

## Nina Schumacher

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**From:** Jen L <jlarrattsmith@gmail.com>  
**Sent:** Sunday, December 3, 2023 4:13 PM  
**To:** Clerk; kphung@cityofperris.org; cmiramontes@cityofperris.org; Guzman, Rafael; CM Office; Michele Patterson; jperez@rivco.org; mfutrell@riversideca.gov; Dan Fairbanks; Dr. Grace Martin  
**Cc:** Michael McCarthy  
**Subject:** Public Comment for TAC 12/4 meeting Item 6a

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.)

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?

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.

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.

Thank you.

Sincerely,

Jen Larratt-Smith  
Riverside Neighbors Opposing Warehouses (R-NOW)  
92508

## Nina Schumacher

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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; mfuturell@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:

- 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.

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 it 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.

Thank you.

Sincerely,

Jerry Shearer  
92508

## Nina Schumacher

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**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 MIPA sunset, 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, MIPA land-use authority and goals, and earnest civic engagement.

MIPA 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), MIPA 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 MIPA because the MIPA 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:

- 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 MIPA 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.

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.

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



## Cindy Camargo

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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 sunseting 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.

Sincerely,

Maria R  
92508

## Cindy Camargo

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**From:** McKinney, Elsa <EMcKinne@rivco.org>  
**Sent:** Wednesday, January 3, 2024 2:57 PM  
**To:** Dan Fairbanks  
**Cc:** Cornelius, William; McNeill, Amy  
**Subject:** GP 23-02 MJP Environmental Justice Element-Due 2/15/2024  
**Attachments:** 1026\_001.pdf

Good afternoon Dan,

Upon review of the site location, since this request for comments received will not have any impacts to Riverside County Flood Control and Water Conservation District storm drain facilities, we have no comments to add.

Best Regards,



**Elsa McKinney, Engineering Aide**

Development Review

[Riverside County Flood Control & Water](#)

[Conservation District](#)

[emckinne@rivco.org](mailto:emckinne@rivco.org)

1995 Market Street, Riverside, CA 92501

951.955.2878  

\*Off Fridays

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[County of Riverside California](#)



# MARCH JOINT POWERS AUTHORITY

## GP 23-02: March JPA Environmental Justice Element

### Update

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 28, 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.**

### Overview

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.

Consistent with the recently adopted 14th Amendment to the Joint Powers Agreement by and between the Cities of Moreno Valley, Perris, Riverside and the County of Riverside, the March Joint Powers Authority is planned to sunset on July 1, 2025. As the March JPA planning jurisdiction will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA is reviewing the adoption of an Environmental Justice Element based on Riverside County’s adopted Environmental Justice Element.

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 map of the March JPA planning jurisdiction is attached to this notice.

### Why is an Environmental Justice Element Necessary?

In California, state law requires every local jurisdiction to prepare and adopt a comprehensive and long-range general plan to guide its growth and physical development. The General Plan provides a consistent framework for land use and development decisions in accordance with an established community vision. In 2016, the State of California passed



Senate Bill 1000 - the Planning for Healthy Communities Act requiring cities and counties to address environmental justice within their general plans.

## What will be included in the JPA's Environmental Justice Element?

The March JPA Environmental Justice Element will include objectives and policies consistent with Government Code section 65302(h) that have as a goal:

- a) Promote Civic Engagement
- b) Health Risk Reduction (e.g., Food Access, Safe and Sanitary Homes, Physical Activity, and Reduce Pollution exposure)
- c) Public Facilities and Health Care Facilities
- d) Other Environmental Justice Objectives (e.g., stormwater capture, solar and renewable energy, and implementation of climate action plans)

## Public Engagement

Community participation is an important component in the development of the March JPA's Environmental Justice Element. The March JPA will conduct two workshops to provide opportunities for the public to participate in the development of the element.

During the development of the Environmental Justice Element, the 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.

## Contