses that adhere to the General Plan and benefit local communities. Please let me know how I can help.

"When one tugs at a single thing in nature, one finds it attached to the rest of the world."

Jerry Shearer

Jerry Shearer
Riverside, CA 92508
jsydor@yahoo.com

25 February 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the recirculated EIR for the March JPA West Campus Upper Plateau project. The updated project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. I must say, as a member of the local community, I am disappointed that you are continuing to push forward this abhorrent industrial project.

RI-259.3

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices, December 2, 2023
- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- March JPA Draft Environmental Justice Element, November 2023
- March JPA TAC Meeting Minute Notes from February 6, 2023, April 3, 2023, June 5, 2023, August 7, 2023, September 6, 2023, and December 4, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- General Plan of the March Joint Powers Authority, assumed March 11, 1997
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

RI-259.4

For the purposes of this comment letter, I will refer to the March Joint Power Authority (JPA) which includes the Commission members, the developer that is understood to be LNR Riverside, LLC, Meridian Park West, LLC, the Lewis Group of Companies (partners and subsidiaries), and member entities the cities of Riverside, Moreno Valley, and Perris, and the County of Riverside.

RI-259.5

The West Campus Upper Plateau is a unique piece of land. It is an extension of the Sycamore Canyon Park natural area geographically, historically, culturally, environmentally, and recreationally. It is a valuable part of the OrangeCrest community, value beyond how much money it can generate a few greedy people. There is no other place like it in western Riverside County. Any development of this land should complement the unique characteristics and value (human value, not just economic value) of this land not destroy it. Through the original draft EIR process, I and many members of the community wrote to you detailing alternate land use plans that accentuate the community, meet the JPA's goals for this project, and preserve large portions of the landscape for both passive and active recreation.

As much as the applicant via this draft and recirculated EIRs tries, this industrial development plan and land use zoning do not preserve the landscape even with the inclusion of the 2012 agreement that sets aside open space and a conservation easement and the "community benefit" of a fire department (which was always a requirement of settlements against the JPA) and park. Viewing this land from a land use map or a parking lot don't begin to do adequate justice to its human value. The public still does not understand your thoughts on taking this special piece of land away from residents of western Riverside County and turning it over for private development. The establishment of the 2012 settlement (why has it taken you 12 years to act on it?) does not adequately reflect how people value and enjoy this land currently. This warehouse project is not like other warehouse projects and it will have a significant negative impact on the community it borders regardless of the CEQA mandated mitigation efforts and applicant's hollow claims of community benefits. It is inconceivable to me why the JPA continues to allow the applicant to push forward this specific plan and project, especially after two years of widespread and uniform community opposition to it. Your effort thus far is appalling.

RI-259.6

After reviewing the recirculated draft EIR, it continues to be quite clear that the March JPA is scrambling to push through an unpopular project before sunsetting July 1, 2025 leaving the County of Riverside to sort out the mess. There are many clear and obvious errors, omissions, misrepresentations, and discrepancies in the recirculated draft EIR. I write this letter to call attention to as many of them as I can, especially those that to me, my family, and my community are the most egregious. Changes to the project itself from the original draft EIR are negligible if not even more upsetting to the residents and communities surrounding the March JPA territory. Specifically, I find the following areas of the recirculated draft EIR to be unstable, dismissive, and predatory in nature.

RI-259.7

1. A clear continued disregard for the 2012 and 2003 settlements, and the destruction of a unique cultural resources and natural habitat and ecosystem in western Riverside County.

RI-259.8

2. The lack of authentic community engagement and involvement when making decisions that impact people's lives, and the lack of enforcement mechanisms or policies in place for existing and future warehouses within the JPA jurisdiction, and a hasty Environmental Justice element that is unapproved by the JPA and Commission at the time of this letter.
3. The continued privatization of public lands surrounding March ARB and throughout southern California, including the criminal request to form a second long-term development agreement with a single contractor.
4. The JPA's refusal to discuss or acknowledge why the applicant is proposing an industrial project instead of working with the community and local agencies to find non-industrial alternative plans for the land of the Upper Plateau despite public demands to do so.
5. Misleading and inconsistent baseline information used to develop this plan including faulty mitigation measures, misleading statements about the benefits and jobs associated with this project, the misinterpretation of aesthetics outside of a very specialized world, the continued demonstration of contempt for this land and how the public has, is, and will benefit from it, and the March JPA's unfunded liabilities.

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RI-259.11

RI-259.12

It is disturbing for all who live in the communities surrounding the March JPA developed lands that you are clearly cherry-picking guidelines, policies, and regulations to suit the greedy goals of your applicant and its private investors. Information developed as part of the CEQA process should influence the development of general plan policies (and specific plan amendments). CEQA should not just be a post hoc rationalization of decisions that have already been made, and this is exactly what your recirculated and draft EIR for the West Campus Upper Plateau have presented for us for public comment. The later environmental review process begins, the more bureaucratic and financial momentum there is behind a proposed project, thus providing a strong incentive for applicants and land use authorities to ignore environmental concerns that could be dealt with more easily at an early stage of the project. My concerns and comments in this letter reflect your negligent and ineffectual governing and oversight practices, and the flaws in the recirculated draft Environmental Impact Report for the Upper Plateau.

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Lastly, the JPA, the applicant, and the growing list of consultants you are hiring to ensure that warehouses are built on the Upper Plateau clearly signal to the public that you have no intention of following your General Plan unless it suites predetermined business goals. Those goals clearly are to help the applicant profit quickly from the sale of and development of this land. While greedy developers may not be explicitly illegal, in some cases predatory development is, the JPA is proudly displaying its duplicitous nature by ignoring the heritage of western Riverside County and selling it (along with the heritage of the US Air Force and March ARB) out for the greed of developers like the Randall Lewis. Companies like the Lewis Group are no better than slumlords preying on people who cannot afford to resist the mistreatment you are providing them. When you sunset in July 2025, will you leave by driving one last surveyors' stake through the heart of the communities you were tasked with rebuilding? Will you offer a greedy developer one last showcase to add to its investment and project portfolios? Or will you change course and align

RI-259.14

with the communities you were formed to serve and demand better land use planning from the applicant? Your recirculated draft EIR makes it clear what you intend to do. I hope the pages to follow help convince you to change your course. RI-259.14 Cont.

The Park: "Community Benefit" in Name Only

The damage and disturbance to this unique piece of land is unquestionable. The recirculated and draft EIRs admit as much throughout the impacts and mitigations described in section 3.5.2 Project Design Features, 3.5.6 Request Approvals and Entitlements, 4.2.6 Impact Analysis, 4.2.7 Mitigation Measures, 4.2.8 Level of Significance after Mitigation, 4.8.6 Mitigation Measures, and 4.10.4-4.10.7. The climate change and extreme weather events of the past few years, from severe drought in California to unprecedented rain and snowfall in 2023, the fact that our climate and weather patterns are changing is unquestionable. Anyone paying attention can hear the environmental alarm bells ringing, warning us of changes to our lives that we may not be prepared to handle, and that we may well be contributing to on a daily basis with our life choices. It is not my intention to argue climate change related to the West Campus, Upper Plateau project, but it is my intention to question why the JPA and applicant feel it is imperative to eliminate valuable open space and natural landscapes in the name of greed and predatory capitalist practices. Where in the March ARB General Plan are you tasked with building more warehouses near our homes and community? Why have you repeatedly in person and in the recirculated draft EIR identified that the General Plan allows you flexibility to develop the land with warehouses and industrial zoning when it does not put an emphasis on doing so? In fact, with the formation of the General Plan (as stated on page V of the General Plan), the March JPA was created as a public entity tasked with preparing, adopting, implementing, and maintaining a general plan that serves to link community values with actual physical decisions. You were tasked with creating a community with diversity and inclusiveness with respect for the military, private, and public land uses; to address circulation, housing, conservation of natural resources, preservation open space, and protect public safety. Cherry-picking where you adhere to the General Plan and where you choose to ignore it is misleading to the public and inconsistent with the draft Environmental Justice Element hastily being formed as I write this letter. I ask you again nearly a year later, how does this specific plan begin to comply with California's push to net zero emissions standards? How does this specific plan meet the objectives stated in your General Plan and benefit the surrounding community? How does this specific plan, essentially unchanged from the original draft EIR, show that the JPA and applicant are operating in good faith with the community it will very soon destroy? And why does the recirculated draft EIR leave so many unfunded financial liabilities for the public and successor agency to assume?

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RI-259.19

RI-259.20

I object to your use of the term "community benefit" on page 3-24 and throughout the recirculated draft EIR. A **Community Benefit Agreement (CBA)** is a strategic vehicle for community (the residents of western Riverside County, specifically the residents living along the eastern border of the City of Riverside) improvement, while benefiting private sector developers (the applicant) and government (the March JPA). CBAs are not zero-sum instruments. They are

RI-259.21

legal agreements between community benefit groups and developers, stipulating the benefits a developer agrees to fund or furnish, in exchange for community support of a project. Community benefits can include commitments to hire directly from a community, contributions to economic trust funds, jobs and local workforce training guarantees, infrastructure improvements, gifts in-kind, and many more establishments to benefit residents of a community.

CBAs pivot around government officials: since elected representatives and government staff need support from their constituencies, and developers need government support for items like zoning and contract approvals, permits, and financing, developers have clear incentives to accommodate community interests. When synergistic development models like CBAs are employed, developers experience reduced risk, government and communities profit from improved cost/benefit positions, and residents benefit from a better quality of life. Thus, CBAs are mutually-reinforcing, since all three stakeholder groups gain, albeit uniquely, from this legally binding relationship.

For example, the California Department of Toxic Substances Control uses the CBA process as part of the Cleanup in Vulnerable Communities Initiative to further improve the quality of life in the most vulnerable communities impacted by contaminated sites overseen by DTSC. The DTSC uses CBAs in remediation projects to provide the community with benefits that go beyond mitigation measures that are required for toxic cleanups. The goal of this CBA process is to engage the public in the investigation and restoration of sites within communities with high cumulative environmental burdens including environmental justice organizations, indigenous tribes, and local community stakeholders.

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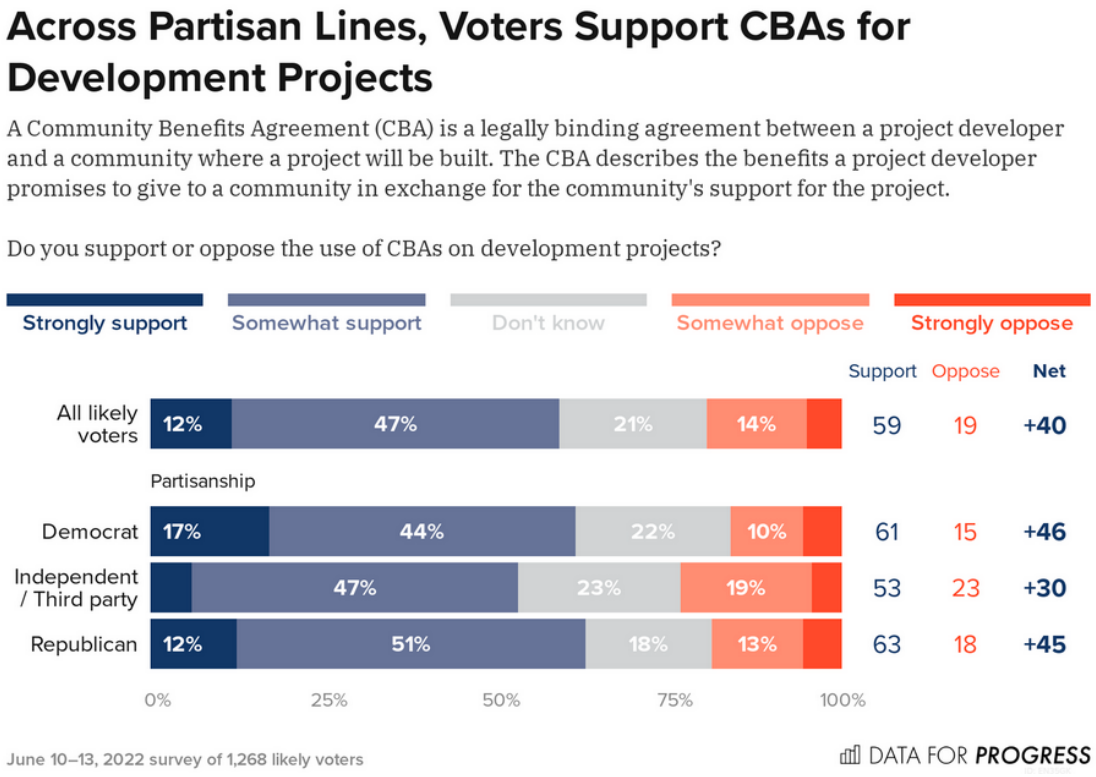
Another example of a successful CBA being implemented is in the City of Richmond, California. Chevron U.S.A. Inc. was planning a large refinery modernization project at the Richmond facility and in order to finalize the EIR process, Chevron entered into a CBA with the City of Richmond to implement measures designed to protect and enhance public health and safety which included funding a five-year air quality study, providing training and equipment to the local fire department, working with Contra Costa Sheriff's department to improve the Community Warning System, and helping to develop and implement local agency emergency response procedures and drills. Chevron's stated contribution would be up to $40 million for these community benefit programs.

One example of the community benefit plan not working, because it was attached to a poorly planned industrial project in Moreno Valley, California, was when the applicant offered numerous CEQA mandated mitigation efforts and community benefits attached to a warehouse project in an over-burdened neighborhood. Among these community benefits were providing more than $200,000 for an electric vehicle grant, more than $100,000 for a solar advocacy program, $500,000 gift for a community foundation (a gift to the City), up to $15,000,000 donations to the same community foundation, and the construction of a community active recreation park. This community benefits offer was rejected in Moreno Valley on a small

warehouse project because the City felt it fell beyond the City's legal authority to approve as CEQA-related Mitigation Measures or as the Conditions of Approval related to the requested entitlements. This applicant was motivated to work with the government to win a project, but they did not engage with the public, a requirement of an authentic community benefits agreement. As this example comes from a member agency in the March JPA, I hope you would consider the negative impacts unilaterally agreeing to "benefits" on behalf of the public will have for your agency and instead involve the community in choosing benefits for this project.

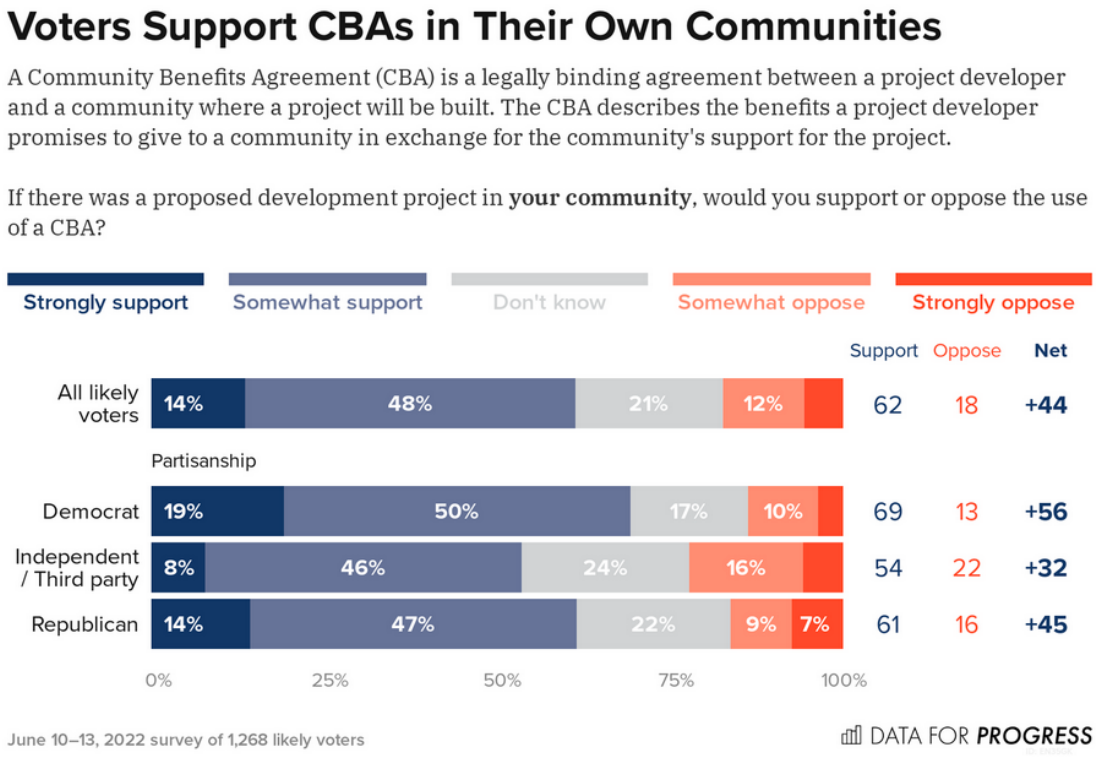
Not only can CBAs be successful when implemented correctly, they are overwhelmingly popular. A 2022 Data for Progress poll found that 59 percent of likely voters support the use of CBAs on development projects (a +40-point margin of support). And this is no political issue, just like opposition to industrial development right in the middle of an establish community is unpopular, support for CBAs holds across partisan lines, with 61 percent of Democrats, 53 percent of Independents, and 63 percent of Republicans in favor.



This same report identifies support for CBAs increases when voters think about their own communities, with 62 percent of respondents in favor of local CBAs. Notably, when asked if they would support or oppose the use of a CBA for a proposed development project in their community, 17 percent of both Black and Latina/o voters indicate they would "strongly support" a CBA. Given historical and ongoing systemic racism and the predatory siting of development

RI-259.21 Cont.

projects (like the many of the warehouses within the March JPA development area) in communities of color, this finding is indicative of the need and support for CBAs that center on equity and prioritize local benefit and restorative justice.



Despite the promise of CBAs to guarantee communities are consulted about and benefit from a given development, CBAs can be weak and nonbinding if designed poorly or unilaterally forced on the public without input. Yet in the recirculated draft EIR, the applicant and JPA are misleading the public in stating that there are community benefits provided in this plan. You fail to include the word "agreement" and therefore are trying to pass the "benefits" off as something you are contributing as a result of this project, but the truth is you are required to provide the benefits you list on page 3-24. To this end, there are two settlement agreements in place within the JPA and they affect any plans put forward and then developed by the JPA and developer including the West Campus Upper Plateau. To better understand the community benefits offered by the JPA and applicant in the recirculated and draft EIR, it is first important to understand how we got to the latest version of your offer to provide benefit to the community in exchange for putting warehouses on the Upper Plateau.

RI-259.21 Cont.

The **September 2012 agreement** with the Center for Biological Diversity and San Bernardino Valley Audubon Society (S.D. Cal No. 09-cv-1864-JAH-POR) is a court ordered mandate that the JPA provides for a conservation easement or water quality open space area to be managed as a wildlife habitat for sensitive species and riparian areas. The purpose of this settlement is to

RI-259.22

preserve this land for light recreation use, for archaeological and historic purposes, and for the safeguarding and conservation of native plants, animals, and topography. The JPA in its latest edition of the EIR clearly states its point-of-view on this settlement as a benefit to the community, but it is a court mandated benefit that was established long before the JPA sought to develop the West Campus Upper Plateau. Open space of any kind is a benefit to the community, but it is not one that you are able to bargain with the community on. You are required to provide it by settlement regardless of what you build on this land. In fact, your zoning of this area from Business Park to Industrial is inconsistent with the terms of the 2012 settlement agreement.

RI-259.22 Cont.

RI-259.23

According to Tables 1-2 and 1-3 of the recirculated and draft EIRs, some of these areas will see "significant and unavoidable" impact due to this project. These items include air quality, historical resources, noise, and tribal cultural resources. In each instance, these unavoidable items are in conflict with the 2012 Settlement Agreement and the guidelines established in your final General Plan. In many instances, your list of items that will be impacted is incomplete, inaccurate, or are downright misleading to the public. These instabilities, errors, and omissions are in direct violation of the objectives you are seeking to establish with the Environmental Justice element found both on the JPA's website and throughout this recirculated draft EIR.

RI-259.24

There seems to be many inconsistencies especially in area of preservation of habitat under the 2012 agreement. The first environmental alarm bell centers around a blatant disregard for the preservation of species on this land. For example, the culverts (see the 2012 Slope Maintenance Exhibits) under Cactus are insufficient and will not accommodate all animals in their migration between Sycamore Canyon north and south areas. Similar wildlife corridors along the 101 freeway in California, Wallis Annenberg wildlife crossing, the Irvine-Laguna Wildlife Corridor and Greenbelt, the I-15 wildlife crossing in Temecula, and the I-10 wildlife crossing connecting the San Bernardino and San Jacinto wildernesses are (a) more numerous giving wildlife options for crossing at different locations, proposing two culverts is negligent wildlife and conservation planning on your part, and (b) larger or wider allowing for small and medium sized animals to move freely without feeling confined or forced into an uncomfortable setting that may restrict their movement and condense the gene pool of many threatened species. These successful corridors improve bio- and genetic diversity (which is one of the reasons you acknowledge in the recirculated draft EIR for the agreement to move the Stephen's Kangaroo Rat) which will help ensure a healthy riparian habitat in the Upper Plateau. Granted these examples include must larger roadways, but the idea remains the same especially considering a large number of vehicles traveling on Cactus, Alessandro, and other roads surrounding the Upper Plateau will be semi-trucks that are unable to stop quickly and will undoubtedly cause an increase in deaths of small animals and reptiles living in and visiting this environment. If you plan on stating that there is a community benefit agreement in place for this project, then leaving out having a healthy diverse population of plants and animals in the open space as a benefit to the community guaranteed by the 2012 Settlement and the establishment of a conservation easement is ignorant, neglectful, and misleading to the public. This appears to be a one-sided benefit, a benefit in name only.

RI-259.25

A real benefit to the community would be to have a healthy ecosystem to live near and enjoy. That would be one way for the JPA to form a truly collaborative CBA for the West Campus Upper Plateau project in relation to the 2012 Settlement. Without a better-defined benefit to the public than exists in the recirculated draft EIR, I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

RI-259.25 Cont.

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. The applicant should disregard any of the wildlife studies over a year old. My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.
3. The applicant should consistently account for species and their vulnerability throughout the document. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
4. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence.

RI-259.26

5. The draft EIR omits a thorough study of reptiles, specifically the study needs to evaluate the impact of construction on migration of snakes, brumation, species variety and reproduction, and prey habits. There is a rich community of reptiles on this land and the draft EIR negligently ignores them and their benefit to the landscape, environment, and local community.
6. The draft EIR does not account for migratory birds sufficiently. At different times of the year, residents and visitors can view geese, ducks, egrets, eagles, vultures, and a host of songbirds as they use the Upper Plateau to migrate from one place to the next. Why does the study of birds not include the migratory nature of birds making use of this land?
7. The draft EIR does not account for migratory butterflies, cicadas, and tarantulas, among other insects. Some of these insects are beneficial to our community from an aesthetics point of view and some of them simply kill other invasive pests. Why were these items omitted from the draft EIR? Along with the migratory and beneficial insects, the construction process will drive many of the less than desirable insects already in the open space into people's homes. Ants and mosquitoes (some carrying West Nile Virus) will be driven from their homes and into closer contact with people. Why does the draft EIR not include mitigations for residents impacted by this invasion? This is not imaginary, and

happened to my house when you last built warehouses so close to people's homes. What responsibility does the JPA take for increasing my pest control bill?

The public cannot trust that you are not destroying rare animal, bird, and plant life unless a more thorough survey is conducted, one that is done over a more representative timeframe that includes the local variations in seasonal temperatures, migration, and rainfall. I request the applicant and its consultants produce a more complete survey of the life forms that call this land home at one time or another as well as the impacts of climate change on this land over the last 10-20 years. I also request the JPA, the applicant, and its consultants survey local residents to assess the value of uninterrupted open space, not the kind provided for in the 2012 Center for Biological Diversity settlement (which is open space in name only), but the type of open space that allows animals to move freely throughout a landscape without the disruptions of traffic, light, noise, and water pollution associated with industrial development. Again, this would be a benefit to the community with respect to the court mandated open space and conservation easement you are required to provide regardless of the specific plan being proposed by the JPA and applicant. And any functioning CBA would balance community, developer, and government benefits in its final draft form and not leave behind the burden of unfunded liabilities for the public and successor agency to take over.

RI-259.26 Cont.

RI-259.27

Under the Terms of the 2012 settlement agreement, item B Defendant-Intervenors' Obligations, subitem 1a on page 4, the agreement establishes, "That any currently existing service roads within the Conservation Areas…can continued to be utilized by the public for passive recreation." Subitem 1b on page 4 refines this to say that public access these roads can be restricted if the land management agency deems the access a threat to "conservation value or public safety." Yet Figures 3-2, 3-3, 3-4, and 3-5 (Site Plan) clearly show a plan that will infringe on and limit public access to existing trails and roadways in the Upper Plateau area. The fact that the recirculated plan is still unstable and provides inaccurate information means the it is unclear how the public will access this land during project construction. Please explain how the public will keep access during the project. You are in all likelihood aware of this requirement and believe that your plan adequately complies with the terms of the settlement agreement, but I fail to understand how. The construction of Cactus alone will destroy several hiking and biking trails in the area frequently used by the public for active and passive recreation. The large-scale demolition needed to level grades associated with roadways and building foundations will clearly impair access to these trails and roads and may eliminate some of them entirely. I like walking in this area, hiking into places that make me feel like I am somewhere outside of civilization. These trails that I and many residents enjoy hiking on will be destroyed by the construction. How is this not in violation of the 2012 agreement that quite clearly calls for maintaining existing roads and trails? I hope subitems 2 and 3a are not the answer to my questions here as they seem subjectively contrary to the idea of conservation and to the items identified in 1a and 1b.

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I also question the status of settlement agreement subitem 7. What has the applicant done to establish and fund this endowment to date? Please provide establishment dates, payment dates

RI-259.29

and amounts, corresponding permit dates, and progress toward the $2 million funding level projected for April 1, 2027. Since the signing of this agreement, depending on your sources, inflation has risen 22%-30%. The funding obligation may have been fair in 2012, but today the number is about 25% behind. Even with the commitment (page 3-24 of the recirculated draft EIR) of the applicant to contribute up to $3.5 million to fund a park feasibility study, there is no park. There is no realized benefit to the community in this offer and it is an offer that is completely one-sided: it favors the developer rather than the community.

RI-259.29 Cont.

As for the park identified in the 2012 settlement agreement: at the JPA's TAC meeting on August 7, 2023, Adam Collier, Vice President with Lewis Management Corp. stated on record that there will be no park under this agreement. He described that the applicant has limited financial responsibility for the park and that the high cost and lack of funding by the JPA (notes recorded in the 2022 Park Subcommittee meeting minutes) were reasons that the park will not be part of the West Campus Upper Plateau project, yet the JPA and applicant hurry to point at the conservation easement as a benefit to the community. JPA staff was less than forthcoming with the TAC and the public at this meeting in regards to the park. So, is the promise to contribute money for a park study in line with the 2012 settlement agreement? And is a park study a benefit to the community? The community is not fooled by your misleading recirculated draft EIR when the applicant and the JPA pick-and-choose what elements of the settlement it will comply with and what elements it will not comply with.

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Why do you insist on labeling the park and conservation easement as a community benefit when they are both required by legal standing? The JPA is required to adhere to the terms of the 2012 settlement and there is no need for it to be a part of the Specific Plan for the Upper Plateau. You are only doing these two items together for public perception rather than adhering to the settlement terms. In fact, the building of a public park cannot be an objective of this project as it is required under the terms of the 2012 settlement. Because you insist on disregarding the zoning identified in the 2012 settlement, and forcing through industrial instead of business park, your Specific Plan is inconsistent with the terms of the 2012 settlement. And it is irresponsible to leave this issue unresolved and unfunded as the JPA sunsets in July 2025.

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It is unclear to the public why you are manipulating the terms of the 2012 settlement in these ways. Please indicate if the applicant has missed deadlines for funding or permits, what accountability exist for their actions, and what would happen if the applicant defaults on this obligation relative to the 2012 settlement agreement. If I understand correctly, the applicant still is required to contribute nearly $1,000,000 to a fund related to this settlement by 2027 regardless of whether they build anything on the Upper Plateau. Also, a true community benefit agreement, one that engages the community in its formation, would likely include the 2012 settlement agreement as a start to a CBA for this project, outlining specific financial status and obligations. The problem is that the JPA is not only inconsistent in regards to communication with the public about this project, but it is inconsistent with the settlement terms and draft Environmental Justice element is seeks to implement with only 16 months before the agency sunsets in 2025.

RI-259.32

One recommendation that I explore later in this letter is to research and present an alternative project plan that incorporates the unique local value of this land into a County or State Park, which is possible under the County and State guidelines for such a park. This official status would need to begin with the applicant and JPA working with community groups to file paperwork that investigates the eligibility of the area to be a County or State Park, one with historical or cultural significance to the area. Such a park would be a benefit to the community, government, and could even benefit the developer. How can the JPA and applicant address the 2012 settlement and provide a CBA that helps establish a BRAC-Park alternate plan as I have identified in this letter? Because the JPA and applicant are pressed by a deadline, what happens to the 2012 agreement once the JPA sunsets at the end of June 2025? Would the County of Riverside be legally required to uphold the terms of the settlement agreement in place of the March JPA? The nature of this question isn't who takes over the land management function, it is more what legal obligation will exist when the applicant is no longer tied to the March JPA? Does the developer's DDA (existing or future) transfer along with its entitlements to the County or the MSHCP to ensure conservation is the primary focus of this set aside land?

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RI-259.34

The **August 2003 agreement** with Center for Community Action and Environmental Justice places conditions for further development of the March Business Center. The conditions include a reduction of semi-truck emissions (which frankly are outdated by today's air quality standards), increased use of bio-diesel and alternate clean burning fuels (with the advances in EVs, there has to be some application here), improve landscaping and scenic vistas from the OrangeCrest neighborhood, amend land uses for lots 16-18 and 54-56 to exclude logistics warehouses, limit semi-trucks on Van Buren Blvd (which certainly did not happen), and provide public amenities that include community, regional, and open space parks, and police and fire sub-stations. How is the proposed project complying with the requirements of the 2003 settlement? This settlement first established the community benefit of parks and community centers (identified in the General Plan) for both passive and active recreation, first responder facilities, and open-space. These, and many items in the 2003 agreement, form the basis for a quality CBA, but the JPA and applicant have failed to adhere to the items you agreed to in 2003.

According to Tables 1-2 and 1-3 of the recirculated and draft EIRs, many of the requirements in this settlement will see "significant and unavoidable" impact or were completely ignored by the draft EIR. The decision to leave this agreement out of the draft EIR is concerning. Can you explain to me and the community how the JPA is adhering to the scope of this agreement with this plan? There seems to be many inconsistencies especially in area of supporting the lives of residents of Riverside in the 2003 agreement.

RI-259.35

The first area I have serious concerns about is the traffic section of the recirculated draft EIR. The traffic analysis in both draft versions of the EIR do not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that

RI-259.36

approximately 20,000 additional trips will take the 215 Freeway. CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for passenger vehicle traffic and the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. Since the 2003 settlement agreement specifies that you work to reduce traffic on these streets, and you have not included this settlement in the draft EIR, it is clear that you do not intent to adhere to the settlement requirements and guidelines. How do you justify not considering the main truck traffic routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Why don't you consider the cumulative impacts for traffic within a five-mile radius of this project? Ignoring it is irresponsible.

RI-259.36 Cont.

RI-259.37

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the region, and the adjacent truck routes of Alessandro, Krameria, and Van Buren and personal vehicle traffic into account. Anyone who lives or travels in this region knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. Ignoring this major project element is not only a violation of the 2003 agreement, it is in conflict with the draft Environmental Justice element you are proposing, and it is a clear signal that your agency has no intention of entering into a community benefit agreement that will benefit the community.

I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, at 4:00 AM on 2/2/23 a semi-truck overturned carrying a heavy shipping container and blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the OrangeCrest and Mission Grove neighborhoods. This driver knew he was driving down a road that prohibited the type of truck he was driving but he did it anyway because he was trying to find the quickest route to his destination. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. This fact is also in violation of the 2003 settlement agreement and is difficult to monitor by law enforcement. In the recirculated draft EIR, PDF-TRA-3 identifies $100,000 contributed by the applicant to fund truck route enforcement for two years. This is again identified as a community benefit, but this action would not take place until after the project is complete and the JPA will no longer exist, so there is no accountability to ensure this actually happens. That is hardly a benefit for the community because it lacks accountability. Your revised plan does not adequately account for the 2003 settlement, does not help mitigate this kind of problem on the streets surrounding the Upper Plateau, and does not offer the community a clear and real benefit.

RI-259.38

Your revised plan also does not account for the noise pollution associate with idling semi-trucks. While not explicitly part of traffic patterns or congestion, it is part of vehicles moving to and from the warehouses. Many of these trucks sit idling for 20 or more minutes and according to you that is illegal. Yet there are virtually no enforcement mechanisms in place to prevent them from doing this, and there certainly is no acknowledgement of this problem in the recirculated draft EIR. You and I have traded many emails, phone calls, and in-person conversations over the past 20 months about this problem yet you cannot offer me or the community a solution to this illegal act occurring around JPA developed warehouses. I bring this up again because it also seems like a violation of the 2003 settlement agreement in the areas of reducing truck emissions and reducing truck traffic on our streets. Once again, the JPA and applicant fail to offer the public any benefit through your plans and all but guarantee that continued infractions will occur because there is no accountability for the businesses, the developer, or the JPA.

RI-259.39

Why are enforcement mechanisms not considered as part of your plan? $100,000 just scratches the surface of the cost to monitor traffic and crime in the JPA warehouses. Who will pay for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? It seems like the County and member City agencies will be required to pay which means tax payers get to fund your poor planning decisions. How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not ethical to leave the burden of maintenance and enforcement to under-staffed and under-funded City or County public service officers. Please redo your traffic study to reflect the actual conditions of the surrounding area.

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RI-259.41

Finally, if the JPA and applicant had pursued a genuine CBA, then the 2003 and 2012 settlement agreements contain some key elements that would benefit the community and government in this legal relationship. If the JPA and applicant had pursued a genuine CBA, then your Environmental Justice element would contain objectives that impact the area around March ARB instead of the Salton Sea. If the JPA and applicant had pursued a genuine CBA, then like the City of Richmond and the California Department of Toxic Substances Control, the JPA would have a specific plan that aligns with the goals of the agency, the developer's wish to profit, and the community's dreams of living happy and healthy lives in homes surround the March ARB. There is still time to act: start today by forming a community advisory board to the JPA and work with them to establish an authentic Community Benefit Agreement for your project and an Environmental Justice Element that the JPA can and will actually employ on projects permitted in the final months of its existence.

RI-259.42

The Environmental Justice Element and Community Engagement

While I am clearly a novice when it comes to CEQA and your working relationship and knowledge and use of it as a project framework, it appears to me that you failed to follow the CEQA process in presenting the draft Environmental Justice amendment to the March JPA General Plan as part of the recirculated draft EIR for the West Campus Upper Plateau. By shortcutting the process and copy-pasting the County of Riverside's Environmental Justice policy into the March JPA's plans, you appear to be circumventing the CEQA process wherein you are required to complete an environmental study and release an EIR for the EJ element before you can adopt it as part of the General Plan. I encourage you to follow this process before moving forward with both the final March JPA Environmental Justice policy and any development project or agreement that will be impacted by this final document including the West Campus Upper Plateau project presented in the recirculated draft EIR. RI-259.43

Building on this idea that the plan is inconsistent or insufficient with the two agreements that pertain to any development plans by the March JPA, residents believe that the JPA is working for the builder rather than the residents of western Riverside County. Your community engagement effort has been a checkbox, not an actual process, you have documented and followed and that is illustrated by your reactive last minute-effort to establish an Environmental Justice element as part of the March JPA General Plan, and your lack of an authentic Community Benefit Agreement. To begin, the community benefits identified in the recirculated draft EIR were invented by the applicant, not a product of meaningful engagement with the public. As discussed in the previous section, a community benefit agreement is a partnership between business, government, and the public. Please explain this partnership in your recirculated and draft EIR documents to me. I can't see it. As part of the proposed DDA on page 3-24 of the recirculated draft EIR, you list a $3.5 million contribution to a park feasibility study and the construction of the Meridian Fire Station as community benefits. Both of these items are a result of settlements against the JPA and applicant and are required by you from previous litigation. To attach them as benefits to the community for this project is disingenuous and deceptive planning on your part and looks to skirt your responsibility to the community for previous obligations that you have chosen to ignore to this point. Neither of these are benefits to the community in relation to the project at the West Campus Upper Plateau. The inclusion of these two items tied to a new 15-year development agreement is pure trickery by the applicant and the JPA and if the commission approves either of these items it would be complicit in disregarding the wishes of the community and selling us out to help the applicant and the JPA get a controversial project approved quickly and assure the applicant and its present and future investors maximize profit, not, I repeat, not benefit the community. RI-259.44 RI-259.45

Back to the park from the previous section, there is no park, though a park is required by settlement and the JPA and applicant do not have the funds or desire to pay for it. $3.5 million for a study is not a tangible benefit to the community and to label it one is purposefully misleading. The Meridian Fire Station, also a requirement of previous settlement against the JPA RI-259.46

and applicant, is also not a direct benefit to the community as it will primarily service the County of Riverside and not the City of Riverside. 90% of the homes surrounding the March JPA development area to the west of the 215 are homes within the City of Riverside. This fire station will not service these communities and is not a benefit to residents; it does however benefit the warehouses and buildings erected by the March JPA. The fire station only benefits businesses and warehouses, not residents and therefore is no community benefit. Interesting to note, there have been more large-scale fires in warehouses than in people's homes over the last 20 months. This fire station is not a benefit to the community, it is a requirement of your poor land use planning, lack of funding for mitigation measures, and narrow-minded past decisions.

RI-259.46 Cont.

The March JPA staff and some members of the commission have openly advocated for the applicant during this process. It is blatant, once again to refer back to the definition of a community benefit agreement, that the JPA is working on behalf of the applicant. How can you claim otherwise when you advocate for their business and allow them to propose development plans that do not support your main goals identified in the General Plan? Instead, the Director of the March JPA consistently advocates for and defends the applicant in public and private communications. I have received several offensive emails from Dr. Martin where she belittles members of the community and spins her message of support for the applicant like any good soldier would do taking orders from above. Members of the March JPA Commission have either openly said they support and stand with the applicant who is doing fine work, or have been implicated as cultivated assets by the logistics industry. The perception of bias or pre-determination on projects as significant as this one is concerning for not just me and my neighbors, but for all southern California residents as we watch schools, homes, and precious open space be destroyed to build more warehouses at a time when the logistics and warehouse industry is facing historic losses and laying off both part-time and full-time employees, closing locations because their economic modeling has changed. Your eagerness to stand up for such a predatory industry demonstrates clearly that you do not agree with the definition of the community benefit agreement because you insist on taking sides instead of helping to bridge and connect the public to predatory businesses like the Lewis Group.

RI-259.47

Over the past century, land use planning by regulatory agencies has increasingly displaced the decentralized process of private landowners making their own decisions about land use. Local governments, county governments, state governments, and, to an increasing extent, the federal government are all requiring private landowners to modify their lives in order for privately owned land to conform to government plans. Increasingly, such plans are justified as necessary to grow the economy and provide jobs for local workers, which extends the reach of government agencies beyond important and traditional land use concerns like protecting residential neighborhoods from commercial intrusions.

RI-259.48

Predatory land development practices, like the practices displayed by the March JPA and its applicant over the last 15 years, are those that harm communities and the environment for the sake of profit. While many developers approach their work responsibly and ethically, others

RI-259.49

engage in practices that can cause harm and contribute to economic inequality. Some of the most common predatory land development practices include:

1. *Displacing low-income residents*: In many cases, land developers will purchase properties in low-income areas with the intention of demolishing existing housing or other buildings to make way for more lucrative developments for the developer and its investors. This can result in the forced displacement of residents who may not have the means to relocate, leading to increased homelessness and economic instability in the affected community.
2. *Environmental degradation*: Land development can have a significant impact on the natural environment, particularly when developers fail to implement sustainable practices or cut corners in the interest of maximizing profits. Clearing land for development can lead to deforestation, loss of wildlife habitat, and increased air and water pollution, among other negative outcomes. The negative impacts of the recirculated and draft EIR are well documented and, in the words of the draft EIR "unavoidable" (which was written 26 times in the recirculated draft EIR). These "unavoidable" environmental impacts include the loss of habitat for sensitive and endangered plants and animals as well as cultural and historic sites. Yet these impacts are avoidable, the applicant and the JPA choose to offer this unpopular and destructive warehouse project instead of offering a project that accentuates the landscape, and you propose this project in the name of profit for the applicant and its investors alone.
3. *Lack of transparency*: Some developers engage in secretive practices, such as concealing information about the impact their developments will have on the environment or failing to disclose financial arrangements with local officials. This lack of transparency can undermine public trust and prevent communities from having a say in the development process. The JPA staff and its elected commission members certainly have a high level of scrutiny on them related to the perception of bias and impropriety, and perception alone is enough to cast doubt as the authenticity of this process and the agency leading it.
4. *Overbuilding*: In some cases, developers may also engage in overbuilding, creating more properties than there is demand for in a given area. This can lead to a glut of empty properties, which can in turn lead to blight and economic decline in the surrounding area. For nearly two years, I and members of Riverside Neighbors Opposing Warehouses have communicated to the JPA that this is true for the land along Meridian Parkway, yet the JPA continues to alter the General Plan with Specific Plans that focus only on one land use: warehouses. This overbuilding seemed logical due to the rise in e-commerce in the late 20-teens but as the U.S. and global economy deal with post-COVID realities, there just isn't a need for logistics-driven businesses at the levels you have made a reality in our neighborhoods. Simply put, the JPA has overbuilt this area with primarily one land use, a land use that is seeing a steep decline in business. Smart investors rarely sink all of their assets into one market, but the JPA seems to have done just that and you are seeing the negative impacts of your bad land use planning. But the economy still supports profits for one business and that is the development industry and your applicant. As long as you allow the applicant to propose warehouses, the fastest way for them to make the most money,

RI-259.49 Cont.

RI-259.50

RI-259.51

without oversight, they will do so and their predatory nature will continue without government protection of residents like me and my neighbors.

RI-259.51 Cont.

At its worst, predatory land development can have devastating consequences for local communities and the environment. As you embark on your ambitious effort to create an Environmental Justice element for the General Plan as well as get this Specific Plan approved and contracted prior to sunsetting in 2025, I have a few recommendations for the March JPA:

1. *Keep the community informed*: At the first EJ workshop hosted by the March JPA, Dan Fairbanks said that emails were sent announcing the workshop to residents within 300 feet of your area. While this may be your minimum obligation, it shows a lack of respect for residents who live in the area and are trying to understand and adjust to your predatory land use practices. At the second EJ workshop hosted by the March JPA, Dan Fairbanks said that the draft EJ element was posted to the JPA website on November 8, 2023, yet only the developer was notified of this plan and the public wasn't made aware of it during a busy holiday season until emails were sent out for the first workshop. By keeping the public informed about proposed developments in your area, you can better work with and engage the public in decisions being made and help them understand the potential impacts on their lives, and allow them to hold developers like the Lewis Group accountable for their predatory practices.
2. *Hold the developer accountable*: If you respect the community and endeavor to implement the EJ element you are proposing, you can work with local officials including your commission members and community groups to demand greater equity, transparency, and accountability from the development community. As I have offered in the past and will do so again and again, the JPA needs to for a community advisory board to similar to the TAC and I am happy to serve on it once formed.
3. *Support sustainable development*: Going back to the predatory practice of overbuilding an area, you can support the region and local community by advocating for developers who prioritize sustainability and responsible practices, including helping to incentivize more responsible approaches to land development. The March JPA should be leading this effort, and the developer makes every effort in public and private communications, to be the lead agency on the project described in the recirculated and draft EIR. But it is clear that the March JPA has its eyes on the sunsetting date of July 1, 2025 and are eager to finish your mission to build out every parcel of land that you can before the County of Riverside takes over land use decisions. In fact, I am requesting that the JPA consider imposing a moratorium on industrial development projects until the JPA transitions land use authority for the remaining areas to the County of Riverside.

RI-259.52

Predatory land development practices are a serious problem that can have far-reaching consequences, and these practices are clearly impacting the communities around March ARB. It's important to hold developers and the government accountable, and support sustainable development practices in our communities. And with this in mind, it is about time that you

consider an Environmental Justice element for the March JPA. Just as you have misrepresented the community benefit agreement process in the recirculated draft EIR, you have also misrepresented the EJ element in the recirculated draft EIR.

The release of the draft EJ element coincides with the re-release of the draft EIR for the West Campus Upper Plateau project that the local community overwhelmingly rejects. It is frankly insulting to think that while the JPA has existed since 1996, and have consistently built warehouses in communities that CalEnviroScreen 4.0 lists in the 98th and 99th percentile, the JPA has chosen the last days of November 2023 to amend the General Plan for an organization that sunsets in July 2025. It is farcical to think that the JPA intends to actually carry through with this ambitious plan, and as a member of an active community that opposes the land development practices of the JPA, I don't believe this effort is genuine on your part. This effort is clearly in response to comment letters submitted by the community in response to the draft EIR for the West Campus Upper Plateau and pressure from CEQA and State mandates, and rather than engage with the community and consider the comments in these letters, the JPA is obviously assisting in the applicant's greed and desire to push through a significantly controversial project despite the very communities that this copy-paste EJ policy intends to protect and represent.

RI-259.52 Cont.

I have concerns with the process by which the JPA is going about this amendment to the General Plan, as they have already inserted in into the revised draft EIR for the West Campus Upper Plateau project being recirculated currently. The policy in its current form reads as an unimaginative cut-and-paste from the County, lacking any accountability, filled with policies that the March JPA has no ability or intention to follow through on in the 16 months it has left to exist. Please elaborate in detail your plan to actually implement this plan. Specifically, the policies that the JPA has no ability or intention of fulfilling include:

1. The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7)
2. The March JPA has no jurisdiction over the Salton Sea (policy HC 16.1)
3. The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC 16.8), and rejected community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10)
4. The March JPA won't be coordinating with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7)
5. The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13)

RI-259.53

6. The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

RI-259.53 Cont.

As I have mentioned, what concerns me is that the JPA has decided to engage simultaneously with a re-circulation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304) and in this proposal, the JPA references this not-yet-adopted policy extensively in the document. How meaningful are community comments for a General Plan amendment if it is already assumed that the agency will adopt the plan wholesale before the process has even started? As it stands, the public comment window for the re-circulated draft will close before you are able to officially adopt a policy. How can a community officially comment on a draft EIR when it is contingent on policies that have not been finalized and that are wholly unresponsive to the specific EJ needs of the area? The JPA's prescribed process communicates that it is not actually interested in meaningful feedback, that this is an exercise with a pre-determined outcome (just as this whole experience with the West Campus has been), and is exactly the opposite of what the civic engagement policies the JPA is trying to adopt is attempting to codify. This process also highlights how your consultants are working to help the JPA bow to the wishes of your applicant for the Upper Plateau rather than collaborate with business and the public to make decisions.

RI-259.54

As indicated in the City of Riverside's recently adopted public engagement policy, in order to have a functioning EJ policy, an agency like the March JPA would actually need to incorporate feedback from the community into their land use planning and decisions. That is what such a policy establishes and that is what governors of the public are tasked with doing. To date, the March JPA only engages with the public when forced to involve community wishes by a court, and even then, the JPA has shown that is only follows through on settlement terms that benefit them or the sole-source applicant that has had far too much influence in this region for far too long. Even the results of the "DOT Polls" at the December and February EJ workshops listed as the number one item that the March JPA needs to collaborate with all stakeholders on projects. The negative influences the March JPA has allowed this applicant to have on our region is clear to see, and the public is telling you enough is enough. Instead of listening to the public, you have allowed this applicant to build yet more warehouses around a community of retired military veterans and the final resting place that provides full military honors for our veterans!

RI-259.55

Please consider slowing down this process, listening to the community as this proposed policy says you will do, and drafting a sensible, CEQA compliant, EJ element to adopt into the March JPA's General Plan that responds to the community's needs, is realistic to the agency's capabilities and mission, and will transition to and benefit the County once the JPA sunsets in 2025 (not one driven by greedy developers and investors). Please also consider pausing the release of the Recirculated draft EIR for the Upper Plateau until the CEQA-defined EJ process is complete so that the community can have meaningful comments on a policy that has been approved by the JPA and thus will be relevant to the applicant's proposed project.

It is ironic that California SB 1000, which is codified in Government Code Section 63502(h), requires jurisdictions with disadvantaged communities to either include an environmental justice element in their general plan or incorporate environmental justice goals, policies, and objectives throughout other general plan elements. SB 1000 is triggered when a jurisdiction concurrently adopts or revises two or more general plan elements if there is one or more disadvantaged communities within the jurisdiction. A "disadvantaged community" is an area identified by the California Environmental Protection Agency as such or that is a low-income area disproportionately affected by environmental pollution and other hazards that may lead to negative health effects or environmental degradation within its planning area. What has taken the JPA so long to address this requirement? And why are you doing it now so hastily? RI-259.56

As mentioned previously, I am happy to volunteer my time to serve on a community advisory board, working with the JPA to draft and finalize an authentic EJ element for the General Plan. Please let me know how I can help. I would also request that the JPA enact a warehouse moratorium until the EJ element can be finalized and the General Plan amended, and the community can be engaged in the planning process for the Upper Plateau. I find it ironic that in your listing of project goals in Table 4.10-1 of the recirculated draft EIR you include only the goals that you will adhere to rather than the goals including the community engagement that you will not adhere to. RI-259.57

This development project poses many concerns for local residents, the people of the cities of Riverside, Moreno Valley, and Perris, and western Riverside County including air and water pollution, increased crime and traffic, an increase of homeless and vagrant camps as seen near many of the warehouses along the 215 corridor and on existing March JPA developed land, a loss of aesthetics and scenic vistas for this natural area, it detracts from or limits economic opportunity for home owners and places undue financial burden on them to repair construction caused damage to their homes and exposure for people and appliances like HVAC and pool filtration systems to higher levels of "significant and unavoidable" pollution, a lower quality of life for humans and non-humans alike, and a significant burden on and health risk for residents. These are all items that directly benefit the public but you do not include any of it in your recirculated draft EIR. Engaging the community and making decisions that reflect our goals for the lands surrounding our homes would show that the applicant and the JPA care about us, rather than continue to demonstrate that the JPA is a vehicle for profit by greedy industrial investors. RI-259.58

Of the approximately 817.9-acre area, your plan calls for 250.85 acres for Mixed Use, Business Park and Industrial (143.31 acres) development, 523.43 acres designated as Park, Open Space, and Open Space Conservation (445.43 acres), and 40.75 acres for roadways and public facilities. After reviewing the draft Environmental Impact Report dated January 9, 2023 and recirculated draft EIR dated December 2, 2023 in some detail, you have attempted to demonstrate how this project benefits the public. Your claim that this project is bringing jobs and industry for people that live near this space is complete nonsense and I believe you know it. I have some serious concerns about your recirculated draft EIR and what looks like (at least per your working and RI-259.59

reworking of the political and CEQA process) the JPA intentionally acquiescing to the developer on all ideas and decisions related to the former redevelopment March AFB lands. Why aren't your mitigation efforts supported by evidence on previous projects? Why do you contradict in your communications the real experiences of residents surrounding your development projects? The only people to write anything positive in comments to the original EIR were unions whose sole purpose is to get their members jobs with fair working conditions and pay. No one who lives in this part of Riverside County likes your existing or planned projects because they are exclusive of our wishes and they are predatory in nature.

RI-259.59 Cont.

Even after the December and February workshops for the draft EJ element, the JPA has never genuinely engaged the effected communities (of which I am a member and I currently deal with the daily adverse effects of your advocacy for unrestrained logistics sprawl). For proof one only needs to look at the ongoing fiasco of your plans with the area around the Air Force Village West. Warehouses right next to a retirement village, one that houses veterans? Who thinks this is a good idea? How does the JPA defend such decisions if not that you are allowing the developer (might I remind you the applicant is ONLY concerned with profit margin and to think otherwise is purposeful nativity) to do as they please, unchecked. As it relates to the West Campus Upper Plateau, the draft EIR referred to "A public scoping period was held to solicit input on the scope of the analysis for the EIR between November 19 and December 20, 2021. Additionally, an open house scoping meeting was held by March JPA on December 8, 2021. The purpose of this meeting was to seek input from public agencies and the general public regarding the potential environmental impacts of the proposed Project" (p.1-13). As someone living on the perimeter of this proposed project and will be directly impacted by your construction insensitive construction plan for more than four years, where was my invitation to participate in this meeting? Where were invitations to any of the more than 1,000 homes in the area? In fact, where was my invitation to attend planning and community meetings for any of the warehouses that impede my views, give off excessive light and noise pollution, and are the cause of an increase in migraines for both me and my son?

RI-259.60

These warehouses did not exist when I bought my home and they were not planned, the JPA maneuvered around the community and upzoned land use plans to build warehouses against the wishes or sometimes knowledge of the community. Your purposeful reference to legally exchanging land reserved for the SKR is an excuse, a justification for your profit-driven decisions of the past. In fact, the changes from your Final Reuse Plan have gotten so far out of hand that the less than 10% of space set aside for industrial and warehouses has grown to more than 20% of all land. Had anyone who bought these homes, anyone who paid a premium to have a home that bordered such a grand open space and natural area known that within five years we would be rewarded with views of warehouses and the sound and smell of illegally idling semi-trucks (see the emails I frequently send to Dan Fairbanks documenting such incidents including on the Thanksgiving morning 2023), I am sure that most people would not have bought a home here. The lack of genuine engagement, a true community benefits agreement, and EJ element implies you purposefully neglect to inform residents (and municipalities) of your plans. It also

RI-259.61

implies that you are likely flying by the seat of your pants and proposing land use zoning based on whatever the developer tells you is in demand at the time (and they have been wrong for the last two years).

Additionally, the nature of their non-competitive contract with you is shameful, one that I view as criminal but also one that I rarely see in government work where contacts must be awarded to the business with the lowest price for the best value to the government. How is this any different? Why does the public, whose land this is/was, have to pay for and settle for whatever a sole source bidder wants to build? This is a disturbing pattern for your operation, one that again is predatory by nature. The practice of conducting business in private that directly impacts the public is unethical, unfair, and seemingly is a violation of the public's trust (if not a misuse of tax dollars). Please explain to me how the Air Force, the State of California, and the U.S. Government allows the JPA to negatively harm the public in this way.

RI-259.61 Cont.

As a precursor to your level of insincerity in the EJ element, and your willingness to enter into a genuine community benefit agreement, on February 24, 2022 the March JPA, along with the applicant, hosted a public Q&A forum online. The meeting was virtual due to COVID restrictions via Zoom and you did not permit people to speak with you instead forcing people to comment or ask questions via the website's chat. You did not monitor that chat appropriately or professionally, ignored comments and questions at your discretion (much like you did when you failed to protect the health of residents by choosing to site warehouses within 300 feet of people's homes in Riverside along Barton Road), and you allowed a member of your commission to berate residents (also a disturbing pattern for this commissioner as he professed to represent the JPA and the USAF) who questioned or expressed frustration with your plans. If you would have listened to this first public discussion of your plan one year ago, you would have heard a common and consistent message: no more warehouses. **No more warehouses!** Not making these comments integral to your recirculated draft EIR is dismissive and negligent on your part. It feeds the propagation of the idea that the applicant is only proposing this plan because it assures the highest level of profit for them and ignores the wishes of the public.

RI-259.62

Another example of a one-way community engagement event was on August 18, 2022 when you hosted a presentation of the proposed plan at an open house at the March Air Museum. This event was open to the public and the public believed we were going to be able to discuss the plans with you, provide meaningful feedback on the plans, and work together to meet the goals of the JPA's mission and the needs of the community that surrounds this land. Wrong again. The event turned into a show by the JPA and developer and became quite heated. One of your commissioners, who said publicly that he was there to learn more about the project, stood with you and the builder as he argued with residents for more than an hour. How is this type of engagement productive or genuine? If you, and I know because I listened to you intentionally mislead residents that night, had listened to residents at this second gathering, you would have heard that same common and consistent message: no more warehouses. **No more warehouses!** And had your EJ element been in place, you would have had processes for engaging with the

public in a meaningful way, but you didn't and even with the finalization of the draft EJ element sometime in 2024, you still will not have the staff or processes to conduct meaningful community engagement on important land use decisions. The draft EJ element is a check-box, nothing more, and your effort to claim its integrity is disingenuous. **No more warehouses!**

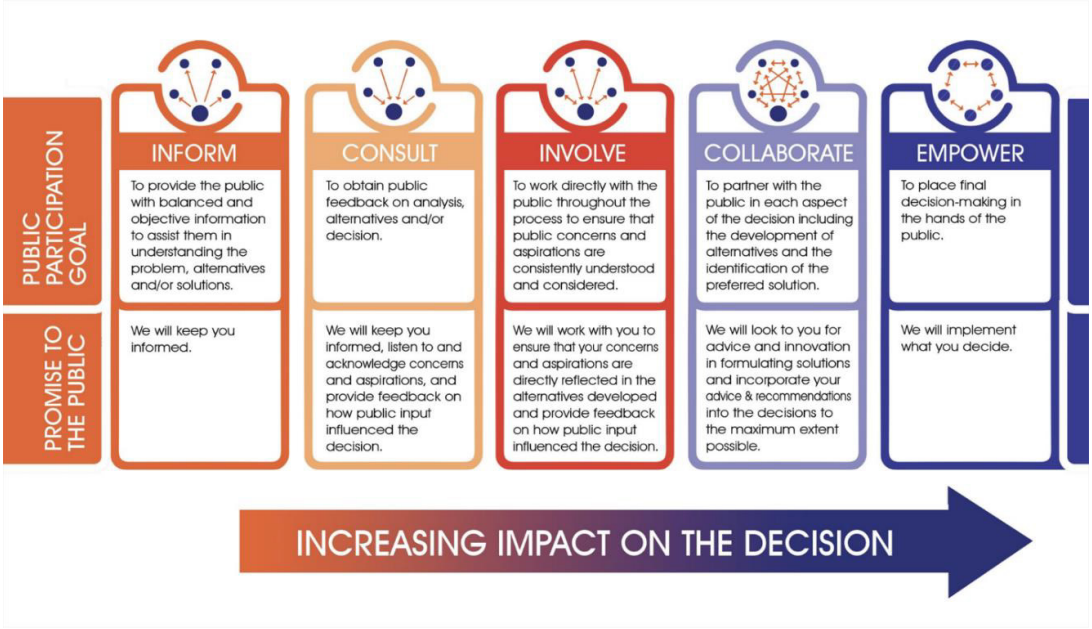
At a public meeting on January 11, 2023 held at the Moreno Valley Conference Center, 40 residents spoke against this project. Directing their words to the commission, they spoke honestly, emotionally, and factually about their continued desire to have a plan that excluded industrial and logistics sprawl. No more warehouses they demanded. I spoke that night and questioned the JPA's insistence on providing development and land use plans that included solely industrial and logistics. I asked why no alternate plan was offered. I also asked for the convening of a Public Advisory Board to the JPA much like the TAC severs today. Since that time, our requests have been "heard" by the JPA but the Director of the March JPA sent Jennifer Larratt-Smith an email denying the request for a community advisory board due to the JPA's 2025 sunset date. Yet here you are trying to backtrack and establish an EJ element that centers on community engagement, which a community advisory board and community benefits program would complement perfectly. Your public engagement is less than genuine. Where in this process so far have the voices of the public been acted upon? **No more warehouses!**

In yet another show of public engagement, the developer hosted another public showing of the project and their plans to develop the Upper Plateau. This meeting was held again at the March Air Museum on February 9, 2023 and involved nothing more than a live reading of the project. The applicant did its best to justify the warehouses but few from the public attended. I was one who did and found the meeting insulting and less than authentic. It was quite clear to attendees that the JPA and developer have no interest in considering alternate land use plans, nor have you ever considered them in the past, and this meeting was more box checking to say that you gave the public time to share their thoughts. **No more warehouses!** This again was an act, a misrepresentation of what it means to engage the public just as your Environmental Justice plan has been and your community benefit agreement has been, and I believe your meetings are held with the intention of misleading the public to view the project and applicant positively. This is once again a predatory practice sanctioned by the March JPA.

RI-259.62 Cont.

Part of the process that makes a community benefits agreement successful is a collaborative approach to communication. The JPA has consistently engaged with the public in a limited capacity, only sharing the minimum information to the minimum number of people. The image below comes from the Environmental Protection Agency. It describes what public engagement looks like at the federal level.

RI-259.63



RI-259.63 Cont.

The JPA has clearly kept the public in the inform category despite the many public meetings that you claim you have held over the last two years. You have rarely ventured into "consulting" the public phase and have never empowered people to help make decisions about their lives, including in your December and February EJ workshops where you will say that you entered the "involved" the public phase of decision-making, but in reality, you only gave us a menu to choose from, we never helped develop the menu in the first place so the word involved is a flse definition of what you did at the workshop. What upsets residents so much is that you, someone who does not live here, unilaterally make decisions for us. How is this fair, beneficial, and legal in our world today? Do you believe you are acting reasonably? I think you believe you are and have chosen to ignore the community hoping to see this project contracted as quick as possible so that the you and the JPA can ride off into the "sunset" in July 2025. Just checking the boxes.

RI-259.64

On a more personal note, I live within 800 feet of several of your warehouses today. I have contacted the JPA and your office many times to request help with bad warehouse tenants, questions about the JPA's operational and management policies, and illegal public activity within your jurisdiction.

1. On January 22, 2023, I submitted a public request form asking the JPA for all correspondence in support of the West Campus Upper Plateau project. After four extensions to the time for response from Ms. Carmago and Mr. Fairbanks, I received a response and the documents I requested on April 17, 2023.
2. On January 30, 2023, I emailed the March JPA and Commission with a complaint about the warehouses near my home. I detailed the air, light, and noise pollution caused by these warehouses and asked you what from my experiences give me confidence that the proposed Upper Plateau development would be any different than what currently exists under the JPA's management today. I also asked what accountability exists for the lack of

RI-259.65

mitigations to these problems. After several emails with the JPA, I am still left wonder what is being done as I observe these problems continuing even today. Regarding these exchanges, how and where they the JPA be monitoring the noise from in relation to the existing warehouses, and how will these enforcements be applied to future developments like the mega-warehouses at Upper Plateau? How can residents access the data that the JPA will collect to confirm that the noise, light, and air pollution being monitored is represented accurately? This applies to existing and future warehouse developments. And What noise levels are considered unacceptable by JPA ordinance? How do these levels impact residents and wildlife? And what enforcement exists today and, in the future, to prevent significant noise, air, and light pollution generated by the JPA's warehouses? To date, nearly a year later, I have received no responses to this message.

3. The week of January 9, 2023, I visited the JPA's offices to discuss my concerns and report idling semi-trucks. My concerns were addressed with the promise to speak with the tenants of the warehouses near my home and to conduct some noise level measurements. And you agreed to speak with the Riverside Sheriff's Department about ticketing idling or illegally parked semi-trucks. These promises are a step in the right direction but offer no accountability or proof they are occurring. Because the JPA's word hold very little value with me right now, I am not included to believe this engagement is genuine. I have emailed or visited in person with Dan Fairbanks about this same issue xx more times in 2023 and each time Dan has responded that the JPA will talk with the occupants but the idling is largely out of the JPA's control. There are no accountability measures in place to stop pollution, so the tenants of these buildings and the workers will do whatever they can get away with. How under the recirculated and draft EIRs for the Upper Plateau, and with the JPA sunsetting in 2025, would the County or the JPA enforce such illegal activity and major disruptions to our lives today and in the future? The recirculated and draft EIR offers no plan, no mitigations, and no methods for monitoring instances like this, and have I not experienced such accountability from the March JPA in the past.
4. On September 18, 2022, I emailed the March JPA and commission to ask for help with a pack of migratory coyotes who had taken up residence in my front yard and along the fence of my back yard. These animals, like many others, are being pushed out of their territory by development and increased human activities within the JPA management lands. While I live in the City of Riverside, these animals don't but did visit and cause a problem related to safety for residents of the City. Again, the lack of accountability, changes to the climate and the coyotes' homes, and a lack of empathy for residents is the clear signal from the March JPA in your response.
5. On June 1, 2023, I emailed the JPA requesting help with weed abatement throughout the JPA administered open-space because it was a fire danger to residents. As a resident who has seen my homeowner's insurance canceled due to fires in California and the insurance industry pulling out of the market, I am sensitive to this issue in my own backyard. The Director of the JPA contacted me the same day and explained that they were having scheduling issues with contractors and nesting bird habitat preservation. Almost, like most other things, seems like she was working hard to justify the JPA's inability to

RI-259.65 Cont.

manage their responsibilities and communicate with the public to ensure safety for all. Weeks later, I noticed that the schedules aligned so that the contractor could mow down a 10–20-foot buffer between the over-grown space and residential properties. The work was inadequate and the communication was non-existent and thankfully we didn't have any fires. Had the JPA considered a community advisory board, then maybe they would have employed a more environmentally appropriate solution to this issue and made sure resident homes were safe from fire danger in 2023. But no such board exists and the JPA continues to operate with minimal regard for the public welfare, and I get to build a buffer between my house and the fire danger growing just outside of my neighborhood.

RI-259.65 Cont.

It is misleading and disingenuous to say that the March JPA has authentically engaged with the public during this process. The March JPA should delay the recirculated draft EIR until you can review and approve the EJ element by following the CEQA process and amend the General Plan, and then recirculate an updated draft EIR for the Upper Plateau, one that implements an approved and meaningful EJ policy in regards to this specific plan amendment, and incorporates public preference in your proposed project.

RI-259.66

The Development Agreement: Privatizing Public Lands

With the recirculated and draft EIR, the March JPA seeks to amend the DDA with the applicant and extend the development agreement for an additional 15-25 years (page 3-24). As described, the JPA claims there are two community benefits associated with this extension and new business agreement. The first is the $3.5 million contribution by the applicant, which is more than they are required to contribute, for a feasibility study, but it is not for a park as the JPA has advertised but cannot build for lack of planning and funding. The second is a fire station which was always required of the JPA and applicant via the 2003 settlement agreement with CCAEJ.

RI-259.67

For 12 years I worked as a contractor who specialized in finalizing contracts with local, state, and federal government agencies including the DOD and Military. I am familiar with the Federal Acquisition Regulations and know from experience that for the most part, state and local government contracting vehicles mirror the way federal government agencies (like California's Procurement Division) and the U.S. General Services Administration conduct business with public funds. FAR1.102 states, "The vision for the Federal Acquisition System is to deliver on a timely basis the best value product or service to the customer, while maintaining the public's trust and fulfilling public policy objectives. Participants in the acquisition process should work together as a team and should be empowered to make decisions within their area of responsibility." The third item under this definition is the FA system will "promote competition." While people far more fluent in the FAR process than I will parse finer details of the introduction to these regulations, the fact of the matter is that the goal of the government is to spend tax dollars wisely, on goods and services that benefit the people who pay taxes.

RI-259.68

FAR subparts 6.1 and 6.2 establish the requirements for full and open competition for projects and acquisitions, but FAR subpart 6.3 identifies when an open competition is not appropriate for contracting with a company doing business with the government. FAR 6.301 states that contracting without full and open competition is a violation of statue unless permitted by FAR 6.302. FAR 6.302-1 is labeled, "Only one responsible source and no other supplies or services will satisfy agency requirements." It states that contracting without open competition is permitted when the item or service being contracted is in limited supply or requires a domain expertise not easily found. In 2004, I helped a group of retired special ops members who formed a unique collaborative of skills used to map rivers in jungles finalize a contract for work with the CIA. I was only able to find one company to do this work and therefore helped the government avoid an open and competitive contract for a classified project. FAR 6.302-2 is labeled "Unusual and compelling urgency" and is used in times of conflict or disaster recovery. In 2003, I helped a large company and its subcontractors quickly establish a contract to support the identification and recovery of the Space Shuttle Columbia debris. This time sensitive procurement process required expertise and speed during a national disaster. FAR subpart 6.302-3 is labeled "Industrial mobilization; engineering, developmental, or research capability; or expert services." This FAR element helps the government streamline R&D efforts and streamline production and purchasing of essential products and services for the government. FAR 6.302-4 is labeled "International Agreement," FAR 6.302-5 is labeled "Authorized or required by statue," FAR 6.302-6 is labeled "National Security," and FAR 6.302-7 is labeled "Public Interest." Each of these last four elements is fairly self-explanatory as to why it would be in the best interest of the government to contract outside of their normal open and competitive requirement. This is a simplified look at standard government contracting practices, but again the FAR process is a model that most federal, state, and local government agencies follow during procurement of products and services.

RI-259.68 Cont.

So why describe all of this? Well, frankly, the March JPA doesn't operate quite like a federal, state, or local government agency because it lacks real accountability to the public. I also include this summary because the relationship between the March JPA and applicant is somewhat backwards in the typical government contracting world. Rather than pay a contractor money for products and services, the March JPA is getting paid by the contractor in this case. A different way of doing business that even people with experience like me struggle to understand entirely.

You see, to my knowledge, the applicant and the JPA privately agreed to convey the land of the West Campus Upper Plateau, as is permitted by the existing Disposition and Development Agreement between the March JPA and applicant, for a specific project that had yet to be released for public comment or commission approval. The JPA and the applicant rushed to execute a contract that had little to do with your mission and a pressing need, and more to do with timing. At the October 26, 2022 March JPA Commission Meeting, the commission approved the following transfer of land payment terms.

*Mass Grading Permit Issuance – New Development	$14,000,000
*Building Permit Issuance – New Development First New Building	$4,750,000
*Any Certificate of Occupancy – New Development First New Building	$4,750,000
*Building Permit Issuance – New Development Second New Building	$4,750,000
*Any Certificate Occupancy Permit Issuance – New Development Second New Building	$4,750,000
*Building Permit Issuance – New Development Third New Building	$4,750,000
*Any Certificate Occupancy Permit Issuance – New Development Third New Building	$4,750,000
*Building Permit Issuance – New Development Fourth New Building	$4,750,000
*Any Certificate Occupancy Permit Issuance – New Development Fourth New Building	$4,750,000

In this secretive act, the March JPA gave the applicant a 60% discount on the current market value of this land. At a time when the logistics and warehouse industry was in decline, the JPA agreed to sell the land for this project for $52,000,000. That is $135,755.35 per acre. Based on my inexperienced knowledge of land prices with industrial zoning, the value today is $129,292,379.72 or $337,541 an acre for Riverside County. Asking me to accurately value land prices is like asking me, or anyone without expertise in the field, to compose a blues song or paint a seascape with water colors. I would try my best but ultimately pale in comparison to an expert. Never-the-less, the need for more industrial zoning and warehouses is not reflected in today's economy yet the value of the land is high, much higher than the price that the JPA agreed to sell this land to the applicant for in late October 2022. Within the logistics industry today, investors are preferring to keep their money in low-interest earning accounts as the two-five-year downturn in logistics seeks to become profitable again. I am unclear where in the DDA that parameters exist for how land is priced, but the JPA didn't do the public any favors like it did the applicant. The public doesn't need to be experts in this field to ask questions about your policies and practices and in this case, I wonder why you sold this land at such a cheap price that appears to benefit the applicant? The appearance of impropriety is enough for the public to believe something foul is afoot because the JPA does not have a trusting relationship with the public, and only now in the final months of its existence is the JPA trying to (at least on paper) establish an open-door communication policy with residents of western Riverside County.

RI-259.68 Cont.

Returning to the DDA and the misuse of public lands: the former March Air Force Base is considered public land. When the land use authority transferred from the Air Force to the March JPA, the JPA was tasked with redeveloping public land with respect to the local communities and the operations of the airport and Air Force. In some ways, and I realize this may be

comparing bananas to mangos, but the Base is much like any forest, park, or wildlife preserve wherein bananas and mangos are both fruits and the Base and a forest, park, or wildlife preserve are all public lands. By ignoring the need for a genuine EJ element that guides all land use decisions by the March JPA, the JPA is communicating that it does not care about the public. By upzoning projects to include significant industrial and warehousing on repurposed public lands, you are communicating that benefiting the public is secondary to the benefit the land offers private businesses and investors. By proposing to extend and amend the DDA with the same company for up to 25 additional years, you are allowing the applicant, a private for-profit business to take advantage, in a predatory manner, of a backwards contracting process that in all areas of government contracting would be in violation of Federal Acquisition Regulations.

The FAR, again the benchmark by which nearly all government contracting adheres to, clearly states that the government is required to get the best products and services for the best price possible. Thus, their requirement of open and competitive contracting processes. But because the JPA, the government, is not buying the land identified in Exhibits A and B of the amended DDA executed on 9/1/22, rather the applicant is buying land from the government, at a discounted price, the requirements of the FAR are muddied, and purposefully obscure to avoid public scrutiny and legal challenges. The applicant does not offer the government best value, in fact, the government is offering the applicant best value pricing for public land. I call this, for the lack of a better term, a gift of public funds, which is illegal in California, wherein the applicant benefits from an exclusive contract with the JPA to purchase something of value to the applicant at preferred pricing. By statue, all expenditures of public funds (in this case public land) must support the government's function, purpose, and benefit the government. Individuals and businesses are prohibited from receiving any advance payments or pre-payments made by a contractor before work has been performed or before all goods or services have been accepted.

RI-259.68 Cont.

It is the exclusive nature of the DDA that is concerning to the public. One business, one voice, telling the JPA how to develop land in the communities that the Military and March ARB helped grow over many decades. One company profits, and a private owner gets rich because the March JPA is understaffed and unqualified to conduct open and competitive contracting projects that benefit the region instead of a single company and its corporate investors. You have taken public land and given nearly all of its benefits to a private company. And when you sunset in July 2025, you will proudly announce mission accomplished. And it will be accomplished assuming your mission was to enrich greedy land developers and investors. It will not be if your mission was to follow the guidelines of the final March JPA General Plan and "define reuse and development opportunities of the area, while preserving the environmental quality," or "address specific elements of the community," or "plan for the preservation of open space designed to promote the management of natural (historical/cultural) resources, outdoor recreation (active and passive), and public health and safety." **No more warehouses!**

Why was the DDA amended in 2022 privately and without community knowledge or involvement? Your General Plan has always required community (largely defined as residents of

the area surround March ARB) input and now you are hastily trying to approve an EJ policy to make sure on paper that you are reflecting the wishes of the community, which it is clear you are not and never have. How does the draft EJ element found throughout the recirculated draft EIR impact your past DDA agreement now and future plans (CA AB994) for more of the same with this developer? What responsibility does the JPA have to comply with Federal Acquisition Regulations, State of California Procurement Department regulations, and the County of Riverside Purchasing Department guidelines and policies? What makes the applicant unique in providing products and services to the government, especially to the County since you appear to be preparing for a new DDA that will transition to the County of Riverside in 2025? They do not offer the unique skills of the contractor who specializes in mapping rivers in a rain forest, they do not offer a speedy service in a time of national emergency, they do not offer best value to the government in relations to public funding. They are a company that you foolishly awarded an exclusive contract to years ago because of a lack of experience and staffing. There are other contracting options available to you to work with the applicant through the remaining life of the JPA without saddling the County with an exclusive 15–25-year agreement, but the applicant requires a long-term assurance, they have said this a number of times publicly, to continue the business relationship with the JPA, and you are agreeing to it without hesitation. Not only is the agreement an exclusive deal for the applicant and its investors in order to maximize profit, it is a violation of your role as a government entity whose job is to collaborate with the public and incorporate private investment in the communities surrounding March ARB. You are failing the communities and rewarding the investors for their predatory practices. You are leaving this space with unfulfilled financial liabilities that you are eager to pass on to the public and to municipalities that will inherit the mess of your poor and predatory land use decisions surrounding March ARB. Please specify the government contracting regulations for the State of California and the U.S. Government that permit you to misuse public lands in such a way as to place an undue burden on residents of western Riverside County, and the cities of Riverside, Moreno Valley, and Perris. Better yet, I'd appreciate a public roundtable discussion (not workshop or presentation) on your answers to my questions in addition to written responses prior to a public hearing and voting on a final EIR for the Upper Plateau.

RI-259.68
Cont.

The privatization of public lands is a disgusting practice by predatory developers and investors taking advantage of a distracted or uninformed public. The amendment of the DDA to add 15-25 years to it, or to form a new DDA that transitions to the County of Riverside for the same purpose it entirely outside of standard government contracting practices and it may in fact be a violation of both federal and state statue. But the JPA and applicant's insistence that these predatory and illegal contracting practices be used to build more warehouses in an area saturated with them is irresponsible land use planning, decision making, and management of public spaces by the JPA. The lack of non-industrial zoning and alternate plans in the recirculated and draft EIRs is insulting to the public and is incompatible with the final General Plan. I once again call on the JPA to enact a moratorium on all industrial projects and plans until the County of Riverside assumes land use authority in 2025.

Lack of Non-Industrial Alternate Project Plans Violates the Draft EJ Element

Another disturbing failure of the recirculated and draft EIR has been the lack of non-industrial development and land use options for this land. I am disappointed that the alternative plans still do not consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for nearly two years. In the recirculated draft EIR, the JPA continues to identify 143.31 acres of industrial and that is for warehousing, possibly including cold storage warehousing, 42.22 acres of mixed use, which the JPA has gone to great lengths in the recirculated draft EIR to identify MAY contain warehouses as well, 78 acres of park and open space, though the park will not exist as a result of this project being approved, and less than 10 acres of public facilities, which again are public only in that the public will pay for them to be provided to warehouses that the public does not want. RI-259.69

Why did the JPA and applicant on page 4.2-17 choose to highlight the County of Riverside's Good Neighbor Guidelines when on several occasions the Director of the March JPA said publicly that the project would adhere to all local jurisdiction guidelines for siting warehouses near homes? While this project will ultimately fall under the management of the County of Riverside, their guidelines are outdated, the softest in the region, and the residents who are impacted the most by this project are largely from the City of Riverside who is working to update their guidelines as I write this letter. For the record, were the Director's word hollow and a political stunt? Or did the Director genuinely mean to engage with the concerns of the public and work with local government entities to protect the public? Please look to your draft Environmental Justice policy for answers and let me know if you find them. The way you have handled this project and the release of the recirculated and draft EIRs is in direct conflict with the draft Environmental Justice element you hope to shove through with this project. RI-259.70

Section 4.10 of the recirculated draft EIR identifies land use considerations by the March JPA for the Upper Plateau. In this section, you identify 14 munitions bunkers that the City of Riverside and other agencies have concluded are of significant historical value to the County, State, and U.S. Air Force. Your plan is still to demolish them, except for two that will be fenced off and surrounded by warehouses. This plan defies the concept of historical significance and your claims that your project will honor the U.S. Air Force by keeping two of them is absurd. You identify many sources to justify your proposal to largely zone this land as industrial and then you refer back to the General Plan as proof that you are interpreting it as it was designed. This is just what I referred to above in that you pick-and-choose which parts of the General Plan suite your needs, and your needs are driven by a predatory developer looking to profit further from public lands. With the recirculated draft EIR, you are helping the applicant reach financial goals for its investors, and ignoring the public that has asked you to zone this land in a way that lessens the burden of a community suffering from your overbuilding of warehouses. RI-259.71

It is pointless to argue with your selective claims that the noise of the airport is a major consideration factor for choosing to continue to offer an industrial zoning plan. The noise from RI-259.72

the airport impacts homes, business, and public spaces throughout the March JPA and they co-exist today. To suddenly use the ALUC and their wishes as justification for only developing warehouses on the Upper Plateau is purposeful and predatory by the March JPA and applicant. Why do each of the alternative development plans you offer still include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area including my own house that routinely sees Air Force planes fly directly over my roof, which could include residential, commercial, and recreational uses as long as they are low-density. Figure 4.8-2 in the recirculated draft EIR seems to indicate that there are other zoning opportunities for this land but the JPA and applicant have chosen against any of them for a variety of reasons. Please specify why you declined other land uses C-2 zoning allows and why you chose not to pursue these options. Please explain why this is the right project at this time on this land. You have never successfully done this to the public and until you do you will have public opposition to it.

RI-259.72 Cont.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." Given that this industrial complex is surrounded on more than three sides by residential homes (including mine) and that residents have submitted thousands of signatures, hundreds of emails, and hundreds of comments at public meetings opposing the project; how is our feedback being "seriously" and "carefully" considered? How are you doing what your draft EJ policy states you will do? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies and the inclusion of a draft EJ policy that largely values community input on decisions?

RI-259.73

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." How does building 4.7 million square feet of industrial warehouses that have "significant and unavoidable" noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Your responses in section 4 of the recirculated draft EIR do not answer this question, rather they are an attempt to justify your insistence on zoning this land industrial and ignoring any real community benefits. Also, how does this plan align with this goal and the subsequent 2003 and 2012 settlement agreements that require more of the same from the JPA?

RI-259.74

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how "the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of

RI-259.75

your plan? To date, the only comments we have been given is that a few members helped the developer reconsider siting of a road or placement of smaller industrial buildings deceptively identified as mixed use or business. This was true in the draft EIR and it is true in your recirculated draft EIR, and I imagine it will continue so long as you ignore the wishes of the surrounding jurisdictions and communities.

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

> "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein; b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space; d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred."

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. So, it is concerning and suspicious to the public why you persist in the recirculated draft EIR to only offer industrial and warehousing as a use for this land when clearly it was not intended and currently isn't publicly desired to be used this way.

RI-259.75 Cont.

In the last two years, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple developer and JPA-hosted community meetings opposing to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is as presented in the recirculated and draft EIRs is unstable and incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use.

RI-259.76

Therefore, I once again urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference (found in both the General Plan and draft Environmental Justice policy) and protect existing residential property owners in its planning process. Why has the JPA kept the public in the "Inform" and "Consult" stages of the EPA's decision-making continuum? Will you continue to deal with the public in this way even if you approve the draft EJ element found in the recirculated draft EIR? How do you justify any of this as authentic public engagement?

RI-259.76 Cont.

It seems almost that as soon as the March ARB General Plan was released, the JPA and developer began to ignore it, began to upzone and maximize profits from this land, and began to ignore and disregard the public interest in the repurposing of this land. In the initial planning process, the March ARB Final Reuse Plan, 1996 describes how the community was included in the planning of land-uses.

> "With the formulation of the Land Use Plan, the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v).

RI-259.77

As part of the Base Realignment and Closing (BRAC) process four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B (shown below) is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered East of Brown Street within the first three quarters of a mile adjacent to the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. While the Business Park category allows warehouses, it also allows a wide range of other less intense land-uses identified in General Plan Table 1-1 below.

RI-259.78

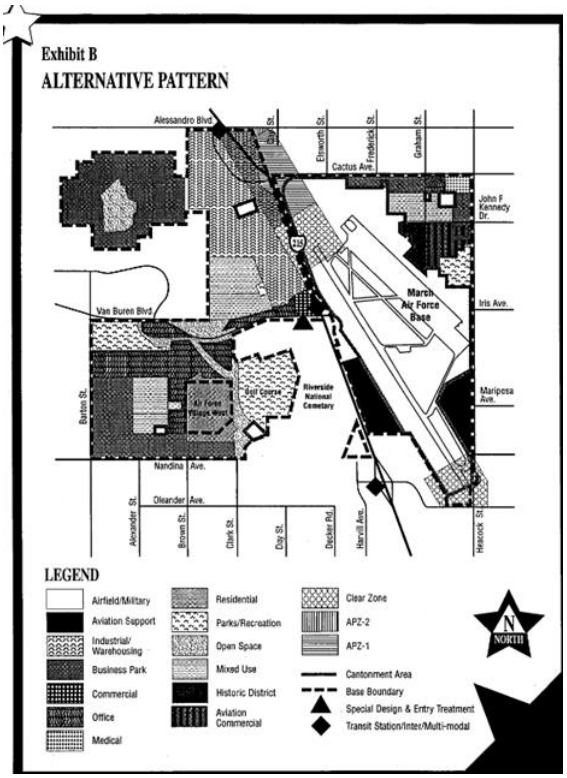


TABLE 1-1
BUILDOUT MARCH JPA PLANNING AREA

Land Use Designation	Acres GROSS	Density MAX.	Density AVG.	Buildout Capacity*
INDUSTRY				
Business Park	1278	.75	.20	7,793,755 sf
Industrial	433	.60	.15	1,980,455 sf
SUBTOTAL				9,774,210 sf
COMMERCE				
Office	104	.75	.30	951,350 sf
Mixed Use	360	.60	.25	2,744,280 sf
Commercial	45	.60	.30	411,642 sf
Destination Recreation	135	.50	.25	1,029,105 sf
SUBTOTAL				5,136,377 sf
PUBLIC				
Park/Recreation/ Open Space	777	.25	.025	592,307 sf
Public Facility	449	.50	.10	1,369,091 sf
SUBTOTAL				1,961,398 sf
SPECIAL				
Military Operations	2102	n/a	n/a	2,500,000 sf
Aviation	316	.40	.15	1,445,321 sf
Historic District	58	2du/ac	2du/ac	111 units
AFVW Expansion	75	.60	.30	686,070 sf
Cemetery Expansion	160	.10	.005	24,394 sf
SUBTOTAL				4,655,784 sf 111 units
TOTAL				21,527,769 sf 111 units

ac - acre sf - square feet du/ac - dwelling unit per acre
FAR - floor area ratio * based on average FAR, of net acre

The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. This was the same map and designation I was presented with when I bought my house in 2009. In fact, I was given the maps in Exhibits 5-1 and 5-4 from the original owner of my house and they clearly indicate the intention for this land was conservation. It was what the original owner, a municipal judge and retired Marine Corps officer, understood at the time he paid a premium to own a house next to this unique landscape and the military base that played such an important role in his life. Did the JPA change their minds after they wrote and disseminated the final General Plan? If so, why? What changed? Did the JPA communicate these changes to residents in the surrounding communities? Has the JPA modified the Final Land Use Plan in the past? If not, why are you proposing a specific plan that is inconsistent with the Final Land Use Plan (see your own diagrams and roadways)? Any specific plan needs to comply with the Final Land Use Plan and it is clear this one does not.

RI-259.78 Cont.

Exhibit 5-1
SKR Management & Open Space Areas

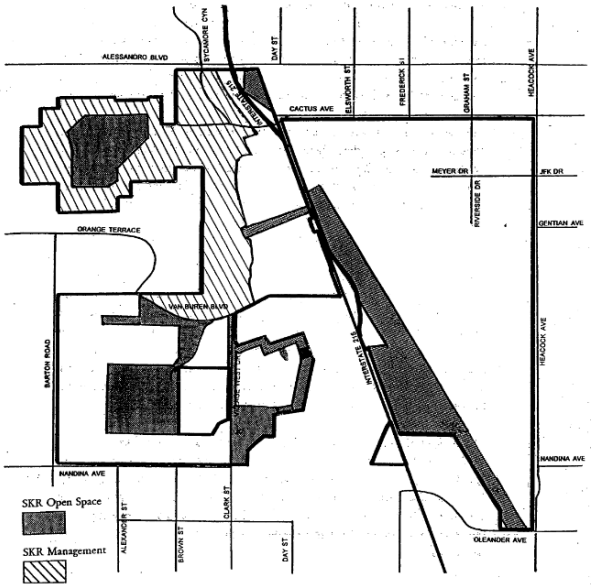


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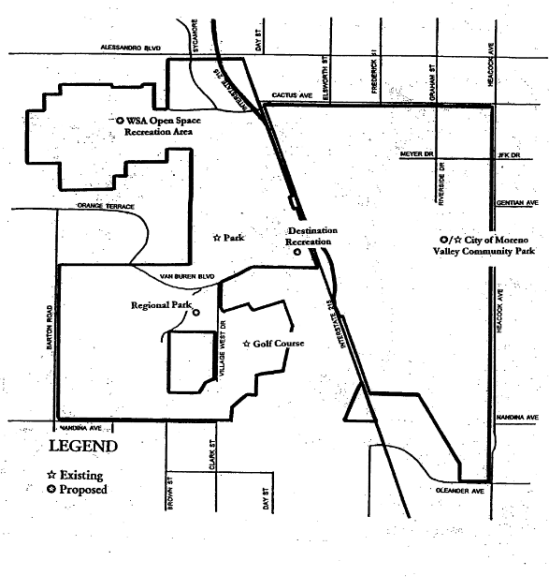
Exhibit 5-4
Recreation Facilities (Existing & Proposed)



March Joint Powers Authority - General Plan
Profile Reports
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Moreover, the Draft General Plan 2010 "Draft Vision 2030" which incorporated clearly a desire to avoid incompatible warehouse land uses adjacent to residential homes. In Section 2.2.25(d) it stated, "Any and all future distribution/warehouse development in the Meridian West area shall maintain a 1000' distance from existing residential uses in accordance with the Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities. (See 2.1.4 of the Land Use Element)."

RI-259.78
Cont.

The historical precedent of the Final Reuse Plan (1996), General Plan (1999) and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses and all discussion of warehouse uses focused on appropriate setbacks to protect adjacent residential zoning. Your justifications in the recirculated draft EIR are a disappointing effort for a public entity advocating for a developer-friendly plan that the community clearly rejects. At an industry event in December 2023, Prologis President Dan Letter described the current development environment as, "the fight is most pronounced and high-profile in California and New Jersey, states that are home to dense populations, tough environmental and permitting regulations, and major air and seaports. In both states are growing numbers of residents who, tired of seeing most warehouse projects being rubber-stamped, are resisting development and pushing their local commissions and state legislatures to fight with them" (Solomon). Even within the industry, developers and logistics executives know that southern California is over saturated with warehouses. Why do you insist on contributing to this problem as opposed to finding a solution that benefits all three parties (private, public, govt.)?

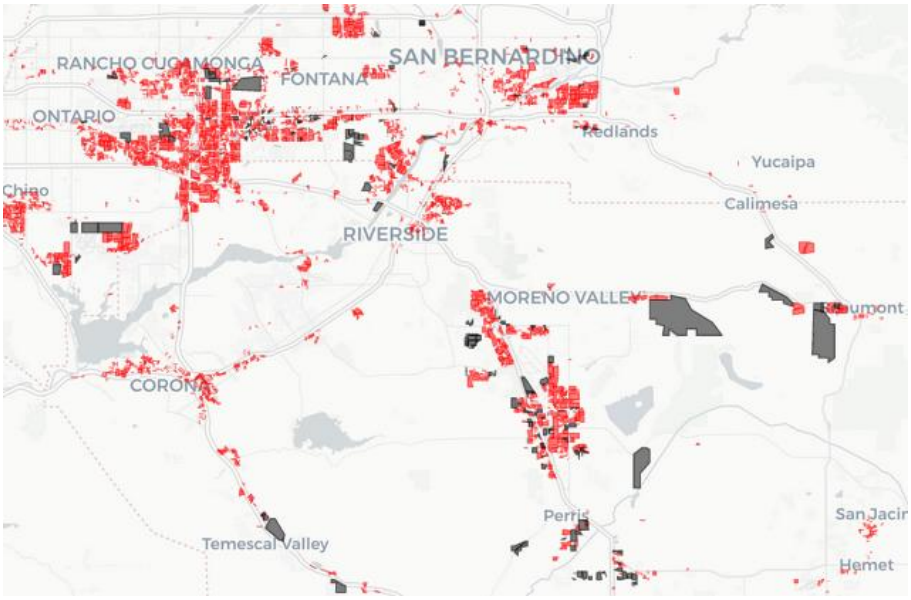
Finally, the specific plan for this campus changes the definition of the mixed-use land category. In the existing General Plan (1999), mixed-use is explicitly defined on page 1-34, “Mixed uses include a variety of complementary land uses; including commercial, business park, office, medical, educational and vocational, research and development, and services. Industrial and major warehousing uses are excluded.”

However, in the draft EIR (2023), p. 2-4, mixed-use is now defined as, “Mixed uses include a variety of complementary land uses, including commercial, business park, office, medical, research and development, business enterprise, and services. Industrial, and outdoor storage is prohibited.” Why change this designation? To approve unwanted warehouses on the Upper Plateau that was always set aside as a conservation and business park? This makes no sense to the public and many who serve in local government of the surrounding jurisdictions. This once again points to the predatory nature of the applicant, refusing to listen to the wishes of the public.

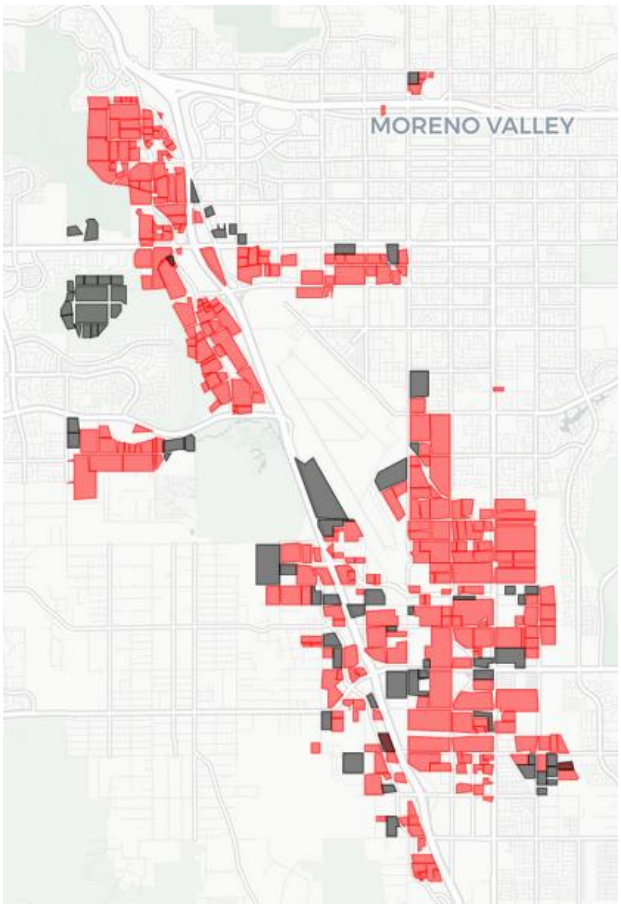
RI-259.79

Major warehousing uses are now acceptable to the March JPA in the mixed-use zoning, despite a 24-year precedent in its 1999 General Plan and the definition that excluded this use. This sudden change in the recirculated and draft EIR is deceptive and malevolent. It is misleading to the public, and it gives rise to the belief that the JPA, at the direction of the applicant, can do whatever it wants without consequence. The public expects better of the JPA and the Commission. What justification do you offer to explain this apparent privatization of public lands? Please don’t refer me to the DDA (past or future).

The region of western Riverside County is overly populated with warehouses, largely because of the JPA’s TFZ244. The residents of eastern Riverside, western Moreno Valley, north Perris, and unincorporated Riverside County all along the 60/215 freeway corridors are disproportionally impacted by these warehouses thanks to the JPA and the predatory nature of the developer.



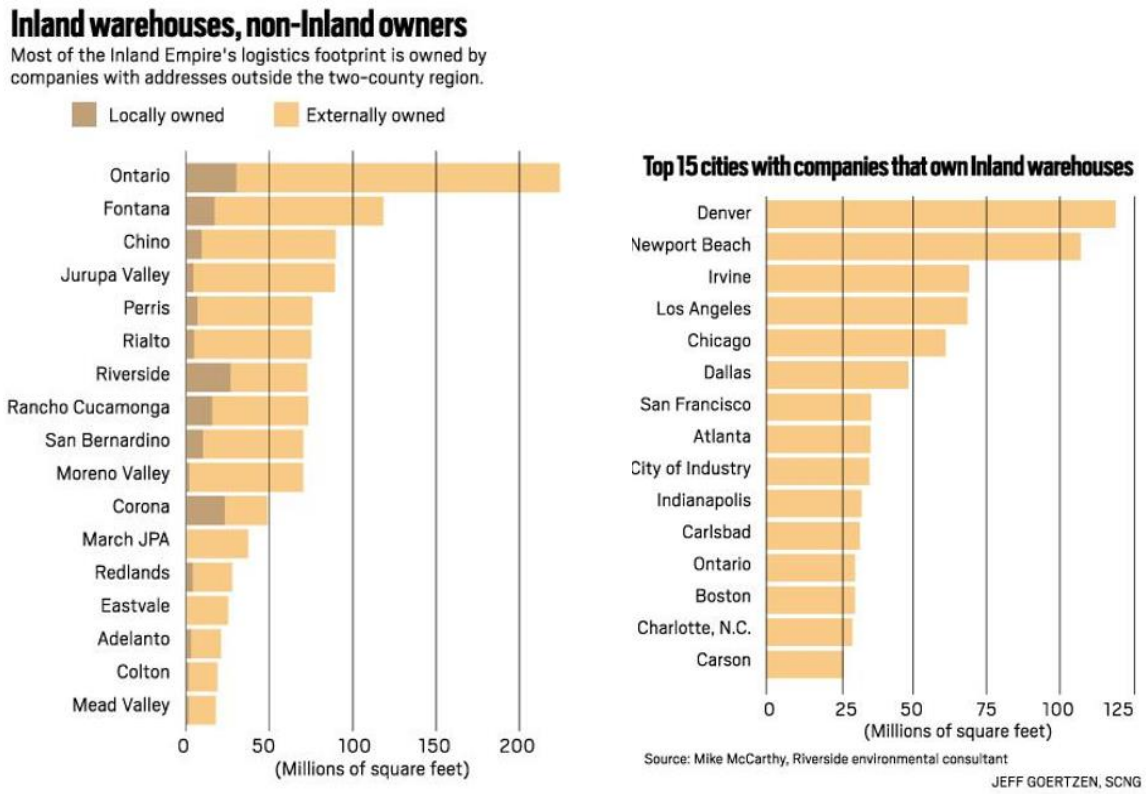
RI-259.80



As the updated maps above demonstrate, the 215/60 freeway corridor is disproportionally impacted by the sprawl of warehouses and logistics as is most of the Inland Empire. The JPA has specialized in placing warehouses on a majority of the land it was tasked with repurposing. So, one has to ask why build so many warehouses when they are not the land use planning option that the original General Plan and its creators envisioned in the late 1990s. Well, it doesn't take long for a mistrusting public to draw rash conclusions like "it's all about the money" or "it is a land grab by the (insert your adversarial foreign government of choice here)."

Fortunately, a little work and publicly available information provides me with some insight to avoid the conspiracies about why there are so many warehouses in the JPA's territory. In a meeting with the JPA in April 2022, I was told that most of these warehouses are built as speculative developments, and that they don't have tenants waiting to lease or buy them. This is the case with the West Campus, Upper Plateau project as well. I was still new to this the development around March ARB in April, but I have had some time to learn about it since that meeting. The graphic from 2023 below demonstrates the listed owners of the warehouses for warehouses in Riverside County, including the warehouses built by the JPA.

RI-259.80
Cont.



RI-259.80 Cont.

The nature of this speculative development means that the developer is incentivized to find financial backers, investors, that will fund the development of this land with the promise of a return on their investment. The way that the developer ensures that it and its investors profit is to spend the least amount of money in order to make the most amount of money in return, and this is what I am suggesting the JPA and applicant are doing with this land. If the JPA or the developer had the public interest in mind, then why is it that the mailing addresses for the owners of these businesses do not have a more equitable spread favoring local owners? Is it because as the graphics indicate, and what I learned at the April 2022 meeting and is confirmed in your recirculated draft EIR, that these warehouses were never intended to consider local business owners or local jobs for residents of western Riverside County? Is it because these warehouses are part of an investment portfolio for companies more concerned with Wall Street than the local streets of Alessandro or Van Buren? Is this another example of the JPA allowing their exclusive private developer to profit off lands that were intended for public benefit?

If I were to dig further, would these addresses stop in Denver, Tulsa, Chicago, Atlanta, or Newport Beach? Or would they quickly leave the North American shores and head to destinations far and wide? Are you, the JPA, telling me that my desire to live a happy and healthy life is not as important as the portfolio of the investors of your exclusive developer and their wealthy corporate friends? It is at times like this that you have to decide where your obligations lie. Do they lie with those that will profit from bad decisions or do they lie with the

people you were hired and tasked to serve? How will you enforce the JPA's own mission identified in the General Plan, the one that protects community values, health, and history from narrowly focused and neglectful land use decisions? I cannot see how building more warehouses accomplish this clear and focused goal as described by the writers of the original General Plan document. Where again is the accountability to the public? What will it take to get the JPA to stop privatizing public lands? Fortunately, I have some recommendations for you.

RI-259.80 Cont.

This brings me to a crucial and consequential point in this comment letter and the heart of my objection to this project, a project that would build nearly 5 million square feet of industrial warehouses right in the middle of a large residential neighborhood. Ever since the community became aware of and engaged in the plans for this shocking large industrial project, the community has repeatedly asked the JPA for one thing: **no more warehouses**. Warehouses are a part of life today, Councilmember Conder is right about that, but it is egregious to consider putting so many of them right in the middle of thousands of homes, something Councilmember Conder, the JPA, and the developer fail to acknowledge. This specific plan is a bad idea and real alternatives are needed.

RI-259.81

But before we get to the alternative plans, I realize that you have not modified the plans in the recirculated draft EIR and that is my concern. The JPA and developer address alternatives to the projects that were rejected in the original draft EIR. The first reason listed (6.3.1) is that there is no alternate site for this project (because of its size). This explanation implies that this project (a mega-warehouse complex) is pre-decisional, the realization of a legal entitlement for the developer to build warehouses anywhere it wishes and the decision to sell the land to the developer in October 2022 shows that you understood the project was unpopular and didn't want to hold the applicant accountable to public sentiment. The fact that you never considered in the recirculated draft EIR the alternate project ideas provided by the community in comments to the original draft EIR means you don't care about public sentiment, but will work to give the public the perception that you do via the inclusion of the draft EJ element you are circulating now. It also implies that because the developer wants mega-warehouses to lease or sell to whomever (foreign or domestic) it wants, whenever it wants in the future, that it is their right to repurpose public land for private gain. It implies that the decision to build only warehouses here was made long ago and by approving these plans the JPA and this commission are helping to privatize public lands in a way that damages the public interest and our infrastructure but benefits the applicant and its investors financially. There is absolutely no community sentiment for building warehouses here (nor is there a need for the few temporary, low paying jobs created by these eyesores), but there is wide ranging public support for development that improves our lives and community. The applicant does not prioritize the values of the community, the protection of its citizens, or the collaboration with impacted and disadvantaged communities impacted by this project. They have a history of sanctioned negligence and their lack of accountability and accuracy is even written in the draft EIR. Residents of Riverside, Moreno Valley, Perris and unincorporated Riverside County expect the JPA to hold the developer accountable for our lives as much as it allows them to profit from this project. What lengths have you taken to do this?

RI-259.82

You do not explain this in your recirculated draft EIR. How will you hold them accountable on our behalf (a function of government)? How will you enforce your own mission identified in the General Plan, the one that protects community values, health, and history from narrowly focused and neglectful land use decisions? The economic risk here is massive; as quickly as the economy moved to demand more storage space, it has swung back just as quickly purging jobs and closing locations due to slow retail late 2023-early 2024. Once built, that space will sit as an empty concrete monument to bad government decisions and capitalism at its worst unless you demand real alternate uses for this land now.

RI-259.82 Cont.

Now on to the alternate plans that I and the community proposed in our comments to the original draft EIR: Section 1-10 of the draft EIR presents four alternative plans evaluated for the release of this document. If the JPA and developer had truly listened to the public when you met with us time-and-time again over these last two years, if you had genuinely engaged with residents of Riverside who are directly and adversely impacted by this plan as you say you will do under the draft EJ policy, then maybe one of your four alternative plans would have included development without warehouses or industrial. At the risk of being repetitive, why have you ignored this request for so long? Is it because the applicant has already paid for land with the assumption that they will be building large warehouses on it? The public expects the JPA to honor its commitment (page "v" of the General Plan) to serve as a link between community values and physical (land use) decisions. Is this line guidance or a mission statement? After 23 months of communication with the JPA, why is there no option to develop this land in a way that reflects community values and input?

RI-259.83

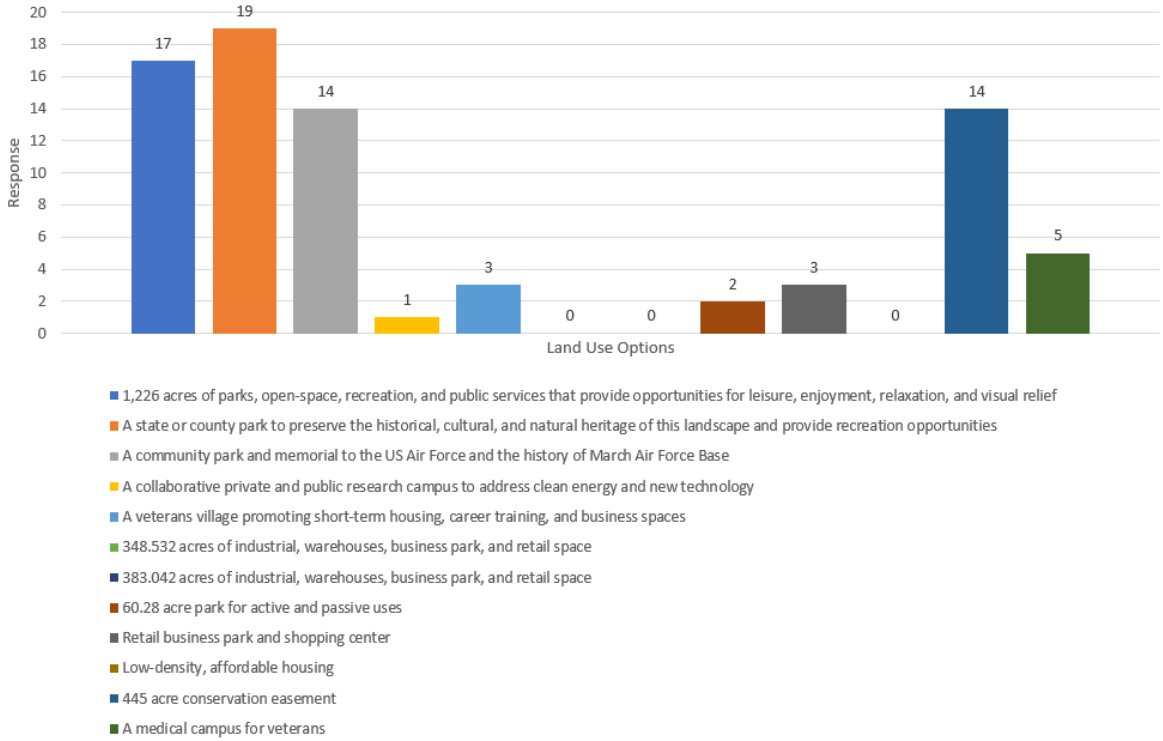
In the draft EIR, Alternate Plan 1 under consideration is titled "No Project" and under section 6.4.2 the explanation of this plan appears to be a CEQA mandated option in the EIR, primarily for comparison purposes with the main plan and the other three alternate plans. This plan can be easily dismissed as naïve and misguided, and more than once I have been accused of being the loudest of the unreasonable proponents of this alternative. Alternate plan 1 is ideal and is the right decision for this land from a residential land use and quality of life point of view. Think about it, this land has historical significance for the City and County of Riverside, and Moreno Valley and Perris communities that grew up largely because of March AFB and these weapons storage facilities. The historical and native artifacts found in the area are irreplaceable and according to Table 1-3 this project will cause significant and unavoidable damage to these American and Native American symbols of our past. Even the City of Riverside questioned your willingness to destroy a part of the local history so cavalierly. I do not believe the JPA or the applicant will do the mitigation described in your draft EIR and want to understand why (a) I should take your word in writing for it (legal action is not a suitable response), and (b) why the JPA wants to erase the history and public image of March Air Force Base before sunsetting?

RI-259.84

Prior to submitting this letter, in an act of community engagement similar to that the JPA demonstrated at the December 2023 Environmental Justice workshop, I collected responses in a

RI-259.85

"dot poll" of my own the last week of January 2024. In the poll, I asked respondents what they wanted to see done with the West Campus Upper Plateau. Here are the results of the poll:



Respondents were given three dots to place next to their top three land use objectives for the Upper Plateau. The choices presented to respondents came from the March JPA Final Reuse and General Plans, the draft EIR for the West Campus Upper Plateau, the 2012 Settlement agreement the JPA has with the Center for Biological Diversity and San Bernardino Valley Audubon Society, or from the community preferred land uses and alternate options proposed in this letter and in hundreds of responses to the original draft EIR in 2023. In this effort to listen to the community, we found that the community universally disagrees with the applicant's plans for how this land should be used and have once again demonstrated to you that they prefer non-industrial or warehouse uses for this unique piece of land in western Riverside County. 82% of respondents asked that this land be preserved as open-space for public enjoyment and relaxation, and 100% of respondents rejected industrial and warehouses on this land as proposed by the applicant and the JPA. I would imagine that if the JPA and applicant, the Parks and TAC Committee, and the Commission truly engaged with the public regarding land use decisions, you would see similar results as I did in my efforts to give the public a voice in the decision-making process as it relates to land use planning and decisions for the Upper Plateau.

RI-259.85 Cont.

The recirculated draft EIR does nothing to address universal public objection to your industrial specific plan. From the draft EIR, alternative plans 2-4 all include significant warehouse development, major and heavy demolition and construction to build these warehouses, and will

RI-259.86

still have significant impact on surrounding residents' health and quality of life. These alternate plans demonstrate that the JPA held public meetings as a matter of process and did not genuinely intend to work with the community (as required in your draft Environmental Justice policy and General Plan) to repurpose this land and build up (literally and metaphorically) the surrounding communities in a positive manner. Why is it that the mixed-use and business park elements already found with the March JPA, especially along Van Buren Blvd, are sparsely occupied, yet you pretend this new project will benefit local businesses and residents? Also, within these three alternate options, for you to tell the people that live here that the proposed plan and three of the alternative plans WILL HAVE significant and unavoidable impacts on our lives is reprehensible, especially for a government agency who says they are committed to protecting (at your discretion apparently) our lives and promoting a clean and healthy land uses.

The community has asked you in person, in writing, on the phone, virtually, and in every way we could to offer development plans that think forward, that offer jobs to our kids and to the bright engineering students and scientists graduating from UC Riverside and other area colleges, jobs and land uses that grow our community with essential services, conserving resources like water and electricity (even generating and storing that electricity), providing a place for the community to gather without congested roads and polluted landscapes: **no more warehouses**. Yet you ignored the community and you did so intentionally. Was this at the direction of your commissioners? Was it at the direction of your exclusive developer? Did the Air Force tell you it wanted more warehouses? Do you read the same reports about the economy as I do? Or are you beholden to the wishes of the applicant? You routinely claim that you cannot tell the applicant what to build, but you are wrong and the General and Final Reuse Plans tell you what your organization, the member communities, and the US Air Force envisioned for this land. By claiming that you cannot tell the applicant what projects to build, you are aiding a private, for-profit company in harming the local community, profiting off of private land, and destroying the very community your organization was tasked with rebuilding after the delisting of March AFB. You, the governmental buffer between private and public interests, chose sides and it wasn't the public you sided with, it was investors and profiteers you tied your legacy to.

RI-259.86 Cont.

To that point, when it became clear to me that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial and logistics in the original draft EIR and now in the recirculated draft EIR, I started working with concerned members of government, business, and diverse and engaged members of the community (my own form of EJ) to develop three reasonable alternatives to your plan for the Upper Plateau. Having been rejected by the JPA, the applicant, and Commission members in the past by proposing everything from a solar farm and energy storage facility to a winery (the bunkers would make great tasting rooms providing they are not radioactive which the latest information in the recirculated draft EIR does little to dismiss public concern) to mixed use residential and commercial centers, all reasonable ideas seemed to fall on predetermined and blind ears. Thus, while the alternate projects were not part of the recirculated draft EIR, it seems like a good time to once again describe and elaborate on alternate projects I presented to you a year ago. These alternate use and zoning projects have

RI-259.87 Cont.

considerable appeal to the community and with traits of realistic development opportunities for the JPA and the applicant as I express my strong objection to the specific plan and alternate plans proposed in the recirculated and draft EIR.

1. Alternate plan #1: The Campus Approach
   - *Concept*: University of California Riverside (or a consortium of colleges such as the ones Randall Lewis has an interest in and donates to) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements for active recreation, and significant open-space with a conservation easement for both active and passive recreation and enjoyment by hikers, runners, naturalists, and mountain bikers.
   - *Environmental Analysis*: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
   - *Project Objectives*: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students and research professionals develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan). I have had a few discussions with UCR about this project and have had some interest from not only researchers but also from administrative personnel. This is an opportunity for the March JPA and applicant to forge a relationship with the University of California and build a unique partnership with education and private business to develop a campus environment similar to the Jacobs Medican Center at UC San Diego, the Rockwell Center at UC Irvine, the Center for Spatial Technologies and Remote Sensing at UC Davis or the UC Davis Center for Health and the Environment, or the Lawrence Berkeley National Laboratory at UC Berkeley. This land might be a good location for a campus that houses an alliance of University of California schools and their Aerospace Studies and Engineering programs (UC Berkeley, UCLA, UC San Diego,

RI-259.87 Cont.

UC Santa Barbara, UC Irvine, UC Santa Cruz, and UC Riverside all have Aerospace programs). This might even be a good location for a central campus for the University of California Institute for Mexico and the United States (UC MEXUS). Such a project would enrich the local

- *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open-space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area, and a way for the US Air Force and March ARB to work with researchers in the Aerospace and Engineering fields. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and a unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
   - *Concept*: A veteran's village that incorporates a conservation easement and open-space and a developed park for active and passive recreations (like the Great Park in Irvine) memorializing the local history of the US Air Force, along with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices (beyond your work on the March LifeCare Campus) and services, rehab and therapy center, job training and career transition services, and a small business park.
   - *Environmental Analysis*: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
   - *Project Objectives*: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Center associated with March ARB. This alternate project is popular with the community as many members of the local community, and a few members of the JPA Commission, served in the military and believe that (a) there are not enough resources and services locally for veterans, and (b) the March JPA isn't doing enough with regards to planning and development to honor the contributions of the US Air Force.
   - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and applicant a diverse project that would provide for long-term military service-member care, a multi-use park for both active and passive recreation, and a nature

RI-259.87 Cont.

preserve protecting valuable open-space and natural resources (just as your General and Final Reuse Plans identify). This is a patriotic plan that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB. This alternate project would allow the March JPA to sunset with some honor in completing its mission, the applicant to profit from a development project that will appeal to its portfolio of investors, and to the community especially to those that served our country.

3. Alternate plan #3: The State or County Park Approach *(#1 on my informal dot poll)*
   - *Concept*: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. "Airman State Park" would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
   - *Environmental Analysis*: These public parks help revitalize communities impacted by the closure of the military bases, providing close to home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. These are all things that the March JPA General Plan and draft Environmental Justice policy strive to do with this land. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
   - *Project Objectives*: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
   - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offer residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses. And it is easily the most popular alternate plan offered here. The public is aware of and has asked for this plan as their clear first choice. In addition, community members, local government staff, and experts in their field submitted many letters and comments in response to the draft EIR and at County and March JPA historical and parks committee meetings. The weapons storage igloos alone have state and local significance because they are the only suck structures in California. They meet the California and National Register of Historic Resources criteria for preservation and the transfer of this land into a park would be very similar to the Naval Weapons Storage Area in Concord, CA. Following through with the plan as proposed in the recirculated and draft EIR would destroy the past and history of the US Air Force on this land, and prior to that the different Native American inhabitants,

RI-259.87 Cont.

rather than preserve and honor them. The March Weapons Storage Area represents a rich historical significance for Riverside County, and their preservation through a County or State Park would greatly benefit residents and the member entities of the March JPA.

My preference is clear and I have indeed spoken with the National Parks Service and the County of Riverside about making alternate plan #3 a reality. There is funding available to do this and all agencies (JPA and the four member agencies) would profit from the establishment of such a park. The JPA could engage with the National Parks Service, for example, and initiate a BRAC agreement to purchase this incredibly unique land and preserve the entire property for the very reasons identified in the 2012 Center for Biological Diversity agreement which seeks to preserve a delicate desert riparian ecosystem, preserve historic and cultural artifacts (hidden well within your draft EIR so much so that I have yet to discover them), and protect (without discretion) threatened or endangered species like the Stephen's Kangaroo Rat (they still live on this land despite your insistence in the recirculated draft EIR that their new home is elsewhere in Riverside County) and the burrowing owls located at the northern end of the property. Such an agreement would pay the JPA member agencies and immensely benefit the surrounding community by giving them recreation opportunities and serving as a buffer from the dreaded industrial sprawl that you are advancing without restraint. This solution is feasible, positive from all points of view, and something you have control over. It would serve as a compromise for all involved and would not negatively impact the airport/USAF. Unfortunately, your insistence on transferring the land to the applicant in October 2022 makes this effort more challenging and it would take some real leadership and community support to work with the County of Riverside or State of California to make the March Field State Park a reality.

RI-259.87 Cont.

Should the JPA consider any of these plans as viable solutions, I am happy to serve as a member of a community advisory board that will help facilitate, discuss, and explore how any of these plans could materialize. I am happy to also help advocate for and work to make any of these plans a reality for the JPA and my surrounding neighbors. And while the business minded persona deep inside of me would like to profit from such involvement and work, I would convince that part of me that an alternate solution to more industrial warehouses is more than enough reward for my time and hard work.

Baseline Information: Misleading and Inaccurate Data Used in Project Plan

The recirculated draft EIR, like the draft EIR, is based on inconsistent, faulty, and misleading information and data that makes doing a public review of the proposed project difficult for the average citizen like myself. These errors and faulty information provided in the recirculated and draft EIRs make for an unstable and confusing project. The information I find troublesome includes:

RI-259.88

- The health-risk assessment in revised appendix C-2 and summarized in the recirculated draft EIR applies arbitrary and incorrect methods for estimating the cumulative cancer

RI-259.89

risk. The updated document omits exhaust emissions from light-duty passenger vehicles from the health-risk assessment, inaccurately allocates construction emissions from outside the Specific Plan area, even though these emissions are closed to residential homes and sensitive receptors, applies a '1,000 foot evaluation distance' for traffic related emissions impacts which is invalid for a modeling project of this scope under CEQA, and still does not model the right number of warehouse buildings or trucks for the project, despite comments on the draft EIR about these issues.

RI-259.89 Cont.

- The March JPA consultant is making unjustifiable boundaries for a cumulative impact health-risk assessment to keep the result below the 10-in-a-million cancer risk level required by statute. This is unjustified, inaccurate, and incorrect and is a deliberate attempt to misinform the public during review and decision makers about the cumulative impacts of warehouses on the community adjacent to its projects.

RI-259.90

- The draft Environmental Justice element policies including in the Air Quality Section have no basis for validity. The community has not had the opportunity to provide formal feedback on these policies and these policies have not been adopted by the March JPA through a formal CEQA process. As such, we cannot meaningfully comment on draft policies which were not included in the formulation of a project retroactively.

RI-259.91

- The business park and mixed-use components of the project are modeled as 'Office Park' in CalEEMod. Office Park is defined as a 'office buildings and support services, such as banks, restaurants, and service stations.' This is not consistent with the industrial land use of Business Park and Mixed Use (warehouse enterprise) described in the March JPA general plan.

RI-259.92

- On page 4.2-30 of the recirculated draft EIR, while business park does include warehouse enterprise uses as an allowed use, it does not REQUIRE warehouse uses and it is a bait and switch to use 1999 assumptions that did not assume that 75% of business park uses would be warehouse uses as an excuse to upzone to industrial zoning which is far more intense. Moreover, the March JPA Development Code and updated in 2016 and 1999 General Plan was not applicable when community input was last solicited on preferred land-use patterns in from 1993-1996. Over the last two years, the community has communicated to the March JPA and applicant repeatedly in writing and verbal feedback to not upzone this parcel to industrial land-use and the MJPA is ignoring this feedback, and even recirculating the EIR while omitting community feedback.

RI-259.93

- Table 4.2-16 and Exhibit 3-B are incomplete and omit multiple warehouses, arterial truck routes, and the 215 Freeway. Your deceptive plan draws a 1,000 foot buffer around the Upper Plateau Specific Plan area, rather than the West Campus Project Site boundaries. The most minimalist interpretation of the 1,000 foot boundary is undercounted by over 4M SQ FT of warehouses. This does not appear to be a mistake rather it is a deceptive act for an applicant and entity practicing predatory land development in my backyard.

RI-259.94

- Air Quality Goals 2 and 3 in the recirculated draft EIR are inconsistent; the project is inconsistent with air quality plans because it is selecting the highest intensity use, failing to consider less intense alternatives, and has an extraordinarily high VMT/employee ratio

RI-259.95

of trips (over 12 vehicle trips per employee per day). That is not reducing VMT or GHG emissions and these goals are inconsistent with a working Environmental Justice element which the March JPA lacks presently.

RI-259.95 Cont.

- A functioning Environmental Justice element would consider the health and safety of all communities, but especially those most at risk. With this in mind, census tract 06065046700 contains at least 50 existing warehouses estimated at over 20 million square feet of cumulative space, most of which have been built in the last 6 years. Another 10 warehouses are entitled or under construction within the census tract (including the March JPA), cumulatively adding another 5 million square feet. Adding this Specific Plan would put the cumulative total within the census tract at approximately 30 million square feet cumulatively, in the 99th percentile for census tracts within Southern California counties. The predatory nature of your land use zoning and development strategy of upzoning appears to risk the health and safety of those in the surrounding communities most at risk. This seems in conflict with the basic mission of the March JPA, to strengthen the community surrounding March ARB, not destroy it.

RI-259.96

- The release of the March JPA's draft Environmental Justice plan coincides with the release of the recirculated draft EIR for the West Campus Upper Plateau project that the local community overwhelmingly rejects. It is insulting to think that while the JPA has existed since 1996, and have consistently built warehouses in communities that CalEnviroScreen 4.0 lists in the 98th and 99th percentile, the JPA chose the last days of November 2023 to amend the General Plan for an organization that sunsets in July 2025. It is farcical to think that the JPA intends to actually carry through with this ambitious plan, and as a member of an active community that opposes the land development practices of the JPA and its practices of bending the CEQA requirements of holding a full environmental review for the EJ policy prior to finalizing it, I don't believe this effort is genuine on your part. This effort is clearly in response to comment letters submitted by the community in response to the draft EIR for the West Campus Upper Plateau, and rather than engage with the community and consider the comments in these letters, the JPA is obviously assisting in the applicant's greed and desire to push through a significantly controversial project despite the very communities that this copy-paste EJ policy intends to protect and represent.

RI-259.97

- I have concerns with the process by which the JPA is going about this amendment to the General Plan, as they have already inserted in into the revised draft EIR for the West Campus Upper Plateau project being recirculated currently. The policy in its current form reads as an unimaginative cut-and-paste from the County, filled with policies that the March JPA has no ability or intention to follow through on in the 18 months it has left to exist.

RI-259.98

- Specifically, the policies that the JPA has no ability or intention of fulfilling include:
  1. The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7)

RI-259.99

2. The March JPA has no jurisdiction over the Salton Sea (policy HC 16.1)
3. The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC 16.8), and rejected community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10)
4. The March JPA won't be coordinating with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7)
5. The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13)
6. The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

RI-259.99 Cont.

- At a minimum, a proposed EJ element needs to incorporate MJPA priorities, exclude inapplicable county policies, and describe community priorities through an active (and hopefully formal) community engagement process. This copy-paste of County policy is neither Specific, Concrete, nor Targeted and it is devoid of community input. Adopting a General Plan amendment with more than a dozen policies that the MJPA has no intention of implementing is dishonest, poor governance, and a litigation risk. Incorporating the draft EJ element into a REIR as if it will be adopted without modification is also dishonest, unstable, and intentionally misleading to the public and decision makers within the March JPA.
- The project goal of providing open space amenities to serve the region is erroneous. This project will reduce open space amenities, reduce the utility of the existing open space amenities, reduce the value of the open space amenities by placing it adjacent to industrial land-uses and roads, and provide no additional open space amenities.

RI-259.100

- The project goal of completing the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue is erroneous. Barton Street and Brown Street are inconsistent with General Plan Circulation element, as is creating a truck arterial for Cactus Avenue that extends West past Camino del Oro. Such an objective is a discretionary action that requires a statement of overriding considerations by the March JPA commission. Including it as a project objective is not allowable.

RI-259.101

- The project goal of removing and redeveloping a majority of the former munitions storage area of the March AFB is inconsistent with the goals of the March JPA General and Final Reuse plans. The former munitions storage area (weapons storage area – WSA) is a significant local cultural resource. It is the only example of an Air Force WSA in the state of California. It is a primary example of cold war nuclear weapons storage. The

RI-259.102

WSA represents an area with a rich historical significance and a significant longitudinal military history exemplifying Air Force weapons storage igloos present during the cold war. They are a unique military-related munitions storage structure in the county of Riverside and state of California; no other igloos were part of the Strategic Air Command. The general plan and preferred final reuse plan both designated the WSA as a open space and specifically named it as a central feature of future designs for the area. The goal in both 1996 and 1999 was to preserve these structures. Refer to all three alternate land use plans above for how the public would like to see this area preserved.

RI-259.102 Cont.

- The recirculated draft EIR documentation is unstable, with multiple versions of maps and text descriptions of the project that are inconsistent across the EIR and its recirculated technical appendices.

RI-259.103

- Table 4.10-1 is a waste of time for public consideration as it demonstrates the level of effort and concern the March JPA has for approving an industrial project prior to sunsetting in July 2025 despite unanimous public objection (outside of the Carpenter's Union which is a private entity, not public). This table demonstrates clearly the predetermined and predatory nature of the applicant and the March JPA and is dismissive of an authentic engagement with the public or living Environmental Justice element.

RI-259.104

- The recirculated draft EIR documentation incorporates a draft Environmental Justice element of the General Plan as a key new component of multiple sections of the EIR. This is highly irregular, since neither the Technical Advisory Committee nor the MJPA commissions were briefed on the new EJ element prior to it being incorporated into the EIR. Given that community members were neither informed nor incorporated in the development of this new EJ element, it clearly does not reflect community input or vision.

RI-259.105

- The recirculated draft EIR documentation makes many references to mitigations, entitlement, permitting, and enforcement actions that the MJPA will undertake, despite the MJPA sunsetting in July 2025. These statements seem doubtful under this project as it is unlikely that the project will be completed by July 2025 and there is no indication that the County of Riverside will agree to the commitments made by the March JPA under this Specific Plan.

RI-259.106

In addition to the inconsistent and misleading baseline data used in the recirculated and draft EIR, you also have consistently included insufficient mitigation measures for the items you claim will be disruptive to this land and surrounding communities. These insufficient mitigation measures demonstrate that the applicant and the JPA adhere to minimal industry regulations and disregard how this project differs from many others built in the March JPA area because of the significantly close proximity to large residential neighborhoods, churches, schools, historical and cultural resources, and parks. I especially take exception, as a resident living with negligent warehouse mitigations from the past, to the following stated mitigation measures from the recirculated and draft EIR documents:

RI-259.107

- Technical Appendix T is a new addition to the draft EIR and it appears to be a static, 15-year-old document that applies to the March Business Center, not the West Campus Upper Plateau, and is exclusive of any current or future "responsible parties" or "monitoring agencies." This makes the inclusion of an essential project Mitigation, Monitoring and Reporting Plan in this recirculated draft EIR inconsistent and inaccurate, misleading for the public, and by stating in the recirculated draft EIR that you will incorporate and updated version of the MMRP into the final specific plan, the March JPA is intentionally excluding public involvement in mitigations for this project.
- Page 12 of Technical Appendix T, "Aesthetics," states that all project landscaping will comply with the approved landscape plan and March JPA development code. I have a couple of objections: one is that the March JPA has no history of implementing a mitigation plan to protect residents living on the perimeter of JPA developed lands, and the other is there is no accountability when the March JPA, master developer or applicant, or lot developer do not follow through with the standards of the development code (which has clearly not changed in this document since 2009). While not considered a grave impact on human life, the aesthetics of the Upper Plateau holds a significant concern for a majority of the residents of Riverside and its surrounding communities. Aesthetics is defined as a branch of philosophy concerned with the nature and appreciation of art, beauty and good taste. It has also been defined as "critical reflection on art, culture and nature". Within aesthetics, there are two main branches: one branch focuses on the appreciation of nature and natural landscapes (the Upper Plateau now), and the other branch focuses on the appreciation of human creation and in this case architecture (the Upper Plateau with warehouses on it). In the recirculated and draft EIRs, the March JPA and applicant have chosen to view aesthetics singularly in regards to human creation and the design of warehouse buildings in relationship to other warehouse building. This is a faulty assumption, though one I am sure you will justify with an obscure development code that suits your unpopular and predatory development plans. When considering the nature of aesthetics, people contemplate and define the ideas of beauty and value to the natural or human made objects they are examining, and for you to assume in the recirculated draft EIR that your definition for aesthetics on this land is the one that the public will support is selfish for a government organization and land use authority working on behalf of the public. Your sections on aesthetics in the draft EIR are written by and for the same audience, a for-profit business and is entirely dismissive of how residents and visitors to the Upper Plateau find beauty and value in this land outside of profit incentives. Your consideration of aesthetics without genuine engagement with the public is unfairly biased toward those who stand to profit financially from this project and not toward those who must live with it after the developer and the March JPA have left the area. They are dismissive of the public and make a mockery of the forced draft Environmental Justice element included in this draft EIR. The draft EIR's consideration of aesthetics is decidedly one-sided and communicates a clear anti-community message to residents living near the Upper Plateau. Was this your intention? Will the JPA and the

RI-259.108

RI-259.109

developer sanction a project that ignores the aesthetic appreciation of people who live her just so the applicant can meet the demands of its hedge-fund and non-local investors? How is this adhering to the spirit and guidance of the March ARB General Plan developed in the late 1990s? RI-259.109 Cont.

- Specifically in the recirculated draft EIR, I find these mitigations to be dismissive of local residents and of people recreating in the open-space surrounding the project area:
    - Pages 4.2-45-50, Section 4.2.7 Mitigation Measures-AQ1: where will this information be publicly posted and maintained for the duration of the project? RI-259.110 Who will hold the applicant accountable for maintaining the most current mitigations for this pollution? AQ2: "Active disturbance" contributes significantly to poor air quality, especially surrounding a large construction site. Why have you chosen to exclude its impact in your projections and this recirculated draft EIR? RI-259.111 What mitigations will be provided for residents and recreationalists during construction regarding the significant impacts of blasting and grading to the air quality? RI-259.112 AQ3 and AQ5: who is responsible for ensuring that the applicant adheres to these items, especially since the March JPA sunsets in July 2025 and this project would still be working through the demo phases? RI-259.113 AQ6: evidence of compliance with LEED standards is an ongoing process, as I understand it. With the March JPA sunsetting in July 2025, who will ensure that the occupants of these buildings maintain the LEED standards for certification over time? Presumably, the applicant will also be long gone and will leave honest business owners to protect the health and safety of residents surrounding this area. RI-259.114 AQ8: while requiring the inclusion of electrical hookups and compatibility with Smartway trucks is a nice feature, there is no requirement that the occupants use them and the March JPA has established no long-term climate plan to ensure that businesses surrounding the March ARB need to work to eliminate hazardous pollutants caused by warehouses and trucks. RI-259.115 AQ9: while it is good to have a place for workers to relax at a warehouse, truck drivers often do so in the cab of their truck. Why is there no requirement for enforcement of idling or illegally parked trucks on all surrounding streets in these mitigation factors? If there is negative incentive to use the lounge area, workers are not likely to use it. RI-259.116 AQ14: the maintenance crews for existing March JPA warehouses do not currently use electric or battery powered equipment for landscaping maintenance so why would the public or decision makers believe they will do so once this project is complete, especially since the March JPA will sunset in July 2025? RI-259.117 AQ16-19: who is responsible for ensuring that the applicant adheres to these items, especially since the March JPA sunsets in July 2025 and this project would still be working through the demo phases? RI-259.118 AQ20: the JPA's emission objectives addition is once again nice but the language in the plan states that "occupants are encouraged" to comply and since the JPA will sunset in July 2025 there is no way it can mitigate or monitor businesses who do not comply. RI-259.119 AQ21-27: who is

responsible for ensuring that the applicant or occupant adheres to these items, especially since the March JPA sunsets in July 2025 and this project would still be working through the demo phases?

- Pages 4.8-40-41, Section 4.8.6 Mitigation Measures-HAZ1: If this project does not begin demolition prior to the March JPA sunsetting in July 2025, what assurances and procedures exist that the County of Riverside will be able to adhere to these same findings and mitigations, or that during the time between now and the time demolition begins that future hazardous materials will be done should there be evidence or a need to study if other non-tested materials are present in the project area? FIRE1: Mitigation measures for fire in the March JPA area, especially the open-space, is lacking. In the spring of 2023, I sent several emails to the Director of the March JPA about removing overgrown brush near homes and it took her more than a month to do anything about it. She had many excuses for why it took so long, but in reality, the March JPA doesn't have the resources to manage a mitigation plan and because of this lack of planning and staffing, and the fact that the JPA will sunset in July 2025, I find these mitigations insufficient and negligent by the March JPA. Were a fire to start in this area and home get damaged, the March JPA would have significant legal exposure.
- Page 4.10-73, Section 4.10.5 Mitigation Measures CUM: the unavoidable impacts identified in this section are more avoidable if the applicant and the March JPA were to propose an alternate land use plan that excluded industrial zoning entirely and focused on true business park and open-space designs. The fact that the March JPA is considering and willing to negatively impact the lives of residents surrounding this project site is unacceptable. Furthermore, the less than significant impacts identified via mitigations in this text, like the discussion on aesthetics above, is dubious for the public because your use of development standards and codes does not always reflect the impact a project will have on people living near a project site like the West Campus Upper Plateau. Your insistence that the mitigations provided will minimize the impact on our lives is arrogant, selfish, and demonstrates the predatory nature of the applicant and this Specific Plan.
- Page 4.10-73, Section 4.10.6 Levels of Significance After Mitigation: The proposed mitigations surrounding the open space amenities described in the recirculated and draft EIR is erroneous. This project will reduce open space amenities, reduce the utility of the existing open space amenities, reduce the value of the open space amenities by placing it adjacent to industrial land-uses and roads, and provide no additional open space amenities. It will result in conflicts with existing applicable land use policies adopted for the purpose of avoiding or mitigating an environmental effect. In spite of your proposed mitigation, the proposed project would result in significant impacts for residents and recreationalists, especially during the demolition and construction phases.

- Page 12 of the Technical Appendix T, "Noise," lists seven MMRP elements and living near warehouses built by the JPA and applicant I can report that the March JPA, Master

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RI-259.120

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RI-259.124

Developer, Lot Developer, and Contractors responsible for mitigation and monitoring do not follow through with the development standards and code established prior to project approval. Acoustic analysis, especially that in surrounding neighborhoods, were and are not performed and therefore no mitigation exists for noise caused by trucks and warehouse operations today along Meridian Parkway. During construction phases, equipment and procedures did not sufficiently mitigate noise and my attempts to contact the Lot Developer, Contractors, Master Developer, or the March JPA to address noise concerns typically resulted in no response or a thank you for contacting us message but no mitigation or change in noise levels caused by construction. There is no separation between current buildings and residents and the proposed mitigation of trees to block the sound have in five or more years never grown and therefore do not mitigate the noise from trucks and warehouses and cannot be considered part of an active MMRP plan for this specific plan as indicated you plan to do on page 3-12 of the recirculated draft EIR.

RI-259.124 Cont.

It is difficult to imagine how the recirculated and draft EIR comply with CEQA and common sense (maybe the two are incompatible) without considering the cumulative impact the specific plan would have on the region. The draft EIR fails to consider the cumulative impacts the specific plan would have on traffic, air, light and noise pollution, housing, and use of resources and infrastructure like water, gas, and electricity and roadways and law enforcement regionally. In many cases, the recirculated and draft EIRs make use of multiple and outdated datasets (biological, traffic, air quality, jobs data) to form its findings and justification for moving forward with this project. In some cases, this data is a preference of the JPA and the applicant because it helps you make your point or it justifies your vision for the project. But in other cases, you have mistakenly or purposefully used multiple, dated, or inaccurate studies and data in the EIR and the inconsistencies raised by old or incompatible data and reports is misleading to the public and done so in a predatory manner. Again, the later environmental review process begins, the more bureaucratic and financial momentum there is behind a proposed project, thus providing a strong incentive for applicants and land use authorities to ignore environmental concerns that could be dealt with more easily at an early stage of the project.

RI-259.125

Even a year after the publication of the original draft EIR, all of the presentations and reports I have seen published by the JPA related to this project name jobs as the primary justification for building industrial on the Upper Plateau. It has been an ever-present and leading comment by the Director of the March JPA and the applicant in public meetings or briefings for two years: this project will provide jobs for local residents but there is little evidence that these jobs will be the ones the March JPA intends or has touted for the last two years. There are many, many problems with this argument, again your primary argument for building industrial warehouses on the West Campus Upper Plateau. This justification just doesn't hold up to further scrutiny and the public is still waiting for a sensible explanation as to why this is the right project, at the right time, for the West Campus Upper Plateau. Maybe you will answer this question one day.

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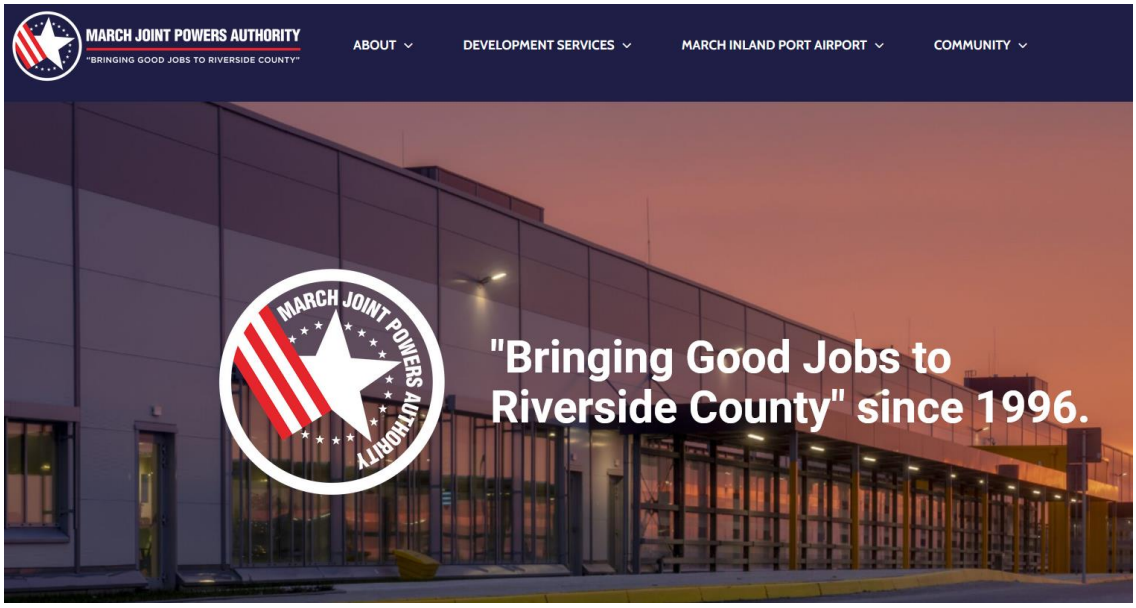
Your continued insistence that this project is a jobs creator is misleading to the public. Even today, your website advertises the misleading promise of “good job” in the image below.



Yet this image is not of building where hard-working, educated people earn an honest living. It is an image of logistics sprawl that has infected the Inland Empire of the last 20 years. The reason that buildings like this are the face of your organization is because you are preying on the uneducated and low-income residents and promoting low-quality jobs and predatory land use practices for Riverside County. Of all the zoning uses you could have used for the face of your organization, you chose logistics, industrial, warehouses. The March JPA General Plan and Final Reuse Plan identify a more balanced land use for the once public lands occupied by the US Air Force. Why did you choose this image? What is it this image communicates to you? Why is it you cannot put yourself in the shoes of the residents of Riverside, Moreno Valley, Perris and unincorporated Riverside County and develop this land to help them live better lives? If you could, you would see that this image communicates a message of greed, corporatism, and survival of the richest instead of building up a community negatively impacted by the reclassification of the March ARB. If you could stand in the shoes of residents, you would understand how this image is evidence that you, the March JPA, are beholden to a profit-driven agenda and business, not the citizenry you are tasked with protecting and helping.

Publicly available data from city, county, and federal jobs reports indicate that there are not enough unemployed people in the local area to fill the number of jobs that the logistics industry claims they are creating. Let’s look at the population in western Riverside County for example; there are approximately 646,000 residents (approximately Riverside 325,000, Moreno Valley, 219,000, Perris 82,000, and Mead Valley 20,000). Based on the most 2023 employment statistics for the area, it is safe to estimate approximately 305,000 employed working-age people and

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15,250 unemployed (based on the 5% unemployment rate). Even adding in residents from unincorporated areas like Woodcrest, Nuevo, and Sun City, there is nowhere near enough capacity for the jobs the industrial sector is claiming. The World Logistics Center in Moreno Valley is supposed to generate 35,000 jobs. Stoneridge Commerce Center is will generate 10,000 or more jobs. There's no way this region can add 45,000 jobs in just warehouses locally. Even if everyone who turned 18 decided to work in warehouses for 10 straight years, the data just doesn't add up. And with college enrollment beginning to rise again after COVID, it is unreasonable to believe that there will be enough local residents who will be willing to work for low paying wages and still be able to afford the cost of living in western Riverside County.

RI-259.126 Cont.

I'd like you to explain to me how graduates of local colleges like UC Riverside, Cal Baptist University, California State University San Bernardino, University of Redlands, and the community colleges in Riverside, San Bernardino, San Jacinto, Moreno Valley, and Yucaipa will find employment in the industrial sector and at these warehouses? If this area is to keep growing, it will require high paying jobs in the medical, technology, and energy sectors in order to keep the next generation of educated citizens an income that allows them to live in western Riverside County. Please explain in detail how this plan helps employ college educated workers. And if there is no explanation, please revise your jobs argument and projections for this plan or propose an alternate plan that meets the goals identified above in this letter.

RI-259.127

The majority of warehouse jobs are low-wage and temporary work with reduced hours, and workers cannot afford to live in the local area. Per Indeed.com, the average annual salary of a warehouse associate in Riverside, CA is $35,064 or $17.00 per hour. Even if one assumes that a resident is fortunate enough to find a warehouse job that provides 40 hours a week for 12 months out of the year, a rare find in this industry where workers average is less than 30 hours a week right now, a person could not afford to live in the local area. Rather than living close to where these warehouse workers live, as indicated in the recirculated and draft EIRs in multiple locations, warehouse workers at the Upper Plateau would have a considerable commute to earn their low wages. In fact, according to rentdata.org, the fair market rent for a 1-bedroom apartment in the 92508-zip code is $1972/per month. As of January 2024, the median home price for the zip code 92508 is $830,617. Even if a warehouse associate were to find a rare steady, full-time job, they would have to pay an unsustainable amount of their paycheck to rent alone. These jobs you insist are the primary reason for building only industrial on the Upper Plateau simply cannot support the lives of people who live within a 30–40-mile radius of these buildings. These jobs cannot and will not serve the local residents. They will increase traffic on the 215, 60, and 91 freeways and local arterial roads, and they will not return the economic boon that you are projecting in your justification for more industrial buildings on the Upper Plateau. Your findings on the impact on housing for the project is faulty, inaccurate, and misleading to the public. This project needs a more detailed and realistic study on housing for these low paying warehouse jobs and low-income warehouse employees. Why did you not provide it with the draft EIR?

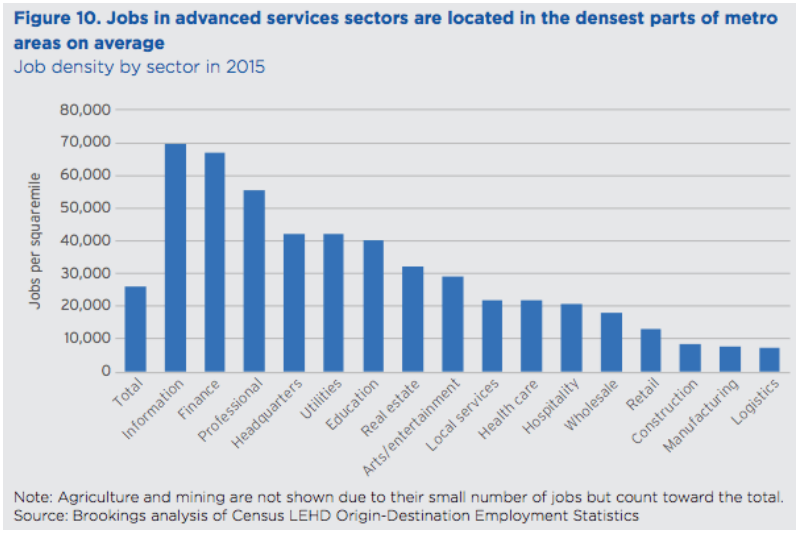
RI-259.128

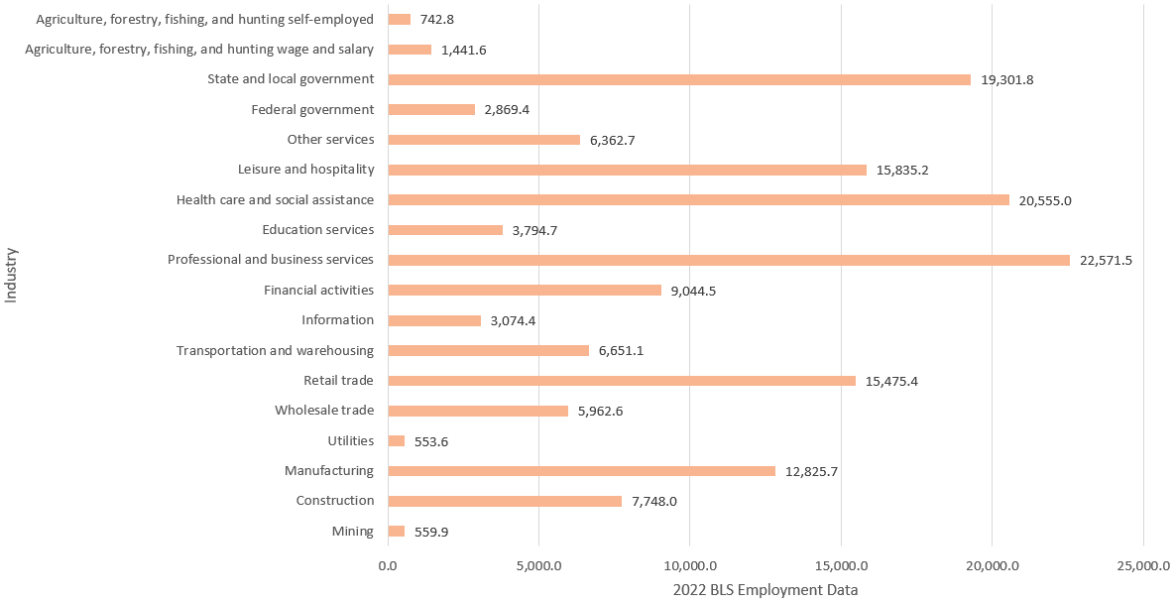
In fact, the logistics industry has actually weakened the economic outlook of our region overall. According to the SCAG December 2022 economic outlook report, "In 2001, GDP per capita in Riverside County and San Bernardino County were 64 percent and 69 percent of U.S. per capita GDP, respectively. When compared to the Rest of California, the ratios are worse: 52 percent and 56 percent. Moreover, by 2022, Riverside County's position had deteriorated to a per capita GDP of only 59 percent of the U.S. level and 40 percent of California. San Bernardino County was at least able to improve to 71 percent of the U.S. level, but still fell to 48 percent of the rest of California level. These numbers are alarming, especially given the success of the Logistics Industry. They imply that the impressive job growth in the Inland Empire since 2001 resulted in numerous jobs, but they tend to be relatively lower paying jobs compared to other parts of the state and nation. This explains, in part, why such a large number of workers prefer to commute into the coastal areas, despite the heavy cost involved in terms of time lost on the road. It also explains why the Inland Empire's per capita GDP has sunk to a rank of 340 out of 386 MSAs, despite being the twelfth largest by population count." More than anything, the draft EIR lacks a detailed analysis of why the JPA insists on contributing to the economic downfall of its member organizations. Why do the cities of Riverside, Moreno Valley, and Perris want to support low-income jobs and residents? What social infrastructure exists for employees who do not have access to affordable healthcare because they only work on a part-time basis? Why has the JPA not included this as a consideration of impacts for the surrounding communities? Any approval of the plan as presented simply ignores the needs of disadvantaged communities and seems to ignore the facts of what really is happening in the current warehouses located within the JPA's territory today.

RI-259.129 Cont.

The continued insistence for only industrial and logistics jobs and buildings in western Riverside County is a slide backwards economically and socially. Some may argue it is a form of social and economic injustice. By forcing a specific industry or employer on people who live in an area, you are forcing young people to decide to live in the community they grew up in, near family and friends they love and value, and work in jobs that disregard their quality of life, negatively affect their health and mental wellbeing, and limit their potential income levels, or move out of the region to find better quality of life and employment opportunities. Most valid and widely accepted studies show that industrial is the worst land use possible when it comes to job generation. Warehouses provide 0.000212 jobs per square foot and are the lowest economic jobs density of any professional category. It is literally the worst job creator per unit of land there is.

The charts provided below compare employment data from 2015 and 2022 and the news isn't great for warehouses and logistics. Everyone from the Mayor and City of Managers of Riverside and Moreno Valley to the current and prospective County Supervisors are on record saying that the warehouse sector is not where they envision job growth happening locally going forward. The advances in technology and efficiencies gained through automation have only reduced the number of warehouse workers inside of buildings today.





In the graph provided below, from the U.S. Bureau of Labor Statistics, you can see that transportation and warehousing jobs show very low growth only ahead of Private Education and Health and Utilities. And not only is this sector of jobs in America not growing, the total number of jobs shows marginal growth, in other words, not enough growth to develop spec-warehouses in the middle of a neighborhood or destroy one of a kind historical, cultural, natural, and community resources for. The data does not explain why the project proposed in both the recirculated and draft EIR is the right project for this land at this time. Once again, the answer comes right off your own webpage: your entity and sole-source contractor have upzoned land uses and are practicing predatory planning and development to satisfy their profit-driven investors, NOT to provide much needed jobs to a community in need.

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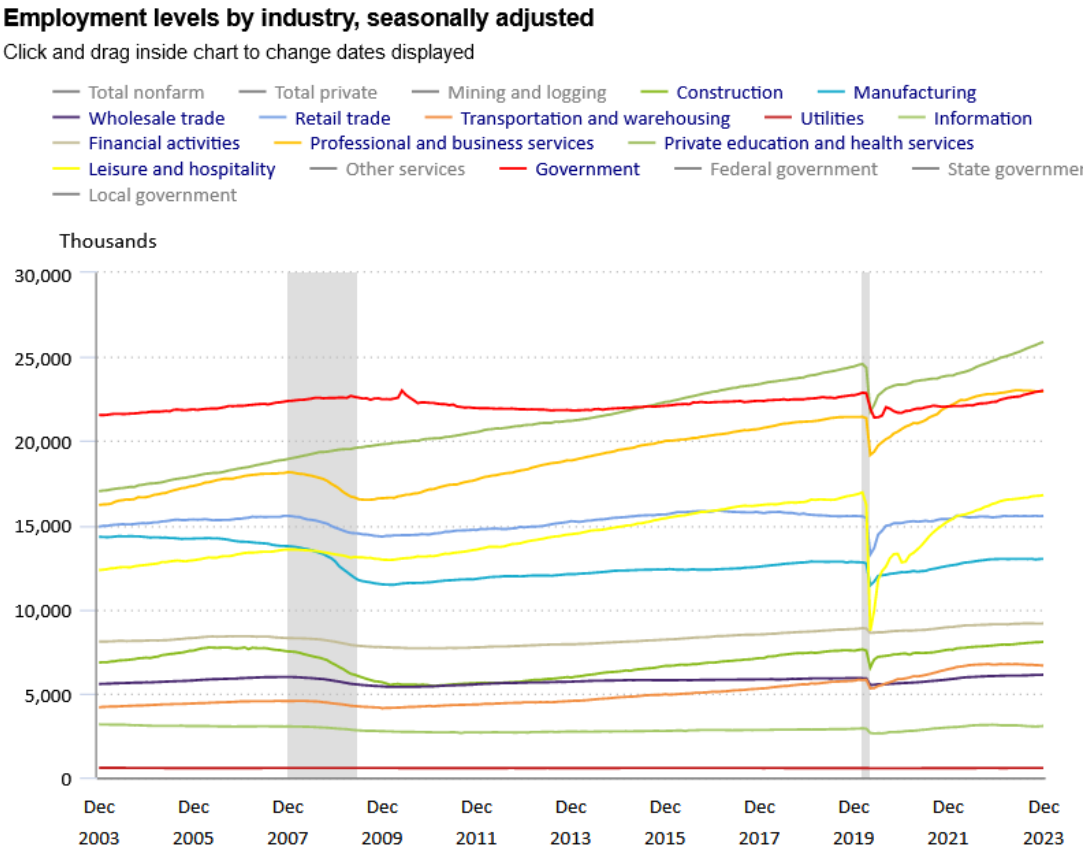

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Advances in automation may lead to mass unemployment if we overinvest in this industry. According to the December 2022 SCAG report, "Over the long-run, Logistics will likely go through a transformation as advances in automation and artificial intelligence displace workers. This means that the industry may continue to thrive, but it may not support the same number of workers as it presently does. In turn, the region must look to other industries as sources of employment and output growth. There will be further costs from the expansion of the Logistics Sector if the result of the expansion means that there will be less industrial space available in the future for industries which are able to add more value to the economy per square foot." What evidence have you provided in the recirculated and draft EIR that refutes this report? What evidence does your plan provide that this project will provide high paying jobs related to the coming of advanced automation and technology in the logistic sector? Your mitigations do not deal with the loss to automation of the very few jobs that you say this project will create. What mitigations do you offer the public in the event of a down or changed economy as consumed by e-commerce as it was in 2019? There are few easy answers here and it is likely that the JPA is gambling that these buildings can be completed before people abandon e-commerce trends that rose so swiftly during the monumental changes in life due to COVID-19, and as evidence of a slow December for retailers emerges, your decisions look even more predatory and foolish.

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For these reasons related to jobs, I urge the March JPA to think harder before making the jobs argument for the West Campus Upper Plateau. We do not want or need, nor can we support, 2,600 more warehouse jobs in this region. We are already oversaturated with the logistics industry and need to think more creatively about land uses so that it benefits the local region and doesn't simply line the pockets of developers.

RI-259.131 Cont.

Another area where the recirculated draft EIR does not sufficiently address the public's concern for your contempt for the land that this project is proposed to destroy. As a member of the community, I am disappointed that none of the alternative development plans in the recirculated and draft EIR consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for two years now. The JPA's General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." The 2012 agreement with the Center for Biological Diversity and San Bernardino Valley Audubon Society (S.D. Cal No. 09-cv-1864-JAH-POR) in fact prohibits industrial land use surrounding the conservation easement.

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Under the Terms of the 2012 settlement agreement, item B Defendant-Intervenors' Obligations, subitem 1a on page 4, the agreement establishes, "That any currently existing service roads within the Conservation Areas…can continued to be utilized by the public for passive recreation." Subitem 1b on page 4 refines this to say that public access these roads can be restricted if the land management agency deems the access a threat to "conservation value or public safety." Yet draft EIR Figures 3-2, 3-3, 3-4, and 3-5 (Site Plan) clearly show a plan that will infringe on and limit public access to existing trails and roadways in the Upper Plateau area. You are in all likelihood aware of this requirement and believe that your plan adequately complies with the terms of the settlement agreement, but I fail to understand how. The construction of Cactus alone will not destroy several hiking and biking trails in the area frequently used by the public for active and passive recreation. The large-scale demolition needed to level grades associated with roadways and building foundations will clearly impair access to these trails and roads and may eliminate some of them entirely. I like walking in this area, hiking into places that make me feel like I am somewhere outside of civilization. These trails that I and many residents enjoy hiking on will be destroyed by the construction. How is this not in violation of the 2012 agreement that quite clearly calls for maintaining existing roads and trails? I hope subitems 2 and 3a are not the answer to my questions here as they seem subjectively contrary to the idea of conservation and to the items identified in 1a and 1b.

RI-259.135

Active recreation refers to a structured individual or team activity that requires the use of special facilities, courses, fields, or equipment. Passive recreation refers to recreational activities that do not require prepared facilities like sports fields or pavilions. Passive recreational activities place minimal stress on a site's resources; as a result, they can provide ecosystem service benefits and are highly compatible with natural resource protection. While active and passive recreation

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typically refer to different types of activities, both types of activities can be located together effectively. In some cases, as is true with the hiking and biking trails found in the open-space of the Upper Plateau and through the conservation easement north of Van Buren and west of Meridian Parkway, the line between active or organized recreation and passive or individual recreation is blurred, and the March JPA and applicant seemingly do not care to understand the community value of this land because it interferes with your profit-driven development plan.

The U.S. EPA defines running, hiking, and biking as passive recreation but in the case of spaces like the Upper Plateau, organized groups like high school and club cross-country and mountain biking teams, and trail running groups like Riverside Road Runners and the Inland Empire Running Club regularly use the trails to train for competitions and compete in organized events on community created trails that offer participants technical challenges as well as uninterrupted open-space to help improve the condition of all athletes and competitors. Your rigid use of the terms active and passive recreation spaced is based on the EPA definitions but residents and visitors to the area clearly view the Upper Plateau as a space with an ideal mix of infrastructure, maintenance, material and environmental alterations, and accessibility to use by younger and older recreationalists. When the March JPA and applicant propose a plan that separates and compartmentalizes the land in such a contemptuous way, you demonstrate a clear misunderstanding and disregard for how the public uses and appreciates the uniqueness of this land in western Riverside County, especially one home to diverse flora, fauna, and historical significance. If approved, this project will destroy a valuable community and natural resource.

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Partnerships can play an important role in turning repurposed land dreams into reality. Many federal agencies regularly work with local government organizations and groups to share responsibility, experience, and resources to help get an active or passive recreational reuse area off the ground. Partnerships may occur, for example, between EPA or the National Parks Service and states, tribes, other federal agencies, local governments, communities, land owners, lenders, developers, and potentially responsible parties. As suggested in the alternate land use plans preferred by residents, the community is asking the March JPA to focus more on open-space and a real mix of active and passive recreation opportunities. Had the applicant listened to the community, had the March JPA a functioning EJ policy that values public input, maybe you would have engaged with private groups like FivePoint Holdings, the City of Irvine, and the Great Park Corporation who have worked to help fund and develop the Irvine Great Park, or MassDevelopment Group who worked with the State of Massachusetts and local government groups to redevelop Fort Devens, the U.S. Army's New England headquarters. This project is especially interesting to opponents of the March JPA and applicant's Specific Plan because the partnership established the Devens Enterprise Commission, a new form of municipal government similar to the March JPA Commission and they recognized that the only chance for economic recovery lay in recognizing the opportunity to define the economic future of the area and rigorously engage with the public in decision making steps. The power and authority to collaborate with the public in development decisions like at Fort Devens has always been available to the March JPA and the Commission. Precedence exists as a model for successful

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partnership yet the March JPA and the applicant refuse to be a part of a partnership with the public, rather you are allowing a private, for-profit entity to define quality of life and the local economy for western Riverside County. Please explain to the public your disregard and indifference for precedence both in California and across the country regarding developing public lands in conjunction with the public.

RI-259.137 Cont.

Lastly, the recirculated draft EIR does not address the status, plans for, obligations, and consequences of funded and unfunded liabilities. The recirculated and draft EIR documentation is unstable, with multiple versions of maps and text descriptions of the project that are inconsistent across the REIR and its recirculated technical appendices. Second, the recirculated and draft EIR incorporates a draft Environmental Justice (EJ) element of the General Plan as a key new component of multiple sections of the recirculated and draft EIR. This is highly irregular, since neither the Technical Advisory Committee nor the March JPA commissions were briefed on the new EJ element prior to it being incorporated into the recirculated and draft EIR.

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Given that community members were neither informed nor incorporated in the development of this new EJ element, it clearly does not reflect community input or vision. Finally, the recirculated and draft EIR make many references to mitigations, entitlement, permitting, and enforcement actions that the recirculated and draft EIR will undertake, despite the March JPA sunsetting in July 2025. The County of Riverside will be the responsible agency for almost every oversight role, given that the project cannot conceivably break ground in 2024 and will almost certainly be delayed well into 2025. However, the recirculated and draft EIR does not mention the sunset of the March JPA nor the change in its oversight role, nor the inherent instability created by switching agencies responsible for oversight as a result of the sunsetting of the March JPA. As a result, there appears to be no consultation or cooperation with the future County agencies that will be responsible for this project, should it be approved. This makes the future mitigation and enforcement actions unstable, questionable, and possibly unenforceable. As noted, the recirculated and draft EIR documentation is unstable in multiple ways, with multiple versions of project site, construction boundaries, and specific plans that are inconsistent in important ways for evaluating the impact of the project on the environment. Moreover, the new draft EJ element and the sunsetting of the March JPA make the stability of the General Plan consistency and the oversight and enforcement agency confusing and irregular.

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Instabilities within the document include:

1. Project site and boundary maps: confusing and inconsistent portrayals in provided maps of the project site and construction boundaries.
2. The draft Environmental Justice element found in both the recirculated draft EIR and the March JPA website has many confusing statements, irrelevant goals as identified in this comment letter.
3. The nature and terms of March JPA's sunsetting July 1, 2025 is unclear, fluid, and clearly being influenced by political means rather than community centered goals.

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4. The Omission of the 2003 CAREE/CCAEJ Settlement Agreement that outlines unfunded liabilities and obligations that the March JPA to date have failed to address or pay for.
5. The unfunded and unrealized public park, police sub-station, and fire department station as required by settlement agreement.
6. The lack of increased job opportunities for local residents.
7. Provision of open space and amenities to serve the region (western Riverside County).
8. The completion of roadway infrastructure buildout.
9. The preservation of ecological, cultural, and historically significant areas surrounding the March ARB.
10. Provision and encouragement of public, pedestrian, and bicycle transportation for residents.

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Throughout this letter, I have documented that this Project is unstable. The recirculated and draft EIR documentation remains inconsistent and unstable in terms of what the 'Project' is and where it will occur and how that impacts the residents adjacent to it. The recirculated and draft EIR has been revised to include a draft EJ element provided to the developer and environmental consultants to 'assess consistency' for the purpose of addressing CEQA deficiencies, but not provided or even revealed to community members within the March JPA planning area or the members of the public who commented on the CEQA deficiency. Finally, the March JPA will not be the Lead Agency responsible for carrying out the project; the March JPA has an expiration date of June 30, 2025 while the development agreement is for a minimum of 15 years with two optional 5-year extensions. It is not comprehensible to call the March JPA the Lead Agency when it will not exist during the development of the project. The recirculated and draft EIR inconsistencies, amendments to the General Plan, and even the Lead Agency make this project documentation completely unstable and preclude giving the public a meaningful opportunity to comment on the project.

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As I have already established, it is disturbing for all who live in the communities surrounding the March JPA developed lands that you are clearly cherry-picking guidelines, policies, and regulations to suit the greedy goals of your applicant and its private investors. Information developed as part of the CEQA process should influence the development of general plan policies (and specific plan amendments). CEQA should not just be a post hoc rationalization of decisions that have already been made, and this is exactly what your recirculated and draft EIR for the West Campus Upper Plateau have presented for us for public comment. The later environmental review process begins, the more bureaucratic and financial momentum there is behind a proposed project, thus providing a strong incentive for applicants and land use authorities to ignore environmental concerns that could be dealt with more easily at an early stage of the project. I once again ask that the March JPA imposes a moratorium in industrial and warehouse projects and plans until the County of Riverside assumes land use authority for the remaining areas to be developed surrounding the March ARB. I also remind you that I am happy to serve on a community advisory board to help the March JPA and County develop land use plans that will benefit the residents of western Riverside County.

RI-259.155

The EIR contains some mixed messaging (at best) on jobs for sure, but the end result is this is not an overwhelming driving reason to build warehouses on the Upper Plateau. This argument by the JPA and developer is misleading and is not supported by data on your local agency websites. Please explain how the low quality and temporary jobs this project would provide will employ residents (as stated multiple times by the draft EIR). Western Riverside County cries out for jobs that can support the cost of living in this region and warehouse jobs cannot do this. How is this a primary reason to approve this project? If job creation is a primary driving factor for this project, why hasn't the developer and the JPA created a land use plan that focuses on jobs for residents of western Riverside County? There must be a better use for this special piece of land, one that the Air Force, residents and visitors, local municipalities, lawyers and lawmakers, and the JPA and the applicant can all support. Are you ready to do your part?

RI-259.156

Conclusion: Wrap Up Your Legacy as a Land Use Authority

The project as described in the recirculated draft Environmental Impact Report for the West Campus Upper Plateau is full of clear and obvious errors, omissions, misrepresentations, and discrepancies. The project is poorly planned, lacks a clear business need for the region, and not only ignores community preference and engagement, it actively excludes any involvement from residents of the communities surrounding the March ARB.

RI-259.157

As time passes, local and national media outlets, regional business and investment groups, and the entirety of the logistics industry food chain has realized that the need for additional warehouse space in Orange, Los Angeles, Riverside, and San Bernardino Counties is diminishing. This is because the economy of 2024 is looking more and more like the U.S. economy of 20 years ago. Throughout the nation, retailers and their suppliers have been slashing their inventories, and now these same businesses are cutting back the need for storage space.

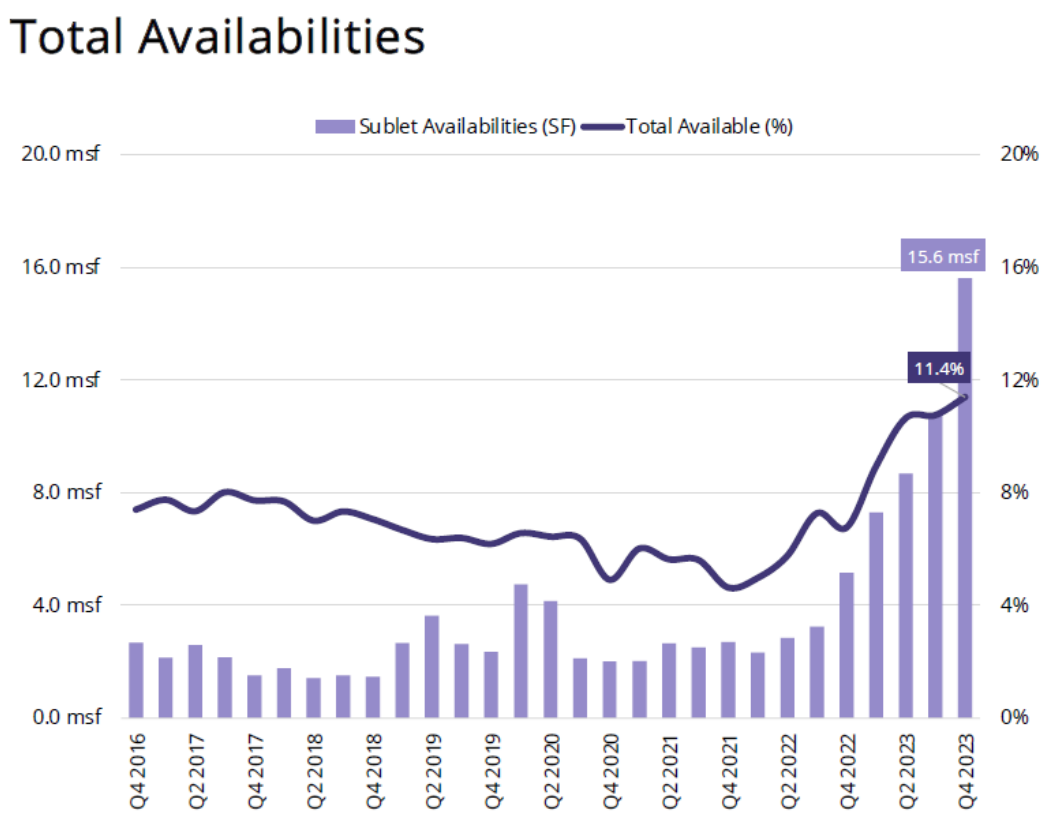
A once-booming U.S. warehousing market is coping with signs of contraction as businesses consolidate warehouses and, in some cases, upgrade existing sites rather than add facilities. The shift comes as retailers have turned the corner on a big drawdown of inventories and are working to align their supply chains for more normal, pre-pandemic stocking and consumer spending patterns. Major retail businesses are closing warehouses or upgrading existing facilities rather than leasing or opening new sites, and we are only at the beginning for this two-five-year trend of balancing inventories with the space needed to store them.

RI-259.158

This turnabout comes as more manufacturers and retailers are returning to a leaner inventory management strategy that had given way to greater stockpiling during the pandemic, as companies sought to build so-called buffer stock amid product shortages and widespread supply chain disruptions. More and more today, many warehouse businesses are now subleasing space they had added during the pandemic based on projections that didn't come to fruition post-pandemic. The speculative development model of the past, one that fueled rapid land use

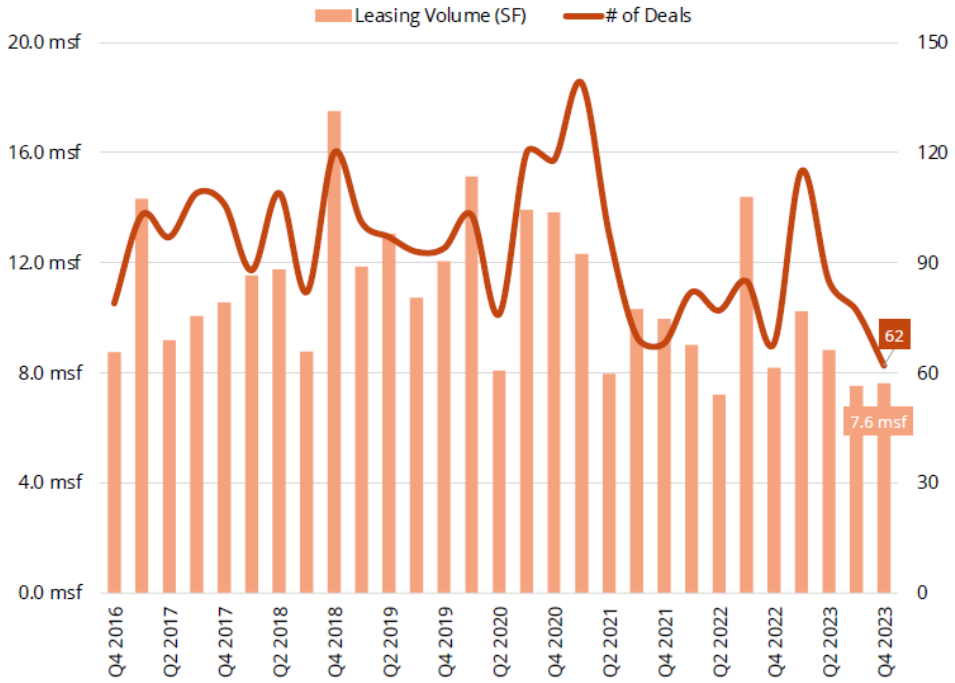
rezoning in not only the Inland Empire, but more specifically gave the March JPA an excuse to upzone land uses from the Final Reuse plan to be more industrial focused. This speculative development practice might have been a safe bet for investors and land use authorities, but today it is a risky proposition. Many companies are now consolidating warehouses and upgrading to newer buildings that can accommodate more automation and require less labor. The lifespan of spec-warehouse development has ended, yet the March JPA and its greedy applicant insist on pretending it still lives in western Riverside County.

The following graphs illustrate just how quickly the need for MORE warehouses, and specifically the developments being proposed for the West Campus Upper Plateau area, can turn from boom to bust.



RI-259.158 Cont.

Leasing Activity



Inland Empire Industrial development pipeline

272 properties

97 under construction
175 proposed

151.9 million sf

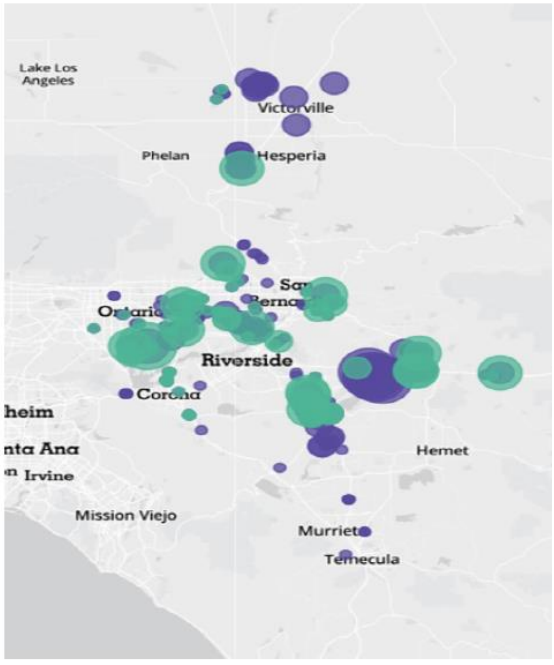
28.4 million sf under construction
123.5 million sf proposed

Major developments

1363 Merrill Ave – 1.5 million sf

I-15 Logistics Center - 1.2 million sf

Eucalyptus & Euclid - 1.1 million sf (Pre-leased) – Home Depot

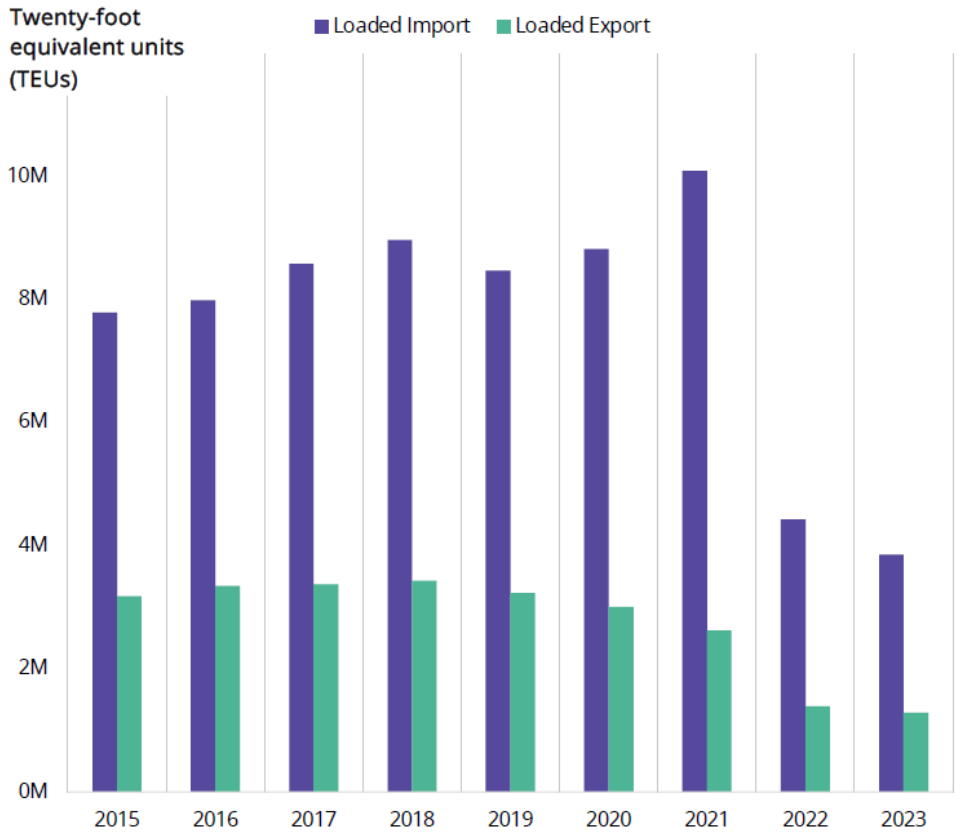


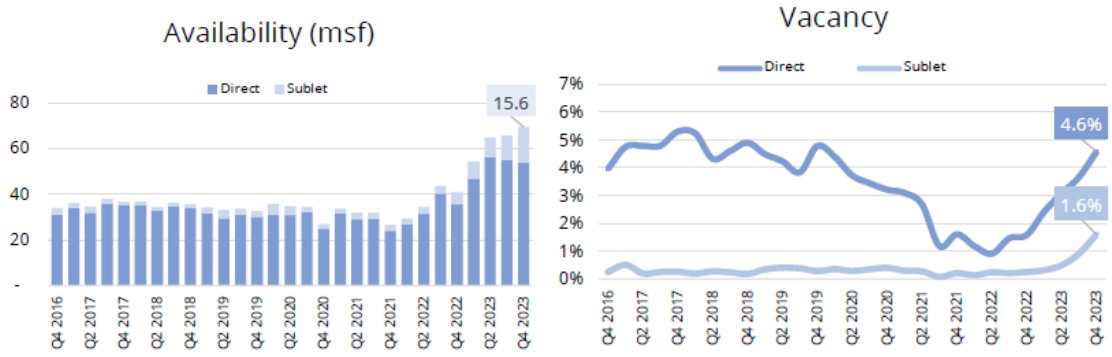
Under Construction

Proposed Development

*Survey consists of industrial buildings greater than 50,000 sf.

RI-259.158
Cont.





The growth of the logistics industry leading up to and during the pandemic exacerbated environmental concerns in communities, especially within Environmental Justice Tracks like those found within the March JPA, with some of the least-healthful air in the United States. And analysts say too many households in the area are struggling to make ends meet as earnings from the part-time and low-paying jobs found in the logistics and warehouse industry have not kept up with rising costs adding to the already vulnerable quality of life for many residents.

RI-259.158 Cont.

As jobs continue to melt away in the warehouse sector, a number of retail brands, e-commerce firms and industry giants have announced staff cuts (hourly as well as salaried employees) and new facility closures this year. This is hardly surprising, given a continuing focus on trimming costs to maximize corporate and investor profits and has prompted firms to reassess and consolidate operations and reduce the number of shipping locations.

One reflection of this trend has been the decline of deals involving mega-facilities – those larger than a million sq ft. Real estate firm CBRE reported that last year, 43 of the top 100 warehouse deals involved these behemoths, a drop from 63 such agreements in the top 100 of 2022 and from 57 the year before. It isn't just me, you see, that believes building mega-warehouses anywhere right now, let alone building them in the middle of an existing neighborhood near homes, parks, and churches, is a bad idea and a losing investment strategy.

RI-259.158 Cont.

Because the economy is clearly trending away from the growth of the pandemic economy, industry data points to no significant rise in inventories in the foreseeable future. The largest warehouse companies throughout the nation are right this minute trying to reduce labor and its costs, reduce inventory and the cost of storing it, and reduce unoccupied space on the books all in the name of maximizing corporate profits and return on investment. And with supply heading for a big drop in terms of newly available space, the facility construction boom, triggered by the surging e-commerce market of 2021/22, has largely run its course. And thus, as I said earlier, the specific project plan as presented in the recirculated and draft EIRs for the West Campus Upper Plateau makes no sense, excludes public preference, and is a bad investment for the JPA, the Lewis Group, and the environment you pretend to protect with the conservation easement. It is time for the March JPA to wrap up its legacy as a land use authority and ride off into the sunset.

RI-259.159

As a concerned citizen, it is not enough to just find problems with the recirculated draft EIR and the process undertaken by its developers. Responsible citizens take an interest in their community for the benefit of all people, working to avoid the economic and social injustices these warehouse projects present our communities. With this in mind, I once again propose the following mitigations and solutions to you related to the West Campus Upper Plateau project, the recirculated and draft EIR, and the March JPA's operations moving forward.

First, commission a community advisory board that works alongside of the JPA and the developer working collaboratively to develop a list of alternative plans that would support the goals of the JPA and meet the needs of the community while allowing the developer to realize a profit and an incentive to do the work. This advisory board would need to have some level of authority, a voice in how this land is used and in the enforcement of policies that protect the neighbors surrounding it, and be backed by the objectives of a functioning Environmental Justice Policy. Genuine public engagement is recommended by the March JPA General Plan (p.1-3, 1st paragraph; p.1-5, 1st paragraph; p.1-13, goal 2; p.1-14, goal 4; p.1-18, goal 8; and p.1-37, all) and the Final Reuse Plan (p.I-2, last paragraph; and p.II-10, item F) and a community advisory board is one way for you to align with these recommendations and work harmoniously with business,

RI-259.160

developers, public government, and the people whose taxes pay for all of this. It is also a tool your organization has successfully used in the past and it seems like an essential step to take in order to maintain the close public connection March AFB has always enjoyed in this area.

Second, the public and local jurisdictions would support the JPA if it represents the interests of the people who live in these communities and the USAF instead of representing the interest of the entitled developer and its Wall Street investors. Be our leader and advocate for one of the researched and vetted alternate plans recommended in this letter. Thousands of voices of the residents of western Riverside County have spoken clearly over the last two years. The people who have invested in and helped pay for the land that March AFB was built on demand a voice and a return on their investment. There is a time to rise above the legal loopholes that allow private companies to derive profit from public lands. Local businesses would appreciate a voice in this effort as they would benefit and offer jobs at a much more significant level than a million square foot warehouse ever would. Residents would enjoy natural landscapes with open space and unimproved trails that allow them some relief from the urban world around them. The land itself would appreciate it too. And the JPA gets to satisfy its mission and realize its economic goals by redeveloping the land and bringing jobs that would actually employ the people who live near March ARB. Once again, we'd have a community living in harmony and with purpose (the roots of the March AFB community) instead of one literally divided by an investment or development portfolio for global investors.

RI-259.160
Cont.

Lastly, while the March General Reuse Plan was written more than 20 years ago, and you have publicly stated that it is a guideline rather than a requirement for the JPA to follow it, you owe it to the public the plan was created to protect and benefit to develop this land primarily in our interest, not in the interest of outside investors. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. The general plan was the government's best effort to do something positive for Riverside, Moreno Valley, and Perris residents who directly felt the blow of decommissioning the March base. Ask anyone that does not work for you, has the JPA lessened that life altering change from the 90s today? Has the JPA improved people's (not you or your exclusive developer partner) lives? The answer is no.

The March JPA and its exclusive developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. You have a duty to think about this land after your organization sunsets in 2025. Your overreliance on heavy industrial development will leave the communities surrounding March ARB with more problems than they will be able to handle 10 years from now. I have found nothing in the draft EIR to convince me that you have planned for this area beyond the conclusion of its construction. This, it must be stated, is irresponsible land use planning and land management. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations developed, limiting the negative impacts developing this land will have on the residents who will have to live with this development.

I have previously submitted comments on this project, including a list of feasible mitigation measures and alternative land use ideas, so that the March JPA would include these measures or provide a reasoned explanation for why it has not included the requested mitigation measures, as required by CEQA. As mentioned previously, more than a thousand residents, community groups, and public agencies have submitted similar comments regarding the need for the March JPA and its applicant to include community preference as part of its plans for the West Campus Upper Plateau, but you have chosen not to include these feasible mitigation measures to mitigate this Specific Plan's significant environmental impacts as required by California law and CEQA.

Therefore, I once again urge the March JPA Commission and Staff to reject this Specific Plan as currently designed, follow the CEQA process to form and approve an Environmental Justice Element plan to amend in the General Plan, engage local residents to determine their preference for land uses on the Upper Plateau, fully fund and adhere to the 2003 and 2012 Settlement Agreements before the JPA sunsets July 1, 2025, enact a warehouse moratorium until these actions are completed, and then revise the draft EIR so that complies with the applicable State of California project guidelines and requirements and the March JPA's General and Final Reuse Plans. Please don't allow one final grand act of greed and poor land use planning be your lasting legacy. I await your detailed response. See you down the road.

RI-259.160
Cont.

"We abuse the land because we regard it as a commodity, belonging to us. When we see land as a community to which we belong, then we may begin to use it with love and respect."

Jerry Shearer
Riverside, CA 92508
jsydor@yahoo.com

RI-259

Jerry Shearer
February 25, 2024

RI-259.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.2 This comment is the same as Letter RI-232 submitted by the commenter. As Response RI-232.2 states: This comment letter is identified as comments on the March JPA Draft Environmental Justice Element, which is not part of the proposed Project. This comment letter was separately included in the administrative record for the Draft Environmental Justice Element. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found the adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element. The comment refers to the Recirculated Draft EIR but does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.3 This comment is introductory in nature. This comment references the Project vicinity and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.4 This comment lists publicly available documents reviewed by the commenter. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.5 This comment identifies various parties involved with the proposed Project. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.6 This comment describes the existing Project site and expresses the value this land, which is currently undeveloped, has for the community. This comment also questions why non-industrial alternatives suggested by the community have not been considered. In response to the request for a non-industrial alternative, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.2.

RI-259.7 This comment states without specificity that the Recirculated Draft EIR sections contain errors, omissions, misrepresentations, and discrepancies. The comment also expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning).

Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-259.8 This comment states that the Recirculated Draft EIR sections disregard the CBD and 2003 settlements and refers to the destruction of unique cultural resources, natural habitat, and ecosystems. Implementation of the CBD Settlement Agreement is a Project Objective and is discussed throughout Recirculated Section 4.10, Land Use and Planning, of the EIR. Further, Topical Response 4 – Project Consistency analyzes the Project's consistency with the 2003 and CBD Settlement Agreements. Additionally, the 2003 Settlement Agreement is now included as Appendix S-2 of the Final EIR. The EIR evaluates impacts to biological resources and natural habitats and ecosystems in Section 4.3, Biological Resources, and evaluates impacts to cultural resources in Section 4.4, Cultural Resources. The EIR analysis concludes that, after incorporation of mitigation measures, all biological resources impacts can be mitigated to a less than significant level. Mitigation measures are included to address the Project's impacts to cultural resources, however, as discussed in the EIR, such impacts would remain significant and unavoidable. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.2.

RI-259.9 This comment questions community engagement and involvement. March JPA is a public agency that holds public meetings that are noticed and open to the public. Regarding this Project, March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. The comment suggests also that there is a lack of enforcement mechanisms or policies in place for existing and future warehouses, and an unapproved Environmental Justice Element. As discussed in Response RI-259.2, above, the March Joint Powers Commission adopted the Environmental Justice Element, which is now part of the March JPA General Plan. For purposes of analysis, Recirculated Section 4.10, Land Use and Planning, included an analysis of the Project's consistency with the Draft Environmental Justice Element released by March JPA in November 2023, and concluded that the Project is consistent with all applicable policies. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element. With regard to enforcement, please see Topical Response 9 – Long-Term Project Implementation and Enforcement. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.2.

RI-259.10 This comment discusses privatization of public lands surrounding March Air Reserve Base and throughout Southern California and appears to refer to the development and disposition agreement. The comment describes the Project site as 'public land.' The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant. In response to this comment, please see Topical Response 10 – West March Development and Disposition Agreement. The comment raises no specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.2.

RI-259.11 This comment expresses concern about an industrial project as opposed to non-industrial alternatives. In response to this comment, please see Topical Response 8 – Alternatives, for a discussion about Alternative 5 – Non-Industrial Alternative. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.2.

RI-259.12 This comment states the commenter's opinion that the Project is based on misleading and inconsistent baseline information and refers generally to concerns regarding mitigation measures, the benefits and jobs associated with the proposed Project, aesthetics, the public benefit of the land, and March JPA's unfunded liabilities. As explained in the EIR and consistent with the requirements of CEQA, baseline information used within the environmental analysis is representative of existing conditions at the time the Notice of Preparation was issued for the Project (November 19, 2021). The comment cites concerns about mitigation measures but does not offer any specific examples. Regarding the jobs associated with the proposed Project, please see Topical Response 5 – Jobs, and for an analysis of aesthetic impacts associated with the proposed Project, please see Section 4.1, Aesthetics. The comment raises no specific comments, questions or concerns about the adequacy of environmental analysis within the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.2.

RI-259.13 This comment states that March JPA is "cherry-picking" guidelines, policies, and regulations to suit the goals of the applicant and that information developed as part of the CEQA process should influence the development of general plan policies and specific plan amendments. The comment criticizes the March JPA and suggests that the Recirculated Draft EIR sections are "a post hoc rationalization of decisions that have already been made." To the contrary, consistent with the requirements of CEQA, the purpose of the EIR is to identify the significant effects on the environment of the Project, to identify alternatives to the Project, and to indicate the manner in which those significant effects can be mitigated or avoided (CEQA Section 21002.1(a)). As set forth in CEQA, "[i]f economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency if the project is otherwise permissible under applicable laws and regulations." The environmental analysis will be considered by decision makers and thus informs decisions on the Project, which have not yet been made.

As outlined in Threshold LU-1 in Recirculated Section 4.10, Land Use and Planning, evaluation of land use and planning impacts is specifically focused on "conflict with any applicable land use plan, policy or regulation adopted for the purposes of avoiding or mitigating an environmental effect." The analysis in Table 4.10-1 identifies, and includes a consistency evaluation, for each of the applicable General Plan goals and policies identified in the EIR Sections 4.1 through 4.18. Consistent with the requirements of CEQA, a lead agency need not evaluate consistency with every single policy in a General Plan. Pursuant to the applicable threshold, the relevant policies are those adopted for the purposes of avoiding or mitigating an environmental effect. Final EIR Section 4.10, Land Use and Planning, determines the Project would be generally consistent with the applicable goals and policies identified in the March JPA General Plan and the Environmental Justice Element.

RI-259.14 This comment expresses general opposition to the Project and criticism of the March JPA and the applicant. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.15 This comment notes that the Draft EIR and Recirculated Draft EIR sections acknowledge the environmental impacts of the Project. The comment also discusses climate change in a general nature and expresses concern regarding loss of open space. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.3.

RI-259.16 This comment questions the development of warehouses under the March ARB General Plan. It should be noted that the March Air Reserve Base does not have an adopted General Plan. The Project's consistency with applicable March JPA General Plan goals and policies is included in Recirculated Section 4.10, Land Use and Planning. The March JPA General Plan serves as a framework document to help guide overall development. Specific plans, such as the proposed West Campus Upper Plateau Specific Plan for the Project site, help to implement the ideas and concepts envisioned within the General Plan. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.3.

RI-259.17 This comment again asserts that March JPA is selectively adhering to and ignoring the General Plan, resulting in inconsistency with the Draft Environmental Justice Element. Please see Response RI-259.13, above, regarding consistency with General Plan goals and policies. Also, Recirculated Section 4.10, Land Use and Planning, includes an analysis of the Project's consistency with the Draft Environmental Justice Element released by March JPA in November 2023, and concludes that the Project would be consistent with all applicable policies. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element.

RI-259.18 This comment questions how the Project will comply with California's push to net zero emissions standards. The comment appears to be referring to California's goal to achieve carbon neutrality by 2045. Achieving this goal will require changes to be made at all levels of society and that impact all types of industry. The Project will be subject to any applicable rules and requirements that California imposes in order to realize this target. The Project has been designed with sensitivity to – and includes mitigation to address – climate change impacts that may result from its implementation. PDF-AQ-1 prohibits the use of natural gas by Specific Plan Area development. PDF-GHG-1 requires conduit to be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. MM-AQ-8 requires all TRU loading docks provide electrical hookups and all loading docks designed to be compatible with SmartWay trucks. MM-AQ-11 requires main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. MM-AQ-19 requires tenants to be provided with information on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment. MM-AQ-20 requires that all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires that tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet"

requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-GHG-7 requires each Project site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. As discussed in Section 4.7, GHG Emissions, the Project's GHG impacts are less than significant with mitigation incorporated. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.3.

RI-259.19 This comment questions how the proposed Specific Plan meets the objectives stated in the General Plan and benefits the surrounding community. The comment also notes that the Specific Plan is essentially unchanged from the Draft EIR. With regard to the purpose of the Recirculated Draft EIR, the commenter is referred to Response RI-259.7, above. Regarding General Plan consistency, please see Response RI-259.13, above.

RI-259.20 This comment generally questions unfunded financial liabilities but does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.21 This comment refers to the term "community benefit" as used in the Recirculated Draft EIR, in the context of the proposed Development Agreement. The comment also discusses community benefits agreements generally and the merits of such agreements, as well as examples of such agreements in other jurisdictions. As stated in Recirculated Chapter 3, Project Description, the Project includes a proposed development agreement between March JPA and the applicant, which is not a community benefits agreement as described by the comment. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.22 This comment discusses the CBD Settlement Agreement and the purpose of the Settlement Agreement. Implementation of the CBD Settlement Agreement is a Project Objective and placement of the Conservation Easement over the 445.43 acres is a requested Project entitlement. The EIR evaluates the Conservation Easement as a part of the Project. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.4.

RI-259.23 This comment incorrectly asserts that zoning of the Development Area from Business Park to Industrial is inconsistent with the terms of the CBD Settlement Agreement. The Specific Plan Area does not currently have any zoning designation associated with the site, and the CBD Settlement Agreement only details the Developable Area, not the type of development proposed.

RI-259.24 This comment states the EIR identifies significant and unavoidable impacts of the Project, and suggests these impacts are in conflict with the CBD Settlement Agreement and the General Plan. This comment also suggests generally that the discussion of impacts is misleading and in violation of the Environmental Justice Element objectives. The EIR identifies impacts from the proposed Project that would result in significant impacts, including those that cannot be mitigated below a level of significance, pursuant to CEQA Guidelines Section 15126(b). The comment does not identify specific impacts that would conflict with the CBD Settlement Agreement and the General Plan, or describe in what way they would conflict. Final EIR Section 4.10, Land Use and Planning, includes a consistency analysis of the adopted Environmental Justice Element and concludes the Project would be consistent

with all applicable goals and policies. Topical Response 4 – Project Consistency analyzes the Project's consistency with the terms of the CBD Settlement Agreement. This comment does not raise any specific issues, questions, or concerns regarding the analysis of the Recirculated Section 4.10, Land Use and Planning. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.4.

RI-259.25 This comment suggests the Project's preservation of habitat is inconsistent with the CBD Settlement Agreement, particularly with regard to culverts under Cactus Avenue, which the commenter asserts are insufficient for wildlife crossing and provides examples of other wildlife corridors. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.4. The comment states a community benefits agreement should include a healthy diverse population of plants and animals. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.26 This comment addresses biological resources. The comment is similar to the commenter's previous letter, identified as I-788, and Form Letter C – Biological Resources. As such, please see Response I-788.5, I-788.6, and Form Letter C Response. The comment also adds a request for an evaluation of the impacts of climate change on the Project site over the last 10-20 years. Per CEQA Guidelines (California Code of Regulations, Section 15000 et seq.) the intent of an EIR is to evaluate the environmental effects of a proposed project and to discuss those potential effects on the environment from the project at the time the project is proposed, which are the baseline conditions.

RI-259.27 This comment reiterates the benefits of a community benefits agreement, and also refers to unspecified financial liabilities left to the public and a successor agency. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.28 This comment discusses the terms of the CBD Settlement Agreement and suggests the proposed Project will infringe on and limit public access to existing trails and roadways in the area of the Project site. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.6. Please see Topical Response 4 – Project Consistency, for a discussion of the Project's consistency with the CBD Settlement Agreement. The CBD Settlement Agreement contemplated the extensions of Cactus Avenue, Brown Street and Barton Street, which would include the interruption of any existing trails, as shown in Figure 3-4. The Specific Plan provides new access points to the trails within the Conservation Easement.

RI-259.29 This comment questions what has been done to establish and fund the conservation endowment identified CBD Settlement Agreement sub-item 7. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.7. Please see Topical Response 4 – Project Consistency, for a discussion of the Project's consistency with the CBD Settlement Agreement. Additionally, the comment questions the funding for the Park. Please see Response 259.7, above, for a discussion of the funding, construction, and maintenance of the Park.

RI-259.30 This comment discusses the park identified in the CBD Settlement Agreement, the timing of the development of a park, and the terms of the CBD Settlement Agreement. See Response RI-259.7 for a discussion of Park development, funding, construction, and maintenance. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.31 This comment questions the description of the proposed Park and Conservation Easement as community benefits as they are required by settlement agreements. Implementation of the CBD Settlement Agreement is a Project Objective. For purposes of evaluating the whole of an action, as required under CEQA Guidelines Section 15378, full buildout of all components of the Project are evaluated, including the proposed Park and placement of the conservation easement. The comment incorrectly asserts that zoning of the Development Area from Business Park to Industrial is inconsistent with the terms of the CBD Settlement Agreement. The Specific Plan Area does not currently have any zoning designation associated with the site, and the CBD Settlement Agreement only details the Developable Area, not the type of development proposed.

The comment further suggests the Project Objectives cannot include the Park because it is required by the CBD Settlement Agreement. The CBD Settlement Agreement does not include any requirement to build the Park but rather identifies an area on the Project site for a park. The commenter appears to misunderstand the purpose of Project Objectives. Pursuant to the CEQA Guidelines, the project description in an EIR must include "[a] statement of the objectives sought by the proposed project." (CEQA Guidelines, Section 15124(b)). As stated in CEQA Guidelines Section 15124(b), the project objectives help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings and/or a statement of overriding considerations. See Response RI-259.7 for a discussion of Park development, funding, construction, and maintenance. In response to the comment's reference to sunsetting of March JPA, see Topical Response 9 – Long-Term Project Implementation and Enforcement.

RI-259.32 This comment questions the developer's compliance with the terms of the CBD Settlement Agreement. Regarding funding the Conservation Easement endowment, the comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.7. Please see Topical Response 4 – Project Consistency, for a discussion of the Project's consistency with the CBD Settlement Agreement. The comment further advocates for a community benefits agreement and states, without specificity, that the Project is inconsistent with the Draft Environmental Justice Element. With respect to a community benefits agreement, please see Response RI-259.21, above. With respect to the EIR's discussion of the Environmental Justice Element, please see Response 259.2, above. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.33 This comment discusses an alternative to the Project and recommends a County or State Park. Please see Topical Response 8 – Alternatives, for a discussion about the alternative suggested by the commenter.

RI-259.34 This comment questions what will happen with regard to the CBD Settlement Agreement and associated legal obligations when March JPA sunsets at the end of June 2025. Please see Topical Response 9 – Long-Term Implementation and Enforcement.

RI-259.35 This comment questions the Project's compliance with the requirements of the 2003 Settlement Agreement and expresses concern that it is not discussed in the EIR. The 2003 Settlement Agreement specifically focused on the North Campus and South Campus portions of the March Business Center. The 2003 Settlement Agreement established terms for the buildout of these two campuses within the March Business Center and did not apply to the development of the proposed Project on the West Campus Upper Plateau site. However, please see Topical Response 4 – Project Consistency, for a

detailed consistency evaluation with the 2003 Settlement Agreement, which is included as Appendix S-2 of the Final EIR.

The comment references Tables 1-2 (Summary of Project Impacts) and 1-3 (Comparison of Project and Alternatives Impacts) of "the recirculated and draft EIRs"; however, Chapter 1, Executive Summary was not recirculated. The Project does have significant and unavoidable impacts, which are disclosed and thoroughly analyzed in the EIR, but neither the CBD nor 2003 Settlement Agreement would dictate the conclusions under CEQA. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.10.

RI-259.36 This comment addresses transportation and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The comment references "the traffic section of the recirculated draft EIR" and the "traffic analysis in both draft versions of the EIR" but neither Section 4.15, Transportation, the Project VMT Analysis (Appendix N-1) nor the Project Traffic Analysis (Appendix N-2) were recirculated. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.11.

The comment further alleges the Project's transportation analysis is inconsistent with the 2003 Settlement Agreement. Regarding the applicability of the 2003 Settlement Agreement, please see Response RI-259.35, above.

RI-259.37 This comment raises concerns about cumulative transportation impacts and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.12.

RI-259.38 This comment addresses transportation and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.13. The comment alleges the transportation analysis violates the 2003 Settlement Agreement and the Draft Environmental Justice Element. Regarding the applicability of the 2003 Settlement Agreement, please see Response RI-259.35, above. The comment further alleges, without any specific detail, the transportation analysis conflicts with the Draft Environmental Justice Element. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element, and concludes that the Project is consistent with all applicable goals and policies. Finally, the comment states March JPA has no intention of entering into a community benefits agreement. As detailed in Recirculated Chapter 3, Project Description, the Project is proposing a development agreement, not a community benefits agreement.

RI-259.39 This comment addresses noise from idling trucks and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.14. Additionally, the comment states the Recirculated Draft EIR does not acknowledge the potential for trucks to idle in excess of 5 minutes. As detailed in Recirculated Section 4.2, Air Quality, the Project HRA (Appendix C-2) modeled the unmitigated Project operations with trucks idling for 15 minutes while on site and parked at loading docks and TRU engines would operate for approximately 2.1 hours while on site and parked at loading docks. Mitigated Project operations were modeled with TRU engines operating for 30

minutes while on site, but not at a loading dock (MM-AQ-8), and trucks would idle for a maximum of 3 minutes while on site and parked at loading docks (MM-AQ-17).

RI-259.40 This comment addresses truck route enforcement mechanisms and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.15.

RI-259.41 This comment asks who will ensure that mitigation measures are followed when March JPA sunsets. In response to this comment, please see Topical Response 9 – Long-Term Project Implementation and Enforcement.

This comment also questions the Project Traffic Analysis (Appendix N-2) and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.16.

RI-259.42 This comment discusses both a community benefits agreement and the Draft Environmental Justice Element. Neither of these are part of the proposed Project. The comment advocates for a community benefits agreement. The comment also requests the establishment of a community advisory board to the JPA. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.43 This comment raises concerns about the CEQA process for the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element is a separate process from the Project EIR. For further discussion, please see Response 259.2, above. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.44 This comment claims the Project is inconsistent with the 2003 and CBD Settlement Agreements. Please see Topical Response 4 – Project Consistency, which demonstrates the Project's consistency with the 2003 Settlement Agreement and CBD Settlement Agreement. The comment further questions the public outreach for the Project. Please see Response RI-259.9, which details the public outreach for the Project. It is noted that comment advocates for a community benefits agreement. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.45 This comment discusses the Meridian Fire Station and the contribution towards a park feasibility study as community benefits associated with the Project. The comment alleges the Meridian Fire Station is an existing commitment and cannot be considered a Community Benefit. The 2003 Settlement Agreement Section 2.6.3 only required March JPA and the developer to provide a site for a fire station. The applicant previously dedicated a 2.12-acre parcel in North Campus at the northeast corner of Meridian Parkway and Opportunity Way to the County of Riverside. Thus, the commitment to fund and construct the Meridian Fire Station goes beyond the obligations in the 2003 Settlement Agreement. Additionally, March JPA is obligated to construct the park under the 2003 Settlement Agreement. The Project is undertaking this action. See Response RI-259.7 for a discussion of Park development, funding, construction, and maintenance. This comment does not raise any specific issues, questions or concerns about the environmental analysis in the Recirculated Draft EIR sections.

RI-259.46 This comment asserts that the Meridian Fire Station would not be a benefit to the community and would only benefit the warehouses. The provision of a fire station within the Meridian Business Park would alleviate the demands on fire protection services provided by the surrounding jurisdictions, thus improving response times in the surrounding communities.

RI-259.47 This comment cites communications with March JPA staff and March Joint Powers Commission and alleges there is a perception of bias or pre-determination of support for the logistics industry and the Project. No decision on this Project has been made. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.48 This comment discusses private land ownership and land use decisions generally. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.49 This comment discusses predatory land development practices and the displacement of low-income residents generally. The Project site does not contain any existing housing and will not displace any residents. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.50 This comment discusses environmental degradation that occurs with land development. The comment discusses the significant and unavoidable impacts identified in the EIR and lists those as the loss of habitat for sensitive and endangered plants and animals as well as cultural and historic sites. The EIR does identify significant and unavoidable air quality impacts; however, impacts to biological resources, as discussed in Section 4.3, Biological Resources, are less than significant with implementation of mitigation measures. The EIR also identifies that impacts to cultural resources are significant and unavoidable, even with implementation of mitigation. The comment suggests March JPA consider alternative proposals to the Project to avoid significant and unavoidable impacts. Chapter 6, Alternatives, evaluates five alternatives to the Project, including a non-industrial alternative. Consistent with the requirements of CEQA, decision makers may approve a project with significant and unavoidable impacts after consideration and approval of a statement of overriding considerations.

RI-259.51 This comment discusses lack of transparency and the overbuilding of warehouses generally, and criticizes the March JPA's land use planning. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.52 This comment focuses on the Draft Environmental Justice Element and offers the commenter's recommendations for community involvement, including the establishment of a community advisory board, and a moratorium on industrial development projects. The comment also questions the March JPA's motivation for proposing the Draft Environmental Justice Element. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's

adopted Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. As discussed in Response 259.2, above, the Environmental Justice Element is now part of the March JPA General Plan and applicable within the existing 4,400-acre March JPA Planning Area. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

Regarding the comment's request for a community advisory board, creation of an advisory committee is within the scope of the March Joint Powers Commission's authority. However, whether the Commission establishes an advisory committee or not, the creation of an advisory committee is not germane to the CEQA analysis for the Project. The comment states the Recirculated Draft EIR "misrepresented the community benefit agreement process," however, a community benefits agreement is not part of the Project. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.53 This comment is about the Draft Environmental Justice Element process and policies. See Response RI-259-52, above, for a discussion of the Environmental Justice Element process. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.54 This comment discusses the timing of the Draft Environmental Justice Element and the public review period of the Recirculated Draft EIR for the West Campus Upper Plateau Project and its inclusion of the Draft Environmental Justice Element. In response, please see Response RI-259.52, above, for a discussion of the Environmental Justice Element process. The Recirculated Draft EIR sections did not rely upon the Draft Environmental Justice Element. Rather, although not specifically required by CEQA for a draft policy, the Recirculated Draft EIR sections recognized the existence of the Draft Environmental Justice Element and, in order to provide a thorough and conservative analysis, included an evaluation of the Project's consistency with the Draft Environmental Justice Element. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-259.55 This comment discusses March JPA's efforts related to public engagement for the Draft Environmental Justice Element process. The comment requests that the process of adopting the Draft Environmental Justice Element is slowed down, and that the release of the Recirculated Draft EIR for the Project is paused until the CEQA process for the Draft Environmental Justice Element is complete. In response, please see Response RI-259.52, above, for a discussion of the Environmental Justice Element process. As discussed in Response RI-259.2, above, the March Joint Powers Commission found the Environmental Justice Element to be categorically exempt under CEQA and adopted the Element. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.56 This comment discusses SB 1000 and the requirements of an environmental justice element, and questions why this process has not moved more quickly with respect to the March JPA General Plan. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.57 This comment reiterates the commenter's offer to serve on a community advisory board, as well as the commenter's request for a warehouse moratorium until the Draft Environmental Justice Element is final. As discussed in Response RI-259.2, above, the Environmental Justice Element is now a part of the March JPA General Plan. The comment also discusses the project goals in Table 4.10-1 of the Recirculated Section 4.10, Land Use and Planning. Table 4.10-1 includes all applicable goals and policies of the March JPA General Plan and a corresponding consistency analysis of the Project for each goal or policy. Regarding the draft Environmental Justice Element, as explained in footnote 1 of Table 4.10-1 in Recirculated Section 4.10, Land Use and Planning, the analysis focused on policies that are applicable to development projects. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-259.58 This comment cites general social and environmental concerns, including air pollution, water pollution, increased crime and traffic, increase of homeless and vagrant camps, a loss of aesthetics and scenic vistas, economic opportunity, and health risk for residents, and expresses general opposition to the Project. The Draft EIR and Recirculated Draft EIR sections include analysis for all the environmental topics raised in this comment through Chapter 4, Environmental Analysis. Please see Topical Response 1 – Aesthetics, regarding the Project's aesthetics impacts. In addition, please see Recirculated Section 4.2, Air Quality, for further information regarding air quality, health risks, and the Project's air quality mitigation measures, which were revised and expanded to incorporate additional feasible mitigation in response to comments. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.17.

RI-259.59 This comment summarizes the proposed Project, expresses general concerns about the Draft EIR and Recirculated Draft EIR and questions the jobs analysis in the Draft EIR. In response to this comment, please see Topical Response 5 – Jobs. Public benefits provided by the Project would include increased job opportunities for local residents, preservation of open space, extension of the roadway infrastructure and the pedestrian and bicycle circulation system, a new approximately 60-acre public park, and construction of the Meridian Fire Station, at the intersection of Opportunity Way and Meridian Parkway (see Topical Response 6 - Meridian Fire Station, for additional details). The comment also alleges the EIR mitigation measures are not supported by evidence on previous projects. Consistent with the requirements of CEQA, throughout the Draft EIR and Recirculated Draft EIR sections, the analysis explains how the mitigation measures are intended to reduce the Project's impacts. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.18.

RI-259.60 This comment raises concerns regarding public engagement. With regard to public engagement, please see Response RI-259.9 for an overview of the outreach efforts for the Project. This comment also discusses a separate project located near Air Force Village West. The comment generally references construction impacts, views, light and noise, which are all addressed in the environmental analysis in the EIR. The comment is similar to the commenter's previous letter, identified as I-788. As such, please

see Response I-788.19. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.61 This comment expresses displeasure with the explanation in Recirculated Section 4.10, Land Use and Planning, that, since the development of the March JPA General Plan in 1999, the Project site has been designated for development. Figure 1-4, Land Use Plan, of the March JPA General Plan designates the former Weapons Storage Area as Park/Recreation/Open Space and the remainder of the Project site as Business Park. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of the EIR. The Conservation Easement included in the proposed Project would provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses than under the current General Plan, and does not introduce new designated uses.

The comment further raises concerns with the Development and Disposition Agreement (DDA). In response, please see Topical Response – 10, West March Development and Disposition Agreement, for the history of the DDA. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.20.

RI-259.62 This comment discusses past public meetings and criticizes the JPA's public engagement. The comment also reiterates the commenter's opposition to warehouses, request for a community advisory board and Project alternatives without warehouses. With regard to public engagement, please see Response RI-259.9 for an overview of the outreach efforts for the Project. The comment expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project based on public comments. Please see Response 259.7, above, for an explanation of the purpose of the Recirculated Draft EIR sections. All public comment made during EIR scoping meetings and written comments on the Draft EIR and the Recirculated Draft EIR made during the public review periods are responded to and published in the Final EIR. The comment also expresses general frustration with the process associated with development of the Draft Environmental Justice Element. In response, please see Response RI-259.52, above, for a discussion of the Environmental Justice Element process. With regard to an alternative without warehouses, please see Topical Response 8 – Alternatives, which includes the analysis of Alternative 5 – Non-Industrial Alternative. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.21.

RI-259.63 This comment presents a chart used by the US EPA for public engagement at the federal level and continues to advocate for a community benefits agreement. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.64 This comment is similar to comments raised previously by the commenter regarding public engagement. Please refer to Responses RI-259.9 and RI-259.62 above. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.65 This comment discusses the commenter's contacts and communications with March JPA regarding information requests, complaints about existing warehouses tenants and other activity and questions regarding existing and future enforcement and accountability. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.24.

The comment adds a discussion of fire hardening practices. The Project includes a Fire Protection Plan (Appendix Q), the purpose of which is to generate and memorialize the fire safety requirements and standards of the Riverside County Fire Department along with Project-specific measures based on the Project site, its intended use, and its fire environment. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.66 This comment reiterates the commenter's concerns regarding public engagement and the request for the JPA to recirculate the Project EIR again after the Environmental Justice Element is adopted. Please see Response RI-259.52 for a discussion of the Environmental Justice Element process. Please see Responses RI-259.9 and RI-259.62 related to public engagement. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.67 This comment discusses the development agreement between March JPA and the applicant and the community benefits, the Park and Meridian Fire Station, discussed in Recirculated Chapter 3, Project Description. Regarding the Park development, see Response RI-259.7 for a discussion of Park development, funding, construction, and maintenance. For purposes of the analysis within the EIR, buildout of the Park was evaluated to ensure CEQA compliance with respect to Park development. Please see Response RI-259.45, which explains that construction of Meridian Fire Station exceeds the obligations of the 2003 Settlement Agreement. Please see Topical Response 6 – Meridian Fire Station for further information regarding the Meridian Fire Station. Contrary to the comment's assertion, amendment to the DDA is not part of the Project. For further information, please see Topical Response 10 – West March Development and Disposition Agreement.

RI-259.68 This comment discusses the commenter's background, explains the Federal Acquisition Regulations (FAR), and quotes several FAR sections. The comment suggests the DDA is not typical of government procurement contracts. The DDA is not a procurement contract and is not subject to the federal procurement regulations cited by the comment. The DDA is not a part of the Project. To the extent the comment relates to the DDA, please see Topical Response 10 – West March Development and Disposition Agreement. To the extent the comment relates to the proposed development agreement for the Project, please refer to Response RI-259.67 above. The comment reiterates the request for a moratorium on industrial projects and requests a non-industrial alternative. Please see Topical Response 8 – Alternatives, for a discussion of non-industrial alternatives, including Alternative 5 – Non-Industrial Alternative. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.69 This comment discusses the lack of non-industrial alternatives. Please see Topical Response 8 – Alternatives, for a discussion of non-industrial alternatives, including Alternative 5 – Non-Industrial Alternative. The comment notes the Project's proposed land use designations did not change in the Recirculated Draft EIR sections. In response, please see Response RI-259.7, above, for a discussion of the purpose of the Recirculated Draft EIR sections. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.70 This comment questions the inclusion of the County of Riverside's Good Neighbor Guidelines but not the guidelines of other adjacent jurisdictions in Recirculated Section 4.2, Air Quality. The comment is incorrect as the City of Riverside's Good Neighbor Guidelines are discussed immediately after the County's in Recirculated Section 4.2, which states: "As the Project site is adjacent to the City of Riverside, the Project was designed to generally comply with the City's Good Neighbor Guidelines." The Environmental Justice Element directs projects to address consistency with the County's Guidelines. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies. Topical Response 4 – Project Consistency includes a discussion of the Project's consistency with the City's Good Neighbor Guidelines. The comment questions public engagement and references the Draft Environmental Justice Element. Regarding public engagement, please see Responses RI-259.9 and RI-259.62.

RI-259.71 This comment focuses on the munition bunkers located on the Project site and suggests they should be considered historical (cultural) resources. The comment inaccurately states that the City of Riverside and other agencies have concluded that the bunkers in the Weapons Storage Area (WSA) are historically significant. This is not the case as no such determination by any agency has occurred. The description of the WSA in Section 4.4, Cultural Resources, as well as within the WSA report included as Appendix E-2 of the Draft EIR, erroneously stated the WSA igloos were the only United States Air Force-associated munitions storage igloos in California. Travis Air Force Base includes munitions storage igloos as part of the Travis AFB ADC Readiness National Register Historic District Area. Munitions bunkers are also found at Beale Air Force Base in Marysville and Edwards Air Force Base in Edwards. Further, the WSA igloos are not unique or distinctive examples of munitions storage igloos in California or the local region and are among the most common military-related weapons storage constructions. For example, similar igloos are regionally found at Fallbrook Ammunition Depot, Naval Weapons Station Seal Beach, and Marine Corps Air Station El Toro. Additionally, Concord Naval Weapons Station in San Francisco includes a larger weapons storage area that features various underground and overground bunkers constructed in different periods and styles. Sierra Army Depot in Herlong includes over 800 munitions storage igloos and igloos remain from the closed Benicia Arsenal in Benicia. The text within Section 4.4, Cultural Resources, of the Final EIR as well as the WSA report have been revised to accurately describe the state and regional context for the WSA igloos. The WSA and its individual buildings were determined not eligible under NRHP, CRHR, or the March JPA CEQA Guidelines criteria for historic resources at the national, state, or local level.

The comment further incorrectly states that the two remaining igloos will be fenced off. The igloos will be within open space, which will be accessible to the public. A plaque describing the military activities of the WSA will also be erected adjacent to the retained igloos. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.72 This comment discusses existing airport noise on homes, businesses, and public spaces and suggests the airport impacts and ALUC are not a sufficient basis to justify industrial development on the Project site. The comment inaccurately states the Project site is zoned C-2. The March JPA General Plan designates the Project site as Business Park, Industrial, and Park/Recreation/Open Space. The Project site has not been assigned a zoning designation per the official March JPA Zoning Map, as shown on Figure 3-3, March JPA Zoning Designations, of the EIR. The comment may be referencing the Project site's compatibility zone under the March ARB/IPA Airport Land Use Compatibility Plan (ALUCP). Under the ALUCP, the Project site is located within the C1 Primary Approach/Departure Zone and C2 Flight Corridor Zone. The ALUCP provides noise and safety policies governing development of compatible

future land uses in areas within the airport influence area. As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, the Project's mixed use, business park, and industrial land uses are considered normally acceptable land uses within the applicable noise contours under the ALUCP. The comment seeks non-industrial alternatives. In response, please see Topical Response 8 – Alternatives, for a discussion of non-industrial alternatives, including Alternative 5 – Non-Industrial Alternative. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.25.

RI-259.73 This comment suggests March JPA is not complying with the Final Reuse Plan or the Draft Environmental Justice Element policies regarding public engagement. Please see Responses RI-259.9 and RI-259.62 regarding public engagement. Please see Response RI-259.52 for a discussion of the Environmental Justice Element process. Please see Topical Response 8 – Alternatives, for a discussion about non-industrial alternatives including Alternative 5 – Non-Industrial Alternative. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.26.

RI-259.74 This comment questions the Project's consistency with March JPA General Plan Goal 2, Policies 2.3 and 2.4, which call for discouraging land uses that conflict with the services or plans of adjoining jurisdictions and protecting the interests of local residents and jurisdictions, given the Project's significant and unavoidable noise and air quality impacts. The Project is consistent with Land Use Element Policy 2.3 because development of the Project would occur in a logical pattern of growth through the guidance of the proposed Specific Plan, compatible with adjacent land uses to the east and northeast. The Conservation Easement will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.

The Project is also consistent with Land Use Element Policy 2.4. The March JPA General Plan includes warehousing in the definition of Business Park. Moreover, wholesale, storage and distribution are expressly identified as allowed uses within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of the EIR. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses.

The comment incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. With regard to the 2003 and CBD Settlement Agreements, please see Topical Response 4 – Project Consistency. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Responses I-788.27 and I-788.28.

RI-259.75 This comment claims the Project site was never intended to be an industrial zone and references the Final Reuse Plan. Please see Recirculated Section 4.10, Land Use and Planning, for further discussion of the history and interplay of the Final Reuse Plan and March JPA General Plan and the Project site. The March JPA General Plan implements the Final Reuse Plan and designates the Project site as Business Park, Industrial, and Park/Recreation/Open Space. The March JPA General Plan includes warehousing in the definition of Business Park and Industrial uses. Moreover, wholesale, storage and distribution are expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, 85% of the Project site would be designated for development; under the Project, only 45% of the Project site is proposed for development. Thus, the Project designates more land for non-development uses and does not introduce new designated uses. The comment references the 2010 March JPA General Plan, but that document was never adopted. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Responses I-788.29 and I-788.30.

RI-259.76 This comment discusses the community's opposition to the Project. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.31. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.77 This comment suggests the applicant and March JPA ignore the March ARB General Plan and Final Reuse Plan. March ARB does not have a general plan so it is assumed the commenter is referring to the March JPA General Plan. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.31. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.78 This comment repeats points made in comment RI-259.75 regarding alternatives identified in the Final Reuse Plan and provides a copy of Table 1-1 of the March JPA General Plan. The comment describes the commenter's understanding of the surrounding land uses when they bought their home in 2009. The comment asserts that the Project is in conflict with the intent of the Final Reuse Plan, General Plan, and never-adopted 2010 Draft March JPA General Plan. As discussed in Recirculated Section 4.10, Land Use and Planning, the proposed Project is consistent with all applicable plans and regulations governing land use at the Project site, including the General Plan. The comment also expressed general opposition to the Project. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Responses I-788.31 and I-788.32.

RI-259.79 This comment questions whether the proposed Specific Plan's definition of Mixed Use is consistent with the General Plan's definition regarding warehousing. The March JPA General Plan excludes "major warehousing uses" from Mixed Use designated parcels. The proposed Specific Plan includes business enterprise within the Mixed Use designation. Business enterprise use is not major warehousing and is intended to provide a transitional environment that allows for limited commercial and office uses in conjunction with small scale industrial warehouse activity. Under Table 3-1, West Campus Upper Plateau Specific Plan Land Use Table, of the proposed Specific Plan, all major warehousing uses (Warehouse – Medium, Warehouse – Heavy, High Cube Transload and Short-Term Storage Warehouse, High Cube Fulfillment Warehouse, High Cube Code Storage Warehouse, Parcel Delivery Terminal) are prohibited under the Mixed Use designation.

Under Table 3-2 Development Standards, of the Specific Plan, Business Park and Mixed Use buildings greater than 100,000 square feet are required to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. The proposed Specific Plan's Mixed Use definition is consistent with the March JPA General Plan. The comment also refers to the privatization of public land. The area proposed for the Conservation Easement is public land under the ownership of March JPA; the Specific Plan Area is private land owned by the applicant. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.33.

RI-259.80 This comment is about the general trend of warehouse development in Western Riverside County. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.34.

RI-259.81 This comment expresses general opposition to the Project and does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.35.

RI-259.82 This comment expresses disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project alternatives. However, that was not the purpose of the Recirculated Draft EIR sections. Please see Response 259.7, above, for an explanation of the purpose of the Recirculated Draft EIR sections.

This comment raises concerns regarding the EIR's analysis of alternative sites and the lack of a non-warehouse alternative, and asserts that the EIR's rejection of an alternate site is pre-decisional. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.36. The comment does not raise any additional specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.83 This comment questions the alternatives evaluated within the environmental analysis and asks why no alternatives have been developed to respond to concerns raised by the community. In response, please see Topical Response 8 – Alternatives for a discussion and evaluation of Alternative 5 – Non-Industrial Alternative. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.37.

RI-259.84 This comment expresses support for Alternative 1 – No Project. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.38. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.85 This comment summarizes polling results conducted independently by the commenter and outside of the formal review process for the Recirculated Draft EIR sections. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.86 This comment notes that the Recirculated Draft EIR did not make substantive changes to the proposed Project. However, that was not the purpose of the Recirculated Draft EIR sections. Please see Response 259.7, above, for an explanation of the purpose of the Recirculated Draft EIR sections. This comment

discusses Alternatives 2 through 4 evaluated within Chapter 6, Alternatives, of the EIR. The comment notes that the Alternatives would have significant and unavoidable impacts, which is consistent with the discussions within Chapter 6. The comment requests an alternative without industrial uses. In response to this comment, please see Topical Response 8 – Alternatives, where Alternative 5 – Non-Industrial Alternative, is introduced and evaluated. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.39.

RI-259.87 This comment describes and expresses support for three other alternatives to the proposed Project: "The Campus Approach," "The Veterans Village Approach," and "The State or County Park Approach." In response, please see Topical Response 8 – Alternatives, which discusses each of these alternatives as well as includes an evaluation of Alternative 5 – Non-Industrial Alternative. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.40.

RI-259.88 This comment states generally that the commenter believes the EIR includes errors and faulty information. The comment is introductory in nature and does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections. Responses to specific issues raised by commenter are provided below.

RI-259.89 This comment states without specific detail that the Project HRA applies arbitrary and incorrect methods for estimating cumulative cancer risk and questions the use of a 1,000-foot evaluation distance for traffic-related emissions impact. As discussed in Recirculated Section 4.2, Air Quality, and the Project HRA (Appendix C-2), SCAQMD does not have an approved methodology for evaluating cumulative TAC health impacts. The Project HRA used the EPA's guidance for air toxic analyses at the community scale and the threshold of a cancer risk of 100 in a million or less to be within the "acceptable" range of cancer risk. As stated in the Project HRA, the 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources. To support the 1,000-foot evaluation distance, the Project HRA references traffic-related studies, CARB and SCAQMD emissions and modeling analysis, the Waters Bill, and the 2021 report *Evaluating Siting Distances for New Sensitive Receptors Near Warehouses*, prepared by the Ramboll Group. While SCAQMD does not provide specific guidance for evaluating cumulative health risk impacts beyond the use of the incremental cancer risk threshold of 10 in one million on an individual project basis, the Bay Area Air Quality Management District (BAAQMD) utilizes a 1,000-foot zone of influence approach for evaluating cumulative health risk impacts.[25] Although the Project is not under the jurisdiction of BAAQMD, Project emissions would not result in a significant cumulative health impact. (Appendix C-4)

The comment suggests the Project HRA is deficient by omitting exhaust emissions from light-duty passenger vehicles. Diesel particulate matter (DPM) has been identified as the top contributor to cancer risk-weighted emissions, contributing more than 85% of the total carcinogenic potential of emissions. Carcinogenic compound contributions from gasoline-powered cars and light duty trucks include 1,3-butadiene (4%) and benzene (3%). Collectively, five compounds—DPM, 1,3-butadiene, benzene, formaldehyde, and acetaldehyde— were found to be responsible for more than 90% of the cancer risk

[25] https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-a-thresholds-of-significance-justification_final-pdf.pdf?rev=d35960ec035546629124ae2a25fb1df9&sc_lang=en

attributed to emissions.26 While passenger vehicles do emit some TACs, the inclusion of passenger vehicle emissions in the analysis would not alter the findings. For example based on the BAAQMD data cited above, even if the Project operational risk estimates from the EIR were increased by 15%, this would result in a risk of 6.05 in one million for the unmitigated scenario and 2.56 in one million for the mitigated scenario, both of which are well below the applicable threshold of 10 in one million. In addition, the BAAQMD data is from 2014 when there were a limited number of electric vehicles available compared to current and future EV usage.27 The increasing trend toward electric passenger vehicles will reduce the volume of gasoline related emissions and will further reduce any health risks associated with gasoline powered passenger vehicles. Therefore, compared to gasoline-powered passenger vehicles, diesel truck emissions pose a significantly greater health risk. (Appendix C-4)

Additionally, passenger vehicles and trucks differ in their speeds and behavior while visiting the Project site and on surrounding roadways. Passenger vehicles typically travel at higher speeds, and would presumably arrive at the Project site, park, and be turned off. Alternatively, trucks travel more slowly, spending a greater amount of time on the Project site and off-site roadways. Truck engines would also be operating for longer periods of time on the Project site while checking in at the facility, maneuvering, and parking at Project loading docks. Although CARB anti-idling requirements restrict idling to no more than 5 minutes, the analysis conservatively assumed that, unmitigated, trucks would idle for 15 minutes at building loading docks. Diesel truck exhaust poses a greater health risk than gasoline passenger vehicles, because trucks "behave" differently at the Project site in a manner that would produce more emissions. Diesel truck exhaust is the primary driver of health risk for facilities such as the proposed Project. (Appendix C-4)

The Project HRA was prepared in accordance with SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis28 and was comprised of all relevant and appropriate procedures presented by the U.S. EPA, California EPA and SCAQMD. Consistent with SCAQMD guidance and standard CEQA analyses, the Project HRA analyzed emissions from both on-site and off-site truck trips, truck idling emissions, and emissions that would occur from TRU operation both on- and off-site, as well as emissions that would result from the use of operational on-site cargo handling equipment. The analysis concluded that any impacts would be less than significant. This analysis satisfies the requirements of CEQA. (Appendix C-4)

Furthermore, the International Agency for Research on Cancer (IARC), which is part of the World Health Organization (WHO), has classified diesel engine exhaust as "carcinogenic to humans" (Group 1) based on sufficient evidence of its carcinogenicity to humans. This classification is in contrast to gasoline

26 Bay Area Air Quality Management District, 2014, *Improving Air Quality & Health in Bay Area Communities, Community Air Risk Evaluation Program Retrospective & Path Forward (2004 to 2013)*. https://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE_Retrospective_April2014.ashx?la=en.

27 See https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/light-duty-vehicle. In Riverside County alone, there was an increase from 0.23% EVs on the road in 2014 to 2.64% in 2022. This trend will continue to increase given California's Advanced Clean Cars II regulations that mandated all new passenger cars, trucks, and SUVs sold in California will be zero-emission vehicles by 2035. https://ww2.arb.ca.gov/resources/documents/cars-and-light-trucks-are-going-zero-frequently-asked-questions#:~:text=As%20part%20of%20the%20Advanced,Advanced%20Clean%20Cars%20II%20regulations.

28 https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

engine exhaust, which is classified as "probably carcinogenic to humans" (Group 2A) due to limited evidence in humans and strong evidence in experimental animals.29 (Appendix C-4)

The comment claims the Project HRA inaccurately allocates construction emissions from outside the Specific Plan Area. It is assumed this comment refers to the offsite construction of the reclaimed water tank and line installation along Grove Community Drive. The closest receptor to Project construction emissions sources modeled in the Project HRA is Receptor R11, 32 feet from construction activities, specifically the northern Barton Street extension and the Mixed Use parcels of the Specific Plan Area. Receptor R11 was placed at the edge of the backyard facing construction activities, and the analysis assumes that a newborn would be outside and exposed to construction emissions daily for 4.35 years. The mitigated construction health risk at Receptor R11 is 0.56 in one million, well below the SCAQMD significance threshold of 10 in one million. As noted in the EIR and Project HRA, TACs generally dissipate with distance from the source. Compared to Receptor R11, all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project construction-source emissions. The homes along Grove Community Drive and Barton Drive in the vicinity of the offsite construction activity30 would not be exposed to construction source emissions to the extent or duration compared to Receptor R11 – the mitigated construction health risk would be below 0.56 in one million. Offsite construction would occur over a significantly shorter duration than construction of the Project itself. As such, since the mitigated construction health risk at Receptor R11, the maximally exposed individual receptor, is well below the SCAQMD significance threshold, the Project will not cause a significant human health or cancer risk to nearby residences from any on-site or off-site construction activity. (Appendix C-4)

The comment further states, without specific detail, that the Project HRA modeled an incorrect number of warehouse buildings and trucks. As part of this Project, there are only site plans for Buildings B and C. However, for modeling purposes, the analysis assumed buildings on the remaining parcels. There are three industrial parcels and therefore, three industrial warehouse buildings were modeled and analyzed. The modeling of the Project's Business Park square footage was based on an earlier site plan, which included four business park parcels at the northern end of the Specific Plan Area, with the same square footage and mix of uses as is included in the current site plan. In response to comments, Urban Crossroads analyzed seven business park parcels at the northern end of the Specific Plan Area, for a total of 10 business park buildings. The results of this analysis indicate that cancer risk at the MEIR would be lower than was presented in the Recirculated DEIR, at 4.55 in one million at Receptor R2 without mitigation and 2.23 in one million at Receptor R12 with mitigation. Risk at the MEISC, the preschool at Receptor R8, would be 0.65 in one million without mitigation and 0.33 in one million with mitigation. The HRA and EIR have been revised based on this updated analysis. The number of idling trucks and TRUs is based on the Project Traffic Analysis. (Appendix C-4).

RI-259.90 This comment questions the boundaries used for the cumulative health risk assessment. Regarding the cumulative evaluation distance, refer to Response RI-259.89, above. The comment suggests the cumulative impact threshold is "10-in-a-million cancer risk level required by statute." There is no statute mandating a threshold for cumulative impacts analysis for a health risk assessment. Further,

29 https://www.iarc.who.int/wp-content/uploads/2018/07/pr213_E.pdf.

30 Offsite construction includes an aboveground 0.5-million-gallon prefabricated, bolted steel tank on a poured concrete slab next to an existing water tank on an already disturbed and graded site and installation of a waterline along Grove Community Drive.

as explained in Recirculated Section 4.2, Air Quality, and the Project HRA (Appendix C-2), the cumulative analysis used the EPA's threshold of a cancer risk of 100 in a million or less to be within the "acceptable" range of cancer risk and determined the cumulative cancer risk would be 9.45 in one million.

RI-259.91 This comment states the Draft Environmental Justice Element policies should not be included in the Recirculated Section 4.2, Air Quality, because the community has not provided formal feedback and March JPA has not adopted them. In response, please see Responses RI-259.2 and RI-259.52, above, for a discussion of the Environmental Justice Element process.

RI-259.92 This comment states that the land use components modeled as Office Park in CalEEMod are not consistent with the Industrial land use of Business Park and Mixed Use described in the March JPA General Plan. The business park and mixed-use parts of the Project were modeled in CalEEMod as "office park" as CalEEMod does not include business park or mixed-use land types. As such, the office park land use was utilized. However, because the trip rates in CalEEMod were updated to reflect those utilized in the Project Traffic Analysis, the modeling accurately accounts for the trips and emissions associated with this portion of the Project, and the selection of this land use category would not affect the mobile source emissions calculated by the model. However, it should be noted that CalEEMod default energy usage factors are based on the land use type that is selected. In the model, default energy usage factors for the Office Park and Industrial Park land uses are identical, and these energy usage factors for Office Park are higher than the defaults for the General Light Industry and Unrefrigerated Warehouse land uses. Thus, because warehouse uses are allowed in the Business Park, the selection of the Office Park land use in CalEEMod is conservative.

RI-259.93 This comment asserts that the Project would upzone the Specific Plan Area by switching Business Park and Industrial, and business park uses are not solely warehousing. The EIR evaluates a buildout scenario based on the most intensive uses proposed in the Specific Plan to provide the decision makers and public with a full picture of the Project's potential environmental impacts. The comment further suggests the March JPA General Plan and Development Code were updated without community involvement or input. Contrary to the comment's suggestion, the March AFB Final Reuse Plan was not "when community input was last solicited." As explained in Recirculated Section 4.10, Land Use and Planning, the March General Plan is a 'living' document. The adoption of the March JPA General Plan in 1999, when the Project site was shown as Business Park, which would include warehousing, was done at a noticed public meeting. This has not changed in 25 years. All revisions to the March JPA Development Code also occurred at noticed public meetings. Please also see Response RI-253.25.

RI-259.94 This comment states that Table 4.2-16 and Exhibit 3-B of the Recirculated Section 4.2, Air Quality, omit multiple warehouses, arterial truck routes, and the 215 freeway because the 1,000-foot evaluation distance should be around the Project site, rather than the Specific Plan Area. As discussed in Response RI-259.89 above, there is substantial support for the use of the 1,000-foot radius for purposes of cumulative analysis. It would not be appropriate to use the Project site boundaries as there are no Project emissions in the Conservation Easement. Figure 4.2-2 (Exhibit 3-B of the Project HRA) correctly uses the Specific Plan boundary, which is still conservative given it includes the proposed Park to the west.

RI-259.95 This comment states that the Project is inconsistent with Goals 2 and 3 of the Air Quality Element of the March GPA General Plan. As shown in Table 4.10-1 of the Recirculated Section 4.10, Land Use and Planning, the Project was found to be partially consistent with both Air Quality Element Goals 2 and 3. Goal 2 calls for reducing emissions associated with vehicle miles travelled (VMT) by enhancing the jobs/housing balance in the region. As discussed in Recirculated Section 4.10, Land Use and Planning, the Project would provide employment opportunities that would help to address the jobs/housing balance in western Riverside County by providing local employment opportunities. Although VMT impacts are anticipated to be less than significant, VMT would be further reduced because MM-AQ-21 requires all tenants to implement or otherwise participate in a Transportation Demand Management Program. Goal 3 aims to reduce air pollution through proper land use, transportation and energy use planning. As discussed with respect to Goal 2, the Project would improve the regional jobs/housing balance and include VMT-reduction measures consistent with this goal. However, because the air quality impacts of the Project would be significant and unavoidable, even with implementation of all feasible mitigation measures, the Recirculated Draft EIR sections concluded that the Project is only partially consistent with both Goals 2 and 3. For a complete discussion of consistency with the March JPA General Plan, please see Table 4.10-1 in Recirculated Section 4.10, Land Use and Planning, of the EIR.

The comment further alleges the Project will have over 12 vehicle trips per employee per day and suggests this represents a high VMT/employee ratio. The commenter does not provide a basis for the presented number. It appears the commenter has taken the Project's total trip generation of 34,116, removed the Park trips (2,200), and divided the remainder by the Project's estimated employee count. However, not all Project trips are generated by employees. The Project's trip generation is comprised of a variety of trips depending on the land use, including, for example, customers accessing the retail and clients or contractors visiting offices and services. Vehicle Miles Traveled (VMT) is a distinct metric from trip generation. Section 4.15, Transportation, identifies that the Project's retail component will result in a net reduction of -0.29% for total VMT in the region. Additionally, the Project's non-retail component, which is analyzed through VMT per employee, will result in VMT per employee, which is 5.30% below the WRCOG threshold. The Project has a less than significant VMT impact. Regarding the request for a less intense alternative, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

RI-259.96 This comment discusses the number of warehouses in census tract 06065046700 and the potential for additional warehouses resulting from the Project, and claims the March JPA's land use zoning and development strategy are putting the community at risk. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.97 This comment discusses previously made points regarding the timing of the Recirculated Draft EIR and the Draft Environmental Justice Element. Please see Responses RI-259.2 and RI-259.52 for a discussion of the Environmental Justice Element process.

RI-259.98 This comment is about the Draft Environmental Justice Element process and policies. In response, please see Responses RI-259.2 and RI-259.52, above, for a discussion of the Environmental Justice Element process. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.99 The comment lists specific policies of the Draft Environmental Justice Element the commenter believes the March JPA does not have the ability or intention to fulfill and criticizes the Draft Environmental Justice Element and associated process. Please see Responses RI-259.2 and RI-259.52, above, for a discussion of the Environmental Justice Element process. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.100 This comment states the Project would reduce open space amenities and provide no additional amenities. Regarding open space, the Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. Please see Response 259.7, above, for a discussion of the funding, construction, and maintenance of the Park. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.101 This comment states the proposed roadway changes would be inconsistent with the General Plan and thus would require a statement of overriding considerations and therefore cannot be a project objective. The comment correctly notes that one of the Project Objectives is completing the buildout of roadway infrastructure. However, CEQA does not prohibit project objectives on the basis of requiring entitlements or a statement of overriding considerations. Pursuant to the CEQA Guidelines, the project description in an EIR must include "[a] statement of the objectives sought by the proposed project." (CEQA Guidelines, Section 15124(b)). As stated in CEQA Guidelines Section 15124(b), the project objectives help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings and/or a statement of overriding considerations. As stated in Recirculated Chapter 3, Project Description, the Project includes a General Plan Amendment, including an amendment to the Transportation Element of the General Plan, which is analyzed as part of the EIR. With the approval of the General Plan Amendment, the Transportation Element would be amended to allow for these changes to the roadway network, and the Project would be consistent with the General Plan. The potential effects of the transportation changes were analyzed as part of the proposed Project in the EIR and consistent with the requirements of CEQA. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.102 This comment discusses the Project Objective of removal and redevelopment of the former munitions storage area and asserts without specificity that it is inconsistent with the March JPA General Plan and Final Reuse Plans. The comment states that the Weapons Storage Area (WSA) is the only example of an Air Force WSA in California. This is incorrect. Section 4.4, Cultural Resources, of the EIR and the WSA report (Appendix E-2) erroneously stated the WSA igloos were the only United States Air Force-associated munitions storage igloos in California. Travis Air Force Base includes munitions storage igloos as part of the Travis AFB ADC Readiness National Register Historic District Area. Munitions bunkers are also found at Beale Air Force Base in Marysville and Edwards Air Force Base in Edwards. Further, the WSA igloos are not unique or distinctive examples of munitions storage igloos in California or the local region and are among the most common military-related weapons storage constructions. For example, similar igloos are regionally found at Fallbrook Ammunition Depot, Naval Weapons Station Seal Beach, and Marine Corps Air Station El Toro. Additionally, Concord Naval Weapons Station in the San Francisco Bay Area includes a larger weapons storage area that features various underground and overground bunkers constructed in different periods and styles. Sierra Army Depot in Herlong includes over 800 munitions storage igloos and igloos remain from the closed Benicia

Arsenal in Benicia. Section 4.4, Cultural Resources, of the EIR and the WSA report have been revised to accurately describe the state and regional context for the WSA igloos. The WSA and its individual buildings were determined not eligible under NRHP, CRHR, or MJPA CEQA Guidelines criteria for historic resources at the national, state, or local level. As discussed in Recirculated Section 4.10, Land Use and Planning, the Project is generally consistent with the applicable goals and policies of the March JPA General Plan. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.103 This comment states generally that the Recirculated Draft EIR documentation is unstable and inconsistent but does not identify any specific inconsistencies.

RI-259.104 This comment expresses the commenter's disregard for Table 4.10-1, Project Consistency with March JPA General Plan Goals, and states, without support or specificity, that it demonstrates the predetermined nature of the Project. Contrary to the commenter's suggestion, the referenced table is part of the land use analysis in the EIR to help inform the public and decision-makers regarding the potential land use impacts of the Project. The intent of Table 4.10-1 is to provide a list of each applicable goal or policy, adopted for the purposes of avoiding or mitigating an environmental impact, of the March JPA General Plan, and a corresponding consistency analysis of the goal or policy with the proposed Project. The consistency analysis determines whether the Project is consistent, partially consistent, or inconsistent with the applicable goals and policies. The Land Use impact analysis then determines if the consistency analysis results in a potentially significant impact. As shown in Section 4.10.4, with the incorporation of Project Design Features and mitigation measures, impacts to land use would be less than significant.

RI-259.105 This comment questions the inclusion of the Draft Environmental Justice Element consistency analysis within the Recirculated Draft EIR sections, in particular because neither the Technical Advisory Committee nor the March Joint Powers Commission were briefed on the Draft Environmental Justice Element. Please see Responses RI-259.2 and RI-259.52 for a discussion of the Environmental Justice Element process. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element. While required before the Project can be approved, it is not part of the Project.

RI-259.106 This comment questions how the County of Riverside will enforce the mitigation measures when they become the lead agency upon the sunsetting of March JPA. Please see Topical Response 9 - Long-Term Project Implementation and Enforcement, which explains how the County will step into the place of March JPA and enforce the mitigation measures. The comment further alleges the Recirculated Draft EIR sections do not mention or discuss the reversion of March JPA's land use authority to the County. This is incorrect as the reversion is discussed in Recirculated Chapter 3, Project Description (p. 3-25), Recirculated Section 4.2, Air Quality (p. 4.2-15, 4.2-17), Recirculated Section 4.8, Hazards and Hazardous Materials (p. 4.8-22), and Recirculated Section 4.10, Land Use and Planning (p. 4.10-10). This discussion is also included in Section 4.7, Greenhouse Gases (p. 4.7-27). The change in land use authority for March JPA is long planned and does not create any instability.

RI-259.107 This comment states generally that the mitigation measures presented in the Recirculated Draft EIR sections are insufficient and introduces comments on a list of specific mitigation measures, which are responded to below.

RI-259.108 This comment questions the inclusion of Appendix T in the Recirculated Draft EIR. As identified in Recirculated Chapter 3, Project Description, one of the community benefits of the proposed Development Agreement for the Project is the construction of the Meridian Fire Station, which was evaluated in the EIR prepared for the March Business Center Specific Plan as one Specific Plan component. As noted in Recirculated Chapter 3, the Meridian Fire Station would be subject to the mitigation measures identified within the Mitigation Monitoring and Reporting Program (MMRP) for the March Business Center Specific Plan Project, and the MMRP is therefore included as Appendix T. This does *not* represent the MMRP for the Project. For additional information about the Meridian Fire Station, please see Topical Response 6 – Meridian Fire Station.

RI-259.109 This comment focuses on aesthetics and specifically about Aesthetics within Appendix T. As discussed in Response RI-259.108 above, Appendix T is the MMRP for the March Business Center Specific Plan Project, a component of which includes the Meridian Fire Station. Appendix T, does *not* represent the MMRP for the Project. With regard to the aesthetic impacts of the proposed Project, please see Section 4.1, Aesthetics, and Topical Response 1 – Aesthetics.

RI-259.110 This comment refers to MM-AQ-1 and asks where the information would be available to the public. MM-AQ-1 requires the applicant to provide evidence that all offroad equipment used during construction meets CARB Tier 4 Final emission standards or better, to March JPA at the time of grading permit and building permit issuance. This information will be a public record. The comment also questions who will enforce MM-AQ-1. This measure, as with all mitigation measures, would be enforceable through the Project's MMRP. March JPA will monitor compliance with the MMRP. With regard to long-term enforcement, please see Topical Response 9 – Long-Term Project Implementation and Enforcement.

RI-259.111 This comment asserts that "active disturbance" is excluded from the Recirculated Draft EIR with regard to air quality. This is incorrect. In analyzing the Project's potential air quality impacts during construction, Appendix C-1 made assumptions about the amount of active ground disturbance during each phase of construction and determined impacts would be less than significant with mitigation incorporated. MM-AQ-2 prohibits the Project construction from exceeding the daily active ground disturbance assumed in Appendix C-1's analysis. These requirements ensure the air quality impacts from active ground disturbance do not exceed those disclosed in the EIR. The potential impact of active disturbance is analyzed in Recirculated Section 4.2 Air Quality, under Threshold AQ-2, as shown in Table 4.2-7 Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – Unmitigated. Table 4.2-12 Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – Mitigated (presented in Section 4.2.8) shows the reduction in air pollution emissions from the implementation of the proposed mitigation measures, including MM-AQ-2. As such, contrary to the commenter's suggestion, the Recirculated Draft EIR did not exclude the impact of active disturbance to air quality from the analysis.

RI-259.112 This comment questions what mitigations would be provided for residents and recreationalists during construction regarding blasting and grading. MM-AQ-1 through MM-AQ-4 reduce impacts to air quality during construction activities. Additionally, PDF-NOI-2 prohibits blasting within 1,000 feet of any residence or other sensitive receptor. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP.

RI-259.113 This comment asks who is responsible for ensuring the applicant adhere to MM-AQ-3 and MM-AQ-5, especially when the March JPA sunsets in July 2025. The mitigation measures will be incorporated into the Project MMRP, and March JPA will monitor compliance with the MMRP. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. The March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025. Please also see Topical Response 9 – Long-Term Project Implementation and Enforcement.

RI-259.114 This comment discusses MM-AQ-6, which requires all constructed buildings to achieve at least 2023 LEED Silver certification standards or the equivalent and asks about oversight once the March JPA sunsets. Please see Response RI-259.113 above and Topical Response 9 – Long-Term Project Implementation and Enforcement.

RI-259.115 This comment discusses MM-AQ-8 and states it does not require the use of SmartWay trucks. Regarding the implementation of MM-AQ-8, as stated in MM-AQ-20, through lease agreements or purchase and sale agreements, building occupants will be encouraged to become SmartWay Partners, if eligible. The comment also states March JPA does not have a climate plan addressing pollutants from warehouses and trucks. March JPA does not have such a climate plan, but the Project is designed to comply with the Good Neighbor Guidelines of the County of Riverside and the City of Riverside, and the County of Riverside's Climate Action Plan.

RI-259.116 This comment discusses MM-AQ-9's requirement for truck operator lounges and suggests drivers would instead remain in their trucks idling. MM-AQ-9 would provide truck drivers with a desirable alternative location to remaining in their trucks. This incentivization would reduce truck idling. The comment further questions restrictions on truck idling and parking on neighborhood streets. MM-AQ-17 prohibits trucks from idling for a more than 3 minutes while on site and parked at loading docks. MM-AQ-22 requires tenants provide information to employees and truck drivers on participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies; health effects of diesel particulates, state regulations limiting truck idling time, and the benefits of minimized idling; the importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity; and efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. Please see Recirculated Section 4.2, Air Quality, for a detailed discussion and list of the mitigation measures that have been added to the Project. With regard to the comment's concern regarding trucks on surrounding streets and enforcement, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As Section 4.13, Public Services, explains, March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week and truck route enforcement is paid for through an existing truck route mitigation fund. Additionally, as Section 4.15, Transportation, explains, to "enforce the utilization of the approved truck routes, PDF-TRA-3 directs the Project applicant to provide the March JPA with compensation of $100,000 to fund a truck route enforcement for a period of two years." PDF-TRA-3 allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur, with each jurisdiction

addressing any violations of their approved truck routes. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP. March JPA will monitor compliance through the MMRP. Further, the Project is designed to comply with the Good Neighbor Guidelines of the County of Riverside and the City of Riverside. Section 3.5.4, Off-Street Loading Facilities, of the proposed Specific Plan requires loading or unloading facilities be sized and located so that they do not require trucks to be located in required front or street side yards during loading and unloading activities, ensuring trucks do not spill onto surrounding public streets.

RI-259.117 This comment discusses MM-AQ-14, which requires all building occupants to use electric or battery-powered landscaping equipment, and questions how this would be enforced with the March JPA sunsetting in July 2025. Please see Response RI-259.113 above and Topical Response 9 – Long-Term Project Implementation and Enforcement.

RI-259.118 This comment discusses enforcement of MM-AQ-16 through MM-AQ-19, and questions how they will be enforced with the March JPA sunsetting in July 2025. Please see Response RI-259.113 above and Topical Response 9 – Long-Term Project Implementation and Enforcement.

RI-259.119 This comment discusses enforcement of MM-AQ-20 and MM-AQ-21 through 27, and questions how they will be enforced once March JPA sunsets. Please see Response RI-259.113 above and Topical Response 9 – Long-Term Project Implementation and Enforcement.

RI-259.120 This comment questions enforcement of MM-HAZ-1 and MM-FIRE-1 once March JPA sunsets. Regarding enforcement, please see Response RI-259.113 above and Topical Response 9 – Long-Term Project Implementation and Enforcement. The comment further questions implementation of MM-FIRE-1. Regarding implementation of MM-FIRE-1, the required fuel modification would be approved and implemented by the Riverside County Fire Department, not March JPA.

RI-259.121 This comment states that significant and unavoidable impacts could be avoided if March JPA considered a non-industrial alternative. In response to a non-industrial alternative, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

RI-259.122 This comment suggests generally that mitigation measures would not actually reduce impacts to less than significant levels. The comment refers generally to aesthetics but does not provide specificity. The use of mitigation measures to reduce impacts is supported with substantial evidence throughout the analysis presented in the EIR.

RI-259.123 This comment references Section 4.10.6, Levels of Significance After Mitigation, and questions the adequacy of mitigation as it relates to open space amenities. Section 4.10.6, Levels of Significance After Mitigation summarizes the Project's less than significant land use impacts with incorporation of the mitigation measures identified in Section 4.10.5. The Project's impacts on recreation are discussed in Section 4.14, Recreation. The comment suggests the Project will reduce open space amenities. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of

open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The two retained weapons storage bunkers will be within this open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers. The Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

RI-259.124 This comment discusses Appendix T and noise mitigation and questions its inclusion in the Project MMRP. Appendix T applies to the construction and operation of the Meridian Fire Station. Please see Response RI-259.108 for further information and clarification regarding Appendix T, which is not the MMRP for the Project. The comment further details the commenter's experience regarding the implementation of mitigation and development standards. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-259.125 This comment states, without specificity, that the Recirculated Draft EIR sections and Draft EIR did not evaluate cumulative impacts. Throughout Chapter 4, Environmental Analysis, within each section of the Recirculated Draft EIR and Draft EIR (i.e., Sections 4.1 through 4.18), potential cumulative effects were evaluated and disclosed in compliance with the requirements of CEQA. The comment states, without providing specific examples, that datasets that were different or outdated were used throughout the document. As explained in detail in CEQA Guidelines Section 15130, the cumulative analysis in an EIR can be based on either a list of past, present, and probable future projects producing related cumulative impacts, or a summary of projections in an adopted local, regional or statewide plan, or related planning document. CEQA Guidelines Section 15130(b)(3) states that lead agencies should define the geographic scope of the area affected by the cumulative effect. As discussed in detail in Topical Response 7 – Cumulative Projects, the EIR identifies the geographic scope for each environmental topic and the method of evaluation, consistent with the requirements of CEQA. For further information regarding cumulative projects and cumulative impacts, please see Topical Response 7 – Cumulative Projects. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.41.

RI-259.126 This comment questions the calculation and characteristics of jobs anticipated to be created by the proposed Project. In response to this comment, please see Topical Response 5 – Jobs. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.42. The comment also criticizes an image and text on the March JPA website related to job creation, which does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.127 This comment requests an alternative to specifically employ college-educated workers. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.43. This comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.128 This comment describes socioeconomic conditions in the Project vicinity and Western Riverside County and questions the likelihood the Project would employ local residents. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.44. This comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.129 This comment discusses economic outlooks and gross domestic product, as well as socioeconomic conditions in the region and industrial job generation. This comment refers to general issues beyond the scope of the Project and the environmental analysis included in the Recirculated Draft EIR sections. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.45. Specific comments regarding the Recirculated Draft EIR sections are provided and responded to above and below.

RI-259.130 This comment discusses advances in automation and the potential effect that could have on economic conditions in Western Riverside County. While existing warehouse automation would be accounted for in March JPA employment data, at this time, it is speculative to assume future automation and/or incorporate such unknown factors into the EIR. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.46.

RI-259.131 This comment expresses general concern about the jobs associated with the proposed Project. In response to this comment, please see Topical Response 5 – Jobs, for a discussion of local employment. The comment is similar to the commenter's previous letter, identified as I-788. As such, please see Response I-788.47. This comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.132 This comment expresses disappointment that the Recirculated Draft EIR sections did not evaluate non-industrial alternatives. In response, please see Topical Response 8 – Alternatives, for an analysis of Alternative 5 – Non-Industrial Alternative. The commenter is referred also to Response RI-259.7 above, regarding the purpose of the Recirculated Draft EIR sections.

RI-259.133 This comment questions the Project's consistency with March JPA General Plan Goal 2, Policies 2.3 and 2.4. In response, please see Response 259.74, above, which addresses the same comment.

RI-259.134 This comment asserts that the CBD Settlement Agreement "prohibits industrial land use surrounding the conservation easement." This is inaccurate. In response, please see Response 259.23, above, which addresses the same comment.

RI-259.135 This comment discusses the terms of the CBD Settlement Agreement and suggests the proposed Project will infringe on and limit public access to existing trails and roadways in the area of the Project site. Please see Response RI-259.28, above, which addresses the same comment.

RI-259.136 This comment discusses active and passive recreation and the use of the existing open space and trail network on the Project site. This comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.137 This comment discusses partnerships to repurpose land for alternate uses and collaboration with the community on development decisions. For discussion of alternatives, please see Topical Response 8 – Alternatives. The remainder of this comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections. With regard to public engagement, please see Response RI-259.9 for an overview of the outreach efforts for the Project.

RI-259.138 This comment questions, without providing specific examples, why the Recirculated Draft EIR sections do not address funded and unfunded financial liabilities. This comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.139 This comment states generally that the Recirculated Draft EIR documentation is unstable and inconsistent but does not identify any specific inconsistencies.

RI-259.140 This comment discusses the inclusion of the Draft Environmental Justice Element in the Recirculated Draft EIR sections and is similar to prior comments by the commenter. In response, please refer to Response RI-259.105, which addresses the same comment.

RI-259.141 This comment discusses enforcement of mitigation measures and the July 2025 sunsetting of March JPA. In response to this comment, please see Topical Response 9 - Long-Term Project Implementation and Enforcement.

RI-259.142 This comment cites general concerns about inconsistencies in maps, text, and analyses, and asserts they were not adequately addressed in the Recirculated Draft EIR sections. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.143 This comment is about the Draft Environmental Justice Element policies. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.144 This comment raises concerns about the nature and terms of March JPA sunsetting. In response to this comment, please see Topical Response 9 - Long-Term Project Implementation and Enforcement.

RI-259.145 This comment questions the omission of the 2003 Settlement Agreement and compliance therewith. In response, please see Topical Response 4 – Project Consistency. Additionally, the 2003 CAREE/CCAEJ Settlement Agreement is included as Appendix S-2 in the EIR.

RI-259.146 This comment discusses the park, police substation and fire department station. As outlined in Chapter 3, Project Description, the Project includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. Additionally, the Community Benefits under the proposed Development Agreement include funding for the construction of Park improvements and construction of the Meridian Fire Station. Please see Response 259.7, above, for a discussion of the funding, construction, and maintenance of the Park.

RI-259.147 This comment suggests the Project will not create job opportunities for local residents. In response, please see Topical Response 5 – Jobs.

RI-259.148 This comment questions the provision of open space and amenities to serve the region. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections. In response, please refer to Response RI-259.100, which addresses an expanded version of this comment.

RI-259.149 This comment refers to "The completion of roadway infrastructure buildout." In response, please refer to Response RI-259.101, which addresses an expanded version of this comment.

RI-259.150 This comment refers generally to the preservation of ecological, cultural, and historically significant areas surrounding the March ARB. Impacts to ecological and biological resources are discussed in Section 4.3, Biological Resources, and impacts to cultural and historical resources are discussed in Section 4.4, Cultural Resources, of the EIR. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.151 This comment refers to "The provision and encouragement of public, pedestrian and bicycle transportation for residents." The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections. However, it should be noted that publicly accessible roadways, bicycle lanes, and pedestrian sidewalks and trails are included within the Project.

RI-259.152 This comment refers to the commenter's prior comments and states generally the commenter's opinion that the EIR documentation is inconsistent and unstable. The commenter is referred to the responses to the commenter's prior comments above.

RI-259.153 This comment reiterates the commenter's concerns regarding public review of the Draft Environmental Justice Element in relation to the Recirculated Draft EIR sections. In response, please see Responses RI-259.2 and RI-259.52, above, for a discussion of the Environmental Justice Element process.

RI-259.154 This comment states that March JPA should not be the lead agency because it will sunset in 2025. While March JPA will sunset on June 30, 2025, as cited in CEQA Guidelines Section 15051(c), "where more than one public agency equally meet the criteria in subdivision (b), the agency which will act first on the project in question will normally be the lead agency." As such, it is appropriate, as the approving agency, for March JPA to serve as the Lead Agency for the Project. For additional information about the sunsetting of March JPA, please see Topical Response 10 - Long-Term Project Implementation and Enforcement.

RI-259.155 This comment suggests the CEQA document is a post hoc rationalization of decisions that have already been made for the Project. The commenter again requests a warehouse moratorium until the County of Riverside assumes authority and again volunteers to serve on a community advisory board. The CEQA process is not intended to inform broad policy; rather, the intent of the CEQA process is to analyze the environmental impacts of a proposed project, plan, or other discretionary action determined to have the potential to have a detrimental effect on the environment. The CEQA analysis must occur once the details of the action have been determined so that the analysis correctly captures the potential environmental effects. Regarding the County of Riverside assuming authority, please see Topical Response 9 - Long-Term Project Implementation and Enforcement. As the comment is similar to prior comments made by the commenter, please refer also to the responses to the commenter's prior comments above, including Response RI-259.13.

RI-259.156 This comment discusses jobs provided by the proposed Project. In response, please see Topical Response 5 – Jobs.

RI-259.157 This comment provides general opposition to the Project and the Recirculated Draft EIR sections. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.158 This comment discusses the economic environment and expresses general opposition to building more warehouses. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.159 This comment expresses general opposition to the Project. The comment does not raise specific issues or questions about the environmental analysis included in the Recirculated Draft EIR sections.

RI-259.160 This comment expresses general opposition to the Project and summarizes many of the points raised previously in this comment letter. It also refers to previously submitted comments on the Project by the commenter. The commenter's previously submitted comments on the Draft EIR are included and responded to as Comment I-788. As such, please refer to Response to Comment I-788 for responses to the commenter's prior comments. This comment is conclusory in nature and offers the commenter's suggestions that a community advisory board be created and that March JPA advance one of the alternate plans recommended earlier in the comment letter. The comment refers generally to mitigation measures and the environmental analysis included in the Recirculated Draft EIR sections and urges March JPA to reconsider the Project. Responses to the commenter's specific comments on the Recirculated Draft EIR sections are provided and responded to above.

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From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Sunday, February 25, 2024 2:09 PM
To: Dan Fairbanks
Subject: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: PublicCommentWestCampusUP-REIR-S1.pdf; MJPA-EJELetter-021224JS.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project. Please find my comments in the attached letters. I look forward to your thoughts and responses, and appreciate your consideration. RI-260.1

Please reply to confirm receipt of this public comment to ensure it is part of the public record.

Sincerely,

Jerry Shearer
Riverside 92508

11 February 2024

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

RE: Public comment on record for the draft Environmental Justice Element of the March JPA General Plan dated November 30, 2023

Attention Mr. Fairbanks:

Thank you for considering my comments on the draft Environmental Justice Element as an amendment to the March JPA's General Plan. This letter focuses on the inclusion of the draft Environmental Justice element as both a standalone amendment with comments as well as details incorporated into the recirculated draft EIR for the West Campus Upper Plateau project (SCH 2021110304), as well as my objection to the March JPA's characterization of the "Application of Environmental Justice Policies" as part of the March JPA's General Plan on page 3 of 14 of the PDF posted on your website.

Standard government contracting procedures allow for quick adoption of an agreement or contract because of pressing factors like public safety or timely acquisition by the government of a product or service at an advantageous price or offering. I do not see where in the government's guidance that the release of the Environmental Justice Element at the same time as including it as a part of a specific land development project meets the acquisition or contracting standards at the federal or state government level. The timing of your release of this policy is questionable. In addition, your interpretation that the March JPA General Plan (as approved and through this proposed amendment) contains goals and policies that "are evaluated as a continuum of direction within broad interpretation parameters" is no more than your attempt to interpret and construct the General Plan to meet your narrowly focused development practices and land use plans as the March JPA prepares to sunset in July 2025. You have consistently demonstrated your willingness to venture away from the original intentions of the General Plan and Final Reuse Plan at the whim of the profit-driven goals of your single source development partner and their greedy investors. The authors of the General Plan had a clear vision for how the land surrounding March ARB could be used to provide both blue and white-collar jobs, recreation and open-space areas, and community focused business opportunities for local entrepreneurs, military personnel, and college graduates. For example, under Planning Process C1F, the Final Reuse Plan (1996) reads: "Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base." In addition, in your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions," and "Protect the interest of, and existing

RI-260.2

commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." And finally, the Final Reuse Plan (1996) describes how "the planning process was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse." But you have ignored these guidelines giving preference to a very narrow interpretation of how the repurposed land should be redeveloped. These founding organizational documents clearly indicate a preference for community preference in decision making and land use planning which you have largely ignored, dismissed, or purposefully excluded or marginalized increasingly over the past 15 years. Your willingness to overlook these clear objectives demonstrates your eagerness to serve private industry and predatory capitalism over the people living in the communities surrounding March ARB. I am curious to know why the March JPA staff, Commission, and your partners have excluded the public in every aspect of the redevelopment of public lands surrounding the base.

On November 29, 2023, the March JPA released information on their website and through mailed notifications and email to members of the Westmont Village, Green Acres, and Veteran's Village communities within the March JPA planning area that an Environmental Justice Element was under consideration. The March JPA included the draft Environmental Justice Element in two completely separate but concurrent business filings with no input from all impacted community members (and no public notification that an Environmental Justice Element was under consideration, a disturbing pattern), no review by the March JPA Technical Advisory Committee, and no input from the March JPA Commission. The Environmental Justice Element has not undergone any formal CEQA review, as required under CEQA for a general plan amendment. And you clearly shared drafts of this plan, if not the very draft published on your website, with your contractors and the applicant for the West Campus Upper Plateau prior to the public ever being made aware of your plans to establish an Environmental Justice Element. Why are you pursuing these two simultaneous yet wholly connected efforts now and in this manner? Why, for a policy that lives and dies with public engagement, did you exclude the public and include private contractors and for-profit commercial entities? What is your definition of stakeholders?

RI-260.2
Cont.

Whatever your responses, and I imagine they will be as insufficient as your justification for bastardizing the General Plan's language to meet your anti-community business objectives, it is about time you considered an Environmental Justice Element for the March JPA's General Plan. It concerns me, as I have mentioned, that the release of the draft at the end of November 2023 coincided with the recirculation of the draft EIR for the West Campus Upper Plateau project (and is included as part of this updated plan) that the local community (including more than 160 members from the most at-risk communities within the March JPA development territory) overwhelmingly rejects. It is frankly insulting to think that while the March JPA has existed since 1996, and have consistently built warehouses in communities that CalEnviroScreen 4.0 lists in the 98th and 99th percentile, the March JPA has chosen the last days of November 2023 to amend the General Plan for an organization that sunsets in July 1, 2025. It is farcical to think that the March JPA intends to actually carry through with this absurd and ambitious plan, and as a

member of an active community that opposes the land development practices of the March JPA, I don't believe this effort is genuine on your part. Your last minute draft Environmental Justice Element is clearly in response to comment letters submitted by the community in response to the draft EIR for the West Campus Upper Plateau, and rather than engage with the community and consider the comments in these letters, the March JPA is obviously placating to the applicant's greed and desire to push through a significantly controversial project despite unanimous opposition from the very communities that this copy-paste Environmental Justice policy intends to protect and represent.

Looking back to page 3 of the draft Environmental Justice plan online, the paragraphs addressing the "Application of Environmental Justice Policies" spells out the fact quite clearly: you do not intend to comply with this plan, only to use it as a way to measure the degree to which you are working toward "the direction set by the goal or policy is met, a level of compliance is achieved such that the direction set by the goal or policy is met within a continuum framework" to satisfy your behind the scenes effort to pass CA Senate Bill 994. Per the bill summary posted on www.fastdemocracy.com, the March JPA is seeking authority from the State of California to "authorize the authority to transfer jurisdiction over any landscaping and lighting maintenance districts and any community facilities districts, as specified, and to assign its contractual obligations relating to the use of land to the county … require the application of specified authority land use laws and entitlements, as specified, on and after July 1, 2025." Your attempts to manipulate the system in a way not available to the public in order to force through the unpopular West Campus Upper Plateau project even after the March JPA ceases to exist is a disturbing misuse of power and clearly is being done to cut out the public and our wishes for how the land surrounding the March ARB is repurposed. You have no intention of adhering to the goals or policies in the draft Environmental Justice Element. But what is worse is that you are developing a framework to lock out the public (exactly the opposite of aligning with the objectives stated in your draft policy) while negotiating with the County of Riverside to continue your pro-developer, anti-community policies and legal relationships after you close your doors for good. You need to amend the General Plan so that these policies are in place so you or your successor agency can continue to contract needless and unpopular warehouses on the remaining March JPA lands, and CA SB994 will ensure that the County of Riverside is obligated to grant the greedy applicant and its investors time and land to profit at the expense of people's health and life choices even as it inherits all of the costs of your destructive business decisions.

RI-260.2 Cont.

I have concerns with the process by which the JPA is going about this amendment to the General Plan, as you and your contractors have already inserted it into the revised draft EIR for the West Campus Upper Plateau project being recirculated currently. The policy in its current form reads as an unimaginative cut-and-paste from the County of Riverside, filled with policies that the March JPA has no ability or intention to follow through on in the 18 months it has left to exist. Maybe this is your intention. You plan to amend the General Plan with some form of the draft plan posted November 2023 and you will then attempt to amend the specific plan for the West Campus Upper Plateau while it is in the final stages of review or even possibly after the

Commission has voted on it. And if you succeed in getting CA SB994 approved by the State, your plan appears like it will work. When this area falls under the land permitting jurisdiction of the County of Riverside, it will be more capable of administering the Environmental Justice Element you have included, but how is it equipped to administer your unfunded obligations related to this policy? Please elaborate in detail your plan to actually implement this plan in regards to past and current specific plan amendments to the General Plan in a more meaningful way than measuring progress on an ongoing basis.

Diving a bit deeper, the draft policy posted on your website is a wholesale copy-paste of the County of Riverside Environmental Justice Element incorporated in the Healthy Communities section of the County of Riverside General Plan. Your justification for this adoption appears to be that the County of Riverside will be the successor agency to the March JPA in July 2025, though no written succession plan is available on your website today outside of revenue sharing detailed in the 14th Amendment to the General Plan and CA SB994 (not on the JPA website). This copied plan is desperate, reactionary management and decision-making on your part. Your choice to take this path is indefensible because the timeframes, financial resources, jurisdiction, accountability, and specific issues of the two land-use agencies are completely different. The March JPA needs to examine its own planning area and create an Environmental Justice Element that is specific to the needs of the community members who live in the surrounding communities; it should contain land-use policies that will govern the residents and neighbors of the March JPA planning area regardless of how long your organization has left to exist, not the County of Riverside.

RI-260.2 Cont.

The County of Riverside's Environmental Justice Element includes 77 policies, many of which are long-range goals. However, the March JPA is sunsetting in 18 months and cannot make long-range plans like those found in your draft Environmental Justice Element. The March JPA has limited staff, time, and resources to establish, monitor, and manage such a plan, and you cannot achieve or even work towards any long-range objectives for your planning area. Adopting the County of Riverside's objectives leads to an absurd number of policies that make no sense. Specifically, the policies that the March JPA has no ability or intention of fulfilling include:

1. The March JPA has no history of, and has repeatedly rejected the idea of coordinating with community-based organizations and community members to develop an outreach plan to increase public awareness and participation in the local planning process (HC 15.1), especially in relationship to Environmental Justice communities (HC 15.2-15.3).
2. The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7).
3. The March JPA has no jurisdiction over the Salton Sea (HC 16.1).
4. The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC

16.8), and rejected community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10).

5. The March JPA won't be coordinating with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7).
6. The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13).
7. The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

As I have mentioned, what concerns me is that the March JPA has decided to engage simultaneously with a draft Environmental Justice policy and the recirculation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304), though you consistently state the two "projects" are unrelated, and that the JPA references this not-yet-adopted policy extensively in the document. How meaningful are community comments for a General Plan amendment if it is already assumed that the agency will adopt the plan wholesale for even one specific plan before the process has started? As it stands, the public comment window for the recirculated draft EIR will close before you are able to officially adopt an Environmental Justice policy. How can a community officially comment on a project's draft EIR when it is contingent on policies in the General Plan have not been finalized, and the policies are wholly unresponsive to the specific Environmental Justice needs of the area? The March JPA's process communicates that it is not actually interested in meaningful feedback, that this is an exercise with a predetermined outcome, a process that fulfills a legal requirement rather than fulfills the JPA's responsibility to "protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses," and finally is exactly the opposite of the language and spirit of the civic engagement policies that the March JPA is trying to adopt and codify.

RI-260.2
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The proposed Environmental Justice Element for the March JPA needs to incorporate March JPA priorities, exclude inapplicable County of Riverside policies, and describe community priorities through a formal and active community engagement process. This copy-paste of the County of Riverside policy is neither specific, concrete, nor targeted and it is devoid of all community input. Adopting a General Plan amendment with more than a dozen policies that the March JPA has no intention of implementing is dishonest, poor governance, leaves behind unfunded obligations, and is a litigation risk. Incorporating the draft Environmental Justice Element into an existing March JPA draft EIR as if it will be adopted without modification is also dishonest, unstable, and risks litigation. Is the County of Riverside aware of the unfunded obligations that the March JPA is leaving behind? Is the County of Riverside prepared to assume the legal responsibilities and liabilities left behind by the March JPA? If so, please provide written evidence of the communications stating their acceptance of these terms.

Around the country, but especially in the Inland Empire, urban planning (and those responsible for it) continues to have an uneasy relationship with Environmental Justice advocates and requirements. Poor planning decisions and discriminatory practices have historically heightened the burdens of environmental contamination in low-income neighborhoods and communities of color, in comparison to largely white, wealthy populations. This is why the residents of Irvine, Temecula, and Pasadena are able to assure their communities are not overrun by narrowly focused land uses like industrial and warehousing. Since the 1980s, activists have garnered some regulatory and scholarly support for changes to policy and planning processes, but urban planners have been slow to adopt an explicit Environmental Justice framework in land-use policies in more diverse, poorer, and less educated communities. The urban planning profession, however, has the task of helping ensure that future development does not repeat the unjust environmental injustices of the past.

Adopted in 2016 and implemented in 2018, California Senate Bill (SB) 1000 calls for local jurisdictions with disadvantaged communities to include Environmental Justice considerations in their general land use plans. CA SB1000 is intended to ensure transparency and community engagement in urban planning processes, mitigate the harm of living near environmental hazards, and facilitate equitable access to health-promoting amenities such as recreation, healthy and affordable food options, and safe and sanitary housing.

RI-260.2
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Without support from elected officials, public agencies, and senior planning managers, progress toward Environmental Justice has been and will continue to be slow and uneven. Hence, the real work of Environmental Justice takes place in the implementation and enforcement of laws and policies, and the insistence of this implementation and enforcement by all residents and communities. Environmental Justice will not be fully realized without strong oversight and political leadership, and racial and economic diversification of urban planning institutions. It seems as if the March JPA is a bit late in its efforts to implement and enforce laws and policies that protect all residents and communities, and is quite unimaginative in its approach to addressing CA SB1000 a full six years after the State implementation of its guidelines.

Yet, there is guidance available to inform the public and land use authorities like the March JPA about how to engage with the public in this area. The California DoJ and SB1000 implementation toolkit lists some best practices for community engagement. As others before me have requested, I ask that the March JPA engage in these standard practices.

1. Form an Environmental Justice advisory committee (I volunteer for this every time I write or speak with you and you ignore or reject my overtures.)
2. Partner with local community organizations to form authentic goals
3. Consult with tribal groups to preserve culture and history
4. Stagger meeting times and locations to increase participation and offer childcare
5. Make meetings and documents accessible in many languages including ASL

The best practice for an Environmental Justice policy is that it is community led (CA SB1000 Implementation Toolkit, California DoJ). Instead of following this best practice, the March JPA engaged a large engineering/architectural firm (Michael Baker International) to lead the Environmental Justice policy development and you released a draft Environmental Justice policy without any community notification, much less public participation. Michael Baker International is the lead environmental consultant on more than six warehouse projects in southern California, including the I-15 Logistics Center in Fontana and the Southern California Logistics Center 44 in Victorville. It is not clear what qualifications in Environmental Justice they have, as there are no example projects focused on Environmental Justice issues on their website beyond environmental compliance for mega-projects. There are multiple environmental consultants or nonprofit organizations that could have been hired to help in this process that would not have this apparent conflict of interest. Aside from an existing relationship with Michael Baker International, what organizational qualifications does the March JPA believe this contractor has to benefit residents of Moreno Valley, Perris, Riverside, and Riverside County? How are they accountable to you to develop and implement a working Environmental Justice Element as an amendment to the General Plan? And how accountable to the public are you when they fail to develop a policy that meaningfully engages the residents of western Riverside County?

The March JPA has, as I have said previously, copied a plan that demonstrates desperate and reactionary management and decision-making practices on your part. However, one only needs to look down the 10 Freeway to find a better example of a functioning Environmental Justice plan at work. An example of an operational Environmental Justice policy is found in the Los Angeles Area Environmental Enforcement Collaborative. The densely populated communities closest to the I-710 freeway in Los Angeles County are severely impacted by pollution from goods movement and industrial activity, similar to the logistics dystopia the March JPA is creating in western Riverside County. However, in a multiyear effort, a unique collaboration of federal, state, and local governments and nonprofit organizations have been working together to improve the environmental and public health conditions for residents along this corridor. Working with local communities, members of the Collaborative:

- Partner with community leaders to identify pollution sources, “ground-truth” agency data sources, and develop plans for immediate action.
- Engage with community organizations to propose land use designations that integrate with and enhance neighborhoods, parks, and sensitive receptors.
- Improve compliance with environmental laws by targeting inspections and enforcement at the state, federal, and local levels to address the pollution sources of most concern to communities.
- Build on the existing community partnerships and the targeted enforcement efforts of CalEPA’s Department of Toxic Substances Control (DTSC).
- Sustain multi-year partnerships with communities, offering voluntary programs, tools, capacity-building grant opportunities, educational information, and training.

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Through this policy, the Collaborative continues to work with community representatives and local, state and federal regulatory agencies (e.g., Waterboards, air quality and public health agencies, planning departments) to coordinate environmental pollution mitigating activities including inspection and enforcement activities, ground-truthing real sources of environmental pollution in and around communities and schools and sensitive receptors. This example is a good model of how business, government, and the public form a more collaborative relationship. This is in stark contrast to the March JPA and how you are conducting business with the simultaneous release of a draft Environmental Justice plan in two "unconnected projects," each required to follow the CEQA process of posting, review, and comment.

An example much closer to the March area of influence can be found in the City of Riverside's recently adopted public engagement policy (though they are struggling to implement their policy throughout all City departments). In order to have a functioning Environmental Justice Element, an agency like the March JPA would actually need to incorporate feedback from the community into their land use planning and decisions. Genuine civic engagement, like the type the City of Riverside is implementing today, is what a public engagement policy establishes, and what as governors of the public (which the March JPA Commission is supposed to be) you are tasked with doing. To date, the March JPA only engages with the public when forced to involve community wishes by a court mandate or settlement, and even then, the March JPA has shown that it only follows through on settlement terms that benefit your agency or the sole-source applicant that has had far too much influence in this region for far too long. For example, one of the unfunded obligations the March JPA will need to deal with prior to sunsetting July 2025 is the 2012 Center for Biological Diversity Settlement Agreement that requires the construction of a 60-acre park among other things. For more than a year, I and many other community members and organizations have asked the March JPA for involvement in planning for this park. In the February 14, 2024 March JPA Commission meeting agenda, it appears you have been meeting privately with the City and County of Riverside, "Meetings of parks officials and senior management from Riverside County and the City of Riverside were held on December 4, 2023 and January 18, 2024 to discuss the proposal for a park as a component of the West Campus Upper Plateau. Follow-up meetings are expected." It is quite clear that the March JPA has engaged far more meaningfully with JPA Staff, City and County staff, and the Lewis Group and its investors than you ever have with the public. These secretive meetings about an issue deeply important to the community surrounding March ARB demonstrates your lack of urgency to involve the public in ways that your draft Environmental Justice Element says you are going to engage with the public. Your efforts to covertly discuss the park is proof that you are only doing the minimum necessary to allow you to continue to build more warehouses around a community of retired military veterans and the final resting places that provide full military honors for our veterans! Your purposeful dismissal of public concern negates anything you write in your draft Environmental Justice plan.

RI-260.2
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With the unannounced release of the draft Environmental Justice Element in two places or "projects", the March JPA violated the core principle of Environmental Justice – meaningful

civic engagement in policy development. Residents of the March JPA community were not notified at all until the draft Environmental Justice Element was released online. In contrast, the master developer and environmental consultants working with the March JPA were given early access to the policy and fully incorporated it into a recirculated draft EIR for the West Campus Upper Plateau released three days after the draft Environmental Justice Element was released to the public. The consideration of an Environmental Justice Element was not released via CEQANET notification, nor was it released to community members via published agendas of March JPA Commission or TAC Committee meetings occurring between March 2023 and November 2023. I know as I attended many of these meetings in person. Your consideration of the draft Environmental Justice Element was done behind closed doors by March JPA employees, staff, your consultants, and the master developer. Nothing says Environmental Justice like excluding the public from the creation and writing of this document. And now you are trying to backwards map your way into public engagement by hosting two public workshops to discuss the plan you copy-pasted in secrecy. Why have you chosen to work in this exclusionary manner? Does it have anything to do with the Lewis Group's insistence that you obligate the West Campus Upper Plateau project before expiring on July 1, 2025? Is that why you are pursuing a shady political approach of passing CA SB994 at the same time you are rushing to finalize the West Campus Upper Plateau warehouse project? How can you claim to be engaging with the public when your every action works against public interest?

RI-260.2
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To incorporate the draft Environmental Justice Element into an active recirculated draft EIR so extensively, it was necessary for multiple environmental consultants and the master developer to have access to the draft Environmental Justice policies months before the recirculation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304) was released, though allegedly these two "projects" are unrelated. In contrast, the community was not even notified, and certainly was not consulted or engaged during this same time. This is notable not only for its inconsistency with best practice as identified by CEQA and DoJ, it is also notable for its deliberate withholding of responses to CEQA comment on the draft EIR made on March 9, 2023, and for its inconsistency with the very words of the March JPA General and Final Reuse Plans. The March JPA staff knows that the community wants to be engaged in this public agency and its environmental policy-making but chooses not to allow collaborative participation, and thus this draft Environmental Justice Element is disingenuous, manipulative to those serving on and voting on the March JPA Commission, manipulative of the legal and political systems in the State of California, and insulting to the public.

For years now, the March JPA has disproportionately added to the burden of communities living within its planning area by choosing a heavy industrial land-use policy with minimal mitigation measures. I experience the negative impacts of this burden on a daily basis. You have also been derelict in updating your General Plan to address CA SB1000, with over five general plan amendments since 2018 that included no mention of environmental justice. It is ironic that California SB1000, which is codified in Government Code Section 63502(h), requires jurisdictions with disadvantaged communities to either include an Environmental Justice

Element in their general plan or incorporate Environmental Justice goals, policies, and objectives throughout other general plan elements, and the March JPA insists on forcing through this plan on two separate but connected "projects" while ignoring public sentiment on either of them. CA SB1000 is triggered when a jurisdiction concurrently adopts or revises two or more general plan elements if there is one or more disadvantaged communities within the jurisdiction. A "disadvantaged community" is an area identified by the California Environmental Protection Agency as such or that is a low-income area disproportionately affected by environmental pollution and other hazards that may lead to negative health effects or environmental degradation within its planning area. What has taken the March JPA so long to address this requirement? And why are you doing it now so hastily and without public involvement or participation? Why are you working covertly to move a draft Environmental Justice Element through with proper CEQA requirements? Why are you working covertly with private and government groups to push through a flawed and irrelevant policy and controversial industrial projects?

Please consider slowing down this process, listening to the community just as this proposed policy says you will do, and draft a sensible Environmental Justice Element to the March JPA's General Plan that responds to the community's needs, is realistic to the agency's capabilities and mission, includes metrics and milestones to measure progress toward and compliance with individual policies and goals (as any element of a "project" of this scope would do), and will transition to and benefit the County of Riverside once the March JPA sunsets in July 2025 (not one driven by greedy developers and investors or one that leave the County with unfunded obligations and liabilities). Please also consider pausing the release of the Recirculated Draft EIR for the West Campus Upper Plateau until the Environmental Justice Element General Plan amendment process is complete so that the community can meaningfully comment on a policy that has been approved by the March JPA and its Commission and thus will be relevant to the applicant's proposed project.

RI-260.2
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I close by offering once again to volunteer my time to serve on a community advisory board, working with the March JPA to draft and finalize an authentic Environmental Justice Element amendment to the General Plan, and then to consider and propose reasonable land uses that adhere to the General Plan and benefit local communities. Please let me know how I can help.

"When one tugs at a single thing in nature, one finds it attached to the rest of the world."

Jerry Shearer

Jerry Shearer
Riverside, CA 92508
jsydor@yahoo.com

25 February 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the recirculated EIR for the March JPA West Campus Upper Plateau project. The updated project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. I must say, as a member of the local community, I am disappointed that you are continuing to push forward this abhorrent industrial project.

RI-260.3

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices, December 2, 2023
- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- March JPA Draft Environmental Justice Element, November 2023
- March JPA TAC Meeting Minute Notes from February 6, 2023, April 3, 2023, June 5, 2023, August 7, 2023, September 6, 2023, and December 4, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- General Plan of the March Joint Powers Authority, assumed March 11, 1997
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

RI-260.4

For the purposes of this comment letter, I will refer to the March Joint Power Authority (JPA) which includes the Commission members, the developer that is understood to be LNR Riverside, LLC, Meridian Park West, LLC, the Lewis Group of Companies (partners and subsidiaries), and member entities the cities of Riverside, Moreno Valley, and Perris, and the County of Riverside.

The West Campus Upper Plateau is a unique piece of land. It is an extension of the Sycamore Canyon Park natural area geographically, historically, culturally, environmentally, and recreationally. It is a valuable part of the OrangeCrest community, value beyond how much money it can generate a few greedy people. There is no other place like it in western Riverside County. Any development of this land should complement the unique characteristics and value (human value, not just economic value) of this land not destroy it. Through the original draft EIR process, I and many members of the community wrote to you detailing alternate land use plans that accentuate the community, meet the JPA's goals for this project, and preserve large portions of the landscape for both passive and active recreation. RI-260.5

As much as the applicant via this draft and recirculated EIRs tries, this industrial development plan and land use zoning do not preserve the landscape even with the inclusion of the 2012 agreement that sets aside open space and a conservation easement and the "community benefit" of a fire department (which was always a requirement of settlements against the JPA) and park. Viewing this land from a land use map or a parking lot don't begin to do adequate justice to its human value. The public still does not understand your thoughts on taking this special piece of land away from residents of western Riverside County and turning it over for private development. The establishment of the 2012 settlement (why has it taken you 12 years to act on it?) does not adequately reflect how people value and enjoy this land currently. This warehouse project is not like other warehouse projects and it will have a significant negative impact on the community it borders regardless of the CEQA mandated mitigation efforts and applicant's hollow claims of community benefits. It is inconceivable to me why the JPA continues to allow the applicant to push forward this specific plan and project, especially after two years of widespread and uniform community opposition to it. Your effort thus far is appalling. RI-260.6

After reviewing the recirculated draft EIR, it continues to be quite clear that the March JPA is scrambling to push through an unpopular project before sunsetting July 1, 2025 leaving the County of Riverside to sort out the mess. There are many clear and obvious errors, omissions, misrepresentations, and discrepancies in the recirculated draft EIR. I write this letter to call attention to as many of them as I can, especially those that to me, my family, and my community are the most egregious. Changes to the project itself from the original draft EIR are negligible if not even more upsetting to the residents and communities surrounding the March JPA territory. Specifically, I find the following areas of the recirculated draft EIR to be unstable, dismissive, and predatory in nature. RI-260.7

1. A clear continued disregard for the 2012 and 2003 settlements, and the destruction of a unique cultural resources and natural habitat and ecosystem in western Riverside County. RI-260.8

2. The lack of authentic community engagement and involvement when making decisions that impact people's lives, and the lack of enforcement mechanisms or policies in place for existing and future warehouses within the JPA jurisdiction, and a hasty Environmental Justice element that is unapproved by the JPA and Commission at the time of this letter.
3. The continued privatization of public lands surrounding March ARB and throughout southern California, including the criminal request to form a second long-term development agreement with a single contractor.
4. The JPA's refusal to discuss or acknowledge why the applicant is proposing an industrial project instead of working with the community and local agencies to find non-industrial alternative plans for the land of the Upper Plateau despite public demands to do so.
5. Misleading and inconsistent baseline information used to develop this plan including faulty mitigation measures, misleading statements about the benefits and jobs associated with this project, the misinterpretation of aesthetics outside of a very specialized world, the continued demonstration of contempt for this land and how the public has, is, and will benefit from it, and the March JPA's unfunded liabilities.

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RI-260.10

RI-260.11

RI-260.12

It is disturbing for all who live in the communities surrounding the March JPA developed lands that you are clearly cherry-picking guidelines, policies, and regulations to suit the greedy goals of your applicant and its private investors. Information developed as part of the CEQA process should influence the development of general plan policies (and specific plan amendments). CEQA should not just be a post hoc rationalization of decisions that have already been made, and this is exactly what your recirculated and draft EIR for the West Campus Upper Plateau have presented for us for public comment. The later environmental review process begins, the more bureaucratic and financial momentum there is behind a proposed project, thus providing a strong incentive for applicants and land use authorities to ignore environmental concerns that could be dealt with more easily at an early stage of the project. My concerns and comments in this letter reflect your negligent and ineffectual governing and oversight practices, and the flaws in the recirculated draft Environmental Impact Report for the Upper Plateau.

RI-260.13

Lastly, the JPA, the applicant, and the growing list of consultants you are hiring to ensure that warehouses are built on the Upper Plateau clearly signal to the public that you have no intention of following your General Plan unless it suites predetermined business goals. Those goals clearly are to help the applicant profit quickly from the sale of and development of this land. While greedy developers may not be explicitly illegal, in some cases predatory development is, the JPA is proudly displaying its duplicitous nature by ignoring the heritage of western Riverside County and selling it (along with the heritage of the US Air Force and March ARB) out for the greed of developers like the Randall Lewis. Companies like the Lewis Group are no better than slumlords preying on people who cannot afford to resist the mistreatment you are providing them. When you sunset in July 2025, will you leave by driving one last surveyors' stake through the heart of the communities you were tasked with rebuilding? Will you offer a greedy developer one last showcase to add to its investment and project portfolios? Or will you change course and align

RI-260.14

with the communities you were formed to serve and demand better land use planning from the applicant? Your recirculated draft EIR makes it clear what you intend to do. I hope the pages to follow help convince you to change your course.

RI-260.14 Cont.

The Park: "Community Benefit" in Name Only

The damage and disturbance to this unique piece of land is unquestionable. The recirculated and draft EIRs admit as much throughout the impacts and mitigations described in section 3.5.2 Project Design Features, 3.5.6 Request Approvals and Entitlements, 4.2.6 Impact Analysis, 4.2.7 Mitigation Measures, 4.2.8 Level of Significance after Mitigation, 4.8.6 Mitigation Measures, and 4.10.4-4.10.7. The climate change and extreme weather events of the past few years, from severe drought in California to unprecedented rain and snowfall in 2023, the fact that our climate and weather patterns are changing is unquestionable. Anyone paying attention can hear the environmental alarm bells ringing, warning us of changes to our lives that we may not be prepared to handle, and that we may well be contributing to on a daily basis with our life choices. It is not my intention to argue climate change related to the West Campus, Upper Plateau project, but it is my intention to question why the JPA and applicant feel it is imperative to eliminate valuable open space and natural landscapes in the name of greed and predatory capitalist practices. Where in the March ARB General Plan are you tasked with building more warehouses near our homes and community? Why have you repeatedly in person and in the recirculated draft EIR identified that the General Plan allows you flexibility to develop the land with warehouses and industrial zoning when it does not put an emphasis on doing so? In fact, with the formation of the General Plan (as stated on page V of the General Plan), the March JPA was created as a public entity tasked with preparing, adopting, implementing, and maintaining a general plan that serves to link community values with actual physical decisions. You were tasked with creating a community with diversity and inclusiveness with respect for the military, private, and public land uses; to address circulation, housing, conservation of natural resources, preservation open space, and protect public safety. Cherry-picking where you adhere to the General Plan and where you choose to ignore it is misleading to the public and inconsistent with the draft Environmental Justice Element hastily being formed as I write this letter. I ask you again nearly a year later, how does this specific plan begin to comply with California's push to net zero emissions standards? How does this specific plan meet the objectives stated in your General Plan and benefit the surrounding community? How does this specific plan, essentially unchanged from the original draft EIR, show that the JPA and applicant are operating in good faith with the community it will very soon destroy? And why does the recirculated draft EIR leave so many unfunded financial liabilities for the public and successor agency to assume?

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RI-260.18

RI-260.19

RI-260.20

I object to your use of the term "community benefit" on page 3-24 and throughout the recirculated draft EIR. A **Community Benefit Agreement (CBA)** is a strategic vehicle for community (the residents of western Riverside County, specifically the residents living along the eastern border of the City of Riverside) improvement, while benefiting private sector developers (the applicant) and government (the March JPA). CBAs are not zero-sum instruments. They are

RI-260.21

legal agreements between community benefit groups and developers, stipulating the benefits a developer agrees to fund or furnish, in exchange for community support of a project. Community benefits can include commitments to hire directly from a community, contributions to economic trust funds, jobs and local workforce training guarantees, infrastructure improvements, gifts in-kind, and many more establishments to benefit residents of a community.

CBAs pivot around government officials: since elected representatives and government staff need support from their constituencies, and developers need government support for items like zoning and contract approvals, permits, and financing, developers have clear incentives to accommodate community interests. When synergistic development models like CBAs are employed, developers experience reduced risk, government and communities profit from improved cost/benefit positions, and residents benefit from a better quality of life. Thus, CBAs are mutually-reinforcing, since all three stakeholder groups gain, albeit uniquely, from this legally binding relationship.

For example, the California Department of Toxic Substances Control uses the CBA process as part of the Cleanup in Vulnerable Communities Initiative to further improve the quality of life in the most vulnerable communities impacted by contaminated sites overseen by DTSC. The DTSC uses CBAs in remediation projects to provide the community with benefits that go beyond mitigation measures that are required for toxic cleanups. The goal of this CBA process is to engage the public in the investigation and restoration of sites within communities with high cumulative environmental burdens including environmental justice organizations, indigenous tribes, and local community stakeholders.

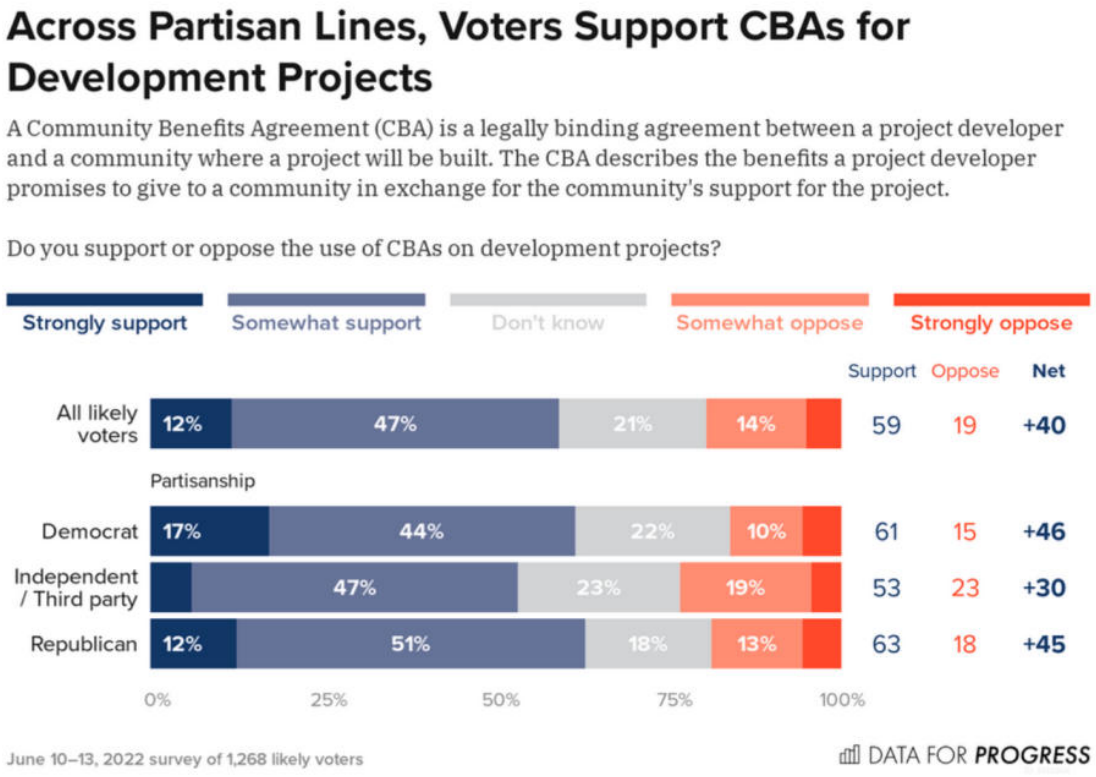
RI-260.21
Cont.

Another example of a successful CBA being implemented is in the City of Richmond, California. Chevron U.S.A. Inc. was planning a large refinery modernization project at the Richmond facility and in order to finalize the EIR process, Chevron entered into a CBA with the City of Richmond to implement measures designed to protect and enhance public health and safety which included funding a five-year air quality study, providing training and equipment to the local fire department, working with Contra Costa Sheriff's department to improve the Community Warning System, and helping to develop and implement local agency emergency response procedures and drills. Chevron's stated contribution would be up to $40 million for these community benefit programs.

One example of the community benefit plan not working, because it was attached to a poorly planned industrial project in Moreno Valley, California, was when the applicant offered numerous CEQA mandated mitigation efforts and community benefits attached to a warehouse project in an over-burdened neighborhood. Among these community benefits were providing more than $200,000 for an electric vehicle grant, more than $100,000 for a solar advocacy program, $500,000 gift for a community foundation (a gift to the City), up to $15,000,000 donations to the same community foundation, and the construction of a community active recreation park. This community benefits offer was rejected in Moreno Valley on a small

warehouse project because the City felt it fell beyond the City's legal authority to approve as CEQA-related Mitigation Measures or as the Conditions of Approval related to the requested entitlements. This applicant was motivated to work with the government to win a project, but they did not engage with the public, a requirement of an authentic community benefits agreement. As this example comes from a member agency in the March JPA, I hope you would consider the negative impacts unilaterally agreeing to "benefits" on behalf of the public will have for your agency and instead involve the community in choosing benefits for this project.

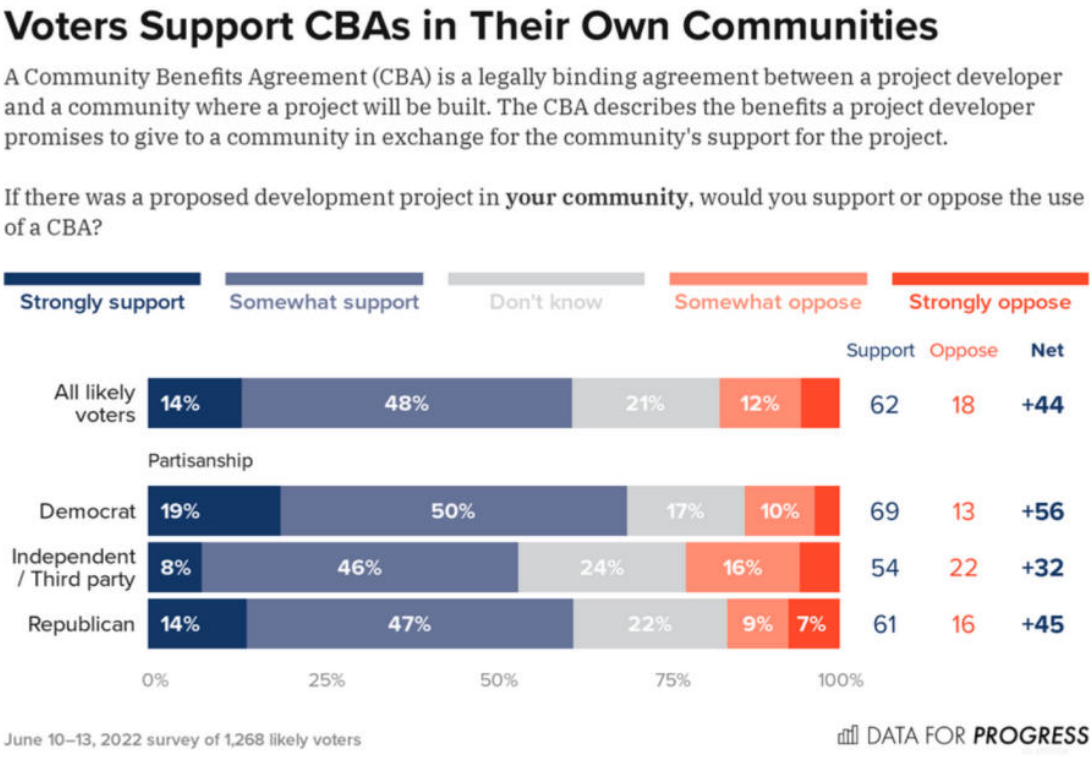
Not only can CBAs be successful when implemented correctly, they are overwhelmingly popular. A 2022 Data for Progress poll found that 59 percent of likely voters support the use of CBAs on development projects (a +40-point margin of support). And this is no political issue, just like opposition to industrial development right in the middle of an establish community is unpopular, support for CBAs holds across partisan lines, with 61 percent of Democrats, 53 percent of Independents, and 63 percent of Republicans in favor.



This same report identifies support for CBAs increases when voters think about their own communities, with 62 percent of respondents in favor of local CBAs. Notably, when asked if they would support or oppose the use of a CBA for a proposed development project in their community, 17 percent of both Black and Latina/o voters indicate they would "strongly support" a CBA. Given historical and ongoing systemic racism and the predatory siting of development

RI-260.21 Cont.

projects (like the many of the warehouses within the March JPA development area) in communities of color, this finding is indicative of the need and support for CBAs that center on equity and prioritize local benefit and restorative justice.



Despite the promise of CBAs to guarantee communities are consulted about and benefit from a given development, CBAs can be weak and nonbinding if designed poorly or unilaterally forced on the public without input. Yet in the recirculated draft EIR, the applicant and JPA are misleading the public in stating that there are community benefits provided in this plan. You fail to include the word "agreement" and therefore are trying to pass the "benefits" off as something you are contributing as a result of this project, but the truth is you are required to provide the benefits you list on page 3-24. To this end, there are two settlement agreements in place within the JPA and they affect any plans put forward and then developed by the JPA and developer including the West Campus Upper Plateau. To better understand the community benefits offered by the JPA and applicant in the recirculated and draft EIR, it is first important to understand how we got to the latest version of your offer to provide benefit to the community in exchange for putting warehouses on the Upper Plateau.

RI-260.21 Cont.

The **September 2012 agreement** with the Center for Biological Diversity and San Bernardino Valley Audubon Society (S.D. Cal No. 09-cv-1864-JAH-POR) is a court ordered mandate that the JPA provides for a conservation easement or water quality open space area to be managed as a wildlife habitat for sensitive species and riparian areas. The purpose of this settlement is to

RI-260.22

preserve this land for light recreation use, for archaeological and historic purposes, and for the safeguarding and conservation of native plants, animals, and topography. The JPA in its latest edition of the EIR clearly states its point-of-view on this settlement as a benefit to the community, but it is a court mandated benefit that was established long before the JPA sought to develop the West Campus Upper Plateau. Open space of any kind is a benefit to the community, but it is not one that you are able to bargain with the community on. You are required to provide it by settlement regardless of what you build on this land. In fact, your zoning of this area from Business Park to Industrial is inconsistent with the terms of the 2012 settlement agreement.

RI-260.22 Cont.

RI-260.23

According to Tables 1-2 and 1-3 of the recirculated and draft EIRs, some of these areas will see "significant and unavoidable" impact due to this project. These items include air quality, historical resources, noise, and tribal cultural resources. In each instance, these unavoidable items are in conflict with the 2012 Settlement Agreement and the guidelines established in your final General Plan. In many instances, your list of items that will be impacted is incomplete, inaccurate, or are downright misleading to the public. These instabilities, errors, and omissions are in direct violation of the objectives you are seeking to establish with the Environmental Justice element found both on the JPA's website and throughout this recirculated draft EIR.

RI-260.24

There seems to be many inconsistencies especially in area of preservation of habitat under the 2012 agreement. The first environmental alarm bell centers around a blatant disregard for the preservation of species on this land. For example, the culverts (see the 2012 Slope Maintenance Exhibits) under Cactus are insufficient and will not accommodate all animals in their migration between Sycamore Canyon north and south areas. Similar wildlife corridors along the 101 freeway in California, Wallis Annenberg wildlife crossing, the Irvine-Laguna Wildlife Corridor and Greenbelt, the I-15 wildlife crossing in Temecula, and the I-10 wildlife crossing connecting the San Bernardino and San Jacinto wildernesses are (a) more numerous giving wildlife options for crossing at different locations, proposing two culverts is negligent wildlife and conservation planning on your part, and (b) larger or wider allowing for small and medium sized animals to move freely without feeling confined or forced into an uncomfortable setting that may restrict their movement and condense the gene pool of many threatened species. These successful corridors improve bio- and genetic diversity (which is one of the reasons you acknowledge in the recirculated draft EIR for the agreement to move the Stephen's Kangaroo Rat) which will help ensure a healthy riparian habitat in the Upper Plateau. Granted these examples include must larger roadways, but the idea remains the same especially considering a large number of vehicles traveling on Cactus, Alessandro, and other roads surrounding the Upper Plateau will be semi-trucks that are unable to stop quickly and will undoubtedly cause an increase in deaths of small animals and reptiles living in and visiting this environment. If you plan on stating that there is a community benefit agreement in place for this project, then leaving out having a healthy diverse population of plants and animals in the open space as a benefit to the community guaranteed by the 2012 Settlement and the establishment of a conservation easement is ignorant, neglectful, and misleading to the public. This appears to be a one-sided benefit, a benefit in name only.

RI-260.25

A real benefit to the community would be to have a healthy ecosystem to live near and enjoy. That would be one way for the JPA to form a truly collaborative CBA for the West Campus Upper Plateau project in relation to the 2012 Settlement. Without a better-defined benefit to the public than exists in the recirculated draft EIR, I have serious concerns about the shrinking of open spaces and destruction of habitat, and I ask that you require the project applicant to make every effort to preserve endangered and threatened species and plant life that you can.

1. The applicant should expand their analysis to include the Western Riverside County MSHCP Species Observations Database which contains much more data for our region than does CNDDB.
2. The applicant should disregard any of the wildlife studies over a year old. My understanding is that the final EIR should include wildlife studies from within a year timeframe to satisfy the requirements of the California Department of Fish and Game or U.S. Fish and Wildlife Service. Please redo studies that are more than a year old.
3. The applicant should consistently account for species and their vulnerability throughout the document. Why is the coastal scrub documented in some parts of the EIR and then considered absent in the plant section? How would including it in the plant section potentially impact the significance level of the development on plant life?
4. Some rare plants, including the severely threatened tarplant, thrive in moist environments. Why did you conduct the plant survey during a drought year? How can you say it is absent or assess the significance of impact unless you have documented its absence during a year and season where the rare plant life would grow? Given these deficiencies, I request that you include the coastal scrub documented in the plant section and address how this might impact the significance level. I also ask that you survey severely threatened plants like the tarplant during the wet season in a non-drought year to verify its absence.
5. The draft EIR omits a thorough study of reptiles, specifically the study needs to evaluate the impact of construction on migration of snakes, brumation, species variety and reproduction, and prey habits. There is a rich community of reptiles on this land and the draft EIR negligently ignores them and their benefit to the landscape, environment, and local community.
6. The draft EIR does not account for migratory birds sufficiently. At different times of the year, residents and visitors can view geese, ducks, egrets, eagles, vultures, and a host of songbirds as they use the Upper Plateau to migrate from one place to the next. Why does the study of birds not include the migratory nature of birds making use of this land?
7. The draft EIR does not account for migratory butterflies, cicadas, and tarantulas, among other insects. Some of these insects are beneficial to our community from an aesthetics point of view and some of them simply kill other invasive pests. Why were these items omitted from the draft EIR? Along with the migratory and beneficial insects, the construction process will drive many of the less than desirable insects already in the open space into people's homes. Ants and mosquitoes (some carrying West Nile Virus) will be driven from their homes and into closer contact with people. Why does the draft EIR not include mitigations for residents impacted by this invasion? This is not imaginary, and

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happened to my house when you last built warehouses so close to people's homes. What responsibility does the JPA take for increasing my pest control bill? RI-260.32 Cont.

The public cannot trust that you are not destroying rare animal, bird, and plant life unless a more thorough survey is conducted, one that is done over a more representative timeframe that includes the local variations in seasonal temperatures, migration, and rainfall. I request the applicant and its consultants produce a more complete survey of the life forms that call this land home at one time or another as well as the impacts of climate change on this land over the last 10-20 years. I also request the JPA, the applicant, and its consultants survey local residents to assess the value of uninterrupted open space, not the kind provided for in the 2012 Center for Biological Diversity settlement (which is open space in name only), but the type of open space that allows animals to move freely throughout a landscape without the disruptions of traffic, light, noise, and water pollution associated with industrial development. Again, this would be a benefit to the community with respect to the court mandated open space and conservation easement you are required to provide regardless of the specific plan being proposed by the JPA and applicant. And any functioning CBA would balance community, developer, and government benefits in its final draft form and not leave behind the burden of unfunded liabilities for the public and successor agency to take over. RI-260.33 RI-260.34

Under the Terms of the 2012 settlement agreement, item B Defendant-Intervenors' Obligations, subitem 1a on page 4, the agreement establishes, "That any currently existing service roads within the Conservation Areas…can continued to be utilized by the public for passive recreation." Subitem 1b on page 4 refines this to say that public access these roads can be restricted if the land management agency deems the access a threat to "conservation value or public safety." Yet Figures 3-2, 3-3, 3-4, and 3-5 (Site Plan) clearly show a plan that will infringe on and limit public access to existing trails and roadways in the Upper Plateau area. The fact that the recirculated plan is still unstable and provides inaccurate information means the it is unclear how the public will access this land during project construction. Please explain how the public will keep access during the project. You are in all likelihood aware of this requirement and believe that your plan adequately complies with the terms of the settlement agreement, but I fail to understand how. The construction of Cactus alone will destroy several hiking and biking trails in the area frequently used by the public for active and passive recreation. The large-scale demolition needed to level grades associated with roadways and building foundations will clearly impair access to these trails and roads and may eliminate some of them entirely. I like walking in this area, hiking into places that make me feel like I am somewhere outside of civilization. These trails that I and many residents enjoy hiking on will be destroyed by the construction. How is this not in violation of the 2012 agreement that quite clearly calls for maintaining existing roads and trails? I hope subitems 2 and 3a are not the answer to my questions here as they seem subjectively contrary to the idea of conservation and to the items identified in 1a and 1b. RI-260.35

I also question the status of settlement agreement subitem 7. What has the applicant done to establish and fund this endowment to date? Please provide establishment dates, payment dates RI-260.36

and amounts, corresponding permit dates, and progress toward the $2 million funding level projected for April 1, 2027. Since the signing of this agreement, depending on your sources, inflation has risen 22%-30%. The funding obligation may have been fair in 2012, but today the number is about 25% behind. Even with the commitment (page 3-24 of the recirculated draft EIR) of the applicant to contribute up to $3.5 million to fund a park feasibility study, there is no park. There is no realized benefit to the community in this offer and it is an offer that is completely one-sided: it favors the developer rather than the community.

RI-260.36 Cont.

As for the park identified in the 2012 settlement agreement: at the JPA's TAC meeting on August 7, 2023, Adam Collier, Vice President with Lewis Management Corp. stated on record that there will be no park under this agreement. He described that the applicant has limited financial responsibility for the park and that the high cost and lack of funding by the JPA (notes recorded in the 2022 Park Subcommittee meeting minutes) were reasons that the park will not be part of the West Campus Upper Plateau project, yet the JPA and applicant hurry to point at the conservation easement as a benefit to the community. JPA staff was less than forthcoming with the TAC and the public at this meeting in regards to the park. So, is the promise to contribute money for a park study in line with the 2012 settlement agreement? And is a park study a benefit to the community? The community is not fooled by your misleading recirculated draft EIR when the applicant and the JPA pick-and-choose what elements of the settlement it will comply with and what elements it will not comply with.

Why do you insist on labeling the park and conservation easement as a community benefit when they are both required by legal standing? The JPA is required to adhere to the terms of the 2012 settlement and there is no need for it to be a part of the Specific Plan for the Upper Plateau. You are only doing these two items together for public perception rather than adhering to the settlement terms. In fact, the building of a public park cannot be an objective of this project as it is required under the terms of the 2012 settlement. Because you insist on disregarding the zoning identified in the 2012 settlement, and forcing through industrial instead of business park, your Specific Plan is inconsistent with the terms of the 2012 settlement. And it is irresponsible to leave this issue unresolved and unfunded as the JPA sunsets in July 2025.

It is unclear to the public why you are manipulating the terms of the 2012 settlement in these ways. Please indicate if the applicant has missed deadlines for funding or permits, what accountability exist for their actions, and what would happen if the applicant defaults on this obligation relative to the 2012 settlement agreement. If I understand correctly, the applicant still is required to contribute nearly $1,000,000 to a fund related to this settlement by 2027 regardless of whether they build anything on the Upper Plateau. Also, a true community benefit agreement, one that engages the community in its formation, would likely include the 2012 settlement agreement as a start to a CBA for this project, outlining specific financial status and obligations. The problem is that the JPA is not only inconsistent in regards to communication with the public about this project, but it is inconsistent with the settlement terms and draft Environmental Justice element is seeks to implement with only 16 months before the agency sunsets in 2025.

RI-260.37

One recommendation that I explore later in this letter is to research and present an alternative project plan that incorporates the unique local value of this land into a County or State Park, which is possible under the County and State guidelines for such a park. This official status would need to begin with the applicant and JPA working with community groups to file paperwork that investigates the eligibility of the area to be a County or State Park, one with historical or cultural significance to the area. Such a park would be a benefit to the community, government, and could even benefit the developer. How can the JPA and applicant address the 2012 settlement and provide a CBA that helps establish a BRAC-Park alternate plan as I have identified in this letter? Because the JPA and applicant are pressed by a deadline, what happens to the 2012 agreement once the JPA sunsets at the end of June 2025? Would the County of Riverside be legally required to uphold the terms of the settlement agreement in place of the March JPA? The nature of this question isn't who takes over the land management function, it is more what legal obligation will exist when the applicant is no longer tied to the March JPA? Does the developer's DDA (existing or future) transfer along with its entitlements to the County or the MSHCP to ensure conservation is the primary focus of this set aside land?

RI-260.38

RI-260.39

The **August 2003 agreement** with Center for Community Action and Environmental Justice places conditions for further development of the March Business Center. The conditions include a reduction of semi-truck emissions (which frankly are outdated by today's air quality standards), increased use of bio-diesel and alternate clean burning fuels (with the advances in EVs, there has to be some application here), improve landscaping and scenic vistas from the OrangeCrest neighborhood, amend land uses for lots 16-18 and 54-56 to exclude logistics warehouses, limit semi-trucks on Van Buren Blvd (which certainly did not happen), and provide public amenities that include community, regional, and open space parks, and police and fire sub-stations. How is the proposed project complying with the requirements of the 2003 settlement? This settlement first established the community benefit of parks and community centers (identified in the General Plan) for both passive and active recreation, first responder facilities, and open-space. These, and many items in the 2003 agreement, form the basis for a quality CBA, but the JPA and applicant have failed to adhere to the items you agreed to in 2003.

According to Tables 1-2 and 1-3 of the recirculated and draft EIRs, many of the requirements in this settlement will see "significant and unavoidable" impact or were completely ignored by the draft EIR. The decision to leave this agreement out of the draft EIR is concerning. Can you explain to me and the community how the JPA is adhering to the scope of this agreement with this plan? There seems to be many inconsistencies especially in area of supporting the lives of residents of Riverside in the 2003 agreement.

RI-260.40

The first area I have serious concerns about is the traffic section of the recirculated draft EIR. The traffic analysis in both draft versions of the EIR do not include the 215 Freeway or the 215/60 corridor, a path most, if not all, the trucks will take to access the warehouses. The 215 freeway is within 0.5 miles of the project and the project's own traffic estimates indicate that

RI-260.41

approximately 20,000 additional trips will take the 215 Freeway. CalTrans should have been consulted according to standard WRCOG and County of Riverside Transportation Planning guidance documents. This is a significant deficiency in your analysis, especially when you consider that your traffic analysis failed to account for passenger vehicle traffic and the myriad of approved construction projects in and around the site such as the World Logistics Center, the Stoneridge Commerce Center, and dozens of other approved or planned projects. You also exclude major streets surrounding the development like Alessandro, Krameria, and Van Buren. Since the 2003 settlement agreement specifies that you work to reduce traffic on these streets, and you have not included this settlement in the draft EIR, it is clear that you do not intent to adhere to the settlement requirements and guidelines. How do you justify not considering the main truck traffic routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Why don't you consider the cumulative impacts for traffic within a five-mile radius of this project? Ignoring it is irresponsible.

RI-260.41 Cont.

RI-260.42

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the region, and the adjacent truck routes of Alessandro, Krameria, and Van Buren and personal vehicle traffic into account. Anyone who lives or travels in this region knows that at any time of day, the 215 is bumper-to-bumper, filled with trucks, and undrivable, even though the industrial footprint will be doubling in the next few years without this project. Ignoring this major project element is not only a violation of the 2003 agreement, it is in conflict with the draft Environmental Justice element you are proposing, and it is a clear signal that your agency has no intention of entering into a community benefit agreement that will benefit the community.

I also have concerns about how traffic will affect our arterial streets. Your analysis assumes drivers will stick to approved paths, but we know from experience this is not the case. For instance, at 4:00 AM on 2/2/23 a semi-truck overturned carrying a heavy shipping container and blocked traffic on Alessandro and Trautwein for several hours, disrupting everyone's morning commute and trapping people in the OrangeCrest and Mission Grove neighborhoods. This driver knew he was driving down a road that prohibited the type of truck he was driving but he did it anyway because he was trying to find the quickest route to his destination. This is but one example of trucks not following the enforcement codes and using our arterial roads such as Alessandro/Central and Van Buren, increasing traffic and endangering public safety. This fact is also in violation of the 2003 settlement agreement and is difficult to monitor by law enforcement. In the recirculated draft EIR, PDF-TRA-3 identifies $100,000 contributed by the applicant to fund truck route enforcement for two years. This is again identified as a community benefit, but this action would not take place until after the project is complete and the JPA will no longer exist, so there is no accountability to ensure this actually happens. That is hardly a benefit for the community because it lacks accountability. Your revised plan does not adequately account for the 2003 settlement, does not help mitigate this kind of problem on the streets surrounding the Upper Plateau, and does not offer the community a clear and real benefit.

RI-260.43

Your revised plan also does not account for the noise pollution associate with idling semi-trucks. While not explicitly part of traffic patterns or congestion, it is part of vehicles moving to and from the warehouses. Many of these trucks sit idling for 20 or more minutes and according to you that is illegal. Yet there are virtually no enforcement mechanisms in place to prevent them from doing this, and there certainly is no acknowledgement of this problem in the recirculated draft EIR. You and I have traded many emails, phone calls, and in-person conversations over the past 20 months about this problem yet you cannot offer me or the community a solution to this illegal act occurring around JPA developed warehouses. I bring this up again because it also seems like a violation of the 2003 settlement agreement in the areas of reducing truck emissions and reducing truck traffic on our streets. Once again, the JPA and applicant fail to offer the public any benefit through your plans and all but guarantee that continued infractions will occur because there is no accountability for the businesses, the developer, or the JPA.

RI-260.44

Why are enforcement mechanisms not considered as part of your plan? $100,000 just scratches the surface of the cost to monitor traffic and crime in the JPA warehouses. Who will pay for this enforcement? When the JPA sunsets, who ensures that mitigation measures are followed for maintenance and enforcement? It seems like the County and member City agencies will be required to pay which means tax payers get to fund your poor planning decisions. How might the traffic study change if actual (versus the "ideal") traffic patterns of truck drivers were taken into account? For instance, has there been a study done of EIR predictive numbers versus the actual traffic patterns in existing warehouses? How did the predictions match reality, and why should we trust your analysis to be accurate if past ones underestimated the traffic disruption they caused? Anyone driving down Central or Van Buren can tell you that truck drivers are not following the agreed-upon paths, and it is not ethical to leave the burden of maintenance and enforcement to under-staffed and under-funded City or County public service officers. Please redo your traffic study to reflect the actual conditions of the surrounding area.

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RI-260.46

Finally, if the JPA and applicant had pursued a genuine CBA, then the 2003 and 2012 settlement agreements contain some key elements that would benefit the community and government in this legal relationship. If the JPA and applicant had pursued a genuine CBA, then your Environmental Justice element would contain objectives that impact the area around March ARB instead of the Salton Sea. If the JPA and applicant had pursued a genuine CBA, then like the City of Richmond and the California Department of Toxic Substances Control, the JPA would have a specific plan that aligns with the goals of the agency, the developer's wish to profit, and the community's dreams of living happy and healthy lives in homes surround the March ARB. There is still time to act: start today by forming a community advisory board to the JPA and work with them to establish an authentic Community Benefit Agreement for your project and an Environmental Justice Element that the JPA can and will actually employ on projects permitted in the final months of its existence.

RI-260.47

The Environmental Justice Element and Community Engagement

While I am clearly a novice when it comes to CEQA and your working relationship and knowledge and use of it as a project framework, it appears to me that you failed to follow the CEQA process in presenting the draft Environmental Justice amendment to the March JPA General Plan as part of the recirculated draft EIR for the West Campus Upper Plateau. By shortcutting the process and copy-pasting the County of Riverside's Environmental Justice policy into the March JPA's plans, you appear to be circumventing the CEQA process wherein you are required to complete an environmental study and release an EIR for the EJ element before you can adopt it as part of the General Plan. I encourage you to follow this process before moving forward with both the final March JPA Environmental Justice policy and any development project or agreement that will be impacted by this final document including the West Campus Upper Plateau project presented in the recirculated draft EIR.

RI-260.48

Building on this idea that the plan is inconsistent or insufficient with the two agreements that pertain to any development plans by the March JPA, residents believe that the JPA is working for the builder rather than the residents of western Riverside County. Your community engagement effort has been a checkbox, not an actual process, you have documented and followed and that is illustrated by your reactive last minute-effort to establish an Environmental Justice element as part of the March JPA General Plan, and your lack of an authentic Community Benefit Agreement. To begin, the community benefits identified in the recirculated draft EIR were invented by the applicant, not a product of meaningful engagement with the public. As discussed in the previous section, a community benefit agreement is a partnership between business, government, and the public. Please explain this partnership in your recirculated and draft EIR documents to me. I can't see it. As part of the proposed DDA on page 3-24 of the recirculated draft EIR, you list a $3.5 million contribution to a park feasibility study and the construction of the Meridian Fire Station as community benefits. Both of these items are a result of settlements against the JPA and applicant and are required by you from previous litigation. To attach them as benefits to the community for this project is disingenuous and deceptive planning on your part and looks to skirt your responsibility to the community for previous obligations that you have chosen to ignore to this point. Neither of these are benefits to the community in relation to the project at the West Campus Upper Plateau. The inclusion of these two items tied to a new 15-year development agreement is pure trickery by the applicant and the JPA and if the commission approves either of these items it would be complicit in disregarding the wishes of the community and selling us out to help the applicant and the JPA get a controversial project approved quickly and assure the applicant and its present and future investors maximize profit, not, I repeat, not benefit the community.

RI-260.49

Back to the park from the previous section, there is no park, though a park is required by settlement and the JPA and applicant do not have the funds or desire to pay for it. $3.5 million for a study is not a tangible benefit to the community and to label it one is purposefully misleading. The Meridian Fire Station, also a requirement of previous settlement against the JPA

RI-260.50

and applicant, is also not a direct benefit to the community as it will primarily service the County of Riverside and not the City of Riverside. 90% of the homes surrounding the March JPA development area to the west of the 215 are homes within the City of Riverside. This fire station will not service these communities and is not a benefit to residents; it does however benefit the warehouses and buildings erected by the March JPA. The fire station only benefits businesses and warehouses, not residents and therefore is no community benefit. Interesting to note, there have been more large-scale fires in warehouses than in people's homes over the last 20 months. This fire station is not a benefit to the community, it is a requirement of your poor land use planning, lack of funding for mitigation measures, and narrow-minded past decisions.

RI-260.50 Cont.

The March JPA staff and some members of the commission have openly advocated for the applicant during this process. It is blatant, once again to refer back to the definition of a community benefit agreement, that the JPA is working on behalf of the applicant. How can you claim otherwise when you advocate for their business and allow them to propose development plans that do not support your main goals identified in the General Plan? Instead, the Director of the March JPA consistently advocates for and defends the applicant in public and private communications. I have received several offensive emails from Dr. Martin where she belittles members of the community and spins her message of support for the applicant like any good soldier would do taking orders from above. Members of the March JPA Commission have either openly said they support and stand with the applicant who is doing fine work, or have been implicated as cultivated assets by the logistics industry. The perception of bias or pre-determination on projects as significant as this one is concerning for not just me and my neighbors, but for all southern California residents as we watch schools, homes, and precious open space be destroyed to build more warehouses at a time when the logistics and warehouse industry is facing historic losses and laying off both part-time and full-time employees, closing locations because their economic modeling has changed. Your eagerness to stand up for such a predatory industry demonstrates clearly that you do not agree with the definition of the community benefit agreement because you insist on taking sides instead of helping to bridge and connect the public to predatory businesses like the Lewis Group.

RI-260.51

Over the past century, land use planning by regulatory agencies has increasingly displaced the decentralized process of private landowners making their own decisions about land use. Local governments, county governments, state governments, and, to an increasing extent, the federal government are all requiring private landowners to modify their lives in order for privately owned land to conform to government plans. Increasingly, such plans are justified as necessary to grow the economy and provide jobs for local workers, which extends the reach of government agencies beyond important and traditional land use concerns like protecting residential neighborhoods from commercial intrusions.

RI-260.52

Predatory land development practices, like the practices displayed by the March JPA and its applicant over the last 15 years, are those that harm communities and the environment for the sake of profit. While many developers approach their work responsibly and ethically, others

RI-260.53

engage in practices that can cause harm and contribute to economic inequality. Some of the most common predatory land development practices include:

1. *Displacing low-income residents*: In many cases, land developers will purchase properties in low-income areas with the intention of demolishing existing housing or other buildings to make way for more lucrative developments for the developer and its investors. This can result in the forced displacement of residents who may not have the means to relocate, leading to increased homelessness and economic instability in the affected community.
2. *Environmental degradation*: Land development can have a significant impact on the natural environment, particularly when developers fail to implement sustainable practices or cut corners in the interest of maximizing profits. Clearing land for development can lead to deforestation, loss of wildlife habitat, and increased air and water pollution, among other negative outcomes. The negative impacts of the recirculated and draft EIR are well documented and, in the words of the draft EIR "unavoidable" (which was written 26 times in the recirculated draft EIR). These "unavoidable" environmental impacts include the loss of habitat for sensitive and endangered plants and animals as well as cultural and historic sites. Yet these impacts are avoidable, the applicant and the JPA choose to offer this unpopular and destructive warehouse project instead of offering a project that accentuates the landscape, and you propose this project in the name of profit for the applicant and its investors alone.
3. *Lack of transparency*: Some developers engage in secretive practices, such as concealing information about the impact their developments will have on the environment or failing to disclose financial arrangements with local officials. This lack of transparency can undermine public trust and prevent communities from having a say in the development process. The JPA staff and its elected commission members certainly have a high level of scrutiny on them related to the perception of bias and impropriety, and perception alone is enough to cast doubt as the authenticity of this process and the agency leading it.
4. *Overbuilding*: In some cases, developers may also engage in overbuilding, creating more properties than there is demand for in a given area. This can lead to a glut of empty properties, which can in turn lead to blight and economic decline in the surrounding area. For nearly two years, I and members of Riverside Neighbors Opposing Warehouses have communicated to the JPA that this is true for the land along Meridian Parkway, yet the JPA continues to alter the General Plan with Specific Plans that focus only on one land use: warehouses. This overbuilding seemed logical due to the rise in e-commerce in the late 20-teens but as the U.S. and global economy deal with post-COVID realities, there just isn't a need for logistics-driven businesses at the levels you have made a reality in our neighborhoods. Simply put, the JPA has overbuilt this area with primarily one land use, a land use that is seeing a steep decline in business. Smart investors rarely sink all of their assets into one market, but the JPA seems to have done just that and you are seeing the negative impacts of your bad land use planning. But the economy still supports profits for one business and that is the development industry and your applicant. As long as you allow the applicant to propose warehouses, the fastest way for them to make the most money,

RI-260.53 Cont.

RI-260.54

RI-260.55

without oversight, they will do so and their predatory nature will continue without government protection of residents like me and my neighbors.

RI-260.55 Cont.

At its worst, predatory land development can have devastating consequences for local communities and the environment. As you embark on your ambitious effort to create an Environmental Justice element for the General Plan as well as get this Specific Plan approved and contracted prior to sunsetting in 2025, I have a few recommendations for the March JPA:

1. *Keep the community informed*: At the first EJ workshop hosted by the March JPA, Dan Fairbanks said that emails were sent announcing the workshop to residents within 300 feet of your area. While this may be your minimum obligation, it shows a lack of respect for residents who live in the area and are trying to understand and adjust to your predatory land use practices. At the second EJ workshop hosted by the March JPA, Dan Fairbanks said that the draft EJ element was posted to the JPA website on November 8, 2023, yet only the developer was notified of this plan and the public wasn't made aware of it during a busy holiday season until emails were sent out for the first workshop. By keeping the public informed about proposed developments in your area, you can better work with and engage the public in decisions being made and help them understand the potential impacts on their lives, and allow them to hold developers like the Lewis Group accountable for their predatory practices.
2. *Hold the developer accountable*: If you respect the community and endeavor to implement the EJ element you are proposing, you can work with local officials including your commission members and community groups to demand greater equity, transparency, and accountability from the development community. As I have offered in the past and will do so again and again, the JPA needs to for a community advisory board to similar to the TAC and I am happy to serve on it once formed.
3. *Support sustainable development*: Going back to the predatory practice of overbuilding an area, you can support the region and local community by advocating for developers who prioritize sustainability and responsible practices, including helping to incentivize more responsible approaches to land development. The March JPA should be leading this effort, and the developer makes every effort in public and private communications, to be the lead agency on the project described in the recirculated and draft EIR. But it is clear that the March JPA has its eyes on the sunsetting date of July 1, 2025 and are eager to finish your mission to build out every parcel of land that you can before the County of Riverside takes over land use decisions. In fact, I am requesting that the JPA consider imposing a moratorium on industrial development projects until the JPA transitions land use authority for the remaining areas to the County of Riverside.

RI-260.56

Predatory land development practices are a serious problem that can have far-reaching consequences, and these practices are clearly impacting the communities around March ARB. It's important to hold developers and the government accountable, and support sustainable development practices in our communities. And with this in mind, it is about time that you

consider an Environmental Justice element for the March JPA. Just as you have misrepresented the community benefit agreement process in the recirculated draft EIR, you have also misrepresented the EJ element in the recirculated draft EIR.

The release of the draft EJ element coincides with the re-release of the draft EIR for the West Campus Upper Plateau project that the local community overwhelmingly rejects. It is frankly insulting to think that while the JPA has existed since 1996, and have consistently built warehouses in communities that CalEnviroScreen 4.0 lists in the 98th and 99th percentile, the JPA has chosen the last days of November 2023 to amend the General Plan for an organization that sunsets in July 2025. It is farcical to think that the JPA intends to actually carry through with this ambitious plan, and as a member of an active community that opposes the land development practices of the JPA, I don't believe this effort is genuine on your part. This effort is clearly in response to comment letters submitted by the community in response to the draft EIR for the West Campus Upper Plateau and pressure from CEQA and State mandates, and rather than engage with the community and consider the comments in these letters, the JPA is obviously assisting in the applicant's greed and desire to push through a significantly controversial project despite the very communities that this copy-paste EJ policy intends to protect and represent.

RI-260.56 Cont.

I have concerns with the process by which the JPA is going about this amendment to the General Plan, as they have already inserted in into the revised draft EIR for the West Campus Upper Plateau project being recirculated currently. The policy in its current form reads as an unimaginative cut-and-paste from the County, lacking any accountability, filled with policies that the March JPA has no ability or intention to follow through on in the 16 months it has left to exist. Please elaborate in detail your plan to actually implement this plan. Specifically, the policies that the JPA has no ability or intention of fulfilling include:

1. The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7)
2. The March JPA has no jurisdiction over the Salton Sea (policy HC 16.1)
3. The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC 16.8), and rejected community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10)
4. The March JPA won't be coordinating with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7)
5. The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13)

RI-260.57

6. The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

RI-260.57 Cont.

As I have mentioned, what concerns me is that the JPA has decided to engage simultaneously with a re-circulation of the draft EIR for the West Campus Upper Plateau (SCH 2021110304) and in this proposal, the JPA references this not-yet-adopted policy extensively in the document. How meaningful are community comments for a General Plan amendment if it is already assumed that the agency will adopt the plan wholesale before the process has even started? As it stands, the public comment window for the re-circulated draft will close before you are able to officially adopt a policy. How can a community officially comment on a draft EIR when it is contingent on policies that have not been finalized and that are wholly unresponsive to the specific EJ needs of the area? The JPA's prescribed process communicates that it is not actually interested in meaningful feedback, that this is an exercise with a pre-determined outcome (just as this whole experience with the West Campus has been), and is exactly the opposite of what the civic engagement policies the JPA is trying to adopt is attempting to codify. This process also highlights how your consultants are working to help the JPA bow to the wishes of your applicant for the Upper Plateau rather than collaborate with business and the public to make decisions.

RI-260.58

As indicated in the City of Riverside's recently adopted public engagement policy, in order to have a functioning EJ policy, an agency like the March JPA would actually need to incorporate feedback from the community into their land use planning and decisions. That is what such a policy establishes and that is what governors of the public are tasked with doing. To date, the March JPA only engages with the public when forced to involve community wishes by a court, and even then, the JPA has shown that is only follows through on settlement terms that benefit them or the sole-source applicant that has had far too much influence in this region for far too long. Even the results of the "DOT Polls" at the December and February EJ workshops listed as the number one item that the March JPA needs to collaborate with all stakeholders on projects. The negative influences the March JPA has allowed this applicant to have on our region is clear to see, and the public is telling you enough is enough. Instead of listening to the public, you have allowed this applicant to build yet more warehouses around a community of retired military veterans and the final resting place that provides full military honors for our veterans!

Please consider slowing down this process, listening to the community as this proposed policy says you will do, and drafting a sensible, CEQA compliant, EJ element to adopt into the March JPA's General Plan that responds to the community's needs, is realistic to the agency's capabilities and mission, and will transition to and benefit the County once the JPA sunsets in 2025 (not one driven by greedy developers and investors). Please also consider pausing the release of the Recirculated draft EIR for the Upper Plateau until the CEQA-defined EJ process is complete so that the community can have meaningful comments on a policy that has been approved by the JPA and thus will be relevant to the applicant's proposed project.

It is ironic that California SB 1000, which is codified in Government Code Section 63502(h), requires jurisdictions with disadvantaged communities to either include an environmental justice element in their general plan or incorporate environmental justice goals, policies, and objectives throughout other general plan elements. SB 1000 is triggered when a jurisdiction concurrently adopts or revises two or more general plan elements if there is one or more disadvantaged communities within the jurisdiction. A "disadvantaged community" is an area identified by the California Environmental Protection Agency as such or that is a low-income area disproportionately affected by environmental pollution and other hazards that may lead to negative health effects or environmental degradation within its planning area. What has taken the JPA so long to address this requirement? And why are you doing it now so hastily?

As mentioned previously, I am happy to volunteer my time to serve on a community advisory board, working with the JPA to draft and finalize an authentic EJ element for the General Plan. Please let me know how I can help. I would also request that the JPA enact a warehouse moratorium until the EJ element can be finalized and the General Plan amended, and the community can be engaged in the planning process for the Upper Plateau. I find it ironic that in your listing of project goals in Table 4.10-1 of the recirculated draft EIR you include only the goals that you will adhere to rather than the goals including the community engagement that you will not adhere to.

This development project poses many concerns for local residents, the people of the cities of Riverside, Moreno Valley, and Perris, and western Riverside County including air and water pollution, increased crime and traffic, an increase of homeless and vagrant camps as seen near many of the warehouses along the 215 corridor and on existing March JPA developed land, a loss of aesthetics and scenic vistas for this natural area, it detracts from or limits economic opportunity for home owners and places undue financial burden on them to repair construction caused damage to their homes and exposure for people and appliances like HVAC and pool filtration systems to higher levels of "significant and unavoidable" pollution, a lower quality of life for humans and non-humans alike, and a significant burden on and health risk for residents. These are all items that directly benefit the public but you do not include any of it in your recirculated draft EIR. Engaging the community and making decisions that reflect our goals for the lands surrounding our homes would show that the applicant and the JPA care about us, rather than continue to demonstrate that the JPA is a vehicle for profit by greedy industrial investors.

Of the approximately 817.9-acre area, your plan calls for 250.85 acres for Mixed Use, Business Park and Industrial (143.31 acres) development, 523.43 acres designated as Park, Open Space, and Open Space Conservation (445.43 acres), and 40.75 acres for roadways and public facilities. After reviewing the draft Environmental Impact Report dated January 9, 2023 and recirculated draft EIR dated December 2, 2023 in some detail, you have attempted to demonstrate how this project benefits the public. Your claim that this project is bringing jobs and industry for people that live near this space is complete nonsense and I believe you know it. I have some serious concerns about your recirculated draft EIR and what looks like (at least per your working and

reworking of the political and CEQA process) the JPA intentionally acquiescing to the developer on all ideas and decisions related to the former redevelopment March AFB lands. Why aren't your mitigation efforts supported by evidence on previous projects? Why do you contradict in your communications the real experiences of residents surrounding your development projects? The only people to write anything positive in comments to the original EIR were unions whose sole purpose is to get their members jobs with fair working conditions and pay. No one who lives in this part of Riverside County likes your existing or planned projects because they are exclusive of our wishes and they are predatory in nature.

Even after the December and February workshops for the draft EJ element, the JPA has never genuinely engaged the effected communities (of which I am a member and I currently deal with the daily adverse effects of your advocacy for unrestrained logistics sprawl). For proof one only needs to look at the ongoing fiasco of your plans with the area around the Air Force Village West. Warehouses right next to a retirement village, one that houses veterans? Who thinks this is a good idea? How does the JPA defend such decisions if not that you are allowing the developer (might I remind you the applicant is ONLY concerned with profit margin and to think otherwise is purposeful nativity) to do as they please, unchecked. As it relates to the West Campus Upper Plateau, the draft EIR referred to "A public scoping period was held to solicit input on the scope of the analysis for the EIR between November 19 and December 20, 2021. Additionally, an open house scoping meeting was held by March JPA on December 8, 2021. The purpose of this meeting was to seek input from public agencies and the general public regarding the potential environmental impacts of the proposed Project" (p.1-13). As someone living on the perimeter of this proposed project and will be directly impacted by your construction insensitive construction plan for more than four years, where was my invitation to participate in this meeting? Where were invitations to any of the more than 1,000 homes in the area? In fact, where was my invitation to attend planning and community meetings for any of the warehouses that impede my views, give off excessive light and noise pollution, and are the cause of an increase in migraines for both me and my son?

These warehouses did not exist when I bought my home and they were not planned, the JPA maneuvered around the community and upzoned land use plans to build warehouses against the wishes or sometimes knowledge of the community. Your purposeful reference to legally exchanging land reserved for the SKR is an excuse, a justification for your profit-driven decisions of the past. In fact, the changes from your Final Reuse Plan have gotten so far out of hand that the less than 10% of space set aside for industrial and warehouses has grown to more than 20% of all land. Had anyone who bought these homes, anyone who paid a premium to have a home that bordered such a grand open space and natural area known that within five years we would be rewarded with views of warehouses and the sound and smell of illegally idling semi-trucks (see the emails I frequently send to Dan Fairbanks documenting such incidents including on the Thanksgiving morning 2023), I am sure that most people would not have bought a home here. The lack of genuine engagement, a true community benefits agreement, and EJ element implies you purposefully neglect to inform residents (and municipalities) of your plans. It also

implies that you are likely flying by the seat of your pants and proposing land use zoning based on whatever the developer tells you is in demand at the time (and they have been wrong for the last two years).

Additionally, the nature of their non-competitive contract with you is shameful, one that I view as criminal but also one that I rarely see in government work where contacts must be awarded to the business with the lowest price for the best value to the government. How is this any different? Why does the public, whose land this is/was, have to pay for and settle for whatever a sole source bidder wants to build? This is a disturbing pattern for your operation, one that again is predatory by nature. The practice of conducting business in private that directly impacts the public is unethical, unfair, and seemingly is a violation of the public's trust (if not a misuse of tax dollars). Please explain to me how the Air Force, the State of California, and the U.S. Government allows the JPA to negatively harm the public in this way.

As a precursor to your level of insincerity in the EJ element, and your willingness to enter into a genuine community benefit agreement, on February 24, 2022 the March JPA, along with the applicant, hosted a public Q&A forum online. The meeting was virtual due to COVID restrictions via Zoom and you did not permit people to speak with you instead forcing people to comment or ask questions via the website's chat. You did not monitor that chat appropriately or professionally, ignored comments and questions at your discretion (much like you did when you failed to protect the health of residents by choosing to site warehouses within 300 feet of people's homes in Riverside along Barton Road), and you allowed a member of your commission to berate residents (also a disturbing pattern for this commissioner as he professed to represent the JPA and the USAF) who questioned or expressed frustration with your plans. If you would have listened to this first public discussion of your plan one year ago, you would have heard a common and consistent message: no more warehouses. **No more warehouses!** Not making these comments integral to your recirculated draft EIR is dismissive and negligent on your part. It feeds the propagation of the idea that the applicant is only proposing this plan because it assures the highest level of profit for them and ignores the wishes of the public.

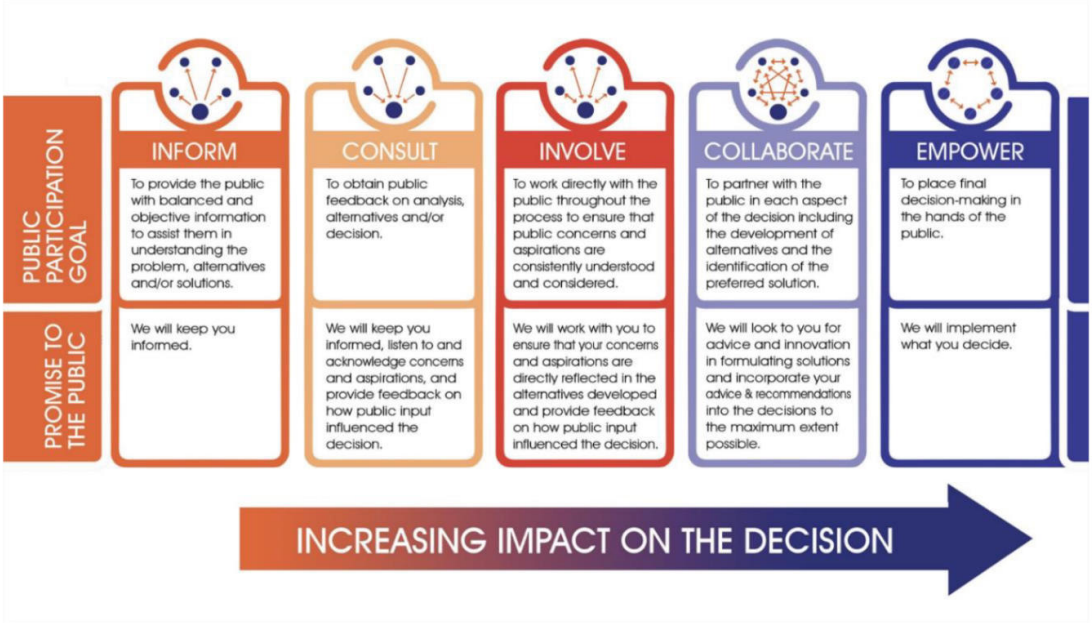
Another example of a one-way community engagement event was on August 18, 2022 when you hosted a presentation of the proposed plan at an open house at the March Air Museum. This event was open to the public and the public believed we were going to be able to discuss the plans with you, provide meaningful feedback on the plans, and work together to meet the goals of the JPA's mission and the needs of the community that surrounds this land. Wrong again. The event turned into a show by the JPA and developer and became quite heated. One of your commissioners, who said publicly that he was there to learn more about the project, stood with you and the builder as he argued with residents for more than an hour. How is this type of engagement productive or genuine? If you, and I know because I listened to you intentionally mislead residents that night, had listened to residents at this second gathering, you would have heard that same common and consistent message: no more warehouses. **No more warehouses!** And had your EJ element been in place, you would have had processes for engaging with the

public in a meaningful way, but you didn't and even with the finalization of the draft EJ element sometime in 2024, you still will not have the staff or processes to conduct meaningful community engagement on important land use decisions. The draft EJ element is a check-box, nothing more, and your effort to claim its integrity is disingenuous. **No more warehouses!**

At a public meeting on January 11, 2023 held at the Moreno Valley Conference Center, 40 residents spoke against this project. Directing their words to the commission, they spoke honestly, emotionally, and factually about their continued desire to have a plan that excluded industrial and logistics sprawl. No more warehouses they demanded. I spoke that night and questioned the JPA's insistence on providing development and land use plans that included solely industrial and logistics. I asked why no alternate plan was offered. I also asked for the convening of a Public Advisory Board to the JPA much like the TAC severs today. Since that time, our requests have been "heard" by the JPA but the Director of the March JPA sent Jennifer Larratt-Smith an email denying the request for a community advisory board due to the JPA's 2025 sunset date. Yet here you are trying to backtrack and establish an EJ element that centers on community engagement, which a community advisory board and community benefits program would complement perfectly. Your public engagement is less than genuine. Where in this process so far have the voices of the public been acted upon? **No more warehouses!**

In yet another show of public engagement, the developer hosted another public showing of the project and their plans to develop the Upper Plateau. This meeting was held again at the March Air Museum on February 9, 2023 and involved nothing more than a live reading of the project. The applicant did its best to justify the warehouses but few from the public attended. I was one who did and found the meeting insulting and less than authentic. It was quite clear to attendees that the JPA and developer have no interest in considering alternate land use plans, nor have you ever considered them in the past, and this meeting was more box checking to say that you gave the public time to share their thoughts. **No more warehouses!** This again was an act, a misrepresentation of what it means to engage the public just as your Environmental Justice plan has been and your community benefit agreement has been, and I believe your meetings are held with the intention of misleading the public to view the project and applicant positively. This is once again a predatory practice sanctioned by the March JPA.

Part of the process that makes a community benefits agreement successful is a collaborative approach to communication. The JPA has consistently engaged with the public in a limited capacity, only sharing the minimum information to the minimum number of people. The image below comes from the Environmental Protection Agency. It describes what public engagement looks like at the federal level.



The JPA has clearly kept the public in the inform category despite the many public meetings that you claim you have held over the last two years. You have rarely ventured into "consulting" the public phase and have never empowered people to help make decisions about their lives, including in your December and February EJ workshops where you will say that you entered the "involved" the public phase of decision-making, but in reality, you only gave us a menu to choose from, we never helped develop the menu in the first place so the word involved is a flse definition of what you did at the workshop. What upsets residents so much is that you, someone who does not live here, unilaterally make decisions for us. How is this fair, beneficial, and legal in our world today? Do you believe you are acting reasonably? I think you believe you are and have chosen to ignore the community hoping to see this project contracted as quick as possible so that the you and the JPA can ride off into the "sunset" in July 2025. Just checking the boxes.

On a more personal note, I live within 800 feet of several of your warehouses today. I have contacted the JPA and your office many times to request help with bad warehouse tenants, questions about the JPA's operational and management policies, and illegal public activity within your jurisdiction.

1. On January 22, 2023, I submitted a public request form asking the JPA for all correspondence in support of the West Campus Upper Plateau project. After four extensions to the time for response from Ms. Carmago and Mr. Fairbanks, I received a response and the documents I requested on April 17, 2023.
2. On January 30, 2023, I emailed the March JPA and Commission with a complaint about the warehouses near my home. I detailed the air, light, and noise pollution caused by these warehouses and asked you what from my experiences give me confidence that the proposed Upper Plateau development would be any different than what currently exists under the JPA's management today. I also asked what accountability exists for the lack of

mitigations to these problems. After several emails with the JPA, I am still left wonder what is being done as I observe these problems continuing even today. Regarding these exchanges, how and where they the JPA be monitoring the noise from in relation to the existing warehouses, and how will these enforcements be applied to future developments like the mega-warehouses at Upper Plateau? How can residents access the data that the JPA will collect to confirm that the noise, light, and air pollution being monitored is represented accurately? This applies to existing and future warehouse developments. And What noise levels are considered unacceptable by JPA ordinance? How do these levels impact residents and wildlife? And what enforcement exists today and, in the future, to prevent significant noise, air, and light pollution generated by the JPA's warehouses? To date, nearly a year later, I have received no responses to this message.

3. The week of January 9, 2023, I visited the JPA's offices to discuss my concerns and report idling semi-trucks. My concerns were addressed with the promise to speak with the tenants of the warehouses near my home and to conduct some noise level measurements. And you agreed to speak with the Riverside Sheriff's Department about ticketing idling or illegally parked semi-trucks. These promises are a step in the right direction but offer no accountability or proof they are occurring. Because the JPA's word hold very little value with me right now, I am not included to believe this engagement is genuine. I have emailed or visited in person with Dan Fairbanks about this same issue xx more times in 2023 and each time Dan has responded that the JPA will talk with the occupants but the idling is largely out of the JPA's control. There are no accountability measures in place to stop pollution, so the tenants of these buildings and the workers will do whatever they can get away with. How under the recirculated and draft EIRs for the Upper Plateau, and with the JPA sunsetting in 2025, would the County or the JPA enforce such illegal activity and major disruptions to our lives today and in the future? The recirculated and draft EIR offers no plan, no mitigations, and no methods for monitoring instances like this, and have I not experienced such accountability from the March JPA in the past.
4. On September 18, 2022, I emailed the March JPA and commission to ask for help with a pack of migratory coyotes who had taken up residence in my front yard and along the fence of my back yard. These animals, like many others, are being pushed out of their territory by development and increased human activities within the JPA management lands. While I live in the City of Riverside, these animals don't but did visit and cause a problem related to safety for residents of the City. Again, the lack of accountability, changes to the climate and the coyotes' homes, and a lack of empathy for residents is the clear signal from the March JPA in your response.
5. On June 1, 2023, I emailed the JPA requesting help with weed abatement throughout the JPA administered open-space because it was a fire danger to residents. As a resident who has seen my homeowner's insurance canceled due to fires in California and the insurance industry pulling out of the market, I am sensitive to this issue in my own backyard. The Director of the JPA contacted me the same day and explained that they were having scheduling issues with contractors and nesting bird habitat preservation. Almost, like most other things, seems like she was working hard to justify the JPA's inability to

> manage their responsibilities and communicate with the public to ensure safety for all. Weeks later, I noticed that the schedules aligned so that the contractor could mow down a 10–20-foot buffer between the over-grown space and residential properties. The work was inadequate and the communication was non-existent and thankfully we didn't have any fires. Had the JPA considered a community advisory board, then maybe they would have employed a more environmentally appropriate solution to this issue and made sure resident homes were safe from fire danger in 2023. But no such board exists and the JPA continues to operate with minimal regard for the public welfare, and I get to build a buffer between my house and the fire danger growing just outside of my neighborhood.

It is misleading and disingenuous to say that the March JPA has authentically engaged with the public during this process. The March JPA should delay the recirculated draft EIR until you can review and approve the EJ element by following the CEQA process and amend the General Plan, and then recirculate an updated draft EIR for the Upper Plateau, one that implements an approved and meaningful EJ policy in regards to this specific plan amendment, and incorporates public preference in your proposed project.

The Development Agreement: Privatizing Public Lands

With the recirculated and draft EIR, the March JPA seeks to amend the DDA with the applicant and extend the development agreement for an additional 15-25 years (page 3-24). As described, the JPA claims there are two community benefits associated with this extension and new business agreement. The first is the $3.5 million contribution by the applicant, which is more than they are required to contribute, for a feasibility study, but it is not for a park as the JPA has advertised but cannot build for lack of planning and funding. The second is a fire station which was always required of the JPA and applicant via the 2003 settlement agreement with CCAEJ.

For 12 years I worked as a contractor who specialized in finalizing contracts with local, state, and federal government agencies including the DOD and Military. I am familiar with the Federal Acquisition Regulations and know from experience that for the most part, state and local government contracting vehicles mirror the way federal government agencies (like California's Procurement Division) and the U.S. General Services Administration conduct business with public funds. FAR1.102 states, "The vision for the Federal Acquisition System is to deliver on a timely basis the best value product or service to the customer, while maintaining the public's trust and fulfilling public policy objectives. Participants in the acquisition process should work together as a team and should be empowered to make decisions within their area of responsibility." The third item under this definition is the FA system will "promote competition." While people far more fluent in the FAR process than I will parse finer details of the introduction to these regulations, the fact of the matter is that the goal of the government is to spend tax dollars wisely, on goods and services that benefit the people who pay taxes.

FAR subparts 6.1 and 6.2 establish the requirements for full and open competition for projects and acquisitions, but FAR subpart 6.3 identifies when an open competition is not appropriate for contracting with a company doing business with the government. FAR 6.301 states that contracting without full and open competition is a violation of statue unless permitted by FAR 6.302. FAR 6.302-1 is labeled, "Only one responsible source and no other supplies or services will satisfy agency requirements." It states that contracting without open competition is permitted when the item or service being contracted is in limited supply or requires a domain expertise not easily found. In 2004, I helped a group of retired special ops members who formed a unique collaborative of skills used to map rivers in jungles finalize a contract for work with the CIA. I was only able to find one company to do this work and therefore helped the government avoid an open and competitive contract for a classified project. FAR 6.302-2 is labeled "Unusual and compelling urgency" and is used in times of conflict or disaster recovery. In 2003, I helped a large company and its subcontractors quickly establish a contract to support the identification and recovery of the Space Shuttle Columbia debris. This time sensitive procurement process required expertise and speed during a national disaster. FAR subpart 6.302-3 is labeled "Industrial mobilization; engineering, developmental, or research capability; or expert services." This FAR element helps the government streamline R&D efforts and streamline production and purchasing of essential products and services for the government. FAR 6.302-4 is labeled "International Agreement," FAR 6.302-5 is labeled "Authorized or required by statue," FAR 6.302-6 is labeled "National Security," and FAR 6.302-7 is labeled "Public Interest." Each of these last four elements is fairly self-explanatory as to why it would be in the best interest of the government to contract outside of their normal open and competitive requirement. This is a simplified look at standard government contracting practices, but again the FAR process is a model that most federal, state, and local government agencies follow during procurement of products and services.

So why describe all of this? Well, frankly, the March JPA doesn't operate quite like a federal, state, or local government agency because it lacks real accountability to the public. I also include this summary because the relationship between the March JPA and applicant is somewhat backwards in the typical government contracting world. Rather than pay a contractor money for products and services, the March JPA is getting paid by the contractor in this case. A different way of doing business that even people with experience like me struggle to understand entirely.

You see, to my knowledge, the applicant and the JPA privately agreed to convey the land of the West Campus Upper Plateau, as is permitted by the existing Disposition and Development Agreement between the March JPA and applicant, for a specific project that had yet to be released for public comment or commission approval. The JPA and the applicant rushed to execute a contract that had little to do with your mission and a pressing need, and more to do with timing. At the October 26, 2022 March JPA Commission Meeting, the commission approved the following transfer of land payment terms.

*Mass Grading Permit Issuance – New Development	$14,000,000
*Building Permit Issuance – New Development First New Building	$4,750,000
*Any Certificate of Occupancy – New Development First New Building	$4,750,000
*Building Permit Issuance – New Development Second New Building	$4,750,000
*Any Certificate Occupancy Permit Issuance – New Development Second New Building	$4,750,000
*Building Permit Issuance – New Development Third New Building	$4,750,000
*Any Certificate Occupancy Permit Issuance – New Development Third New Building	$4,750,000
*Building Permit Issuance – New Development Fourth New Building	$4,750,000
*Any Certificate Occupancy Permit Issuance – New Development Fourth New Building	$4,750,000

In this secretive act, the March JPA gave the applicant a 60% discount on the current market value of this land. At a time when the logistics and warehouse industry was in decline, the JPA agreed to sell the land for this project for $52,000,000. That is $135,755.35 per acre. Based on my inexperienced knowledge of land prices with industrial zoning, the value today is $129,292,379.72 or $337,541 an acre for Riverside County. Asking me to accurately value land prices is like asking me, or anyone without expertise in the field, to compose a blues song or paint a seascape with water colors. I would try my best but ultimately pale in comparison to an expert. Never-the-less, the need for more industrial zoning and warehouses is not reflected in today's economy yet the value of the land is high, much higher than the price that the JPA agreed to sell this land to the applicant for in late October 2022. Within the logistics industry today, investors are preferring to keep their money in low-interest earning accounts as the two-five-year downturn in logistics seeks to become profitable again. I am unclear where in the DDA that parameters exist for how land is priced, but the JPA didn't do the public any favors like it did the applicant. The public doesn't need to be experts in this field to ask questions about your policies and practices and in this case, I wonder why you sold this land at such a cheap price that appears to benefit the applicant? The appearance of impropriety is enough for the public to believe something foul is afoot because the JPA does not have a trusting relationship with the public, and only now in the final months of its existence is the JPA trying to (at least on paper) establish an open-door communication policy with residents of western Riverside County.

Returning to the DDA and the misuse of public lands: the former March Air Force Base is considered public land. When the land use authority transferred from the Air Force to the March JPA, the JPA was tasked with redeveloping public land with respect to the local communities and the operations of the airport and Air Force. In some ways, and I realize this may be

comparing bananas to mangos, but the Base is much like any forest, park, or wildlife preserve wherein bananas and mangos are both fruits and the Base and a forest, park, or wildlife preserve are all public lands. By ignoring the need for a genuine EJ element that guides all land use decisions by the March JPA, the JPA is communicating that it does not care about the public. By upzoning projects to include significant industrial and warehousing on repurposed public lands, you are communicating that benefiting the public is secondary to the benefit the land offers private businesses and investors. By proposing to extend and amend the DDA with the same company for up to 25 additional years, you are allowing the applicant, a private for-profit business to take advantage, in a predatory manner, of a backwards contracting process that in all areas of government contracting would be in violation of Federal Acquisition Regulations.

The FAR, again the benchmark by which nearly all government contracting adheres to, clearly states that the government is required to get the best products and services for the best price possible. Thus, their requirement of open and competitive contracting processes. But because the JPA, the government, is not buying the land identified in Exhibits A and B of the amended DDA executed on 9/1/22, rather the applicant is buying land from the government, at a discounted price, the requirements of the FAR are muddied, and purposefully obscure to avoid public scrutiny and legal challenges. The applicant does not offer the government best value, in fact, the government is offering the applicant best value pricing for public land. I call this, for the lack of a better term, a gift of public funds, which is illegal in California, wherein the applicant benefits from an exclusive contract with the JPA to purchase something of value to the applicant at preferred pricing. By statue, all expenditures of public funds (in this case public land) must support the government's function, purpose, and benefit the government. Individuals and businesses are prohibited from receiving any advance payments or pre-payments made by a contractor before work has been performed or before all goods or services have been accepted.

It is the exclusive nature of the DDA that is concerning to the public. One business, one voice, telling the JPA how to develop land in the communities that the Military and March ARB helped grow over many decades. One company profits, and a private owner gets rich because the March JPA is understaffed and unqualified to conduct open and competitive contracting projects that benefit the region instead of a single company and its corporate investors. You have taken public land and given nearly all of its benefits to a private company. And when you sunset in July 2025, you will proudly announce mission accomplished. And it will be accomplished assuming your mission was to enrich greedy land developers and investors. It will not be if your mission was to follow the guidelines of the final March JPA General Plan and "define reuse and development opportunities of the area, while preserving the environmental quality," or "address specific elements of the community," or "plan for the preservation of open space designed to promote the management of natural (historical/cultural) resources, outdoor recreation (active and passive), and public health and safety." **No more warehouses!**

Why was the DDA amended in 2022 privately and without community knowledge or involvement? Your General Plan has always required community (largely defined as residents of

the area surround March ARB) input and now you are hastily trying to approve an EJ policy to make sure on paper that you are reflecting the wishes of the community, which it is clear you are not and never have. How does the draft EJ element found throughout the recirculated draft EIR impact your past DDA agreement now and future plans (CA AB994) for more of the same with this developer? What responsibility does the JPA have to comply with Federal Acquisition Regulations, State of California Procurement Department regulations, and the County of Riverside Purchasing Department guidelines and policies? What makes the applicant unique in providing products and services to the government, especially to the County since you appear to be preparing for a new DDA that will transition to the County of Riverside in 2025? They do not offer the unique skills of the contractor who specializes in mapping rivers in a rain forest, they do not offer a speedy service in a time of national emergency, they do not offer best value to the government in relations to public funding. They are a company that you foolishly awarded an exclusive contract to years ago because of a lack of experience and staffing. There are other contracting options available to you to work with the applicant through the remaining life of the JPA without saddling the County with an exclusive 15–25-year agreement, but the applicant requires a long-term assurance, they have said this a number of times publicly, to continue the business relationship with the JPA, and you are agreeing to it without hesitation. Not only is the agreement an exclusive deal for the applicant and its investors in order to maximize profit, it is a violation of your role as a government entity whose job is to collaborate with the public and incorporate private investment in the communities surrounding March ARB. You are failing the communities and rewarding the investors for their predatory practices. You are leaving this space with unfulfilled financial liabilities that you are eager to pass on to the public and to municipalities that will inherit the mess of your poor and predatory land use decisions surrounding March ARB. Please specify the government contracting regulations for the State of California and the U.S. Government that permit you to misuse public lands in such a way as to place an undue burden on residents of western Riverside County, and the cities of Riverside, Moreno Valley, and Perris. Better yet, I'd appreciate a public roundtable discussion (not workshop or presentation) on your answers to my questions in addition to written responses prior to a public hearing and voting on a final EIR for the Upper Plateau.

The privatization of public lands is a disgusting practice by predatory developers and investors taking advantage of a distracted or uninformed public. The amendment of the DDA to add 15-25 years to it, or to form a new DDA that transitions to the County of Riverside for the same purpose it entirely outside of standard government contracting practices and it may in fact be a violation of both federal and state statue. But the JPA and applicant's insistence that these predatory and illegal contracting practices be used to build more warehouses in an area saturated with them is irresponsible land use planning, decision making, and management of public spaces by the JPA. The lack of non-industrial zoning and alternate plans in the recirculated and draft EIRs is insulting to the public and is incompatible with the final General Plan. I once again call on the JPA to enact a moratorium on all industrial projects and plans until the County of Riverside assumes land use authority in 2025.

Lack of Non-Industrial Alternate Project Plans Violates the Draft EJ Element

Another disturbing failure of the recirculated and draft EIR has been the lack of non-industrial development and land use options for this land. I am disappointed that the alternative plans still do not consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for nearly two years. In the recirculated draft EIR, the JPA continues to identify 143.31 acres of industrial and that is for warehousing, possibly including cold storage warehousing, 42.22 acres of mixed use, which the JPA has gone to great lengths in the recirculated draft EIR to identify MAY contain warehouses as well, 78 acres of park and open space, though the park will not exist as a result of this project being approved, and less than 10 acres of public facilities, which again are public only in that the public will pay for them to be provided to warehouses that the public does not want.

Why did the JPA and applicant on page 4.2-17 choose to highlight the County of Riverside's Good Neighbor Guidelines when on several occasions the Director of the March JPA said publicly that the project would adhere to all local jurisdiction guidelines for siting warehouses near homes? While this project will ultimately fall under the management of the County of Riverside, their guidelines are outdated, the softest in the region, and the residents who are impacted the most by this project are largely from the City of Riverside who is working to update their guidelines as I write this letter. For the record, were the Director's word hollow and a political stunt? Or did the Director genuinely mean to engage with the concerns of the public and work with local government entities to protect the public? Please look to your draft Environmental Justice policy for answers and let me know if you find them. The way you have handled this project and the release of the recirculated and draft EIRs is in direct conflict with the draft Environmental Justice element you hope to shove through with this project.

Section 4.10 of the recirculated draft EIR identifies land use considerations by the March JPA for the Upper Plateau. In this section, you identify 14 munitions bunkers that the City of Riverside and other agencies have concluded are of significant historical value to the County, State, and U.S. Air Force. Your plan is still to demolish them, except for two that will be fenced off and surrounded by warehouses. This plan defies the concept of historical significance and your claims that your project will honor the U.S. Air Force by keeping two of them is absurd. You identify many sources to justify your proposal to largely zone this land as industrial and then you refer back to the General Plan as proof that you are interpreting it as it was designed. This is just what I referred to above in that you pick-and-choose which parts of the General Plan suite your needs, and your needs are driven by a predatory developer looking to profit further from public lands. With the recirculated draft EIR, you are helping the applicant reach financial goals for its investors, and ignoring the public that has asked you to zone this land in a way that lessens the burden of a community suffering from your overbuilding of warehouses.

It is pointless to argue with your selective claims that the noise of the airport is a major consideration factor for choosing to continue to offer an industrial zoning plan. The noise from

the airport impacts homes, business, and public spaces throughout the March JPA and they co-exist today. To suddenly use the ALUC and their wishes as justification for only developing warehouses on the Upper Plateau is purposeful and predatory by the March JPA and applicant. Why do each of the alternative development plans you offer still include 143 acres of industrial zoning? The area is zoned C-2, much like the surrounding area including my own house that routinely sees Air Force planes fly directly over my roof, which could include residential, commercial, and recreational uses as long as they are low-density. Figure 4.8-2 in the recirculated draft EIR seems to indicate that there are other zoning opportunities for this land but the JPA and applicant have chosen against any of them for a variety of reasons. Please specify why you declined other land uses C-2 zoning allows and why you chose not to pursue these options. Please explain why this is the right project at this time on this land. You have never successfully done this to the public and until you do you will have public opposition to it.

Under Planning Process C1F, the Final Reuse Plan (1996) reads: “Serious and careful consideration will be given to the wishes of existing land users and owners in areas adjacent to the base.” Given that this industrial complex is surrounded on more than three sides by residential homes (including mine) and that residents have submitted thousands of signatures, hundreds of emails, and hundreds of comments at public meetings opposing the project; how is our feedback being “seriously” and “carefully” considered? How are you doing what your draft EJ policy states you will do? What significant reductions in warehouse acreage have been made to the project as a result of the extensive opposition? Specifically, how has it impacted the industrial zoning footprint or the alternative plans? If the answer is that it has not, how do you justify your disregard for the community opposition in relation to your own policies and the inclusion of a draft EJ policy that largely values community input on decisions?

In your General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should “discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions” and “Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses.” How does building 4.7 million square feet of industrial warehouses that have “significant and unavoidable” noise and air quality impacts protect adjacent residents? Please specify in what ways this project fulfills this goal. Your responses in section 4 of the recirculated draft EIR do not answer this question, rather they are an attempt to justify your insistence on zoning this land industrial and ignoring any real community benefits. Also, how does this plan align with this goal and the subsequent 2003 and 2012 settlement agreements that require more of the same from the JPA?

Historically, the West Campus Upper Plateau was never intended to be an industrial zone. In the initial planning process, the Final Reuse Plan (1996) describes how “the planning processing was designed to incorporate consensus of the adjacent communities, creation of a ‘Community Preference’ land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse” (Final Reuse Plan, 1996, p. II-v). In what specific ways have you incorporated Community Preference in the development of

your plan? To date, the only comments we have been given is that a few members helped the developer reconsider siting of a road or placement of smaller industrial buildings deceptively identified as mixed use or business. This was true in the draft EIR and it is true in your recirculated draft EIR, and I imagine it will continue so long as you ignore the wishes of the surrounding jurisdictions and communities.

As part of the Base Realignment and Closing (BRAC) process, four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered within the first ¾ mile of the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat.

Moreover, the Draft General Plan 2010 "Draft Vision 2030" Section 2.2.24 stated,

> "The Meridian West area shall be developed to provide a variety of land uses that will lead to the creation of high-paying jobs while protecting the environmental resources located therein; b) The Meridian West area should include an appropriate land use mix to emphasize the interaction between Office, Business Park and Park, Recreation and Open Space; d) When planning and approving future projects within the Meridian West area, projects that provide large quantities of high-paying jobs (such as corporate offices), high-technology jobs, and jobs related to the green building industry are preferred."

Therefore, the historical precedent of the Final Reuse Plan (1996), General Plan (1999), and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses in any EIR or planning process that involved community meetings. All March JPA planning documents clearly indicate that warehouse uses should observe appropriate setbacks and be compatible with adjacent land uses to protect adjacent residential zoning. So, it is concerning and suspicious to the public why you persist in the recirculated draft EIR to only offer industrial and warehousing as a use for this land when clearly it was not intended and currently isn't publicly desired to be used this way.

In the last two years, community members have presented a clear and consistent pattern of opposition to the proposal to 'upzone' the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, provided hundreds of public comments, and commented in multiple developer and JPA-hosted community meetings opposing to the planned warehouse complex next to residential communities in Orangecrest, Mission Grove, and Camino del Sol. The Project is as presented in the recirculated and draft EIRs is unstable and incompatible with the General Plan, Final Reuse Plan, Draft General Plan, and Community Preference land use.

Therefore, I once again urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference (found in both the General Plan and draft Environmental Justice policy) and protect existing residential property owners in its planning process. Why has the JPA kept the public in the "Inform" and "Consult" stages of the EPA's decision-making continuum? Will you continue to deal with the public in this way even if you approve the draft EJ element found in the recirculated draft EIR? How do you justify any of this as authentic public engagement?

It seems almost that as soon as the March ARB General Plan was released, the JPA and developer began to ignore it, began to upzone and maximize profits from this land, and began to ignore and disregard the public interest in the repurposing of this land. In the initial planning process, the March ARB Final Reuse Plan, 1996 describes how the community was included in the planning of land-uses.

> "With the formulation of the Land Use Plan, the planning processing was designed to incorporate consensus of the adjacent communities, creation of a 'Community Preference' land use plan consistent with the goals of the community relative to base reuse, and to maximize the opportunity for citizen involvement with base reuse" (Final Reuse Plan, 1996, p. II-v).

As part of the Base Realignment and Closing (BRAC) process four specific land use alternatives were considered as shown in Exhibits A, B, C, and D in the Final Reuse Plan. Exhibit B (shown below) is the Alternative Pattern with the largest space reserved for 'Industrial/Warehousing' uses and it explicitly shows 'Industrial/warehousing' land-use was only considered East of Brown Street within the first three quarters of a mile adjacent to the 215 Freeway; the West Campus Upper Plateau was a separate Business Park category for less intense land-uses. While the Business Park category allows warehouses, it also allows a wide range of other less intense land-uses identified in General Plan Table 1-1 below.

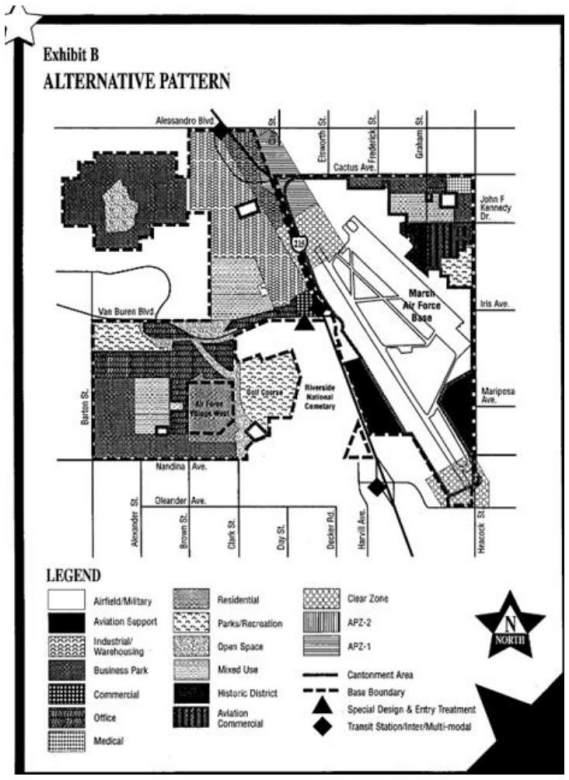
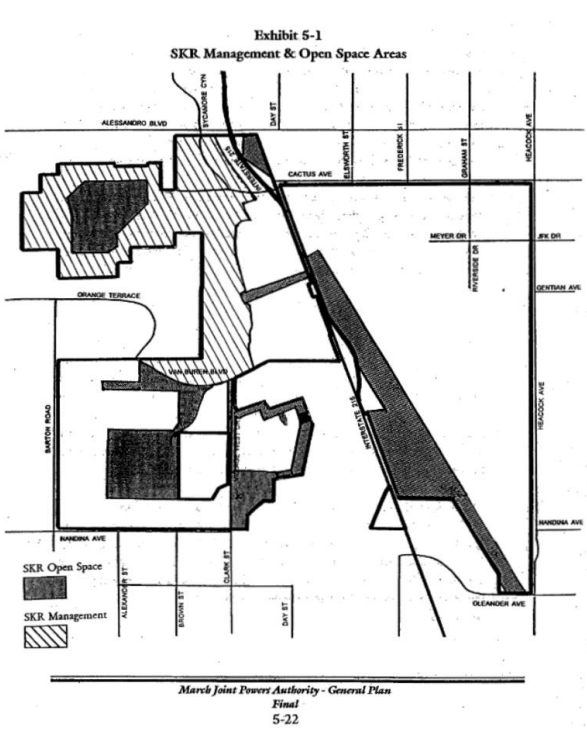


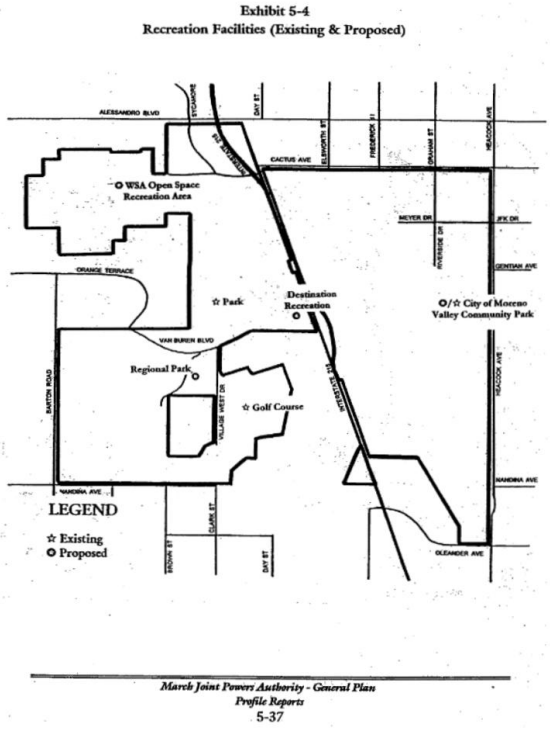
TABLE 1-1
BUILDOUT MARCH JPA PLANNING AREA

Land Use Designation	Acres GROSS	Density MAX.	Density AVG.	Buildout Capacity*
INDUSTRY				
Business Park	1278	.75	.20	7,793,755 sf
Industrial	433	.60	.15	1,980,455 sf
SUBTOTAL				9,774,210 sf
COMMERCE				
Office	104	.75	.30	951,350 sf
Mixed Use	360	.60	.25	2,744,280 sf
Commercial	45	.60	.30	411,642 sf
Destination Recreation	135	.50	.25	1,029,105 sf
SUBTOTAL				5,136,377 sf
PUBLIC				
Park/Recreation/ Open Space	777	.25	.025	592,307 sf
Public Facility	449	.50	.10	1,369,091 sf
SUBTOTAL				1,961,398 sf
SPECIAL				
Military Operations	2102	n/a	n/a	2,500,000 sf
Aviation	316	.40	.15	1,445,321 sf
Historic District	58	2du/ac	2du/ac	111 units
AFVW Expansion	75	.60	.30	686,070 sf
Cemetery Expansion	160	.10	.005	24,394 sf
SUBTOTAL				4,655,784 sf 111 units
TOTAL				21,527,769 sf 111 units

ac - acre sf - square feet du/ac - dwelling unit per acre
FAR - floor area ratio * based on average FAR, of net acre

The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. This was the same map and designation I was presented with when I bought my house in 2009. In fact, I was given the maps in Exhibits 5-1 and 5-4 from the original owner of my house and they clearly indicate the intention for this land was conservation. It was what the original owner, a municipal judge and retired Marine Corps officer, understood at the time he paid a premium to own a house next to this unique landscape and the military base that played such an important role in his life. Did the JPA change their minds after they wrote and disseminated the final General Plan? If so, why? What changed? Did the JPA communicate these changes to residents in the surrounding communities? Has the JPA modified the Final Land Use Plan in the past? If not, why are you proposing a specific plan that is inconsistent with the Final Land Use Plan (see your own diagrams and roadways)? Any specific plan needs to comply with the Final Land Use Plan and it is clear this one does not.





Moreover, the Draft General Plan 2010 "Draft Vision 2030" which incorporated clearly a desire to avoid incompatible warehouse land uses adjacent to residential homes. In Section 2.2.25(d) it stated, "Any and all future distribution/warehouse development in the Meridian West area shall maintain a 1000' distance from existing residential uses in accordance with the Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities. (See 2.1.4 of the Land Use Element)."

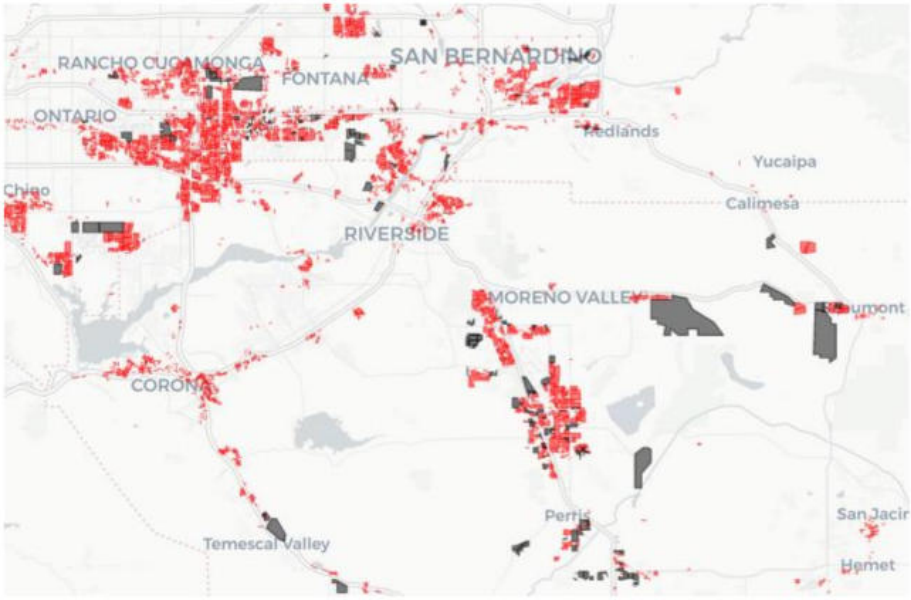
The historical precedent of the Final Reuse Plan (1996), General Plan (1999) and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses and all discussion of warehouse uses focused on appropriate setbacks to protect adjacent residential zoning. Your justifications in the recirculated draft EIR are a disappointing effort for a public entity advocating for a developer-friendly plan that the community clearly rejects. At an industry event in December 2023, Prologis President Dan Letter described the current development environment as, "the fight is most pronounced and high-profile in California and New Jersey, states that are home to dense populations, tough environmental and permitting regulations, and major air and seaports. In both states are growing numbers of residents who, tired of seeing most warehouse projects being rubber-stamped, are resisting development and pushing their local commissions and state legislatures to fight with them" (Solomon). Even within the industry, developers and logistics executives know that southern California is over saturated with warehouses. Why do you insist on contributing to this problem as opposed to finding a solution that benefits all three parties (private, public, govt.)?

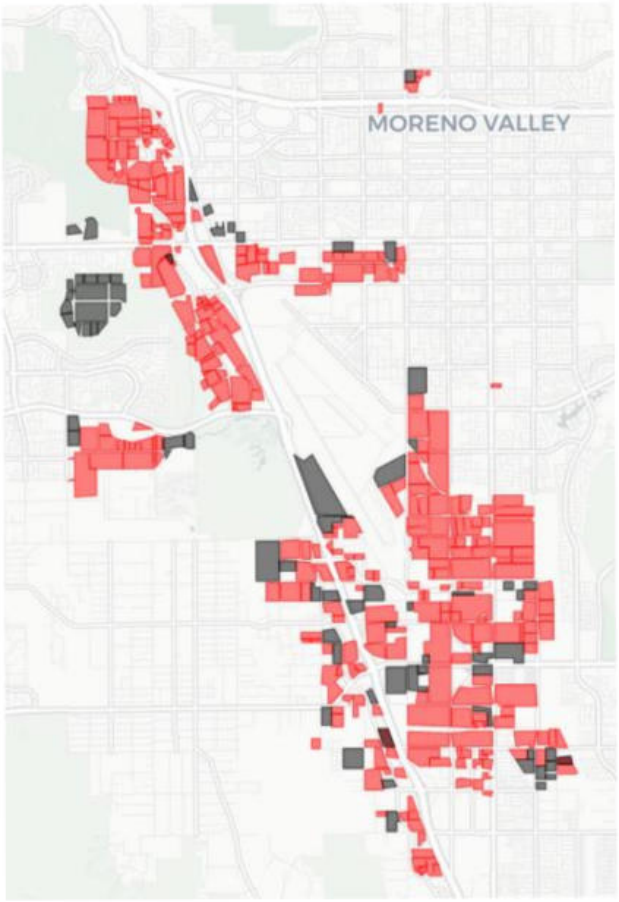
Finally, the specific plan for this campus changes the definition of the mixed-use land category. In the existing General Plan (1999), mixed-use is explicitly defined on page 1-34, “Mixed uses include a variety of complementary land uses; including commercial, business park, office, medical, educational and vocational, research and development, and services. Industrial and major warehousing uses are excluded.”

However, in the draft EIR (2023), p. 2-4, mixed-use is now defined as, “Mixed uses include a variety of complementary land uses, including commercial, business park, office, medical, research and development, business enterprise, and services. Industrial, and outdoor storage is prohibited.” Why change this designation? To approve unwanted warehouses on the Upper Plateau that was always set aside as a conservation and business park? This makes no sense to the public and many who serve in local government of the surrounding jurisdictions. This once again points to the predatory nature of the applicant, refusing to listen to the wishes of the public.

Major warehousing uses are now acceptable to the March JPA in the mixed-use zoning, despite a 24-year precedent in its 1999 General Plan and the definition that excluded this use. This sudden change in the recirculated and draft EIR is deceptive and malevolent. It is misleading to the public, and it gives rise to the belief that the JPA, at the direction of the applicant, can do whatever it wants without consequence. The public expects better of the JPA and the Commission. What justification do you offer to explain this apparent privatization of public lands? Please don’t refer me to the DDA (past or future).

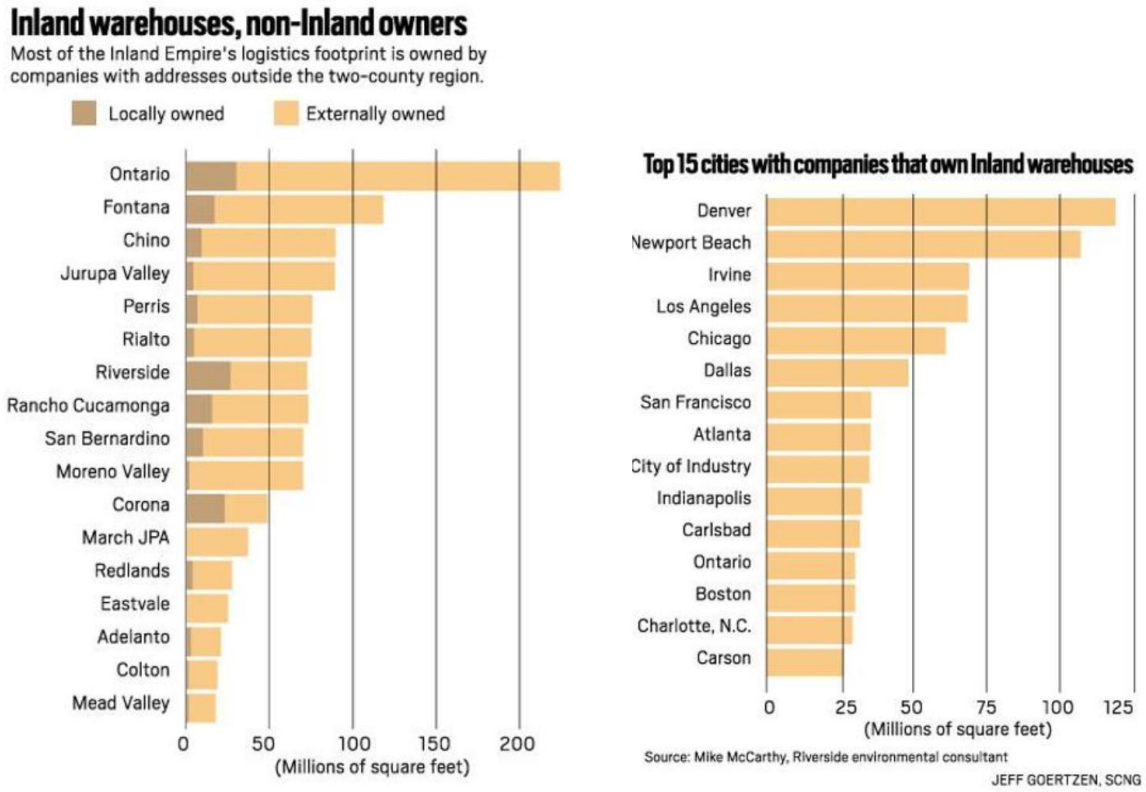
The region of western Riverside County is overly populated with warehouses, largely because of the JPA’s TFZ244. The residents of eastern Riverside, western Moreno Valley, north Perris, and unincorporated Riverside County all along the 60/215 freeway corridors are disproportionally impacted by these warehouses thanks to the JPA and the predatory nature of the developer.





As the updated maps above demonstrate, the 215/60 freeway corridor is disproportionally impacted by the sprawl of warehouses and logistics as is most of the Inland Empire. The JPA has specialized in placing warehouses on a majority of the land it was tasked with repurposing. So, one has to ask why build so many warehouses when they are not the land use planning option that the original General Plan and its creators envisioned in the late 1990s. Well, it doesn't take long for a mistrusting public to draw rash conclusions like "it's all about the money" or "it is a land grab by the (insert your adversarial foreign government of choice here)."

Fortunately, a little work and publicly available information provides me with some insight to avoid the conspiracies about why there are so many warehouses in the JPA's territory. In a meeting with the JPA in April 2022, I was told that most of these warehouses are built as speculative developments, and that they don't have tenants waiting to lease or buy them. This is the case with the West Campus, Upper Plateau project as well. I was still new to this the development around March ARB in April, but I have had some time to learn about it since that meeting. The graphic from 2023 below demonstrates the listed owners of the warehouses for warehouses in Riverside County, including the warehouses built by the JPA.



The nature of this speculative development means that the developer is incentivized to find financial backers, investors, that will fund the development of this land with the promise of a return on their investment. The way that the developer ensures that it and its investors profit is to spend the least amount of money in order to make the most amount of money in return, and this is what I am suggesting the JPA and applicant are doing with this land. If the JPA or the developer had the public interest in mind, then why is it that the mailing addresses for the owners of these businesses do not have a more equitable spread favoring local owners? Is it because as the graphics indicate, and what I learned at the April 2022 meeting and is confirmed in your recirculated draft EIR, that these warehouses were never intended to consider local business owners or local jobs for residents of western Riverside County? Is it because these warehouses are part of an investment portfolio for companies more concerned with Wall Street than the local streets of Alessandro or Van Buren? Is this another example of the JPA allowing their exclusive private developer to profit off lands that were intended for public benefit?

If I were to dig further, would these addresses stop in Denver, Tulsa, Chicago, Atlanta, or Newport Beach? Or would they quickly leave the North American shores and head to destinations far and wide? Are you, the JPA, telling me that my desire to live a happy and healthy life is not as important as the portfolio of the investors of your exclusive developer and their wealthy corporate friends? It is at times like this that you have to decide where your obligations lie. Do they lie with those that will profit from bad decisions or do they lie with the

people you were hired and tasked to serve? How will you enforce the JPA's own mission identified in the General Plan, the one that protects community values, health, and history from narrowly focused and neglectful land use decisions? I cannot see how building more warehouses accomplish this clear and focused goal as described by the writers of the original General Plan document. Where again is the accountability to the public? What will it take to get the JPA to stop privatizing public lands? Fortunately, I have some recommendations for you.

This brings me to a crucial and consequential point in this comment letter and the heart of my objection to this project, a project that would build nearly 5 million square feet of industrial warehouses right in the middle of a large residential neighborhood. Ever since the community became aware of and engaged in the plans for this shocking large industrial project, the community has repeatedly asked the JPA for one thing: **no more warehouses**. Warehouses are a part of life today, Councilmember Conder is right about that, but it is egregious to consider putting so many of them right in the middle of thousands of homes, something Councilmember Conder, the JPA, and the developer fail to acknowledge. This specific plan is a bad idea and real alternatives are needed.

But before we get to the alternative plans, I realize that you have not modified the plans in the recirculated draft EIR and that is my concern. The JPA and developer address alternatives to the projects that were rejected in the original draft EIR. The first reason listed (6.3.1) is that there is no alternate site for this project (because of its size). This explanation implies that this project (a mega-warehouse complex) is pre-decisional, the realization of a legal entitlement for the developer to build warehouses anywhere it wishes and the decision to sell the land to the developer in October 2022 shows that you understood the project was unpopular and didn't want to hold the applicant accountable to public sentiment. The fact that you never considered in the recirculated draft EIR the alternate project ideas provided by the community in comments to the original draft EIR means you don't care about public sentiment, but will work to give the public the perception that you do via the inclusion of the draft EJ element you are circulating now. It also implies that because the developer wants mega-warehouses to lease or sell to whomever (foreign or domestic) it wants, whenever it wants in the future, that it is their right to repurpose public land for private gain. It implies that the decision to build only warehouses here was made long ago and by approving these plans the JPA and this commission are helping to privatize public lands in a way that damages the public interest and our infrastructure but benefits the applicant and its investors financially. There is absolutely no community sentiment for building warehouses here (nor is there a need for the few temporary, low paying jobs created by these eyesores), but there is wide ranging public support for development that improves our lives and community. The applicant does not prioritize the values of the community, the protection of its citizens, or the collaboration with impacted and disadvantaged communities impacted by this project. They have a history of sanctioned negligence and their lack of accountability and accuracy is even written in the draft EIR. Residents of Riverside, Moreno Valley, Perris and unincorporated Riverside County expect the JPA to hold the developer accountable for our lives as much as it allows them to profit from this project. What lengths have you taken to do this?

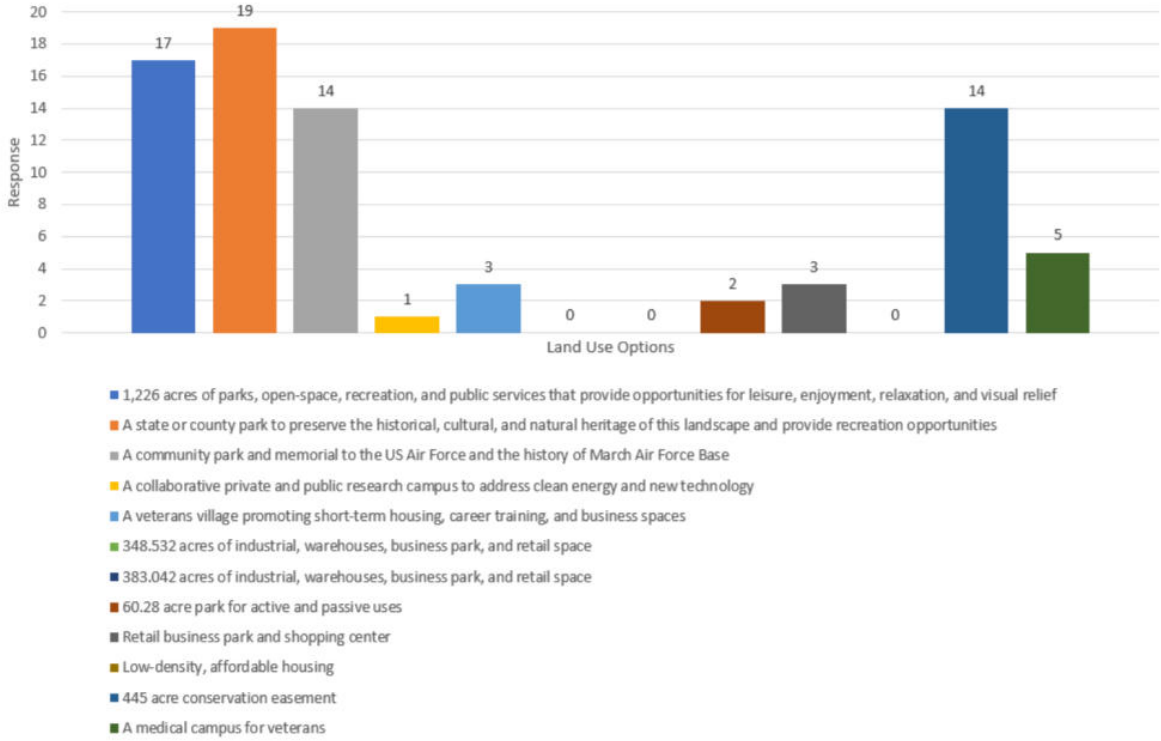
You do not explain this in your recirculated draft EIR. How will you hold them accountable on our behalf (a function of government)? How will you enforce your own mission identified in the General Plan, the one that protects community values, health, and history from narrowly focused and neglectful land use decisions? The economic risk here is massive; as quickly as the economy moved to demand more storage space, it has swung back just as quickly purging jobs and closing locations due to slow retail late 2023-early 2024. Once built, that space will sit as an empty concrete monument to bad government decisions and capitalism at its worst unless you demand real alternate uses for this land now.

Now on to the alternate plans that I and the community proposed in our comments to the original draft EIR: Section 1-10 of the draft EIR presents four alternative plans evaluated for the release of this document. If the JPA and developer had truly listened to the public when you met with us time-and-time again over these last two years, if you had genuinely engaged with residents of Riverside who are directly and adversely impacted by this plan as you say you will do under the draft EJ policy, then maybe one of your four alternative plans would have included development without warehouses or industrial. At the risk of being repetitive, why have you ignored this request for so long? Is it because the applicant has already paid for land with the assumption that they will be building large warehouses on it? The public expects the JPA to honor its commitment (page "v" of the General Plan) to serve as a link between community values and physical (land use) decisions. Is this line guidance or a mission statement? After 23 months of communication with the JPA, why is there no option to develop this land in a way that reflects community values and input?

In the draft EIR, Alternate Plan 1 under consideration is titled "No Project" and under section 6.4.2 the explanation of this plan appears to be a CEQA mandated option in the EIR, primarily for comparison purposes with the main plan and the other three alternate plans. This plan can be easily dismissed as naïve and misguided, and more than once I have been accused of being the loudest of the unreasonable proponents of this alternative. Alternate plan 1 is ideal and is the right decision for this land from a residential land use and quality of life point of view. Think about it, this land has historical significance for the City and County of Riverside, and Moreno Valley and Perris communities that grew up largely because of March AFB and these weapons storage facilities. The historical and native artifacts found in the area are irreplaceable and according to Table 1-3 this project will cause significant and unavoidable damage to these American and Native American symbols of our past. Even the City of Riverside questioned your willingness to destroy a part of the local history so cavalierly. I do not believe the JPA or the applicant will do the mitigation described in your draft EIR and want to understand why (a) I should take your word in writing for it (legal action is not a suitable response), and (b) why the JPA wants to erase the history and public image of March Air Force Base before sunsetting?

Prior to submitting this letter, in an act of community engagement similar to that the JPA demonstrated at the December 2023 Environmental Justice workshop, I collected responses in a

"dot poll" of my own the last week of January 2024. In the poll, I asked respondents what they wanted to see done with the West Campus Upper Plateau. Here are the results of the poll:



Respondents were given three dots to place next to their top three land use objectives for the Upper Plateau. The choices presented to respondents came from the March JPA Final Reuse and General Plans, the draft EIR for the West Campus Upper Plateau, the 2012 Settlement agreement the JPA has with the Center for Biological Diversity and San Bernardino Valley Audubon Society, or from the community preferred land uses and alternate options proposed in this letter and in hundreds of responses to the original draft EIR in 2023. In this effort to listen to the community, we found that the community universally disagrees with the applicant's plans for how this land should be used and have once again demonstrated to you that they prefer non-industrial or warehouse uses for this unique piece of land in western Riverside County. 82% of respondents asked that this land be preserved as open-space for public enjoyment and relaxation, and 100% of respondents rejected industrial and warehouses on this land as proposed by the applicant and the JPA. I would imagine that if the JPA and applicant, the Parks and TAC Committee, and the Commission truly engaged with the public regarding land use decisions, you would see similar results as I did in my efforts to give the public a voice in the decision-making process as it relates to land use planning and decisions for the Upper Plateau.

The recirculated draft EIR does nothing to address universal public objection to your industrial specific plan. From the draft EIR, alternative plans 2-4 all include significant warehouse development, major and heavy demolition and construction to build these warehouses, and will

still have significant impact on surrounding residents' health and quality of life. These alternate plans demonstrate that the JPA held public meetings as a matter of process and did not genuinely intend to work with the community (as required in your draft Environmental Justice policy and General Plan) to repurpose this land and build up (literally and metaphorically) the surrounding communities in a positive manner. Why is it that the mixed-use and business park elements already found with the March JPA, especially along Van Buren Blvd, are sparsely occupied, yet you pretend this new project will benefit local businesses and residents? Also, within these three alternate options, for you to tell the people that live here that the proposed plan and three of the alternative plans WILL HAVE significant and unavoidable impacts on our lives is reprehensible, especially for a government agency who says they are committed to protecting (at your discretion apparently) our lives and promoting a clean and healthy land uses.

The community has asked you in person, in writing, on the phone, virtually, and in every way we could to offer development plans that think forward, that offer jobs to our kids and to the bright engineering students and scientists graduating from UC Riverside and other area colleges, jobs and land uses that grow our community with essential services, conserving resources like water and electricity (even generating and storing that electricity), providing a place for the community to gather without congested roads and polluted landscapes: **no more warehouses**. Yet you ignored the community and you did so intentionally. Was this at the direction of your commissioners? Was it at the direction of your exclusive developer? Did the Air Force tell you it wanted more warehouses? Do you read the same reports about the economy as I do? Or are you beholden to the wishes of the applicant? You routinely claim that you cannot tell the applicant what to build, but you are wrong and the General and Final Reuse Plans tell you what your organization, the member communities, and the US Air Force envisioned for this land. By claiming that you cannot tell the applicant what projects to build, you are aiding a private, for-profit company in harming the local community, profiting off of private land, and destroying the very community your organization was tasked with rebuilding after the delisting of March AFB. You, the governmental buffer between private and public interests, chose sides and it wasn't the public you sided with, it was investors and profiteers you tied your legacy to.

To that point, when it became clear to me that the JPA and the applicant had no interest in discussing and offering alternate plans to industrial and logistics in the original draft EIR and now in the recirculated draft EIR, I started working with concerned members of government, business, and diverse and engaged members of the community (my own form of EJ) to develop three reasonable alternatives to your plan for the Upper Plateau. Having been rejected by the JPA, the applicant, and Commission members in the past by proposing everything from a solar farm and energy storage facility to a winery (the bunkers would make great tasting rooms providing they are not radioactive which the latest information in the recirculated draft EIR does little to dismiss public concern) to mixed use residential and commercial centers, all reasonable ideas seemed to fall on predetermined and blind ears. Thus, while the alternate projects were not part of the recirculated draft EIR, it seems like a good time to once again describe and elaborate on alternate projects I presented to you a year ago. These alternate use and zoning projects have

considerable appeal to the community and with traits of realistic development opportunities for the JPA and the applicant as I express my strong objection to the specific plan and alternate plans proposed in the recirculated and draft EIR.

1. Alternate plan #1: The Campus Approach
   - *Concept*: University of California Riverside (or a consortium of colleges such as the ones Randall Lewis has an interest in and donates to) campus facilities and research centers focusing on expanding the college's OASIS, CARB, CERT, and economic development programs, mixed with business park, a developed public park as required in both the 2003 and 2012 settlement agreements for active recreation, and significant open-space with a conservation easement for both active and passive recreation and enjoyment by hikers, runners, naturalists, and mountain bikers.
   - *Environmental Analysis*: No impacts to population/housing, and recreation; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, public services, transportation, utilities, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
   - *Project Objectives*: Support job creation through partnership with UCR (and other area colleges) and their research centers to help college students and research professionals develop the skills and knowledge needed to lead our world into the future while offering a campus and business park environment that focuses on R&D as well as forward-thinking environmental, medical and hi-tech, and renewable resources and business. Project meets JPA objectives 1-3, 5-7; project does not meet JPA objective 4 (Cactus would not be connected under this plan). I have had a few discussions with UCR about this project and have had some interest from not only researchers but also from administrative personnel. This is an opportunity for the March JPA and applicant to forge a relationship with the University of California and build a unique partnership with education and private business to develop a campus environment similar to the Jacobs Medican Center at UC San Diego, the Rockwell Center at UC Irvine, the Center for Spatial Technologies and Remote Sensing at UC Davis or the UC Davis Center for Health and the Environment, or the Lawrence Berkeley National Laboratory at UC Berkeley. This land might be a good location for a campus that houses an alliance of University of California schools and their Aerospace Studies and Engineering programs (UC Berkeley, UCLA, UC San Diego,

UC Santa Barbara, UC Irvine, UC Santa Cruz, and UC Riverside all have Aerospace programs). This might even be a good location for a central campus for the University of California Institute for Mexico and the United States (UC MEXUS). Such a project would enrich the local

- *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and developer a project that would provide for long-term quality job growth in education and technology, and preserve valuable open-space for residents to enjoy a better quality of life. This plan also considers a need for the area to provide high-paying jobs and an opportunity for the UC and other colleges to grow in the area, and a way for the US Air Force and March ARB to work with researchers in the Aerospace and Engineering fields. And lastly, it incorporates the need for recreational opportunities and the preservation of open space and a unique ecological habitat. It would also allow the JPA to honor the past of March AFB and preserve a part of the munitions bunkers as a memorial to the history of the Air Force in Riverside County.

2. Alternate plan #2: The Veterans Village Approach
   - *Concept*: A veteran's village that incorporates a conservation easement and open-space and a developed park for active and passive recreations (like the Great Park in Irvine) memorializing the local history of the US Air Force, along with low-density affordable veteran housing (like the Veteran's Village in Moreno Valley), medical offices (beyond your work on the March LifeCare Campus) and services, rehab and therapy center, job training and career transition services, and a small business park.
   - *Environmental Analysis*: No impacts to recreation, and utilities; impacts w/mitigation to aesthetics, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning (done in conjunction with USAF), hydrology, population/housing, public services, transportation, and wildfire; significant and unavoidable impact to air quality, noise, and tribal resources.
   - *Project Objectives*: Support the heritage of March AFB while offering job creation through veteran services such as medical, career training, and housing projects. This option could include incentives for Veteran Owned, Disabled, or Minority Owned businesses to serve local communities while offering active and passive recreation opportunities for youth sports and active and passive community recreation. Project meets JPA objectives 1-7 and was enthusiastically received by the US Veterans Center associated with March ARB. This alternate project is popular with the community as many members of the local community, and a few members of the JPA Commission, served in the military and believe that (a) there are not enough resources and services locally for veterans, and (b) the March JPA isn't doing enough with regards to planning and development to honor the contributions of the US Air Force.
   - *Conclusion*: Per the General Plan's goals and policies, this alternate plan offers the JPA and applicant a diverse project that would provide for long-term military service-member care, a multi-use park for both active and passive recreation, and a nature

preserve protecting valuable open-space and natural resources (just as your General and Final Reuse Plans identify). This is a patriotic plan that would allow both the JPA and the developer to capitalize on the good will of the community and connect to the history and present-day operations of March ARB. This alternate project would allow the March JPA to sunset with some honor in completing its mission, the applicant to profit from a development project that will appeal to its portfolio of investors, and to the community especially to those that served our country.

3. Alternate plan #3: The State or County Park Approach *(#1 on my informal dot poll)*
   - *Concept*: A minimally invasive alternative plan partnering with the National Park Service's Federal Lands to Parks program that converts former military bases, closed under Base Realignment and Closure Acts (BRAC), to public parks and recreation areas. “Airman State Park” would be similar to Fort Ord State Park (CA), Charlestown State Park (IN), and Wompatuck State Park (MA).
   - *Environmental Analysis*: These public parks help revitalize communities impacted by the closure of the military bases, providing close to home recreation, protecting natural and cultural resources, and potentially attracting businesses and increasing property values. These are all things that the March JPA General Plan and draft Environmental Justice policy strive to do with this land. No impacts to aesthetics, air quality, biological and cultural resources, energy, geology soils, greenhouse gas emissions, hazardous materials, land use planning, hydrology, population/housing, public services, recreation, transportation, tribal resources, and utilities; impacts w/mitigation to noise and wildfire.
   - *Project Objectives*: Protects a special local natural and recreation attraction for future generations to enjoy while honoring the land and its connection to the USAF. Project meets JPA objectives 2, 6-7; project does not meet JPA objectives 1, 3-5.
   - *Conclusion*: Per the General Plan’s goals and policies, this alternate plan offers the JPA the chance to link with the community (State or County) by preserving an ecologically diverse habitat and landscape, and offer residents a better quality of life and extensive recreational opportunities. It complies with the General Plan and Exhibits 5-1 and 5-4 land uses. And it is easily the most popular alternate plan offered here. The public is aware of and has asked for this plan as their clear first choice. In addition, community members, local government staff, and experts in their field submitted many letters and comments in response to the draft EIR and at County and March JPA historical and parks committee meetings. The weapons storage igloos alone have state and local significance because they are the only suck structures in California. They meet the California and National Register of Historic Resources criteria for preservation and the transfer of this land into a park would be very similar to the Naval Weapons Storage Area in Concord, CA. Following through with the plan as proposed in the recirculated and draft EIR would destroy the past and history of the US Air Force on this land, and prior to that the different Native American inhabitants,

rather than preserve and honor them. The March Weapons Storage Area represents a rich historical significance for Riverside County, and their preservation through a County or State Park would greatly benefit residents and the member entities of the March JPA.

My preference is clear and I have indeed spoken with the National Parks Service and the County of Riverside about making alternate plan #3 a reality. There is funding available to do this and all agencies (JPA and the four member agencies) would profit from the establishment of such a park. The JPA could engage with the National Parks Service, for example, and initiate a BRAC agreement to purchase this incredibly unique land and preserve the entire property for the very reasons identified in the 2012 Center for Biological Diversity agreement which seeks to preserve a delicate desert riparian ecosystem, preserve historic and cultural artifacts (hidden well within your draft EIR so much so that I have yet to discover them), and protect (without discretion) threatened or endangered species like the Stephen's Kangaroo Rat (they still live on this land despite your insistence in the recirculated draft EIR that their new home is elsewhere in Riverside County) and the burrowing owls located at the northern end of the property. Such an agreement would pay the JPA member agencies and immensely benefit the surrounding community by giving them recreation opportunities and serving as a buffer from the dreaded industrial sprawl that you are advancing without restraint. This solution is feasible, positive from all points of view, and something you have control over. It would serve as a compromise for all involved and would not negatively impact the airport/USAF. Unfortunately, your insistence on transferring the land to the applicant in October 2022 makes this effort more challenging and it would take some real leadership and community support to work with the County of Riverside or State of California to make the March Field State Park a reality.

Should the JPA consider any of these plans as viable solutions, I am happy to serve as a member of a community advisory board that will help facilitate, discuss, and explore how any of these plans could materialize. I am happy to also help advocate for and work to make any of these plans a reality for the JPA and my surrounding neighbors. And while the business minded persona deep inside of me would like to profit from such involvement and work, I would convince that part of me that an alternate solution to more industrial warehouses is more than enough reward for my time and hard work.

Baseline Information: Misleading and Inaccurate Data Used in Project Plan

The recirculated draft EIR, like the draft EIR, is based on inconsistent, faulty, and misleading information and data that makes doing a public review of the proposed project difficult for the average citizen like myself. These errors and faulty information provided in the recirculated and draft EIRs make for an unstable and confusing project. The information I find troublesome includes:

- The health-risk assessment in revised appendix C-2 and summarized in the recirculated draft EIR applies arbitrary and incorrect methods for estimating the cumulative cancer

risk. The updated document omits exhaust emissions from light-duty passenger vehicles from the health-risk assessment, inaccurately allocates construction emissions from outside the Specific Plan area, even though these emissions are closed to residential homes and sensitive receptors, applies a '1,000 foot evaluation distance' for traffic related emissions impacts which is invalid for a modeling project of this scope under CEQA, and still does not model the right number of warehouse buildings or trucks for the project, despite comments on the draft EIR about these issues.

- The March JPA consultant is making unjustifiable boundaries for a cumulative impact health-risk assessment to keep the result below the 10-in-a-million cancer risk level required by statute. This is unjustified, inaccurate, and incorrect and is a deliberate attempt to misinform the public during review and decision makers about the cumulative impacts of warehouses on the community adjacent to its projects.
- The draft Environmental Justice element policies including in the Air Quality Section have no basis for validity. The community has not had the opportunity to provide formal feedback on these policies and these policies have not been adopted by the March JPA through a formal CEQA process. As such, we cannot meaningfully comment on draft policies which were not included in the formulation of a project retroactively.
- The business park and mixed-use components of the project are modeled as 'Office Park' in CalEEMod. Office Park is defined as a 'office buildings and support services, such as banks, restaurants, and service stations.' This is not consistent with the industrial land use of Business Park and Mixed Use (warehouse enterprise) described in the March JPA general plan.
- On page 4.2-30 of the recirculated draft EIR, while business park does include warehouse enterprise uses as an allowed use, it does not REQUIRE warehouse uses and it is a bait and switch to use 1999 assumptions that did not assume that 75% of business park uses would be warehouse uses as an excuse to upzone to industrial zoning which is far more intense. Moreover, the March JPA Development Code and updated in 2016 and 1999 General Plan was not applicable when community input was last solicited on preferred land-use patterns in from 1993-1996. Over the last two years, the community has communicated to the March JPA and applicant repeatedly in writing and verbal feedback to not upzone this parcel to industrial land-use and the MJPA is ignoring this feedback, and even recirculating the EIR while omitting community feedback.
- Table 4.2-16 and Exhibit 3-B are incomplete and omit multiple warehouses, arterial truck routes, and the 215 Freeway. Your deceptive plan draws a 1,000 foot buffer around the Upper Plateau Specific Plan area, rather than the West Campus Project Site boundaries. The most minimalist interpretation of the 1,000 foot boundary is undercounted by over 4M SQ FT of warehouses. This does not appear to be a mistake rather it is a deceptive act for an applicant and entity practicing predatory land development in my backyard.
- Air Quality Goals 2 and 3 in the recirculated draft EIR are inconsistent; the project is inconsistent with air quality plans because it is selecting the highest intensity use, failing to consider less intense alternatives, and has an extraordinarily high VMT/employee ratio

of trips (over 12 vehicle trips per employee per day). That is not reducing VMT or GHG emissions and these goals are inconsistent with a working Environmental Justice element which the March JPA lacks presently.

- A functioning Environmental Justice element would consider the health and safety of all communities, but especially those most at risk. With this in mind, census tract 06065046700 contains at least 50 existing warehouses estimated at over 20 million square feet of cumulative space, most of which have been built in the last 6 years. Another 10 warehouses are entitled or under construction within the census tract (including the March JPA), cumulatively adding another 5 million square feet. Adding this Specific Plan would put the cumulative total within the census tract at approximately 30 million square feet cumulatively, in the 99th percentile for census tracts within Southern California counties. The predatory nature of your land use zoning and development strategy of upzoning appears to risk the health and safety of those in the surrounding communities most at risk. This seems in conflict with the basic mission of the March JPA, to strengthen the community surrounding March ARB, not destroy it.
- The release of the March JPA's draft Environmental Justice plan coincides with the release of the recirculated draft EIR for the West Campus Upper Plateau project that the local community overwhelmingly rejects. It is insulting to think that while the JPA has existed since 1996, and have consistently built warehouses in communities that CalEnviroScreen 4.0 lists in the 98th and 99th percentile, the JPA chose the last days of November 2023 to amend the General Plan for an organization that sunsets in July 2025. It is farcical to think that the JPA intends to actually carry through with this ambitious plan, and as a member of an active community that opposes the land development practices of the JPA and its practices of bending the CEQA requirements of holding a full environmental review for the EJ policy prior to finalizing it, I don't believe this effort is genuine on your part. This effort is clearly in response to comment letters submitted by the community in response to the draft EIR for the West Campus Upper Plateau, and rather than engage with the community and consider the comments in these letters, the JPA is obviously assisting in the applicant's greed and desire to push through a significantly controversial project despite the very communities that this copy-paste EJ policy intends to protect and represent.
- I have concerns with the process by which the JPA is going about this amendment to the General Plan, as they have already inserted in into the revised draft EIR for the West Campus Upper Plateau project being recirculated currently. The policy in its current form reads as an unimaginative cut-and-paste from the County, filled with policies that the March JPA has no ability or intention to follow through on in the 18 months it has left to exist.
- Specifically, the policies that the JPA has no ability or intention of fulfilling include:
    1. The March JPA has no time or budget to create a 'far-ranging, creative, forward-thinking public education and community-oriented outreach campaign' about EJ issues or hazards (HC 15.7)

2. The March JPA has no jurisdiction over the Salton Sea (policy HC 16.1)
3. The March JPA will not have time to pursue grant funding for EJ issues (HC 16.2), evaluate creating a cap or threshold on pollution sources within EJ communities (HC 16.8), and rejected community alternatives to consider compact affordable and mixed-use housing near transit (HC 16.10)
4. The March JPA won't be coordinating with transit providers for access to grocery stores and healthy restaurants (HC 17.1), increase access to healthy food (HC 17.3), develop a food recovery plan (HC 17.4), work with local farmers and growers (HC 17.6), or consider edible landscaping (HC 17.7)
5. The March JPA is not discouraging industrial land-uses conflicts with residential land uses (HC 18.6) and rejects considering safe and affordable housing in EJ communities (HC 18.13)
6. The March JPA has no time to utilize public outreach and engagement policies to address local needs in EJ communities (HC 22.4) since it has never addressed or considered this issue prior to November 2023.

- At a minimum, a proposed EJ element needs to incorporate MJPA priorities, exclude inapplicable county policies, and describe community priorities through an active (and hopefully formal) community engagement process. This copy-paste of County policy is neither Specific, Concrete, nor Targeted and it is devoid of community input. Adopting a General Plan amendment with more than a dozen policies that the MJPA has no intention of implementing is dishonest, poor governance, and a litigation risk. Incorporating the draft EJ element into a REIR as if it will be adopted without modification is also dishonest, unstable, and intentionally misleading to the public and decision makers within the March JPA.
- The project goal of providing open space amenities to serve the region is erroneous. This project will reduce open space amenities, reduce the utility of the existing open space amenities, reduce the value of the open space amenities by placing it adjacent to industrial land-uses and roads, and provide no additional open space amenities.
- The project goal of completing the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue is erroneous. Barton Street and Brown Street are inconsistent with General Plan Circulation element, as is creating a truck arterial for Cactus Avenue that extends West past Camino del Oro. Such an objective is a discretionary action that requires a statement of overriding considerations by the March JPA commission. Including it as a project objective is not allowable.
- The project goal of removing and redeveloping a majority of the former munitions storage area of the March AFB is inconsistent with the goals of the March JPA General and Final Reuse plans. The former munitions storage area (weapons storage area – WSA) is a significant local cultural resource. It is the only example of an Air Force WSA in the state of California. It is a primary example of cold war nuclear weapons storage. The

WSA represents an area with a rich historical significance and a significant longitudinal military history exemplifying Air Force weapons storage igloos present during the cold war. They are a unique military-related munitions storage structure in the county of Riverside and state of California; no other igloos were part of the Strategic Air Command. The general plan and preferred final reuse plan both designated the WSA as a open space and specifically named it as a central feature of future designs for the area. The goal in both 1996 and 1999 was to preserve these structures. Refer to all three alternate land use plans above for how the public would like to see this area preserved.

- The recirculated draft EIR documentation is unstable, with multiple versions of maps and text descriptions of the project that are inconsistent across the EIR and its recirculated technical appendices.
- Table 4.10-1 is a waste of time for public consideration as it demonstrates the level of effort and concern the March JPA has for approving an industrial project prior to sunsetting in July 2025 despite unanimous public objection (outside of the Carpenter's Union which is a private entity, not public). This table demonstrates clearly the predetermined and predatory nature of the applicant and the March JPA and is dismissive of an authentic engagement with the public or living Environmental Justice element.
- The recirculated draft EIR documentation incorporates a draft Environmental Justice element of the General Plan as a key new component of multiple sections of the EIR. This is highly irregular, since neither the Technical Advisory Committee nor the MJPA commissions were briefed on the new EJ element prior to it being incorporated into the EIR. Given that community members were neither informed nor incorporated in the development of this new EJ element, it clearly does not reflect community input or vision.
- The recirculated draft EIR documentation makes many references to mitigations, entitlement, permitting, and enforcement actions that the MJPA will undertake, despite the MJPA sunsetting in July 2025. These statements seem doubtful under this project as it is unlikely that the project will be completed by July 2025 and there is no indication that the County of Riverside will agree to the commitments made by the March JPA under this Specific Plan.

In addition to the inconsistent and misleading baseline data used in the recirculated and draft EIR, you also have consistently included insufficient mitigation measures for the items you claim will be disruptive to this land and surrounding communities. These insufficient mitigation measures demonstrate that the applicant and the JPA adhere to minimal industry regulations and disregard how this project differs from many others built in the March JPA area because of the significantly close proximity to large residential neighborhoods, churches, schools, historical and cultural resources, and parks. I especially take exception, as a resident living with negligent warehouse mitigations from the past, to the following stated mitigation measures from the recirculated and draft EIR documents:

- Technical Appendix T is a new addition to the draft EIR and it appears to be a static, 15-year-old document that applies to the March Business Center, not the West Campus Upper Plateau, and is exclusive of any current or future "responsible parties" or "monitoring agencies." This makes the inclusion of an essential project Mitigation, Monitoring and Reporting Plan in this recirculated draft EIR inconsistent and inaccurate, misleading for the public, and by stating in the recirculated draft EIR that you will incorporate and updated version of the MMRP into the final specific plan, the March JPA is intentionally excluding public involvement in mitigations for this project.
- Page 12 of Technical Appendix T, "Aesthetics," states that all project landscaping will comply with the approved landscape plan and March JPA development code. I have a couple of objections: one is that the March JPA has no history of implementing a mitigation plan to protect residents living on the perimeter of JPA developed lands, and the other is there is no accountability when the March JPA, master developer or applicant, or lot developer do not follow through with the standards of the development code (which has clearly not changed in this document since 2009). While not considered a grave impact on human life, the aesthetics of the Upper Plateau holds a significant concern for a majority of the residents of Riverside and its surrounding communities. Aesthetics is defined as a branch of philosophy concerned with the nature and appreciation of art, beauty and good taste. It has also been defined as "critical reflection on art, culture and nature". Within aesthetics, there are two main branches: one branch focuses on the appreciation of nature and natural landscapes (the Upper Plateau now), and the other branch focuses on the appreciation of human creation and in this case architecture (the Upper Plateau with warehouses on it). In the recirculated and draft EIRs, the March JPA and applicant have chosen to view aesthetics singularly in regards to human creation and the design of warehouse buildings in relationship to other warehouse building. This is a faulty assumption, though one I am sure you will justify with an obscure development code that suits your unpopular and predatory development plans. When considering the nature of aesthetics, people contemplate and define the ideas of beauty and value to the natural or human made objects they are examining, and for you to assume in the recirculated draft EIR that your definition for aesthetics on this land is the one that the public will support is selfish for a government organization and land use authority working on behalf of the public. Your sections on aesthetics in the draft EIR are written by and for the same audience, a for-profit business and is entirely dismissive of how residents and visitors to the Upper Plateau find beauty and value in this land outside of profit incentives. Your consideration of aesthetics without genuine engagement with the public is unfairly biased toward those who stand to profit financially from this project and not toward those who must live with it after the developer and the March JPA have left the area. They are dismissive of the public and make a mockery of the forced draft Environmental Justice element included in this draft EIR. The draft EIR's consideration of aesthetics is decidedly one-sided and communicates a clear anti-community message to residents living near the Upper Plateau. Was this your intention? Will the JPA and the

developer sanction a project that ignores the aesthetic appreciation of people who live her just so the applicant can meet the demands of its hedge-fund and non-local investors? How is this adhering to the spirit and guidance of the March ARB General Plan developed in the late 1990s?

- Specifically in the recirculated draft EIR, I find these mitigations to be dismissive of local residents and of people recreating in the open-space surrounding the project area:
    - Pages 4.2-45-50, Section 4.2.7 Mitigation Measures-AQ1: where will this information be publicly posted and maintained for the duration of the project? Who will hold the applicant accountable for maintaining the most current mitigations for this pollution? AQ2: "Active disturbance" contributes significantly to poor air quality, especially surrounding a large construction site. Why have you chosen to exclude its impact in your projections and this recirculated draft EIR? What mitigations will be provided for residents and recreationalists during construction regarding the significant impacts of blasting and grading to the air quality? AQ3 and AQ5: who is responsible for ensuring that the applicant adheres to these items, especially since the March JPA sunsets in July 2025 and this project would still be working through the demo phases? AQ6: evidence of compliance with LEED standards is an ongoing process, as I understand it. With the March JPA sunsetting in July 2025, who will ensure that the occupants of these buildings maintain the LEED standards for certification over time? Presumably, the applicant will also be long gone and will leave honest business owners to protect the health and safety of residents surrounding this area. AQ8: while requiring the inclusion of electrical hookups and compatibility with Smartway trucks is a nice feature, there is no requirement that the occupants use them and the March JPA has established no long-term climate plan to ensure that businesses surrounding the March ARB need to work to eliminate hazardous pollutants caused by warehouses and trucks. AQ9: while it is good to have a place for workers to relax at a warehouse, truck drivers often do so in the cab of their truck. Why is there no requirement for enforcement of idling or illegally parked trucks on all surrounding streets in these mitigation factors? If there is negative incentive to use the lounge area, workers are not likely to use it. AQ14: the maintenance crews for existing March JPA warehouses do not currently use electric or battery powered equipment for landscaping maintenance so why would the public or decision makers believe they will do so once this project is complete, especially since the March JPA will sunset in July 2025? AQ16-19: who is responsible for ensuring that the applicant adheres to these items, especially since the March JPA sunsets in July 2025 and this project would still be working through the demo phases? AQ20: the JPA's emission objectives addition is once again nice but the language in the plan states that "occupants are encouraged" to comply and since the JPA will sunset in July 2025 there is no way it can mitigate or monitor businesses who do not comply. AQ21-27: who is

responsible for ensuring that the applicant or occupant adheres to these items, especially since the March JPA sunsets in July 2025 and this project would still be working through the demo phases?

- Pages 4.8-40-41, Section 4.8.6 Mitigation Measures-HAZ1: If this project does not begin demolition prior to the March JPA sunsetting in July 2025, what assurances and procedures exist that the County of Riverside will be able to adhere to these same findings and mitigations, or that during the time between now and the time demolition begins that future hazardous materials will be done should there be evidence or a need to study if other non-tested materials are present in the project area? FIRE1: Mitigation measures for fire in the March JPA area, especially the open-space, is lacking. In the spring of 2023, I sent several emails to the Director of the March JPA about removing overgrown brush near homes and it took her more than a month to do anything about it. She had many excuses for why it took so long, but in reality, the March JPA doesn't have the resources to manage a mitigation plan and because of this lack of planning and staffing, and the fact that the JPA will sunset in July 2025, I find these mitigations insufficient and negligent by the March JPA. Were a fire to start in this area and home get damaged, the March JPA would have significant legal exposure.
- Page 4.10-73, Section 4.10.5 Mitigation Measures CUM: the unavoidable impacts identified in this section are more avoidable if the applicant and the March JPA were to propose an alternate land use plan that excluded industrial zoning entirely and focused on true business park and open-space designs. The fact that the March JPA is considering and willing to negatively impact the lives of residents surrounding this project site is unacceptable. Furthermore, the less than significant impacts identified via mitigations in this text, like the discussion on aesthetics above, is dubious for the public because your use of development standards and codes does not always reflect the impact a project will have on people living near a project site like the West Campus Upper Plateau. Your insistence that the mitigations provided will minimize the impact on our lives is arrogant, selfish, and demonstrates the predatory nature of the applicant and this Specific Plan.
- Page 4.10-73, Section 4.10.6 Levels of Significance After Mitigation: The proposed mitigations surrounding the open space amenities described in the recirculated and draft EIR is erroneous. This project will reduce open space amenities, reduce the utility of the existing open space amenities, reduce the value of the open space amenities by placing it adjacent to industrial land-uses and roads, and provide no additional open space amenities. It will result in conflicts with existing applicable land use policies adopted for the purpose of avoiding or mitigating an environmental effect. In spite of your proposed mitigation, the proposed project would result in significant impacts for residents and recreationalists, especially during the demolition and construction phases.

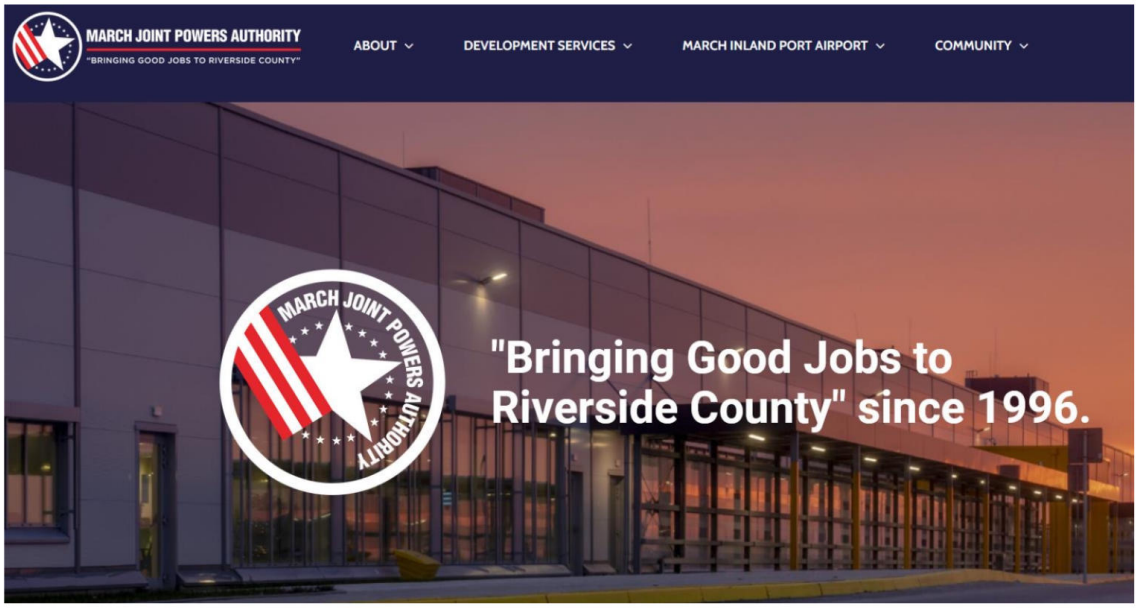
- Page 12 of the Technical Appendix T, "Noise," lists seven MMRP elements and living near warehouses built by the JPA and applicant I can report that the March JPA, Master

> Developer, Lot Developer, and Contractors responsible for mitigation and monitoring do not follow through with the development standards and code established prior to project approval. Acoustic analysis, especially that in surrounding neighborhoods, were and are not performed and therefore no mitigation exists for noise caused by trucks and warehouse operations today along Meridian Parkway. During construction phases, equipment and procedures did not sufficiently mitigate noise and my attempts to contact the Lot Developer, Contractors, Master Developer, or the March JPA to address noise concerns typically resulted in no response or a thank you for contacting us message but no mitigation or change in noise levels caused by construction. There is no separation between current buildings and residents and the proposed mitigation of trees to block the sound have in five or more years never grown and therefore do not mitigate the noise from trucks and warehouses and cannot be considered part of an active MMRP plan for this specific plan as indicated you plan to do on page 3-12 of the recirculated draft EIR.

It is difficult to imagine how the recirculated and draft EIR comply with CEQA and common sense (maybe the two are incompatible) without considering the cumulative impact the specific plan would have on the region. The draft EIR fails to consider the cumulative impacts the specific plan would have on traffic, air, light and noise pollution, housing, and use of resources and infrastructure like water, gas, and electricity and roadways and law enforcement regionally. In many cases, the recirculated and draft EIRs make use of multiple and outdated datasets (biological, traffic, air quality, jobs data) to form its findings and justification for moving forward with this project. In some cases, this data is a preference of the JPA and the applicant because it helps you make your point or it justifies your vision for the project. But in other cases, you have mistakenly or purposefully used multiple, dated, or inaccurate studies and data in the EIR and the inconsistencies raised by old or incompatible data and reports is misleading to the public and done so in a predatory manner. Again, the later environmental review process begins, the more bureaucratic and financial momentum there is behind a proposed project, thus providing a strong incentive for applicants and land use authorities to ignore environmental concerns that could be dealt with more easily at an early stage of the project.

Even a year after the publication of the original draft EIR, all of the presentations and reports I have seen published by the JPA related to this project name jobs as the primary justification for building industrial on the Upper Plateau. It has been an ever-present and leading comment by the Director of the March JPA and the applicant in public meetings or briefings for two years: this project will provide jobs for local residents but there is little evidence that these jobs will be the ones the March JPA intends or has touted for the last two years. There are many, many problems with this argument, again your primary argument for building industrial warehouses on the West Campus Upper Plateau. This justification just doesn't hold up to further scrutiny and the public is still waiting for a sensible explanation as to why this is the right project, at the right time, for the West Campus Upper Plateau. Maybe you will answer this question one day.

Your continued insistence that this project is a jobs creator is misleading to the public. Even today, your website advertises the misleading promise of “good job” in the image below.



Yet this image is not of building where hard-working, educated people earn an honest living. It is an image of logistics sprawl that has infected the Inland Empire of the last 20 years. The reason that buildings like this are the face of your organization is because you are preying on the uneducated and low-income residents and promoting low-quality jobs and predatory land use practices for Riverside County. Of all the zoning uses you could have used for the face of your organization, you chose logistics, industrial, warehouses. The March JPA General Plan and Final Reuse Plan identify a more balanced land use for the once public lands occupied by the US Air Force. Why did you choose this image? What is it this image communicates to you? Why is it you cannot put yourself in the shoes of the residents of Riverside, Moreno Valley, Perris and unincorporated Riverside County and develop this land to help them live better lives? If you could, you would see that this image communicates a message of greed, corporatism, and survival of the richest instead of building up a community negatively impacted by the reclassification of the March ARB. If you could stand in the shoes of residents, you would understand how this image is evidence that you, the March JPA, are beholden to a profit-driven agenda and business, not the citizenry you are tasked with protecting and helping.

Publicly available data from city, county, and federal jobs reports indicate that there are not enough unemployed people in the local area to fill the number of jobs that the logistics industry claims they are creating. Let’s look at the population in western Riverside County for example; there are approximately 646,000 residents (approximately Riverside 325,000, Moreno Valley, 219,000, Perris 82,000, and Mead Valley 20,000). Based on the most 2023 employment statistics for the area, it is safe to estimate approximately 305,000 employed working-age people and

15,250 unemployed (based on the 5% unemployment rate). Even adding in residents from unincorporated areas like Woodcrest, Nuevo, and Sun City, there is nowhere near enough capacity for the jobs the industrial sector is claiming. The World Logistics Center in Moreno Valley is supposed to generate 35,000 jobs. Stoneridge Commerce Center is will generate 10,000 or more jobs. There's no way this region can add 45,000 jobs in just warehouses locally. Even if everyone who turned 18 decided to work in warehouses for 10 straight years, the data just doesn't add up. And with college enrollment beginning to rise again after COVID, it is unreasonable to believe that there will be enough local residents who will be willing to work for low paying wages and still be able to afford the cost of living in western Riverside County.

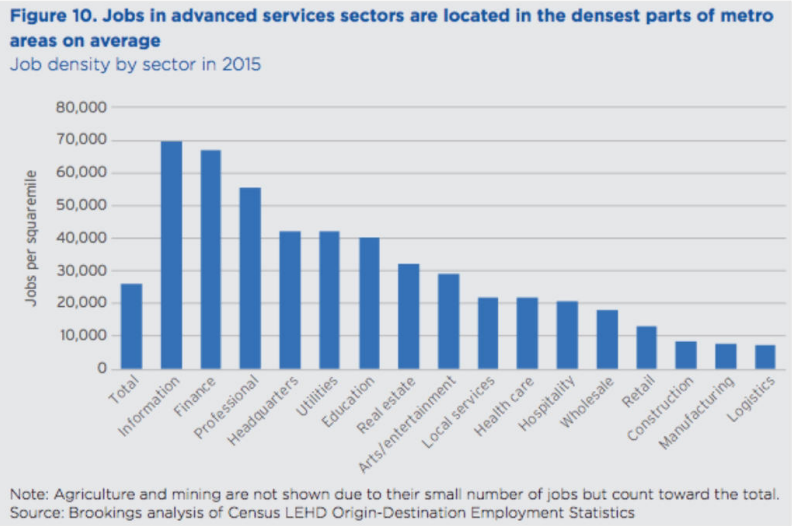
I'd like you to explain to me how graduates of local colleges like UC Riverside, Cal Baptist University, California State University San Bernardino, University of Redlands, and the community colleges in Riverside, San Bernardino, San Jacinto, Moreno Valley, and Yucaipa will find employment in the industrial sector and at these warehouses? If this area is to keep growing, it will require high paying jobs in the medical, technology, and energy sectors in order to keep the next generation of educated citizens an income that allows them to live in western Riverside County. Please explain in detail how this plan helps employ college educated workers. And if there is no explanation, please revise your jobs argument and projections for this plan or propose an alternate plan that meets the goals identified above in this letter.

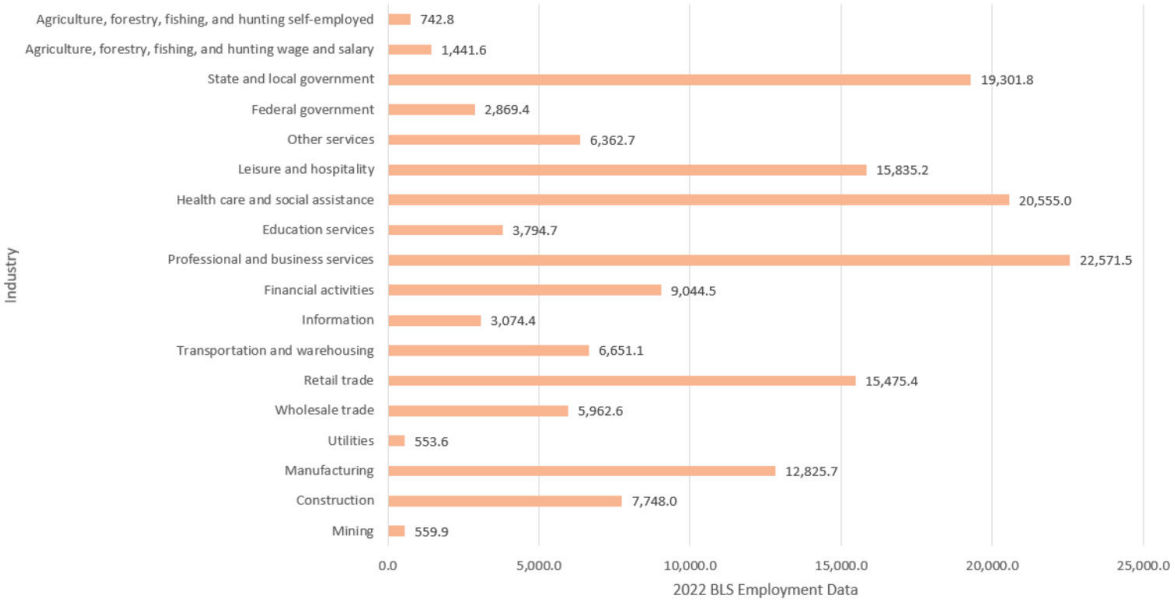
The majority of warehouse jobs are low-wage and temporary work with reduced hours, and workers cannot afford to live in the local area. Per Indeed.com, the average annual salary of a warehouse associate in Riverside, CA is $35,064 or $17.00 per hour. Even if one assumes that a resident is fortunate enough to find a warehouse job that provides 40 hours a week for 12 months out of the year, a rare find in this industry where workers average is less than 30 hours a week right now, a person could not afford to live in the local area. Rather than living close to where these warehouse workers live, as indicated in the recirculated and draft EIRs in multiple locations, warehouse workers at the Upper Plateau would have a considerable commute to earn their low wages. In fact, according to rentdata.org, the fair market rent for a 1-bedroom apartment in the 92508-zip code is $1972/per month. As of January 2024, the median home price for the zip code 92508 is $830,617. Even if a warehouse associate were to find a rare steady, full-time job, they would have to pay an unsustainable amount of their paycheck to rent alone. These jobs you insist are the primary reason for building only industrial on the Upper Plateau simply cannot support the lives of people who live within a 30–40-mile radius of these buildings. These jobs cannot and will not serve the local residents. They will increase traffic on the 215, 60, and 91 freeways and local arterial roads, and they will not return the economic boon that you are projecting in your justification for more industrial buildings on the Upper Plateau. Your findings on the impact on housing for the project is faulty, inaccurate, and misleading to the public. This project needs a more detailed and realistic study on housing for these low paying warehouse jobs and low-income warehouse employees. Why did you not provide it with the draft EIR?

In fact, the logistics industry has actually weakened the economic outlook of our region overall. According to the SCAG December 2022 economic outlook report, “In 2001, GDP per capita in Riverside County and San Bernardino County were 64 percent and 69 percent of U.S. per capita GDP, respectively. When compared to the Rest of California, the ratios are worse: 52 percent and 56 percent. Moreover, by 2022, Riverside County’s position had deteriorated to a per capita GDP of only 59 percent of the U.S. level and 40 percent of California. San Bernardino County was at least able to improve to 71 percent of the U.S. level, but still fell to 48 percent of the rest of California level. These numbers are alarming, especially given the success of the Logistics Industry. They imply that the impressive job growth in the Inland Empire since 2001 resulted in numerous jobs, but they tend to be relatively lower paying jobs compared to other parts of the state and nation. This explains, in part, why such a large number of workers prefer to commute into the coastal areas, despite the heavy cost involved in terms of time lost on the road. It also explains why the Inland Empire’s per capita GDP has sunk to a rank of 340 out of 386 MSAs, despite being the twelfth largest by population count.” More than anything, the draft EIR lacks a detailed analysis of why the JPA insists on contributing to the economic downfall of its member organizations. Why do the cities of Riverside, Moreno Valley, and Perris want to support low-income jobs and residents? What social infrastructure exists for employees who do not have access to affordable healthcare because they only work on a part-time basis? Why has the JPA not included this as a consideration of impacts for the surrounding communities? Any approval of the plan as presented simply ignores the needs of disadvantaged communities and seems to ignore the facts of what really is happening in the current warehouses located within the JPA’s territory today.

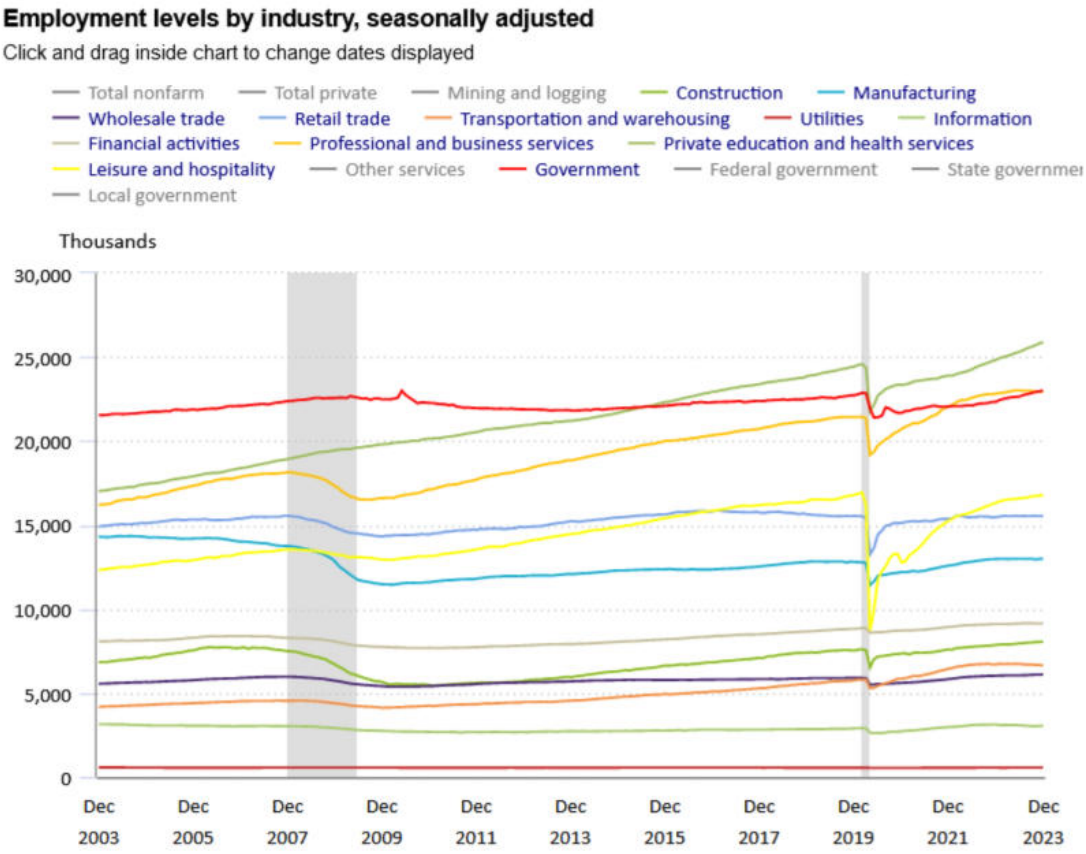
The continued insistence for only industrial and logistics jobs and buildings in western Riverside County is a slide backwards economically and socially. Some may argue it is a form of social and economic injustice. By forcing a specific industry or employer on people who live in an area, you are forcing young people to decide to live in the community they grew up in, near family and friends they love and value, and work in jobs that disregard their quality of life, negatively affect their health and mental wellbeing, and limit their potential income levels, or move out of the region to find better quality of life and employment opportunities. Most valid and widely accepted studies show that industrial is the worst land use possible when it comes to job generation. Warehouses provide 0.000212 jobs per square foot and are the lowest economic jobs density of any professional category. It is literally the worst job creator per unit of land there is.

The charts provided below compare employment data from 2015 and 2022 and the news isn’t great for warehouses and logistics. Everyone from the Mayor and City of Managers of Riverside and Moreno Valley to the current and prospective County Supervisors are on record saying that the warehouse sector is not where they envision job growth happening locally going forward. The advances in technology and efficiencies gained through automation have only reduced the number of warehouse workers inside of buildings today.





In the graph provided below, from the U.S. Bureau of Labor Statistics, you can see that transportation and warehousing jobs show very low growth only ahead of Private Education and Health and Utilities. And not only is this sector of jobs in America not growing, the total number of jobs shows marginal growth, in other words, not enough growth to develop spec-warehouses in the middle of a neighborhood or destroy one of a kind historical, cultural, natural, and community resources for. The data does not explain why the project proposed in both the recirculated and draft EIR is the right project for this land at this time. Once again, the answer comes right off your own webpage: your entity and sole-source contractor have upzoned land uses and are practicing predatory planning and development to satisfy their profit-driven investors, NOT to provide much needed jobs to a community in need.



Advances in automation may lead to mass unemployment if we overinvest in this industry. According to the December 2022 SCAG report, "Over the long-run, Logistics will likely go through a transformation as advances in automation and artificial intelligence displace workers. This means that the industry may continue to thrive, but it may not support the same number of workers as it presently does. In turn, the region must look to other industries as sources of employment and output growth. There will be further costs from the expansion of the Logistics Sector if the result of the expansion means that there will be less industrial space available in the future for industries which are able to add more value to the economy per square foot." What evidence have you provided in the recirculated and draft EIR that refutes this report? What evidence does your plan provide that this project will provide high paying jobs related to the coming of advanced automation and technology in the logistic sector? Your mitigations do not deal with the loss to automation of the very few jobs that you say this project will create. What mitigations do you offer the public in the event of a down or changed economy as consumed by e-commerce as it was in 2019? There are few easy answers here and it is likely that the JPA is gambling that these buildings can be completed before people abandon e-commerce trends that rose so swiftly during the monumental changes in life due to COVID-19, and as evidence of a slow December for retailers emerges, your decisions look even more predatory and foolish.

For these reasons related to jobs, I urge the March JPA to think harder before making the jobs argument for the West Campus Upper Plateau. We do not want or need, nor can we support, 2,600 more warehouse jobs in this region. We are already oversaturated with the logistics industry and need to think more creatively about land uses so that it benefits the local region and doesn't simply line the pockets of developers.

Another area where the recirculated draft EIR does not sufficiently address the public's concern for your contempt for the land that this project is proposed to destroy. As a member of the community, I am disappointed that none of the alternative development plans in the recirculated and draft EIR consider non-industrial uses, especially since the current plan sparked the formation of a grassroots community group that has opposed it for two years now. The JPA's General Plan (1999) Goal 2, Policies 2.3 and 2.4 state that the land uses should "discourage land uses that conflict or compete with the services and/or plans of adjoining jurisdictions" and "Protect the interest of, and existing commitments to adjacent residents, property owners, and local jurisdictions in planning land uses." The 2012 agreement with the Center for Biological Diversity and San Bernardino Valley Audubon Society (S.D. Cal No. 09-cv-1864-JAH-POR) in fact prohibits industrial land use surrounding the conservation easement.

Under the Terms of the 2012 settlement agreement, item B Defendant-Intervenors' Obligations, subitem 1a on page 4, the agreement establishes, "That any currently existing service roads within the Conservation Areas…can continued to be utilized by the public for passive recreation." Subitem 1b on page 4 refines this to say that public access these roads can be restricted if the land management agency deems the access a threat to "conservation value or public safety." Yet draft EIR Figures 3-2, 3-3, 3-4, and 3-5 (Site Plan) clearly show a plan that will infringe on and limit public access to existing trails and roadways in the Upper Plateau area. You are in all likelihood aware of this requirement and believe that your plan adequately complies with the terms of the settlement agreement, but I fail to understand how. The construction of Cactus alone will not destroy several hiking and biking trails in the area frequently used by the public for active and passive recreation. The large-scale demolition needed to level grades associated with roadways and building foundations will clearly impair access to these trails and roads and may eliminate some of them entirely. I like walking in this area, hiking into places that make me feel like I am somewhere outside of civilization. These trails that I and many residents enjoy hiking on will be destroyed by the construction. How is this not in violation of the 2012 agreement that quite clearly calls for maintaining existing roads and trails? I hope subitems 2 and 3a are not the answer to my questions here as they seem subjectively contrary to the idea of conservation and to the items identified in 1a and 1b.

Active recreation refers to a structured individual or team activity that requires the use of special facilities, courses, fields, or equipment. Passive recreation refers to recreational activities that do not require prepared facilities like sports fields or pavilions. Passive recreational activities place minimal stress on a site's resources; as a result, they can provide ecosystem service benefits and are highly compatible with natural resource protection. While active and passive recreation

typically refer to different types of activities, both types of activities can be located together effectively. In some cases, as is true with the hiking and biking trails found in the open-space of the Upper Plateau and through the conservation easement north of Van Buren and west of Meridian Parkway, the line between active or organized recreation and passive or individual recreation is blurred, and the March JPA and applicant seemingly do not care to understand the community value of this land because it interferes with your profit-driven development plan.

The U.S. EPA defines running, hiking, and biking as passive recreation but in the case of spaces like the Upper Plateau, organized groups like high school and club cross-country and mountain biking teams, and trail running groups like Riverside Road Runners and the Inland Empire Running Club regularly use the trails to train for competitions and compete in organized events on community created trails that offer participants technical challenges as well as uninterrupted open-space to help improve the condition of all athletes and competitors. Your rigid use of the terms active and passive recreation spaced is based on the EPA definitions but residents and visitors to the area clearly view the Upper Plateau as a space with an ideal mix of infrastructure, maintenance, material and environmental alterations, and accessibility to use by younger and older recreationalists. When the March JPA and applicant propose a plan that separates and compartmentalizes the land in such a contemptuous way, you demonstrate a clear misunderstanding and disregard for how the public uses and appreciates the uniqueness of this land in western Riverside County, especially one home to diverse flora, fauna, and historical significance. If approved, this project will destroy a valuable community and natural resource.

Partnerships can play an important role in turning repurposed land dreams into reality. Many federal agencies regularly work with local government organizations and groups to share responsibility, experience, and resources to help get an active or passive recreational reuse area off the ground. Partnerships may occur, for example, between EPA or the National Parks Service and states, tribes, other federal agencies, local governments, communities, land owners, lenders, developers, and potentially responsible parties. As suggested in the alternate land use plans preferred by residents, the community is asking the March JPA to focus more on open-space and a real mix of active and passive recreation opportunities. Had the applicant listened to the community, had the March JPA a functioning EJ policy that values public input, maybe you would have engaged with private groups like FivePoint Holdings, the City of Irvine, and the Great Park Corporation who have worked to help fund and develop the Irvine Great Park, or MassDevelopment Group who worked with the State of Massachusetts and local government groups to redevelop Fort Devens, the U.S. Army's New England headquarters. This project is especially interesting to opponents of the March JPA and applicant's Specific Plan because the partnership established the Devens Enterprise Commission, a new form of municipal government similar to the March JPA Commission and they recognized that the only chance for economic recovery lay in recognizing the opportunity to define the economic future of the area and rigorously engage with the public in decision making steps. The power and authority to collaborate with the public in development decisions like at Fort Devens has always been available to the March JPA and the Commission. Precedence exists as a model for successful

partnership yet the March JPA and the applicant refuse to be a part of a partnership with the public, rather you are allowing a private, for-profit entity to define quality of life and the local economy for western Riverside County. Please explain to the public your disregard and indifference for precedence both in California and across the country regarding developing public lands in conjunction with the public.

Lastly, the recirculated draft EIR does not address the status, plans for, obligations, and consequences of funded and unfunded liabilities. The recirculated and draft EIR documentation is unstable, with multiple versions of maps and text descriptions of the project that are inconsistent across the REIR and its recirculated technical appendices. Second, the recirculated and draft EIR incorporates a draft Environmental Justice (EJ) element of the General Plan as a key new component of multiple sections of the recirculated and draft EIR. This is highly irregular, since neither the Technical Advisory Committee nor the March JPA commissions were briefed on the new EJ element prior to it being incorporated into the recirculated and draft EIR.

Given that community members were neither informed nor incorporated in the development of this new EJ element, it clearly does not reflect community input or vision. Finally, the recirculated and draft EIR make many references to mitigations, entitlement, permitting, and enforcement actions that the recirculated and draft EIR will undertake, despite the March JPA sunsetting in July 2025. The County of Riverside will be the responsible agency for almost every oversight role, given that the project cannot conceivably break ground in 2024 and will almost certainly be delayed well into 2025. However, the recirculated and draft EIR does not mention the sunset of the March JPA nor the change in its oversight role, nor the inherent instability created by switching agencies responsible for oversight as a result of the sunsetting of the March JPA. As a result, there appears to be no consultation or cooperation with the future County agencies that will be responsible for this project, should it be approved. This makes the future mitigation and enforcement actions unstable, questionable, and possibly unenforceable. As noted, the recirculated and draft EIR documentation is unstable in multiple ways, with multiple versions of project site, construction boundaries, and specific plans that are inconsistent in important ways for evaluating the impact of the project on the environment. Moreover, the new draft EJ element and the sunsetting of the March JPA make the stability of the General Plan consistency and the oversight and enforcement agency confusing and irregular.

Instabilities within the document include:

1. Project site and boundary maps: confusing and inconsistent portrayals in provided maps of the project site and construction boundaries.
2. The draft Environmental Justice element found in both the recirculated draft EIR and the March JPA website has many confusing statements, irrelevant goals as identified in this comment letter.
3. The nature and terms of March JPA's sunsetting July 1, 2025 is unclear, fluid, and clearly being influenced by political means rather than community centered goals.

4. The Omission of the 2003 CAREE/CCAEJ Settlement Agreement that outlines unfunded liabilities and obligations that the March JPA to date have failed to address or pay for.
5. The unfunded and unrealized public park, police sub-station, and fire department station as required by settlement agreement.
6. The lack of increased job opportunities for local residents.
7. Provision of open space and amenities to serve the region (western Riverside County).
8. The completion of roadway infrastructure buildout.
9. The preservation of ecological, cultural, and historically significant areas surrounding the March ARB.
10. Provision and encouragement of public, pedestrian, and bicycle transportation for residents.

Throughout this letter, I have documented that this Project is unstable. The recirculated and draft EIR documentation remains inconsistent and unstable in terms of what the 'Project' is and where it will occur and how that impacts the residents adjacent to it. The recirculated and draft EIR has been revised to include a draft EJ element provided to the developer and environmental consultants to 'assess consistency' for the purpose of addressing CEQA deficiencies, but not provided or even revealed to community members within the March JPA planning area or the members of the public who commented on the CEQA deficiency. Finally, the March JPA will not be the Lead Agency responsible for carrying out the project; the March JPA has an expiration date of June 30, 2025 while the development agreement is for a minimum of 15 years with two optional 5-year extensions. It is not comprehensible to call the March JPA the Lead Agency when it will not exist during the development of the project. The recirculated and draft EIR inconsistencies, amendments to the General Plan, and even the Lead Agency make this project documentation completely unstable and preclude giving the public a meaningful opportunity to comment on the project.

As I have already established, it is disturbing for all who live in the communities surrounding the March JPA developed lands that you are clearly cherry-picking guidelines, policies, and regulations to suit the greedy goals of your applicant and its private investors. Information developed as part of the CEQA process should influence the development of general plan policies (and specific plan amendments). CEQA should not just be a post hoc rationalization of decisions that have already been made, and this is exactly what your recirculated and draft EIR for the West Campus Upper Plateau have presented for us for public comment. The later environmental review process begins, the more bureaucratic and financial momentum there is behind a proposed project, thus providing a strong incentive for applicants and land use authorities to ignore environmental concerns that could be dealt with more easily at an early stage of the project. I once again ask that the March JPA imposes a moratorium in industrial and warehouse projects and plans until the County of Riverside assumes land use authority for the remaining areas to be developed surrounding the March ARB. I also remind you that I am happy to serve on a community advisory board to help the March JPA and County develop land use plans that will benefit the residents of western Riverside County.

The EIR contains some mixed messaging (at best) on jobs for sure, but the end result is this is not an overwhelming driving reason to build warehouses on the Upper Plateau. This argument by the JPA and developer is misleading and is not supported by data on your local agency websites. Please explain how the low quality and temporary jobs this project would provide will employ residents (as stated multiple times by the draft EIR). Western Riverside County cries out for jobs that can support the cost of living in this region and warehouse jobs cannot do this. How is this a primary reason to approve this project? If job creation is a primary driving factor for this project, why hasn't the developer and the JPA created a land use plan that focuses on jobs for residents of western Riverside County? There must be a better use for this special piece of land, one that the Air Force, residents and visitors, local municipalities, lawyers and lawmakers, and the JPA and the applicant can all support. Are you ready to do your part?

Conclusion: Wrap Up Your Legacy as a Land Use Authority

The project as described in the recirculated draft Environmental Impact Report for the West Campus Upper Plateau is full of clear and obvious errors, omissions, misrepresentations, and discrepancies. The project is poorly planned, lacks a clear business need for the region, and not only ignores community preference and engagement, it actively excludes any involvement from residents of the communities surrounding the March ARB.

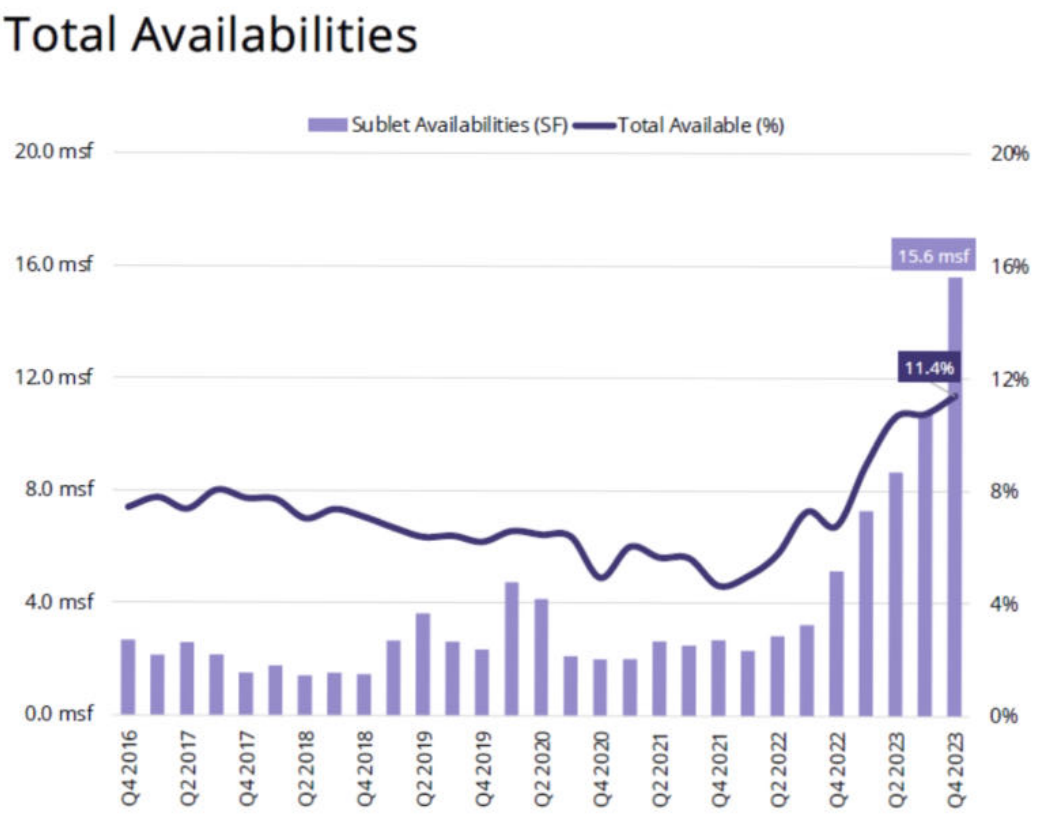
As time passes, local and national media outlets, regional business and investment groups, and the entirety of the logistics industry food chain has realized that the need for additional warehouse space in Orange, Los Angeles, Riverside, and San Bernardino Counties is diminishing. This is because the economy of 2024 is looking more and more like the U.S. economy of 20 years ago. Throughout the nation, retailers and their suppliers have been slashing their inventories, and now these same businesses are cutting back the need for storage space.

A once-booming U.S. warehousing market is coping with signs of contraction as businesses consolidate warehouses and, in some cases, upgrade existing sites rather than add facilities. The shift comes as retailers have turned the corner on a big drawdown of inventories and are working to align their supply chains for more normal, pre-pandemic stocking and consumer spending patterns. Major retail businesses are closing warehouses or upgrading existing facilities rather than leasing or opening new sites, and we are only at the beginning for this two-five-year trend of balancing inventories with the space needed to store them.

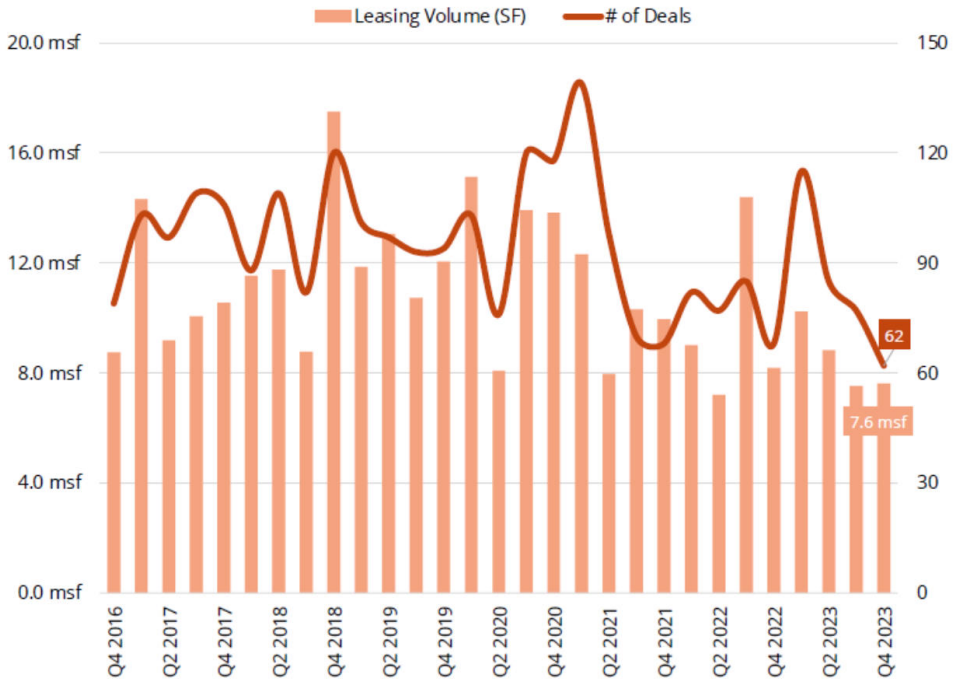
This turnabout comes as more manufacturers and retailers are returning to a leaner inventory management strategy that had given way to greater stockpiling during the pandemic, as companies sought to build so-called buffer stock amid product shortages and widespread supply chain disruptions. More and more today, many warehouse businesses are now subleasing space they had added during the pandemic based on projections that didn't come to fruition post-pandemic. The speculative development model of the past, one that fueled rapid land use

rezoning in not only the Inland Empire, but more specifically gave the March JPA an excuse to upzone land uses from the Final Reuse plan to be more industrial focused. This speculative development practice might have been a safe bet for investors and land use authorities, but today it is a risky proposition. Many companies are now consolidating warehouses and upgrading to newer buildings that can accommodate more automation and require less labor. The lifespan of spec-warehouse development has ended, yet the March JPA and its greedy applicant insist on pretending it still lives in western Riverside County.

The following graphs illustrate just how quickly the need for MORE warehouses, and specifically the developments being proposed for the West Campus Upper Plateau area, can turn from boom to bust.



Leasing Activity



Inland Empire Industrial development pipeline

272 properties

97 under construction
175 proposed

151.9 million sf

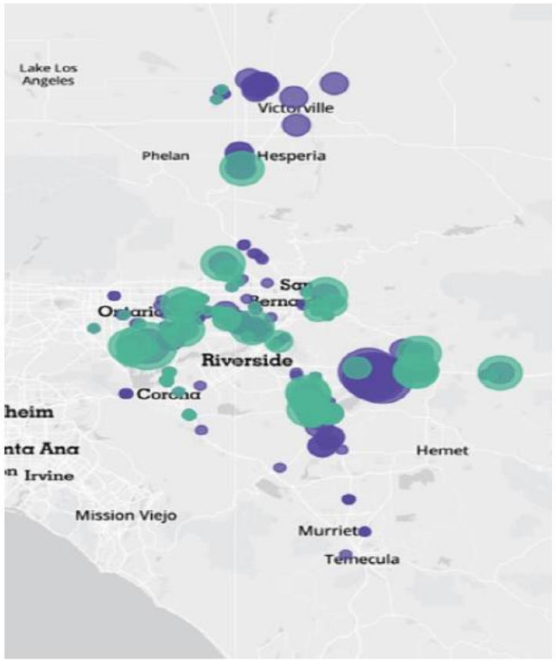
28.4 million sf under construction
123.5 million sf proposed

Major developments

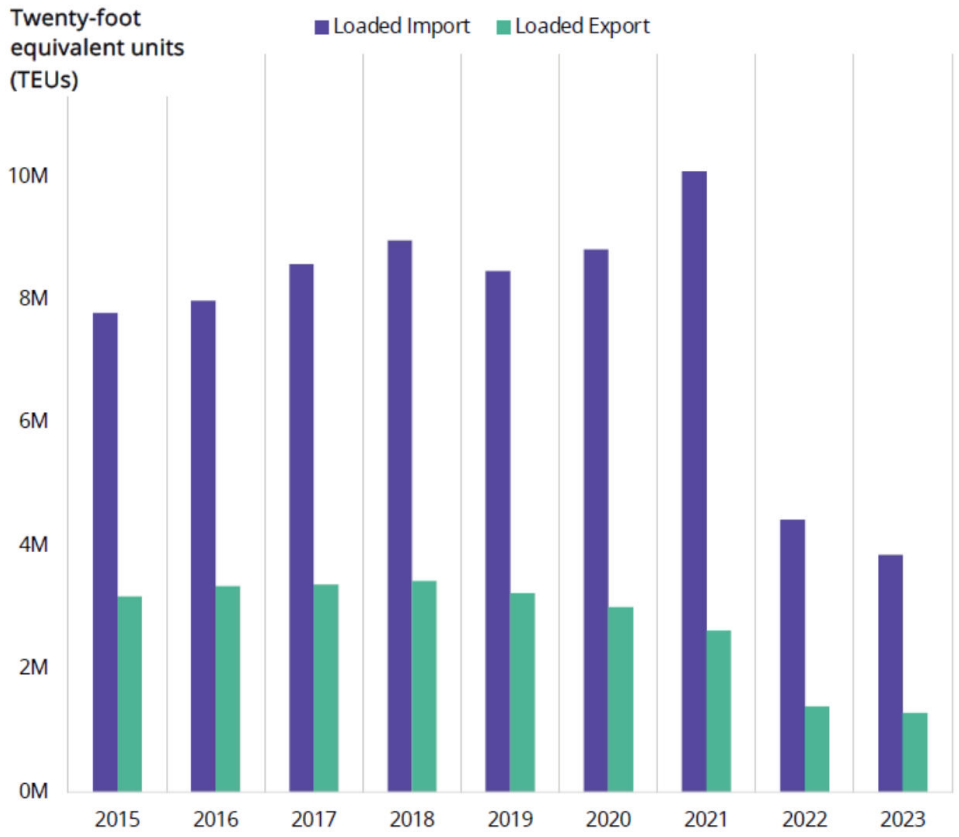
1363 Merrill Ave – 1.5 million sf

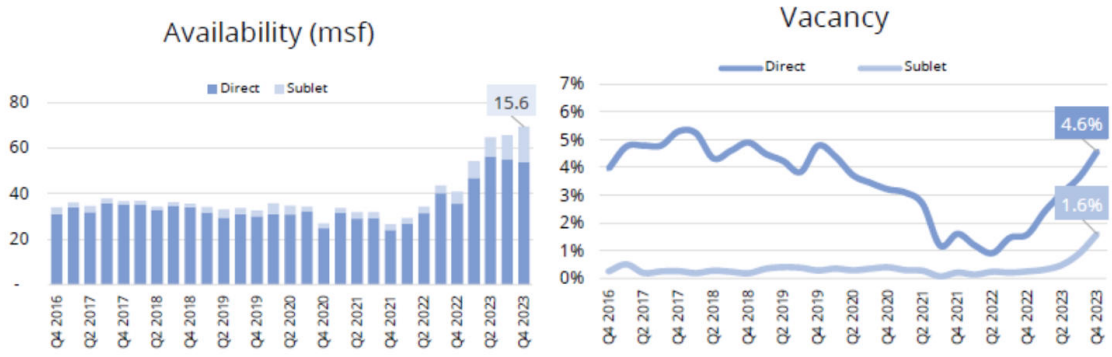
I-15 Logistics Center - 1.2 million sf

Eucalyptus & Euclid - 1.1 million sf (Pre-leased) – Home Depot



*Survey consists of industrial buildings greater than 50,000 sf.





The growth of the logistics industry leading up to and during the pandemic exacerbated environmental concerns in communities, especially within Environmental Justice Tracks like those found within the March JPA, with some of the least-healthful air in the United States. And analysts say too many households in the area are struggling to make ends meet as earnings from the part-time and low-paying jobs found in the logistics and warehouse industry have not kept up with rising costs adding to the already vulnerable quality of life for many residents.

As jobs continue to melt away in the warehouse sector, a number of retail brands, e-commerce firms and industry giants have announced staff cuts (hourly as well as salaried employees) and new facility closures this year. This is hardly surprising, given a continuing focus on trimming costs to maximize corporate and investor profits and has prompted firms to reassess and consolidate operations and reduce the number of shipping locations.

One reflection of this trend has been the decline of deals involving mega-facilities – those larger than a million sq ft. Real estate firm CBRE reported that last year, 43 of the top 100 warehouse deals involved these behemoths, a drop from 63 such agreements in the top 100 of 2022 and from 57 the year before. It isn't just me, you see, that believes building mega-warehouses anywhere right now, let alone building them in the middle of an existing neighborhood near homes, parks, and churches, is a bad idea and a losing investment strategy.

Because the economy is clearly trending away from the growth of the pandemic economy, industry data points to no significant rise in inventories in the foreseeable future. The largest warehouse companies throughout the nation are right this minute trying to reduce labor and its costs, reduce inventory and the cost of storing it, and reduce unoccupied space on the books all in the name of maximizing corporate profits and return on investment. And with supply heading for a big drop in terms of newly available space, the facility construction boom, triggered by the surging e-commerce market of 2021/22, has largely run its course. And thus, as I said earlier, the specific project plan as presented in the recirculated and draft EIRs for the West Campus Upper Plateau makes no sense, excludes public preference, and is a bad investment for the JPA, the Lewis Group, and the environment you pretend to protect with the conservation easement. It is time for the March JPA to wrap up its legacy as a land use authority and ride off into the sunset.

As a concerned citizen, it is not enough to just find problems with the recirculated draft EIR and the process undertaken by its developers. Responsible citizens take an interest in their community for the benefit of all people, working to avoid the economic and social injustices these warehouse projects present our communities. With this in mind, I once again propose the following mitigations and solutions to you related to the West Campus Upper Plateau project, the recirculated and draft EIR, and the March JPA's operations moving forward.

First, commission a community advisory board that works alongside of the JPA and the developer working collaboratively to develop a list of alternative plans that would support the goals of the JPA and meet the needs of the community while allowing the developer to realize a profit and an incentive to do the work. This advisory board would need to have some level of authority, a voice in how this land is used and in the enforcement of policies that protect the neighbors surrounding it, and be backed by the objectives of a functioning Environmental Justice Policy. Genuine public engagement is recommended by the March JPA General Plan (p.1-3, 1st paragraph; p.1-5, 1st paragraph; p.1-13, goal 2; p.1-14, goal 4; p.1-18, goal 8; and p.1-37, all) and the Final Reuse Plan (p.I-2, last paragraph; and p.II-10, item F) and a community advisory board is one way for you to align with these recommendations and work harmoniously with business,

developers, public government, and the people whose taxes pay for all of this. It is also a tool your organization has successfully used in the past and it seems like an essential step to take in order to maintain the close public connection March AFB has always enjoyed in this area.

Second, the public and local jurisdictions would support the JPA if it represents the interests of the people who live in these communities and the USAF instead of representing the interest of the entitled developer and its Wall Street investors. Be our leader and advocate for one of the researched and vetted alternate plans recommended in this letter. Thousands of voices of the residents of western Riverside County have spoken clearly over the last two years. The people who have invested in and helped pay for the land that March AFB was built on demand a voice and a return on their investment. There is a time to rise above the legal loopholes that allow private companies to derive profit from public lands. Local businesses would appreciate a voice in this effort as they would benefit and offer jobs at a much more significant level than a million square foot warehouse ever would. Residents would enjoy natural landscapes with open space and unimproved trails that allow them some relief from the urban world around them. The land itself would appreciate it too. And the JPA gets to satisfy its mission and realize its economic goals by redeveloping the land and bringing jobs that would actually employ the people who live near March ARB. Once again, we'd have a community living in harmony and with purpose (the roots of the March AFB community) instead of one literally divided by an investment or development portfolio for global investors.

Lastly, while the March General Reuse Plan was written more than 20 years ago, and you have publicly stated that it is a guideline rather than a requirement for the JPA to follow it, you owe it to the public the plan was created to protect and benefit to develop this land primarily in our interest, not in the interest of outside investors. The spirit of the general plan was to reignite a community negatively impacted by the closing of March AFB. The general plan was the government's best effort to do something positive for Riverside, Moreno Valley, and Perris residents who directly felt the blow of decommissioning the March base. Ask anyone that does not work for you, has the JPA lessened that life altering change from the 90s today? Has the JPA improved people's (not you or your exclusive developer partner) lives? The answer is no.

The March JPA and its exclusive developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission. You have a duty to think about this land after your organization sunsets in 2025. Your overreliance on heavy industrial development will leave the communities surrounding March ARB with more problems than they will be able to handle 10 years from now. I have found nothing in the draft EIR to convince me that you have planned for this area beyond the conclusion of its construction. This, it must be stated, is irresponsible land use planning and land management. The West Campus Upper Plateau project should be reconsidered and reasonable alternative configurations developed, limiting the negative impacts developing this land will have on the residents who will have to live with this development.

I have previously submitted comments on this project, including a list of feasible mitigation measures and alternative land use ideas, so that the March JPA would include these measures or provide a reasoned explanation for why it has not included the requested mitigation measures, as required by CEQA. As mentioned previously, more than a thousand residents, community groups, and public agencies have submitted similar comments regarding the need for the March JPA and its applicant to include community preference as part of its plans for the West Campus Upper Plateau, but you have chosen not to include these feasible mitigation measures to mitigate this Specific Plan's significant environmental impacts as required by California law and CEQA.

Therefore, I once again urge the March JPA Commission and Staff to reject this Specific Plan as currently designed, follow the CEQA process to form and approve an Environmental Justice Element plan to amend in the General Plan, engage local residents to determine their preference for land uses on the Upper Plateau, fully fund and adhere to the 2003 and 2012 Settlement Agreements before the JPA sunsets July 1, 2025, enact a warehouse moratorium until these actions are completed, and then revise the draft EIR so that complies with the applicable State of California project guidelines and requirements and the March JPA's General and Final Reuse Plans. Please don't allow one final grand act of greed and poor land use planning be your lasting legacy. I await your detailed response. See you down the road.

"We abuse the land because we regard it as a commodity, belonging to us. When we see land as a community to which we belong, then we may begin to use it with love and respect."

Jerry Shearer
Riverside, CA 92508
jsydor@yahoo.com

RI-260

Jerry Shearer
February 25, 2024

RI-260.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-260.2 This comment is identical to the attachment included in Letter RI-259 from the same commenter. As such, please see Responses RI-259.2 through RI-259.177, above.

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From: Jerry Shearer <shearer32@verizon.net>
Sent: Sunday, February 25, 2024 2:28 PM
To: Dan Fairbanks
Subject: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: PublicCommentWestCampusUP-REIR-S4.pdf

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments on the March Joint Powers Authority (JPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project. Please find my comments in the attached letters. I look forward to your thoughts and responses, and appreciate your consideration. RI-261.1

Please reply to confirm receipt of this public comment to ensure it is part of the public record.

Sincerely,

Kevin Shearer
Riverside 92508

25 February 2024

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

RE: Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the recirculated EIR for the March JPA West Campus Upper Plateau project. The updated project site comprises approximately 817.9 acres within the western portion of the March JPA planning subarea (according to documents posted on the JPA's website), located approximately half a mile west of Interstate 215 and Meridian Parkway, south of Alessandro Boulevard, north of Grove Community Drive, and east of Trautwein Road. It is surrounded on two sides by residential neighborhoods in the City of Riverside, on one side by a residential neighborhood within the County of Riverside, and is adjacent to the 215 freeway, more industrial developments, and ultimately the City of Moreno Valley. I must say, as a member of the local community, I am disappointed that you are continuing to push forward this abhorrent industrial project.

RI-261.2

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices, December 2, 2023
- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- March JPA Draft Environmental Justice Element, November 2023
- March JPA TAC Meeting Minute Notes from February 6, 2023, April 3, 2023, June 5, 2023, August 7, 2023, September 6, 2023, and December 4, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022
- General Plan of the March Joint Powers Authority, assumed March 11, 1997
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

RI-261.3

For the purposes of this comment letter, I will refer to the March Joint Power Authority (JPA) which includes the Commission members, the developer that is understood to be LNR Riverside, LLC, Meridian Park West, LLC, the Lewis Group of Companies (partners and subsidiaries), and member entities the cities of Riverside, Moreno Valley, and Perris, and the County of Riverside.

RI-261.4

The West Campus Upper Plateau is a unique piece of land. It is an extension of the Sycamore Canyon Park natural area geographically, historically, culturally, environmentally, and recreationally. It is a valuable part of the OrangeCrest community, value beyond how much money it can generate a few greedy people. There is no other place like it in western Riverside County. Any development of this land should complement the unique characteristics and value (human value, not just economic value) of this land not destroy it. Through the original draft EIR process, I and many members of the community wrote to you detailing alternate land use plans that accentuate the community, meet the JPA's goals for this project, and preserve large portions of the landscape for both passive and active recreation.

As much as the applicant via this draft and recirculated EIRs tries, this industrial development plan and land use zoning do not preserve the landscape even with the inclusion of the 2012 agreement that sets aside open space and a conservation easement and the "community benefit" of a fire department (which was always a requirement of settlements against the JPA) and park. Viewing this land from a land use map or a parking lot don't begin to do adequate justice to its human value. The public still does not understand your thoughts on taking this special piece of land away from residents of western Riverside County and turning it over for private development. The establishment of the 2012 settlement (why has it taken you 12 years to act on it?) does not adequately reflect how people value and enjoy this land currently. This warehouse project is not like other warehouse projects and it will have a significant negative impact on the community it borders regardless of the CEQA mandated mitigation efforts and applicant's hollow claims of community benefits. It is inconceivable to me why the JPA continues to allow the applicant to push forward this specific plan and project, especially after two years of widespread and uniform community opposition to it. Your effort thus far is repugnant.

RI-261.5

I am writing to submit comments on the recirculated draft Environmental Impact Report (REIR) for the proposed West Campus Upper Plateau. After reviewing the REIR, it continues to be clear that the March Joint Powers Authority (JPA) is scrambling to push through an unpopular project before it sunsets July 1, 2025. Changes to the project itself from the original EIR are negligible if not even more upsetting to the residents and communities surrounding the March JPA territory. Specifically, the following areas of the recirculated draft EIR appear to be unstable, dismissive, and predatory in nature.

RI-261.6

1. The yet-to-be adopted draft Environmental Justice (EJ) element is included extensively throughout the EIR, and the existing specific plan is assumed a priority to fit its objectives. Your process of adopting an EJ element and the REIR simultaneously and stating that one fulfills the other undermines the credibility of the community's ability to

RI-261.7

meaningfully impact either of them. The EJ should follow proper CEQA noticing and environmental review.

2. I, along with many community members, implore you to follow a CEQA process while adopting your EJ element. We also ask that you put a warehouse moratorium in place until the EJ element process is complete.
3. Page 3-24 of the REIR refers to community benefits, including a park. Simply put, this park is a work of fiction. The Developer has made clear they will only fund a "park feasibility study" and that neither they nor the County will be funding a park. The soonest the community might expect a park is in the year 2042 when the City of Riverside can annex this land. In other words, there is no park; and therefore, no community benefit.
4. Page 3-24 of the recirculated EIR also mentions the need for the JPA and applicant to agree to a 15-year development agreement with two potential five-year options. Not only do we object to you giving this unresponsive developer another 25-year license to build more warehouses surrounding March ARB, the federal government objects to such contracting practices. Federal Acquisition Regulations (FAR) Subpart 6.1 and 6.3 clearly identify how agencies are to grant contracts. This applicant does not offer the JPA best practices, lowest price, best value, or is the only source of a product or service that are required to offer a non-competitive contract like the proposed 15-year Development Agreement. This is especially disturbing and irresponsible considering the JPA will sunset July 1, 2025 yet will have agreed to a 15–25-year contract with a profit-driven business.
5. The lack of non-industrial alternative plans in the REIR is dismissive of clear and overwhelming public opposition to this project. For two years, residents have tried to understand why the JPA and applicant have been unwilling to discuss and plan for non-industrial land uses for the Upper Plateau, and the answer we keep returning to is greed. Without public notice, the JPA and applicant pushed through an agreement to transmit the land based on the construction of four large warehouses on October 26, 2022. This demonstrates a predetermined use for this land despite your continued insistence that the JPA and applicant have engaged with the public throughout this process. Your actions prioritize the pocketbooks of the applicant and the JPA member agencies instead of job growth and community development as you advertise on your website and within your public presentations.

By signing my name to this letter, I respectfully request that the elected representatives of the JPA commission and the JPA staff be accountable to the community surrounding the West Campus Upper Plateau. The March JPA and the developer have a duty to adhere to the March ARB General Plan and to follow the vision established in this document, not to amend it 16 months before sunsetting to push through one last warehouse project. You also have a duty to work with local communities to develop this land in conjunction with the people and municipalities that make up the Joint Powers Commission.

RI-261.7 Cont.

RI-261.8

RI-261.9

RI-261.10

RI-261.11

I have previously submitted comments on this project, including a list of feasible mitigation measures and alternative land use ideas, so that the March JPA would include these measures or provide a reasoned explanation for why it has not included the requested mitigation measures, as required by CEQA. As mentioned previously, more than a thousand residents, community groups, and public agencies have submitted similar comments regarding the need for the March JPA and its applicant to include community preference as part of its plans for the West Campus Upper Plateau, but you have chosen not to include these feasible mitigation measures to mitigate this Specific Plan's significant environmental impacts as required by California law and CEQA.

RI-261.12

Therefore, I once again urge the March JPA Commission and Staff to reject this Specific Plan as currently designed, follow the CEQA process to form and approve an Environmental Justice Element plan to amend in the General Plan, engage local residents to determine their preference for land uses on the Upper Plateau, fully fund and adhere to the 2003 and 2012 Settlement Agreements before the JPA sunsets July 1, 2025, enact a warehouse moratorium until these actions are completed, and then revise the draft EIR so that complies with the applicable State of California project guidelines and requirements and the March JPA's General and Final Reuse Plans. Please don't allow one final grand act of greed and poor land use planning be your lasting legacy. I await your detailed response.

RI-261.13

May God lead your path,

Kevin Shearer
Riverside, CA 92508
shearer32@verizon.net

RI-261

Kevin Shearer
February 25, 2024

RI-261.1 This comment is a transmittal email and does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-261.2 This comment is introductory in nature, and the comment letter is identical to RI-257. This comment references the Project vicinity. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-261.3 This comment lists out a series of publicly available documents that were reviewed by the commenter. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-261.4 This comment identifies the various entities involved with the Project. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-261.5 This comment describes the existing Project site and expresses the value it has, as currently undeveloped, for the community. This comment also questions why non-industrial alternatives suggested by the community have not been considered. In response to a non-industrial alternative, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. The comment also asserts that the landscape will not be preserved by the Project and that the CBD Settlement Agreement does not provide sufficient protection. The CBD Settlement Agreement involved the Center for Biological Diversity and the San Bernardino Valley Audubon Society. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. Please see Topical Response 4 – Project Consistency, for analysis of the Project's consistency with the CBD Settlement Agreement. Please also see Comment Letter RO-7, in which the Center for Biological Diversity comments that the Project appears to conform with the major provisions of the CBD Settlement Agreement.

RI-261.6 This comment expresses the commenter's belief that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-261.7 This comment raises concerns about the drafting and public review of the Draft Environmental Justice Element, requests a CEQA process for the Environmental Justice Element, and a warehouse moratorium until the process is complete. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-261.8 This comment questions the funding of the Park, citing the text on page 3-24 of Recirculated Chapter 3, Project Description. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The Landscaping and Lighting Maintenance District will be responsible for the maintenance of the Park once complete.

RI-261.9 This comment objects to the Development Agreement and references federal acquisition regulations. March JPA and the proposed Development Agreement are not subject to the referenced federal acquisition regulations. California Planning and Zoning Law and specifically, Government Code section 65864 et seq. governs the authority and contents of development agreements such as that proposed here. As explained in Topical Response 9, Long-Term Project Implementation and Enforcement, the

County of Riverside will be implementing and enforcing the proposed Development Agreement after July 1, 2025.

RI-261.10 This comment requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. The comment also raises concerns about public engagement on the Project. March JPA and the applicant conducted multiple public outreach efforts for the Project, including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. With regard to the October 26, 2022, agreement referenced in the comment, please see Topical Response 10, Development and Disposition Agreement.

RI-261.11 This comment states that March JPA and the applicant have a duty to adhere to the March ARB General Plan and engage the local communities and municipalities. It should be noted that the March Air Reserve Base does not have an adopted General Plan. The Project's consistency with the March JPA General Plan goals and policies is included in Recirculated Section 4.10, Land Use and Planning. March JPA and the applicant conducted multiple public outreach efforts regarding the Project including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation. Using a radius of 1,200 feet around the perimeter of the Project site, March JPA distributed 2,172 public notices. March JPA engaged with local jurisdictions and service providers (see, e.g., the traffic scoping agreement in Appendix N-2). With regard to the timing and development of the Draft Environmental Justice Element, please see response to Comment RI-261.7, above. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-261.12 This comment states that the commenter had previously submitted comments on the Project. This comment is included as Letter I-785. As such, see Responses I-785.1 through I-785.15.

RI-261.13 This comment is a concluding statement and does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Michael Wilson <Bloomington51@outlook.com>
Sent: Sunday, February 25, 2024 8:35 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

(This would not submit on the March JPA page calling for comments.)

Concerns: Obsolete Project Construction Schedule and a Questionable Assumption

Rationale:
In the West Campus Upper Plateau Project recirculated EIR, issued December, 2023, a revision of Section 3, Project Description, with Section 3.5.3 (pages 3-19 through 3-21), containing Table 3.3, has been included. Table 3.3, titled Construction Schedule, lays out the different broadly-categorized activities that will comprise the two phases of the project. In the table, each activity is assigned a starting date, an ending date, and the number of working days. The text of Section 3.5.3 states the anticipated duration of the project will be 4.5 years. The time from the starting date of Phase 1 until the ending date of Phase 2 covers slightly over 4 years, 4 months. While the number of working days within each activity period has been revised, the actual dates of the activities have been retained from the draft EIR, issued January, 2023, and are no longer valid.

RI-262.1

Granted, there are many factors that can affect the dates and duration of a construction project, most often increasing its length, including weather, supply issues, labor availability, legal actions, on-site accidents, discoveries made about the site, etc. The start of this project has already been delayed nearly nine months as of this writing, perhaps due to community opposition. Nevertheless, although the text of this section states this schedule is a "reasonable approximation," the preparers of the draft EIR chose to be specific about the dates, and in the REIR, even amended the number of working days for the sake of accuracy. The schedule, placed in this public document, would serve to advise interested parties of what activities to expect and when to expect them. How is that intention served by retaining obsolete dates? If the preparers of the REIR were so concerned about accuracy, why weren't the activity dates revised, or why not just state something like, "Phase 1 duration: 9 calendar months from starting date" in the table? It is stated in the text of this section that occupancy of this project site is expected in 2028. Based on the 4.5-year estimate, the first phase of construction would begin any time between when this REIR was released, and July 1, 2024—a difference of several months. Why be specific about some dates when it's presented to be only an approximation? If it was important to be precise about dates used in the draft EIR, why weren't they important enough to be revised in the recirculated EIR?

RI-262.2

The answer to the question why these dates were not revised, if I infer correctly from the text, brings up another problem. The answer appears to be, simply stated, that the dates don't matter. The schedule represents a "worst-case analysis scenario" in regards to local air quality. The assumption has been made that, in the course of the 4.5-year duration of the project construction, more stringent emission regulations will necessarily bring about reduced emissions from the construction site. In other words, regardless of when the project starts or how it proceeds, the project's contribution to air pollution will only decrease going forward. While this may seem reasonable on the surface, given the current emphasis on reducing carbon emissions, particularly in California, it is by no means guaranteed. Regulations are subject to a host of factors such as practicality of implementation (sometimes requiring postponement or modification), legal challenges, public opposition, special-interest group opposition, political whims and will, and factors affecting enforcement. Projections, even those made by software programs, depend on assumptions about control and probability. The anticipated 4.5-year period of this construction project will cover a national election in 2024, and a state election in 2026. Emission reduction may be the plan, and, with regulations in place, that is the hope, but it cannot be assured. Furthermore, even if emissions are reduced, it is impossible to predict the extent of reduction. Emissions cannot be entirely eliminated, and there is no mention in this section of any plan to curtail construction activities should local air quality degrade due to other factors.

RI-262.2 Cont.

RI-262

Michael Wilson
February 25, 2024

RI-262.1 The comment expresses concern that the Project construction schedule is obsolete and questions the revisions to the working days listed in Table 3-3, Construction Schedule, in the Recirculated Chapter 3, Project Description. As explained in Recirculated Chapter 3, Project Description, for purposes of the technical analyses throughout the EIR, construction was assumed to begin in June 2023 and last through October 2027. Emissions factors for construction would decrease as time passes and the analysis year increases due to emissions regulations becoming more stringent. Accordingly, the construction schedule utilized in the analysis, and shown in Table 3-3, is conservative because construction would occur after the respective dates. The working days listed in Table 3-3 were corrected in Revised Chapter 3, Project Description, to match the working days analyzed in Recirculated Section 4.2, Air Quality, and Appendix C-1. No changes are required in response to this comment.

RI-262.2 The comment states that the 4.35-year construction duration for the Project is not reflective of what may actually occur due to the delay of the Project through recirculation of the EIR and final adoption. The commenter expresses concern regarding the construction schedule as presented in the Recirculated Draft EIR as the start date (June 2023) has already passed. However, the duration of each phase and total construction of the Project remains accurate with the information for design at the time of preparation and the construction activity assumptions are relevant for purposes of the technical analyses in the EIR. Furthermore, emission factors for on-road mobile sources as well as offroad equipment go down over time due to increases in efficiency and fleet turnover. As such, if the construction schedule was pushed out to a later start date, the emissions from the Project during construction would be lower than those presented within both the Draft EIR and Recirculated Section 4.2, Air Quality. Therefore, the construction emissions evaluated within the Recirculated Section 4.2, Air Quality, are considered conservative. No changes are required in response to this comment.

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From: Abby Banning <h2oabby@gmail.com>
Sent: Monday, February 26, 2024 2:07 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-263.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Abigail and Chris Banning
92508
<zip code>

RI-263

Abigail and Chris Banning
February 26, 2024

RI-263.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Abdallah Karim <akarim23@gmail.com>
Sent: Monday, February 26, 2024 7:30 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-264.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Abdallah Karim
92508

RI-264

Abdallah Karim
February 26, 2024

RI-264.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Adeli Nol <aggieadeli@gmail.com>
Sent: Monday, February 26, 2024 9:11 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Unfortunately you have to receive these types of letter because once again another city leader has not made the right choice. As the city has become littered with warehouse, one has to wonder if you even care about the city or the qualify of life here. Please make sure that all the current warehouses that are already here are being used and occupied. I see so many of them sitting empty.

RI-265.1

REIR Community Email Templat

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

RI-265.2

RI-265

Adeli Nol
February 26, 2024

RI-265.1 This comment expresses displeasure with city leaders and opposition to warehouses. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

RI-265.2 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Amy Litt <amy.litt@ucr.edu>
Sent: Monday, February 26, 2024 10:03 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-266.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Amy Litt
92506

RI-266

Amy Litt
February 26, 2024

RI-266.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Andrew Silva <aesilva4@earthlink.net>
Sent: Monday, February 26, 2024 4:57 PM
To: Dan Fairbanks
Cc: R-NOW Leader Group; Michaeal McCarthy
Subject: Comment on West Campus Upper Plateau SCH 2021110304
Attachments: A. Silva Comment on West Campus Upper Plateau REIR SCH No. 2021110304.docx

Dan Fairbanks, Planning Director

March Joint Powers Authority

14205 Meridian Parkway, Suite 140

Riverside, California 92518

Phone: 951.656.7000

Email: fairbanks@marchjpa.com

Re: West Campus Upper Plateau Recirculated Draft Environmental Impact Report

State Clearinghouse No. 2021110304

Thank you for the opportunity to comment on the Recirculated Draft Environmental Impact Report for the West Campus Upper Plateau project. RI-267.1

The REIR states that impacts to air quality are significant and unavoidable. First, oxides of nitrogen are directly emitted from heavy duty trucks and are the largest source of NOx in South Coast Air Basin (SCAB). Of the 350 tons per day of NOx emitted in the basin, almost 300 tons per day are the result of mobile sources, largely heavy trucks and construction equipment. We must get to less than 80 tpd to reach attainment. RI-267.2

The South Coast Air Basin is in extreme non-attainment for ozone and any contributions to NOx emissions make attainment unattainable. Also, the South Coast Air Basin will soon be subject to draconian measures under the Federal Clean Air Act for failure to attain clean air standards, including potential restrictions on development, and the imposition of fees of up to $12,000 per ton for stationary sources, even if they are in full compliance with all air quality regulations. RI-267.3

NOx is a precursor to ozone but is also a hazard in an of itself. Locating high emission sources, i.e., 2,500 trucks per day, near sensitive receptors, including residences, a neighborhood park, a pre-school, et al, is also unacceptable.

RI-267.3 Cont.

The Inland Empire has the worst ozone pollution in the country and adding to the cumulative impact already imposed by the logistics industry is counter to good planning.

RI-267.4

The EPA recently tightened the standard for PM 2.5, though the region was almost in attainment for the previous standard. PM 2.5 is formed through chemical reaction and is also directly emitted from tire and brake wear, also from heavy trucks. Adding truck traffic makes attainment of the new standard even more impossible.

RI-267.5

Once again, adding to the cumulative impacts further harms children and residents located nearby.

RI-267.6

Inclusion of a draft Environmental Justice policy is also inappropriate. The policy has not been adopted, making it problematic to comment on a policy that does exist. Further, were the County's policy in effect for the March JPA, the JPA would be in clear violation of this policy.

RI-267.7

For example:

HC 16.15: Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development…

HC 16.23* Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.

Under Land Use, this project violates the EJ policy you plan to adopt, though there will be no time to implement it, which makes the EJ policy all but meaningless.

RI-267.8

Siting heavy industry within 300 feet (a football field or lazy 9-iron shot) of residences is simply bad and unacceptable land use. The project is surrounded on three sides by residences and other

RI-267.9

sensitive receptors. The area is already treasured by residents and others who travel some distance to enjoy the mountain biking, hiking, and dog walking. Even with the planned open space under the current plan, the area will lose its value as such once heavy industry is developed. The spiritual or mental health benefits of time out there will be lost if people are mountain biking or walking their dogs next to hulking, noisy, polluting warehouses.

RI-267.9 Cont.

We are not opposing any development in the area, and we have submitted a number of suggestions that would provide long-term benefits to the community and the region, including a park-like campus for veterans' services, or even solar power generation, which will be more important than warehouses as we transition to zero-emission transportation. We object to heavy industry that will operate 24/7, degrading the quality of life of nearby residents who will be subjected to the intrusive noise, light, and pollution from this project.

RI-267.10

Note the obligation to protect the very limited open space in this region. This area has far more value as open space to the community, and the region, in terms of property values and quality of life.

RI-267.11

Though you are not subject to Local Agency Formation Commission (LAFCo) laws, LAFCo law prohibits creation of peninsulas. This creates a peninsula of heavy industry intruding on a long-established residential community. Underline community. This project would destroy the character of this community, where just in my family, three generations have built lives, and the LAFco reference is further evidence this project is simply bad land use.

RI-267.12

Indeed, personally, my (late) wife and I talked for years about moving to another area. Access to the area around the weapons storage area was a major factor in our decision that Orangecrest would be our lifetime home.

RI-267.13

Thank you again for the opportunity to comment.

Andrew Silva

19940 Cuyama Lane

Riverside, CA 92508

(951) 237-4231

Dan Fairbanks, Planning Director
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, California 92518
Phone: 951.656.7000
Email: fairbanks@marchjpa.com

Re: West Campus Upper Plateau Recirculated Draft Environmental Impact Report
State Clearinghouse No. 2021110304

Thank you for the opportunity to comment on the Recirculated Draft Environmental Impact Report for the West Campus Upper Plateau project.

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The South Coast Air Basin is in extreme non-attainment for ozone and any contributions to NOx emissions make attainment unattainable. Also, the South Coast Air Basin will soon be subject to draconian measures under the Federal Clean Air Act for failure to attain, including potential restrictions on development, and the imposition of fees of up to $12,000 per ton for stationary sources, even if they are in full compliance with all air quality regulations.

RI-267.14

NOx is a precursor to ozone but is also a hazard in an of itself. Locating high emission sources, i.e., 2,500 trucks per day, near sensitive receptors, including residences, a neighborhood park, a pre-school, et al, is also unacceptable.

The Inland Empire has the worst ozone pollution in the country and adding to the cumulative impact already imposed by the logistics industry is counter to good planning.

The EPA recently tightened the standard for PM 2.5, though the region was almost in attainment for the previous standard. PM 2.5 is formed through chemical reaction and is also directly emitted from tire and brake wear, also from heavy trucks. Adding truck traffic makes attainment of the new standard even more impossible.

Once again, adding to the cumulative impacts further harms children and residents located nearby.

Inclusion of a draft Environmental Justice policy is also inappropriate. The policy has not been adopted, making it problematic to comment on a policy that does exist. Further,

were the County's policy in effect for the March JPA, the JPA would be in clear violation of this policy.

For example:

HC 16.15: Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development…

HC 16.23* Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.

Under Land Use, this project violates the EJ policy you plan to adopt, though there will be no time to implement it, which makes the EJ policy all but meaningless.

Siting heavy industry within 300 feet (a football field or lazy 9-iron shot) of residences is simply bad and unacceptable land use. The project is surrounded on three sides by residences and other sensitive receptors. The area is already treasured by residents and others who travel some distance to enjoy the mountain biking, hiking, and dog walking. Even with the planned open space under the current plan, the area will lose its value as such once heavy industry is developed. The spiritual or mental health benefits of time out there will be lost if people are mountain biking or walking their dogs next to hulking, noisy, polluting warehouses.

RI-267.14
Cont.

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Note the obligation to protect the very limited open space in this region. This area has far more value as open space to the community, and the region, in terms of property values and quality of life.

Though you are not subject to Local Agency Formation Commission (LAFCo) laws, LAFCo law prohibits creation of peninsulas. This creates a peninsula of heavy industry intruding on a long-established residential community. Underline community. This project would destroy the character of this community, where just in my family, three generations have built lives, as further evidence this project is simply bad land use.

Indeed, personally, my (late) wife and I talked for years about moving to another area. Access to the area around the weapons storage area was a major factor in decision that Orangecrest would be our lifetime home.

RI-267.14
Cont.

Thank you again for the opportunity to comment.

Andrew Silva
19940 Cuyama Lane
Riverside, CA 92508
(951) 237-4231

RI-267

Andrew Silva
February 26, 2024

RI-267.1 This comment is an introduction to comments that follow. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

RI-267.2 The comment restates information contained in the Recirculated EIR regarding air quality impacts. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

RI-267.3 This comment discusses NOx emissions in the South Coast Air Basin, ozone, and clean air standards generally. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

RI-267.4 This comment expresses the commenter's opinions regarding the cumulative impact of the logistics industry in the Inland Empire and the location of high emission sources near sensitive receptors. The commenter also cites 2,500 truck trips a day; however, the EIR analyzed 2,054 truck trips based on established trip rates from the Institute of Transportation Engineers (ITE) and the High-Cube Warehouse Trip Generation Study, which was commissioned by the Western Riverside Council of Governments. Recirculated Section 4.2, Air Quality, and Appendix C-2 provide analysis of the cumulative health risks and determined the total cumulative cancer risk is well below EPA's standard cumulative cancer risk threshold of 100 in one million. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

RI-267.5 The comment states that the EPA recently tightened the standard for $PM_{2.5}$ and expresses concern regarding the effect of additional truck traffic in relation to attainment. The EPA reduced the national ambient air quality standard (NAAQS) for fine particulate matter ($PM_{2.5}$) from a level of 12 micrograms per cubic meter (µg/m^3) to 9 micrograms µg/m^3 on February 7, 2024 and footnote d in Table 4.2-3 of the Final EIR was revised to reflect this change.[31] As explained in the EIR (Table 4.2-2), the South Coast Air Basin was out of attainment for $PM_{2.5}$ prior to this change, as was Riverside County.[32] Therefore the reduced NAAQS does not change any of the conclusions in the EIR. SCAQMD has not published revised ambient air quality standards for $PM_{2.5}$, which are currently 10.4 µg/m3 for construction and 2.5 µg/m^3 for operation).[33] SCAQMD has also not revised its criteria pollutant threshold of significance for $PM_{2.5}$.[34] (Appendix C-4)

The EIR relies upon the thresholds of significance promulgated by SCAQMD, the expert regulatory air agency in the region, which are supported by substantial evidence. The analysis in Recirculated Section 4.2, Air Quality, shows that mitigated peak day localized construction emissions of $PM_{2.5}$ are 0.39 µg/m^3, which is well below the SCAQMD Localized Significance Threshold (LST) of 10.4 µg/m^3. It also

31 https://www.epa.gov/newsreleases/epa-finalizes-stronger-standards-harmful-soot-pollution-significantly-increasing

32 https://www.epa.gov/system/files/documents/2024-02/table_annual-pm25-county-design-values-2020-2022-for-web.pdf

33 http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25

34 http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

shows that the maximum daily construction emissions of $PM_{2.5}$ is 30.91 lbs/day, which is well below the SCAQMD threshold of 55 lbs/day. For operations, Recirculated Section 4.2, Air Quality, shows that the mitigated peak day localized operational emissions of $PM_{2.5}$ are 0.63 µg/m^3, which is well below the SCAQMD LST of 2.5 µg/m^3. However, the mitigated maximum daily operational emissions is 152.42 lbs/day, which is well above the SCAQMD threshold of 55 lbs/day. As such, Recirculated Section 4.2, Air Quality, concluded that construction air quality impacts were less than significant with mitigation, and operational air quality impacts were significant and unavoidable. These impact conclusions would not change based on the EPA's recent action. SCAQMD will develop a plan to achieve compliance with the revised NAAQS and will determine what measures are necessary to implement. Any SCAQMD measures that apply to the Project will be implemented pursuant to regulatory requirements. (Appendix C-4)

RI-267.6 The comment refers to cumulative impacts on children and residents located nearby. Refer to Recirculated Section 4.2, Air Quality, for a thorough discussion on cumulative impacts to air quality from the Project and those surrounding the Project. As detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts.

RI-267.7 This comment states that including the Draft Environmental Justice Element policies is inappropriate and notes that it is not adopted. An environmental justice element is required when an agency amends two or more of its general plan elements. March JPA has already done this in the past without adopting a General Plan amendment to add an environmental justice element. March JPA separately processed the Environmental Justice Element as it was already needed and applies to the whole of the March JPA Planning Area. As described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA proposed an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. The March JPA Environmental Justice Element is applicable throughout the existing 4,400-acre March JPA Planning Area.

March JPA released the Draft Environmental Justice Element in November 2023 and held two public workshops on December 19, 2023, and February 20, 2024, to gather public input on the Draft Environmental Justice Element. Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The

Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

RI-267.8 This comment discusses policies within the Draft Environmental Justice Element, specifically proposed policies HC 16.15 and HC 16.23, and states that the Project would violate these policies and that there will be no time to implement it. Recirculated Section 4.10, Land Use and Planning, determined that the Project would be consistent with Policy HC 16.15 because, as opposed to how development could occur under the existing General Plan, the Project would include at least a 300-foot buffer on all sides of the Specific Plan Area, with a larger buffer to the south and east. The Project would develop only 45% of the Project site, as opposed to 85%, which is permitted under the existing General Plan. In addition, the Project would include various setback requirements and would orient truck courts and loading docks away from or screened to reduce visibility to public roads, publicly accessible locations within the Specific Plan Area, and surrounding residential properties. The Specific Plan also prohibits loading and unloading activities within view of public streets or residential land uses. Recirculated Section 4.10, Land Use and Planning, determined the Project would be consistent with Policy HC 16.23 because the Project does not include any agricultural uses that would produce significant quantities of toxic emissions, and incorporates MM-AQ-1 through MM-AQ-27 to reduce air quality impacts associated with industrial uses. In addition, MM-HAZ-2 includes limitations on storage, handling or use of toxic gases near schools, and MM-HYD-2 would ensure effective control of incidental releases to environment of pollutants of concern. The Health Risk Assessment conducted for the Project did not identify any significant health risk impacts associated with Project construction or operation. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

With regard to the commenter's concern regarding implementation, as described in Recirculated Chapter 3, Project Description, March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. As the March JPA Planning Area will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA adopted an Environmental Justice Element based on Riverside County's adopted Environmental Justice Element. The Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. On April 24, 2024, in a public meeting, the March Joint Powers Commission considered and adopted Resolution JPA 24-04, which found adoption of the Environmental Justice Element categorically exempt from CEQA pursuant to State CEQA Guidelines Class 7 and Class 8 and adopted the Environmental Justice Element. The adopted Environmental Justice Element is substantially similar to the Draft Environmental Justice Element released in November 2023. The Environmental Justice Element is now part of the March JPA General Plan.

RI-267.9 This comment states that siting heavy industry within 300 feet of residences is bad and unacceptable land use. The comment states that the Project site is surrounded on three sides by residences and other sensitive receptors. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for

development. Additionally, the Project would introduce an open space buffer, by way of parkland, open space, and a conservation easement on all sides adjacent to residential land uses. Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. Industrial buildings must be set back a minimum of 1,000 feet from residential. In addition, any industrial-use building will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 3.5.4, Off-Street Loading Facilities, and Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan require truck courts and loading docks to be oriented away or screened to reduce visibility public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties, and prohibits loading and unloading activities within view of public streets or residential land uses. The comment also discusses the current recreational uses of the Project site. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use.

RI-267.10 This comment expresses the opinions of the commenter regarding potential land uses on the Project site. The commenter is referred to Topical Response 8 – Alternatives, regarding land use alternatives. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

RI-267.11 The comment notes an obligation to protect limited open space in the region, though the specific nature of this obligation is not clear. Nevertheless, the Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

RI-267.12 The comment acknowledges that the Project is not subject to Local Agency Formation Commission laws, and that the laws prohibit the creation of peninsulas. Contrary to the commenter's statement, the LAFCO laws discourage the creation of islands, not peninsulas. Please see Response RI-267.9 above regarding land use considerations.

RI-267.13 This comment provides personal background information. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

RI-267.14 This comment is duplicative of the previous comments by the commenter found in RI-267.1 through RI-267.13. As such, please refer to Responses to RI-267.1 through RI-267.13 above.

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From: Beverly Arias <beverly951@yahoo.com>
Sent: Monday, February 26, 2024 7:26 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails.
Your claims to value “civic engagement” in your EJ policy rings hollow.
As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-268.1

Sincerely,

Beverly Arias
R-Now Supporter

RI-268

Beverly Arias
February 26, 2024

RI-268.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Monday, February 26, 2024 7:35 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-269.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Blanca Rivera
92508

Sent from my iPhone

RI-269

Blanca Rivera
February 26, 2024

RI-269.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Bob Buster <bobbuster@att.net>
Sent: Monday, February 26, 2024 3:16 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Sincerely,Mary Humboldt

RI-270.1

RI-270

Mary Humboldt
February 26, 2024

RI-270.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Carolyn Rasmussen <cgrasmus@gmail.com>
Sent: Monday, February 26, 2024 9:36 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. RI-271.1

The impacts on the quality of life for residents including me and my family and my neighbors will be terrible. These negative impacts include but are not limited to increased pollution, more truck traffic and truck idling, and irreparable damage to our roads and open spaces. Additionally, we have an amazingly diverse native plant population within the West Campus Upper Plateau that will be eliminated by warehouse construction. Please put a moratorium on warehouse construction in this area. RI-271.2

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. RI-271.3

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. RI-271.4

Sincerely,

Carolyn Rasmussen
92508

Sent from my iPhone

RI-271

Carolyn Rasmussen
February 26, 2024

RI-271.1 This comment is Comment FL-RA.1 of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-271.2 This comment expresses concern regarding impacts to quality of life due to pollution, truck traffic and truck idling, damage to roads and open spaces, and impacts to diverse native plant populations. The comment also requests a moratorium on warehouse construction. The environmental impacts of the Project related to air quality, including pollution and truck idling, are discussed in Recirculated Section 4.2, Air Quality, of the EIR. Impacts to open space and native plant populations are discussed in Section 4.3, Biological Resources, of the EIR. The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-271.3 This comment is Comment FL-RA.2 of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-271.4 This comment is Comment FL-RA.3 of Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Christina Barhorst <tbar9191@hotmail.com>
Sent: Monday, February 26, 2024 7:28 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit that EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. RI-272.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. This plan is unacceptable to my family. RI-272.2

Sincerely,

Christina and Kelly Barhorst
Orangecrest, 92508

RI-272

Christina and Kelly Barhorst
February 26, 2024

RI-272.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-272.2 This comment states opposition to the plan. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

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From: CHRISTINE MILLER <christinedawn3@verizon.net>
Sent: Monday, February 26, 2024 6:36 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-273.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Rick and Christine Miller
92508

Sent from my iPhone

RI-273

Rick and Christine Miller
February 26, 2024

RI-273.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Cindy <clchiek@gmail.com>
Sent: Monday, February 26, 2024 8:14 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-274.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Cindy Chiek
92508

RI-274

Cindy Chiek
February 26, 2024

RI-274.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Perez, Corinne <perezc@ajiusa.com>
Sent: Monday, February 26, 2024 3:30 PM
To: Dan Fairbanks
Cc: rivnowgroup@gmail.com
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. RI-275.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. This projected plan unequivocally impacts our lives. It is bad enough that we have all the planes flying overhead for the past 30 years, now this will be added on top of that. It is hard to believe that any impact report takes all of this into consideration. In addition to the unforeseen hazards that we continually see in the news where industrial is paired with residential. RI-275.2

Sincerely,

Corinne Perez
92508

RI-275

Corinne Perez
February 26, 2024

RI-275.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-275.2 This comment expresses opposition to the proposed Project and concern over unforeseen hazards related to industrial uses. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

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From: drxman@att.net
Sent: Monday, February 26, 2024 8:39 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks, As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Sincerely,

RI-276.1

Stop putting big business in front of the citizens who live in the community. Do the right thing and reevaluate building additional warehouses in residential neighborhoods.

RI-276.2

David Drexler
92506.

RI-276

David Drexler
February 26, 2024

RI-276.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-276.2 This comment expresses opposition to the proposed Project and requests reevaluating building additional warehouses. The comment does not raise any specific comments, questions or concerns about the analysis included in the Recirculated EIR sections.

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From: David Rose <drose3@charter.net>
Sent: Monday, February 26, 2024 10:33 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a member of the Orangecrest community, a former land use planner, current real estate developer and owner of multiple investment properties in the area, I am extremely disappointed in the Recirculated Draft Environmental Impact Report (REIR), specifically that it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), including but not limited to the area that the Project completely ignores the wishes of the most impacted Mission Grove AND Orangecrest communities/neighborhoods, as was strongly directed, and even mandated by the original Master Plan, and focuses solely on the desires of the Developer, the U.S. Air Force ("USAF") and a previously agreed upon decade plus old 2012 Settlement Agreement with the Center for Biological Diversity ("Settlement Agreement"). RI-277.1

The Land Use element fails to take the surrounding uses, specifically the long established residential communities/neighborhoods of Mission Grove AND Orangecrest, into consideration and further fails to fully mitigate the impacts on said communities/neighborhoods. RI-277.2

The inclusion of a mandated/required park as a benefit and/or mitigation measure of the Project, of which the Developer is NOT directly providing a fully developed and functional park, is, at best, a bait and switch tactic, at worst, disengenuous and of no immediate benefit to the communities/neighborhoods, especially in lieu of the mitigating the immediate Project impacts. RI-277.3

The Circulation element fails to adequately address, and, furthermore, mitigate the increased traffic on Orange Terrace Parkway, the worsened level of service (L.O.S.) throughout the Mission Grove AND Orangecrest communities/neighborhoods, specifically on Barton Road, Grove Community and Orange Terrace Parkway, and the introduction of new stop lights and signals throughout the area. RI-277.4

The long term impacts to Air Quality are of serious concern, especially given that the Developer is proposing to build HUNDREDS of semi truck idling and parking spaces directing surrounded by 300 degrees of long established multi-family AND single family residential community/neighborhoods. RI-277.5

The Recirciulated Draft EIR also fails to address the significant change(s) in circumstances that have resulted since the Settlement Agreement, including but not limited to air quality, land use, traffic, and greenhouse gases (which impacts not only our quality of life, but possibly even our lives). RI-277.6

It is glaringly obvious that the Developer AND the JPA are placing higher importance on the desires of the USAF and a previous Settlement Agreement, which did NOT involve the general public, namely the residents of the Mission Grove NOR Orangecrest communities/neughborhoods, over the desires, requests, wishes and quality of life of the residents of the Mission Grove AND Orangecrest communities/neighborhoods, especially in that the Developer AND the JPA are proposing to develop the most impactful and onerous uses (OVER 1 MILLION SQ. FT. OF INDUSTRIAL WAREHOUSE USES WITH 100'S OF IDLING/PARKING SPAVES) at the peak of the Plateau overshadowing the Mission Grove AND Orangecrest communities/neighborhoods. RI-277.7

As the community has asked continually for well over a year, please consider alternative, non-industrial warehouse uses for the West Campus Upper Plateau. RI-277.8

Sincerely,

David Rose
92508

Sent from my iPhone

Please forgive any errors. 😄

RI-277

David Rose
February 26, 2024

RI-277.1 This comment provides personal background information regarding the commenter and expresses the commenter's disappointment that the Recirculated Draft EIR did not make substantive changes to the proposed Project. As explained in Recirculated Chapter 2, Introduction, select portions of the Draft EIR were revised because additional analysis of impacts related to air quality and hazardous materials had been completed and March JPA had prepared an Environmental Justice Element for the March JPA General Plan. The purpose of the Recirculated Draft EIR was to provide the public with a meaningful opportunity to comment on these environmental topics (i.e., air quality, hazards and hazardous materials, and land use and planning). Recirculated Chapter 3, Project Description, also provided clarification on the construction of the off-site reclaimed water tank and detail regarding the Community Benefits under the proposed Development Agreement, specifically funding and construction of the proposed Park and Meridian Fire Station. Overall, the description of the proposed Project is consistent throughout the Draft EIR sections and the Recirculated Draft EIR sections.

RI-277.2 This comment states that the Land Use Element fails to take the surrounding uses, specifically the surrounding residential neighborhoods, into consideration and fails to fully mitigate impacts on these communities. The Land Use Element is part of the 1999 March JPA General Plan. As discussed in Recirculated Section 4.10, Land Use and Planning, the Project site has been slated for development since the March JPA General Plan was adopted in 1999. To the extent the comment intends to refer to Recirculated Section 4.10, Land Use and Planning, as concluded therein, with the incorporation of mitigation the Project would not result in conflicts with existing applicable land use plans and policies adopted for the purpose of avoiding or mitigating an environmental effect, and land use impacts would be less than significant. This comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-277.3 This comment questions the funding of the Park and its benefit to the community if not fully developed. Regarding the Park development, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities, drainage, and any additional permitting, not to exceed $6.5 million. Separately, the applicant will contribute $23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. The Landscaping and Lighting Maintenance District will be responsible for the maintenance of the Park once complete.

RI-277.4 This comment states that the Circulation Element fails to adequately address and mitigate the increased traffic on Orange Terrace Parkway and worsened traffic through the Mission Grove and Orangecrest neighborhoods. The Circulation Element is part of the 1999 March JPA General Plan. To the extent the commenter is referring to the potential impacts of the Project on the circulation system, these are addressed in Section 4.15, Transportation, of the EIR, which concludes that Project impacts to the circulation system would be less than significant with mitigation incorporated. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus

Development can only be accessed via Cactus Avenue. This comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-277.5 This comment states that the long-term air quality impacts are of serious concern. The impacts associated with air quality are discussed in Recirculated Section 4.2, Air Quality, of the EIR. To clarify, contrary to the commenter's suggestion, the Project does not propose hundreds of semi truck idling and parking spaces. The Project includes parking areas and loading docks necessary to support the proposed uses and also includes measures to limit idling (see, for example, MM-AQ-17, which limits idling to 3 minutes). The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-277.6 The comment suggests that the Recirculated Draft EIR fails to address changes in circumstances since the Settlement Agreement, including with respect to air quality, land use, traffic, and greenhouse gases. To the contrary, as discussed in Recirculated Chapter 3, Project Description, one of the components of the Project is a Conservation Easement to preserve open space in implementation of the CBD Settlement Agreement. Consistent with the requirements of CEQA, the EIR analyzes the Project in relation to existing conditions. As discussed in Section 2.3 of Recirculated Chapter 2, Introduction, each EIR section includes an existing setting discussion that describes the physical environmental conditions within the Project area as they existed at the time the NOP was prepared, in November 2021; these conditions are considered the baseline physical conditions from which the EIR determines whether an impact is significant.

RI-277.7 This comment expresses general opposition to the Project. This comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-277.8 This comment requests the consideration of a non-industrial alternative. In response, please see Topical Response 8 – Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative.

From: Deb Whitney <surfjade@yahoo.com>
Sent: Monday, February 26, 2024 7:48 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-278.1

Sincerely, Deb Whitney 6790 Mission Grove Pkwy N Riverside CA 92506

RI-278

Deb Whitney
February 26, 2024

RI-278.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Felicia Valencia <feliciavalencia@msn.com>
Sent: Monday, February 26, 2024 8:41 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-279.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As we and the community have asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Felix and Felicia Valencia
Residents of Orangecrest
92508

RI-279

Felix and Felicia Valencia
February 26, 2024

RI-279.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: FRANK ERDODI <honiebun2k@aol.com>
Sent: Monday, February 26, 2024 7:35 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-280.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Frank and Michelle Erdodi
92508

Sent from my iPad

RI-280

Frank and Michelle Erdodi
February 26, 2024

RI-280.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Gabriella Zlaket <gzlaket@gmail.com>
Sent: Monday, February 26, 2024 11:34 AM
To: Dan Fairbanks
Subject: Urgent! Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a concerned community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-281.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. More warehouses are not the answer!

Sincerely,

Gabriella Zlaket
92508

RI-281

Gabriella Zlaket
February 26, 2024

RI-281.1 This comment is Form Letter RA – Environmental Justice Element, with an additional statement expressing opposition to more warehouses. In response to this comment, please see Form Letter RA Response.

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From: honeymbernas@gmail.com
Sent: Monday, February 26, 2024 10:26 PM
To: Dan Fairbanks
Subject: Public Comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR), as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse," as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have not, to my knowledge, considered non-industrial alternatives and refused to establish a Community Advisory Board despite persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-282.1

I believe there is a time and place for everything, and building this project that will negatively impact our air quality, traffic and quality of life, is just not the right place. I am gravely disappointed in the March Joint Power Agency’s lack of regard for the will and well-being of the current residents and future generations.

RI-282.2

Sincerely,

Honey Bernas
Orangecrest Resident

RI-282

Honey Bernas
February 26, 2024

RI-282.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-282.2 This comment expresses opposition to the proposed Project due to concerns over air quality, traffic, and quality of life. Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts. The Project would result in less than significant transportation impacts with implementation of MM-TRA-1 and MM-TRA-2. This comment does not raise any additional issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Jack Katzanek <katzanekj@gmail.com>
Sent: Monday, February 26, 2024 10:35 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-283.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Jack Katzanek
92508

RI-283

Jack Katzanek
February 26, 2024

RI-283.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: J Gonsman <teamgonsman@yahoo.com>
Sent: Monday, February 26, 2024 9:31 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-284.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Jason Gonsman
92508

RI-284

Jason Gonsman
February 26, 2024

RI-284.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Jeannine Sabel <j9sabel@gmail.com>
Sent: Monday, February 26, 2024 5:02 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-285.1

I am a community member that values open space and clean air. Please reconsider this JPA project as it endangers our rights to clean air and accessible open spaces!!

RI-285.2

Sincerely,

Jeannine Sabel
92506

RI-285

Jeanine Sabel
February 26, 2024

RI-285.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

RI-285.2 This comment expresses the commenter's concerns regarding clean air and open space. Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts.

Regarding open space, the Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Jennifer Diaz <jenniferadiaz@yahoo.com>
Sent: Monday, February 26, 2024 3:44 PM
To: Dan Fairbanks
Cc: Jennifer Diaz
Subject: Large Truck Noise- Quality of Life- House Shaking | Open Space -Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Warehouse communities are at a higher risk of exposure to air pollution. This means that residents in these areas are exposed to daily air pollution from diesel exhaust and particulate matter, which is a major concern. The new warehouses lead to increased truck traffic, which negatively impacts the community in several ways. This includes traffic congestion, safety issues, pavement damage, noise pollution, and air pollution. RI-286.1

Heavy-duty trucks use diesel fuel, which produces emissions containing diesel particulate matter (DPM). This substance is regulated as a Toxic Air Contaminant in California due to studies showing that exposed truck drivers and rail workers have developed lung cancer. The U.S. EPA regards DPM as "likely to be a carcinogen," meaning it is responsible for causing cancer. **(AASHTO, 2023)** RI-286.2

Our quality of life is being compromised as we are losing sleep and peace of mind due to the constant shaking of our homes throughout the day and night. The trucks passing by are causing damage to our windows, walls, and foundation, despite the signs, rules, and laws in place to protect us from such detrimental effects. RI-286.3

We have researched ways to gather accurate data to provide proof for our observations and experiences.

1. A ground vibration monitor
2. A sound monitoring system
3. 24-camera monitoring and recordings of heavy truck traffic

RI-286.4

It is equally important to discontinue the destruction of open spaces. Open space is our only respite from constant noise and bleak concrete surroundings. Our community's quality of life has suffered enough. RI-286.5

My home backs up to Van Buren | 92508

Reference: AASHTO. (2023). *Effects of heavy truck volumes on Noise: Center for Environmental Excellence: AASHTO*. Center for Environmental Excellence | AASHTO. https://environment.transportation.org/teri-idea/effects-of-heavy-truck-volumes-on-noise/ RI-286.6

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits is clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025. I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard. It is telling that you RI-286.7

propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow. As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. Sincerely,

RI-286.7
Cont.

Sincerely,

Jennifer Diaz

RI-286

Jennifer Diaz
February 26, 2024

RI-286.1 This comment expresses concerns about air pollution, truck traffic, and noise in warehouse communities. Regarding air quality, as detailed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks. The Project would incorporate MM-AQ-1 through MM-AQ-27 to reduce its significant and unavoidable air quality impacts.

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

With regard to on-site operational noise, Section 4.11, Noise, determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant.

RI-286.2 This comment is not a comment on the Recirculated Draft EIR but provides factual information about diesel particulate matter. As discussed in Recirculated Section 4.2, Air Quality, and the Project Health Risk Assessment (Appendix C-2), the Project would result in less than significant human health or cancer risks.

RI-286.3 This comment addresses complaints regarding current truck traffic causing shaking and damage to homes. As described in the Section 4.11 Noise, an assessment of ground-borne vibration related to construction and operation activities was conducted, and vibration impacts were determined to be less than significant during construction and operation.

See also the response to comment RI-286.1 above for details regarding management and enforcement of truck routes and truck travel. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-286.4 This comment identifies methods to study vibration and shaking from trucks. Section 4.11, Noise, assessed ground-borne vibration related to construction and operation activities and determined the Project's vibration impacts to be less than significant during construction and operation. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-286.5 This comment addresses open space and quality of life. Regarding open space, the Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-286.6 This comment provides information about the commenter and a reference to a research idea regarding the effects of heavy truck volumes on noise. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-286.7 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

From: Josie Sosa <josie.sosa@gmail.com>
Sent: Monday, February 26, 2024 10:29 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-287.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Josie Sosa
92508

RI-287

Josie Sosa
February 26, 2024

RI-287.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Lani <creely5@aol.com>
Sent: Monday, February 26, 2024 1:52 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,
As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.
The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.
I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.
It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.
As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.
Sincerely,
Lani Creely
92508

RI-288.1

Sent from the all new AOL app for iOS

RI-288

Lani Creely
February 26, 2024

RI-288.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Leo Mullarky <leomullarky@gmail.com>
Sent: Monday, February 26, 2024 12:22 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

I wholeheartedly endorse the following letter and could not have said it any better myself.

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-289.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

<name>
<zip code>

RI-289

Leo Mullarky
February 26, 2024

RI-289.1 This comment is Form Letter RA – Environmental Justice Element with a personal statement of endorsement of the form letter. This addition does not raise any new or different issues than those raised in the form letter. As such, in response to this comment, please see Form Letter RA Response.

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From: Linlin Zhao <fredzhaolin@gmail.com>
Sent: Monday, February 26, 2024 5:07 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304
Attachments: Comments_REIR_Zhao.pdf

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project. Please find my concerns in the attached document.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-290.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Lin Zhao
92508

February 26, 2024

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

RE: Public comment on the record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Recirculated Draft Environmental Impact Report (REIR) on the West Campus Upper Plateau Project (the Project). The Project would site over 4.7 million square feet of total warehouse space surrounded on three sides by residential neighborhoods located within the City of Riverside and County of Riverside. The Project's warehouses are sited within 500 feet of residents, a proposed park, and reserved passive recreation areas; it is less than a quarter mile from a preschool and the entire project is sited within a 1,500 foot range of residential homes. RI-290.2

In my initial comments dated March 8, 2023, I expressed my concerns regarding the Draft EIR did not properly analyze the Project's Hazards and Hazardous Materials (Section 4.8). I appreciate that the REIR attempted to address my concerns by providing new analysis results and citing regulatory documents. However, I found the answers were insufficient in addressing the deficiencies in the Hazards and Hazardous materials sections. RI-290.3

I am an Associate Professor of Chemistry and Environmental Toxicology at the University of California, Riverside (UCR). I am also the Director of the Environmental Toxicology Graduate Program at UCR. I have a Ph.D. in Analytical Chemistry from the University of Connecticut and have > 15 years of experience in chemical analysis, chemical toxicology, and mechanistic studies of carcinogens. I have published over 40 peer-reviewed papers in highly regarded scientific journals in the fields of analytical chemistry, biochemistry, and chemical toxicology, which have been cited more than 1300 times by peers.

My comments reflect documents available publicly on the March JPA website. These documents include: RI-290.4

- West Campus Upper Plateau Project Recirculated Draft Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendix C-1, December, 2023
- Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al.), 2022
- General Plan of the March Joint Powers Authority[1], assumed 1999 date – last updated 2/17/2022 (General Plan, 1999)

- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)

RI-290.4 Cont.

1. Deficiencies in polychlorinated biphenyls (PCBs) analysis

In my initial response to the Draft EIR, I expressed the following concerns with sample collection methods.

All the presented test results were from wipe tests from concrete surfaces, except one sample was from half metal and half concrete surfaces; however, according to the PCBs Question and Answer Manual (page 52, Q2) from the United States Environmental Protection Agency[2], wipe sample is only suitable for determining the PCB concentration of concrete that has been contaminated by a spill of PCBs less than 72 hours old (see §761.79(b)(4)). *For concrete contaminated by older spills, a bulk sample of the concrete must be analyzed to determine the PCB concentration.* This is critically important for determining the proper disposal of the concrete at these potentially contaminated sites, especially for building 5. *In addition, because of the porous nature of the concrete, the soil under the concrete should be sampled and tested to determine the proper mitigation measures.*

RI-290.5

In the REIR, Appendix J-6, a report from Vista Environmental Consulting (page 3900 of 3920) provided the following response.

While Mr. Zhao's comments concerning the collection of concrete samples and even soil samples beneath the concrete would be correct, if there were PCBs identified at the site, the standard he is referring to addresses situations where it is known or expected that PCBs were present, such as when you are assessing the leakage of oil from a transformer that had been previously tested and determined to contain PCBs. In fact, while it is true that some fraction of PCBs would leach into the concrete, PCBs are very large molecules, and a significant fraction of any PCBs would remain on the surface, with the visible staining. Wipe sampling is an accurate method for determining if PCBs are present. Had any detectable levels of PCBs been identified in any of the wipe samples that were collected, Vista would have recommended follow-on delineation sampling of the concrete or other substrate, but the complete absence of PCBs in the wipe samples collected indicated that this step was unnecessary.

RI-290.6

Unfortunately, these answers to the sampling method are inadequate. The amendment cited "OSHA Salt Lake Technical Center, Guideline for Developing Sampling and Analytical Methods with Validation Requirements"[1]; however, the document clearly states, " Bulk sampling is not specifically addressed in this guideline. " Instead, EPA guidelines state, "Because PCBs can migrate into porous surfaces (e.g., brick, masonry, concrete or wood), surface wipe sampling is not adequate to characterize the PCB concentration of porous surfaces. Instead, core samples

should be collected on a bulk basis (i.e., mg/kg) to collect the top 0.5 to 2 cm of the porous surface."

RI-290.6 Cont.

2. Critical errors in conclusion regarding hazardous materials found in wood communication poles.

In the REIR, Appendix J-5, a report dated April 26, 2022, from Vista Environmental Consulting (Vista Project No. 21 0210 021, page 3797 of 3920 in REIR) concluded that PCB is not an issue (perhaps due to the improper sampling). However, many hazardous chemicals are present at much higher levels than the threshold levels of the 40 CFR hazardous waste. For example, in Table 7 (page 3800), arsenic is preset at 11 mg/kg (regulatory level 5.0 mg/L)[2]; pentachlorophenol is present at 510 to 1,700 mg/kg (regulatory level 100 mg/L). 40 CFR hazardous wastes are also California hazardous wastes. Nonetheless, the report concluded that "The results of both of these samples were well below the RCRA standard for Waste Code D037, and the waste stream is not a federal hazardous waste." (page 3804). Proper disposal and reporting procedures need to be followed for these hazardous waste materials.

RI-290.7

In addition, I want to reiterate the following points, which have not been addressed in REIR.

3. Comprehensive chemical testing is required for all the bunkers within a 0.25-mile radius of the Grove Community Church preschool and single-family homes.

As summarized in Table 6A of Appendix J-2 (page 24 of 656), only a very limited number of wipe samples have been taken from inside the bunkers. Considering the history of ammunition and chemical storage in these areas and the close proximity of many to the Grove Community Church preschool and single-family homes, comprehensive chemical testing of the concrete and the soil underneath is necessary to ensure that no hazardous aerosols are produced during demolition. Additional tests should be conducted for per-and polyfluoroalkyl substances (PFAS) and radioactive materials.

RI-290.8

[1]https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjw697KqMqEAxUJJEQIHXLdAi8QFnoECA8QAQ&url=https%3A%2F%2Fwww.osha.gov%2Fsites%2Fdefault%2Ffiles%2FGUIDELINE_FOR_DEVELOPING_SAMPLING_AND_ANALYTICAL_METHODS.docx&usg=AOvVaw2p0B1KfVN4aneCBuGZhTWi&opi=89978449

[2] https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-261/subpart-C/section-261.24

4. Decontamination plans and testing results after decontamination should be made available to the public for all detected contaminations (toxic metals and VOCs). This is critical for sites within a 0.25-mile radius of the Grove Community Church preschool and single-family homes to ensure the well-being of the children and residues.

RI-290.9

Sincerely,

Linlin Zhao
Riverside, CA 92508

RI-290

Linlin Zhao
February 26, 2024

RI-290.1 This comment is Form Letter RA – Draft Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response. The comment also refers to an attachment with additional comments from the commenter, which are responded to below.

RI-290.2 This comment is introductory in nature. This comment references the Project vicinity and the Specific Plan buildout scenario analyzed in the EIR, but incorrectly identifies the land use square footages. As shown in Table 4.15-1, Project Trip Generation Summary, the EIR analyzed a total of 4,296,779 square feet of warehouse use, 528,951 square feet of office use, and 160,921 square feet of retail use. The comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections. As such, no further response is provided.

RI-290.3 This comment refers to the commenter's comments on the Draft EIR in a letter dated March 8, 2023, which is included in this Final EIR as Letter I-672. Please see Responses I-672.1 through I-672.6. The comment indicates that Recirculated Section 4.8, Hazards and Hazardous Materials, addressed the commenter's prior comments but the commenter believes the updates in the Recirculated Section 4.8 are insufficient. The commenter's comments on Recirculated Section 4.8 are addressed in Responses RI-290.4 through RI-290.8, below.

RI-290.4 This comment includes professional background information regarding the commenter and a listing of publicly available documents reviewed by the commenter. March JPA has not independently verified the commenter's qualifications. The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections. As such, no further response is provided.

RI-290.5 This comment states wipe samples are insufficient to characterize potential PCB contamination and instead suggests bulk sampling should have been used. As noted in the Supplemental PCB Report (Appendix J-6), there was no reason to collect bulk samples of concrete pads. If there had been any PCBs in the various materials that were wipe sampled, there would have been at least some indication in the wipe samples collected from the subject surface, and follow on sampling would have been performed. The EPA guidance on bulk sampling is "for concrete contaminated by older spills." As noted in the Draft EIR and Recirculated Section 4.8, there is no evidence of any PCB spills or contamination. In addition, even if PCBs were present in the areas where the wipe samples were collected, those materials will all be removed from the Project site during the demolition and grading process. MM-HAZ-1 requires the Project applicant to "[e]valuate various wastes identified at the site for hazardous waste characterization under California and Resource Conservation and Recovery Act standards for appropriate disposal to a licensed disposal facility."

Per Vista's supplemental letter dated April 29, 2024 (Appendix J-7), "wipe sampling was a reasonable initial testing method for concrete surfaces with discoloration, even if the contamination had occurred more than 72 hours ago. In the event that there had been any PCBs detected in any of the subject wipe samples collected of discoloration on concrete pads, then it would be reasonable to assume that there had been a release of PCB-containing oil, and further assessment of the concrete and the soil

beneath the concrete would be warranted. The fact that there was no PCB detected in the surficial contamination is indicative of the fact that there never had been a release of transformer oil containing PCBs at concentrations of 50 mg/kg, and therefore there was no need to perform testing of the concrete or the soil below."

In addition, MM-HAZ-1 requires that "[a]ll ground disturbing activities shall be conducted by workers trained to look for any suspect contamination which can include odorous soils, soil staining, pipelines, underground storage tanks, or other waste debris. If encountered, earthwork activities shall cease until laboratory analysis of soil samples have been conducted and direction given from the Air Force and/or overseeing agency." With the implementation of MM-HAZ-1, any impacts relating to contaminated debris on the Project site will be less than significant.

CEQA does not require speculation. *See, e.g. Laurel Heights Improvement Assn. v Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1137. Please refer to Recirculated Section 4.8, Hazards and Hazardous Materials, for further discussion of environmental characterization of the Specific Plan Area and for a discussion of munitions disposal investigations. No changes to the EIR are required in response to this comment.

RI-290.6 The comment states concentrations of arsenic and pentachlorophenol would classify the wood poles as hazardous waste under 40 CFR hazardous waste rules. The comment states arsenic (11 mg/kg) and pentachlorophenol (510 to 1,700 mg/kg) were above regulatory levels for hazardous waste (5.0 mg/L and 100 mg/L, respectively). However, the reported concentrations in the Vista Report (Appendix J-5) are total concentrations in soil in milligrams per kilogram (mg/kg) while the regulatory screening levels for RCRA hazardous waste are based on leachable concentrations determined by TCLP procedure, and units are in milligrams per liter (mg/L). As such, the comparison offered by the comment is not applicable, because units are not comparable. As stated on page 8 of the Vista report (Appendix J-5), select samples were analyzed using TCLP procedures to determine if materials were hazardous wastes, and results were below RCRA standard for waste code D037. As explained in Recirculated Section 4.8, Hazards and Hazardous Materials (p. 4.8-28 to -29), "the proposed Project would involve demolition and removal of structures that could potentially contain hazardous building materials, however pursuant to federal, state, and local regulations, including HBMP programs overseen and enforced by the DEH, the demolition permit process would require appropriate surveying, identification and disposal of any identified hazardous building materials." The Vista Report (Appendix J-5) explains that "all wood poles found throughout the facility should be managed in accordance with California's Alternative Management Standards for treated wood waste, which is set forth in the California Health and Safety Code Sections 25230 through 25230.18. Treated wood poles can be disposed of at landfills that are certified via the local Regional Water Quality Control Board to accept treated wood waste in accordance with the health and safety code sections mentioned above. California Waste Code 614 shall apply to this waste stream (there is no federal waste code)." Therefore, compliance with existing state and federal regulations would ensure the proper disposal of the wood poles and there would be a less than significant impact.

Per the Vista Letter (Appendix J-7), this comment indicates a misunderstanding regarding the standards that apply to treated wood waste (TWW). The comment attempts to compare dry weight testing results (reported as mg/kg) to the RCRA wet extraction standards (expressed as mg/L) for determining toxicity, which would require the wood poles by treated as RCRA waste, rather than TWW waste.

As a result, commenter cites (11 mg/kg for Arsenic and Pentachlorophenol results of 510 mg/kg to 1,700 mg/kg), the RCRA-required wet extraction testing required in 40 CFR 261-268 was performed. The follow-up testing results indicated:

1. Sample TW-2, which expressed Pentachlorophenol at 710 mg/kg, was not subjected to the TCLP extraction for comparison to RCRA standards because Samples TW-3 and TW-9, summarized below, were determined to contain seven to nine ten times the concentration of Pentachlorophenol as Sample TW-2.
2. Sample TW-3, which expressed Pentachlorophenol at 6,400 mg/kg, the highest result for Pentachorophenol, was subjected to the TCLP extraction for comparison to RCRA standards. The result was 0.66 mg/L, significantly below the RCRA standard of 100 mg/L that the commenter correctly cited.
3. Sample TW-9, which expressed Pentachlorophenol at 5,200 mg/kg, the second highest result for Pentachorophenol, was subjected to the TCLP extraction for comparison to RCRA standards. The result was 1.7 mg/L, again significantly below the RCRA standard of 100 mg/L.
4. Sample TW-10, which expressed Arsenic at 11 mg/kg, one of the only positive results for Arsenic, was significantly below the industry standard to perform the TCLP extraction for comparison to RCRA standards. The USEPA's recommendation for performing a TCLP analysis is 100 mg/kg, while the California DTSC recommendation for performing additional analysis for Arsenic is 50 mg/kg, though this standard would not apply to TWW, in particular, which is regulated separately from other types of waste, in accordance with California Health and Safety Code Section 25230, et al.

Please note that the industry standard, based upon Cal/DTSC and USEPA guidelines, is as follows:

1. If the number associated with the dry standard results (expressed in mg/kg) is less than ten times higher than the State of California's wet extraction toxicity standard (STLC, expressed in mg/L), and less than twenty times higher than the RCRA wet extractions toxicity standard (TCLP, also expressed in mg/L), no additional testing or analysis is required. The applicable wet extraction standard for Arsenic (5 mg/L), Chromium (5 mg/L) and Pentachlorophenol (100 mg/L) mean that any result of less than 50 mg/kg for Arsenic and Chromium and any result of less than 1,000 mg/kg for Pentachlorophenol do not require additional analysis.
2. If the number associated with the dry standard results (expressed in mg/kg) is ten times higher than the State of California's wet extraction toxicity standard (STLC, expressed in mg/L), the STLC extraction and analysis is required. However, since the testing performed was for Treated Wood Waste (TWW), which has its' own standard in California, promulgated by Assembly Bill 332 and codified in California Health and Safety Code Sections 25230 to 25230.18, which specifically allows TWW to be handled under alternative management standards which specifically exempt TWW from the TTLC (dry) standards found in 22 CCR 66261.24(a)(2)(A) and the related STLC standards, as long as the TWW is managed in accordance with the cited Health and Safety Code sections and is not a RCRA waste.
3. If the number associated with the dry standard results (expressed in mg/kg) is twenty times higher than the RCRA wet extraction toxicity standard (TCLP, expressed in mg/L, associated with the RCRA "D" codes), the TCLP extraction and analysis is required. Samples TW-3 and TW-9 were subjected to the additional TCLP extraction and analysis, under these guidelines, and both samples were found to exhibit extractable Pentachlorophenol at levels which were orders of magnitude lower than the RCRA standard of 100 mg/L.

4. As a final note, the wet extraction results can and do vary, based upon the individual samples that are analyzed. As an example, the fact that the TCLP result for Sample TW-3 was 0.66 mg/L and the TCLP result for Sample TW-9 was 1.7 mg/L, even though the dry weight result for Sample TW-3 was approximately 20% higher than Sample TW-9, is not a QA/QC issue, but is related to the characteristics of the individual samples. Reasons for this variation could be as varied as the wood in one pole being more dense and therefore having the Pentachlorophenol adhering to it better than the second pole, or one having had the Pentachlorophenol dipped longer before installation, and therefore penetrating deeper into the wood, making it harder to extract during the TCLP process.

RI-290.7 This comment raises concerns regarding testing of the soil underneath the concrete bunkers as well as PFAS and radioactive materials being emitted during demolition of the bunkers. With respect to the soil underneath the concrete bunkers, as discussed in Recirculated Chapter 3, Project Description, the proposed Project is located in a former munitions storage area, in which munitions (and later fireworks) were stored indoors in secured concrete bunkers. As part of the Phase I, the concrete bunkers were inspected and the environmental professional noted that the "bunkers are constructed entirely of concrete" and that "[n]o evidence of floor pitting or staining was observed in the bunkers, and the concrete flooring was noted to be in excellent condition." As such, there is no pathway for contaminants of concern to the soil. Further, as explained in Recirculated Section 4.8, Hazards and Hazardous Materials, extensive characterization of the project site has been completed, including a Phase I Environmental Site Assessment (ESA) in anticipation of the Proposed Project. The Phase I did not recommend sampling based on the historical use of the site and possible contaminants of concern that could be present.

With respect to PFAS, as detailed in Recirculated Section 4.8, Hazards and Hazardous Materials, the only place within the Specific Plan Area identified by the Air Force and relevant environmental agencies with the potential for PFAS contamination is the former Landfill No. 5 (Site 3).[35] The Air Force recently tested soils in the former Landfill No. 5 and found no detections of PFOA, PFOS, or PFBS above screening criteria. The Santa Ana Regional Water Quality Control Board concurred with the conclusion that no additional soil sampling is recommended in the former Landfill No. 5 area. Further, multiple documents from relevant regulatory agencies have cleared the Project site for unrestricted use, including the Santa Ana Regional Water Quality Control Board in 2006, which, responding to a site investigation, indicated that it concurred "with your finding of no release at the site, and the recommendation for no further action for the Weapons Storage Area." As such, no further remediation or removal activities are required. Please refer to Recirculated Section 4.8, Hazards and Hazardous Materials, and Topical Response 3 – Hazards, for further discussion of PFAS, radiological materials, and biological and chemical weapons.

Regarding radioactivity, as discussed in Section 4.8.1, Existing Conditions, Other Environmental Studies of the Project Site, in Recirculated Section 4.8, Hazards and Hazardous Materials, of the EIR, multiple studies and physical surveys were conducted to evaluate the potential for radiological contamination. Surveys evaluated both surface storage and the potential for subsurface anomalies. Studies were completed and reviewed by private consultants, military agencies, and state and federal

[35] AFCEC, 2022, Final Quality Program Plan (QPP) for the Remedial Investigation of Per- and Polyfluoroalkyl Substances (PFAS) at the Former March Air Force Base (AFB) and March Air Reserve Base (ARB), California; memorandum dated May 10, 2022.

regulatory agencies. Findings in each report were consistent and did not find evidence of storage or disposal of biological or chemical weapons, buried anomalies, nor radiological contaminations. Based on this evidence, there is no indication of the potential for surface level or buried radiation. As such, the Project would not result in a foreseeable upset or accident condition. Further testing is not required. No changes to the EIR are required in response to this comment.

RI-290.8 This comment suggests that "decontamination plans and testing results … should be made available to the public for all detected contaminations (toxic metals and VOCs)." It is unclear as to what "decontamination plans" are being referenced, but assuming the commenter is referring to decontamination recommended in the Phase II, such decontamination, as indicated therein, will be conducted in compliance with the applicable state and federal regulations. Any asbestos or lead based paint requiring abatement will be mitigated by a licensed contractor, with oversight and clearance sampling by a licensed professional. A report on the abatement will then be issued. As discussed above, pursuant to MM-HAZ-1, wastes at the Project site must be evaluated for hazardous waste characterization and disposed of at an appropriately licensed disposal facility. MM-HAZ-1 also requires that all ground disturbing activities be conducted by workers trained to look for any suspect contamination, including odorous soils, soil staining, pipelines, underground storage tanks, or other waste debris. MM-HAZ-1 requires that documentation to the satisfaction of March JPA be submitted to verify compliance with this mitigation measure.

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From: Linda Tingly <linda.tingley@yahoo.com>
Sent: Monday, February 26, 2024 7:34 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-291.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Linda Tingley Rivera
92508

Sent from my iPhone

RI-291

Linda Tingley Rivera
February 26, 2024

RI-291.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Loralee Larios <loralee@ucr.edu>
Sent: Monday, February 26, 2024 10:07 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR). It did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-292.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Loralee Larios
92506

RI-292

Loralee Larios
February 26, 2024

RI-292.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Maria Rodriguez <mariarod0421@gmail.com>
Sent: Monday, February 26, 2024 9:21 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-293.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Maria R
92508

RI-293

Maria Rodriguez
February 26, 2024

RI-293.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: mspaso@gmail.com
Sent: Monday, February 26, 2024 10:58 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.
The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit the EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard. RI-294.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. There are many empty warehouses and building more makes no sense.

Sincerely,
Marko Spasojevic
Riverside 92506

RI-294

Marko Spasojevic
February 26, 2024

RI-294.1 This comment is Form Letter RA – Environmental Justice Element followed by the statement "There are many empty warehouses and building more makes no sense". Regarding vacancies in area warehouses, according to Table 1 of the "Economic Impact Analysis of the March Joint Powers Authority (MJPA) Development Projects" by Dr. Qisheng Pan presents 2023 employment data for the various existing developments within the March JPA Planning Area (Appendix U). According to Table 1 of Dr. Pan's report, there are few vacancies within the March JPA Planning Area. In response to this comment, please see Form Letter RA Response.

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From: Michael Wilson <Bloomington51@outlook.com>
Sent: Monday, February 26, 2024 4:21 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

The recirculated draft EIR states as one of its objectives, in Section 3.3, to be "extending Barton Street from Alessandro Boulevard to Grove Community Drive." In Section 3.5.2, as part of PDF-TRA-1, on Pages 3-16 through 3-17, there is more detail: "Construct Barton Street at its ultimate full-section width as a Collector (66-foot right-of-way, 40-foot curb-to-curb) from the existing northerly and southerly termini consistent with the City of Riverside's Circulation Element. Once completed, the roadway will provide a connection between the existing Mission Grove community to the north and Orangecrest community to the south. The right-of-way will accommodate 6-foot sidewalks on the east side with 10-foot multipurpose trail and 5-feet of landscape on the other side along with a 5-foot bike lane and a single traveled lane in each direction (of 14.5-feet)." PDF-TRA-2, Page 3-17, states no truck access will be permitted via Barton Street. RI-295.1

With the completion of the Barton Street extension, Barton Street will not only provide access from the north (except for trucks) to the buildings in the project and the proposed park and athletic field, it will also serve as a direct route between the busy Alessandro Blvd. and Grove Community Drive, for approaching or leaving Orange Terrace Park, Grove Community Church, and schools, businesses, and residences in the Orangecrest area. The creation of what figures to be a popular route where there has not been one will generate emissions that will impact residents in close proximity to Barton Street. In particular, along the west side of Barton Street, south of Camino del Sol, there are nine residences, plus one at the corner of Barton Street and Saltcoats Drive, which have back yards separated from Barton Street, as it is planned, by only a block wall, 68-76 in. high, and a 15-foot-wide strip of open space.

The draft EIR and it's recirculated version contain emission estimates affecting local air quality based on emissions generated by the project site as a whole. No mention was made in the recirculated draft EIR of any study done to determine the effects of just the Barton Street extension. The REIR does at least mention, "Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust, inclusive of brake and tire wear particulates. The emissions estimate for travel on paved roads were calculated using CalEEMod" (4.2-27), but projected contributions from the Barton Street extension were not provided, nor was there an estimate of carbon emissions, expected traffic volume, placement of street lights, use of traffic-control devices (lights or stop signs), or a consideration of what effect the free-flow of vehicles and pedestrians may have with regard to noise, privacy, and safety. These are all things affected residents deserve to know. RI-295.2

For the sake of at least the residents of these homes, these issues should have been addressed in the draft EIR or its recirculated version. RI-295.3

Sincerely,
Michael Wilson
Mission Grove, 92508

RI-295

Michael Wilson
February 26, 2024

RI-295.1 This comment restates the portions of both Project Design Feature (PDF)-TRA-1 and PDF-TRA-2. The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-295.2 The commenter states that with the completion of the Barton Street extension, new vehicle trips along Barton Street would occur and would generate emissions that would impact residents in close proximity to Barton Street. In response, please see Recirculated Section 4.2, Air Quality which includes an evaluation of air quality impacts to sensitive receptors, the closest of which to the Barton Street extension to the south is R8 and to the north are R10 and R11. Vehicle traffic anticipated from the Barton Street extension is evaluated in the technical studies for air quality (Appendix C-1), noise (Appendix M-1) and transportation (Appendix N-2). The Barton Street extension is included in the City of Riverside's Circulation Element. Additionally, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Contrary to the commenter's statement, only the Park and open space amenities will be accessible from Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue.

RI-295.3 This comment is a conclusion to the comment letter. The comment does not raise any specific comments, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Michele Muehls <michelebello@hotmail.com>
Sent: Monday, February 26, 2024 9:47 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for taking time to read this.
As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

RI-296.1

Sincerely,

Michele Muehls
Hawarden 92506

~Michele ✂️
Sent from my iPhone

RI-296

Michele Muehls
February 26, 2024

RI-296.1 This comment is Form Letter RA – Environmental Justice Element with an introductory sentence. As such, in response to this comment, please see Form Letter RA Response.

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From: Peter Pettis <pettis.peter@gmail.com>
Sent: Monday, February 26, 2024 9:11 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the "cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you've completed that process should you evaluate if the current project plan meets its standard.

RI-297.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value "civic engagement" in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Peter Pettis
92508

RI-297

Peter Pettis
February 26, 2024

RI-297.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Rattana Chiek <rchiek@gmail.com>
Sent: Monday, February 26, 2024 8:17 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-298.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Rattana Chiek
92508

RI-298

Rattana Chiek
February 26, 2024

RI-298.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: Rich Priebe <richpriebe36@gmail.com>
Sent: Monday, February 26, 2024 12:56 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Good afternoon,

The Upper Plateau is an area revered by hikers, dog walkers, and mountain bikers.
Our city needs to do a better job of protecting what remains of its open spaces. As a new set of warehouses and industries begin to encircle Sycamore Canyon Wilderness Park-- this cannot be more evident. RI-299.1
Please consider rewilding this area with indigenous species--such as was done in Laguna
https://www.visitlagunabeach.com/blog/lagunas-hidden-history-the-fight-for-laguna-canyon/
or in Chino Hills
https://www.chinohills.org/285/Trails
..... These areas provide both habitat and recreation. RI-299.2

The people of Riverside deserve better-- please preserve one of our last open spaces and help protect the aesthetic value of our city. RI-299.3

Sincerely,

Rich Priebe
92508

RI-299

Rich Priebe
February 26, 2024

RI-299.1 This comment discusses how the Project site is currently utilized by the public for hiking, dog-walking, and mountain biking and states that the City needs to do more to protect open space given the amount of industrial and warehouse development occurring in the area. While the Project would result in changes to the existing trails, because the Project incorporates a southern and eastern boundary similar to the existing one around the fenced Weapon Storage Area, the trails located to the south and east would continue to be available for long term use for mountain biking and passive recreation. This would be an allowable use as a component of the future conservation easement in perpetuity. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-299.2 This comment requests considering "rewilding" the Project site and provides links and examples for Laguna and Chino Hills. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

RI-299.3 This comment requests the preservation of open space to help protect the aesthetic value of the City of Riverside. The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use. The Project also includes an approximately 60-acre park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. This comment does not raise any specific issues, questions or concerns about the analysis in the Recirculated Draft EIR sections.

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From: Richard Stalder <xcoachrs@sbcglobal.net>
Sent: Monday, February 26, 2024 12:26 PM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-300.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,
Richard Stalder
92506

Sent from my iPhone

RI-300

Richard Stalder
February 26, 2024

RI-300.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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From: ANTHONY SCIMIA JR <tscimia@sbcglobal.net>
Sent: Monday, February 26, 2024 8:19 AM
To: Dan Fairbanks
Subject: Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

As a community member, I am disappointed in the Recirculated Draft Environmental Impact Report (REIR) as it did not make meaningful substantive changes to the West Campus Upper Plateau (SCH 2021110304), a highly unpopular and environmentally detrimental project.

The addition of an Environmental Justice (EJ) policy and your justifications for how the project fits are clearly an empty ritual meant to check a box. Your EJ policy is the “cart before the horse", as it ought to have been drafted years ago, not at the same time as an in-process project which you are trying to push through before sunsetting in July 2025.

I ask that you submit thet EJ element to a full CEQA process and that you implement a warehouse moratorium until the process is complete. Only after you’ve completed that process should you evaluate if the current project plan meets its standard.

RI-301.1

It is telling that you propose no substantive changes in the REIR yet claim that the new EJ policy, which you developed without community input, miraculously fits the existing plan. For the past two years, you have never considered non-industrial alternatives and refused a Community Advisory Board in spite of persistent requests, thousands of signatures, and thousands of emails. Your claims to value “civic engagement” in your EJ policy rings hollow.

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Anthony Scimia Jr
20829 Indigo Point
Riverside CA,92508
Orangecrest

Sent from my iPhone

RI-301

Anthony Scimia Jr.
February 26, 2024

RI-301.1 This comment is Form Letter RA – Environmental Justice Element. As such, in response to this comment, please see Form Letter RA Response.

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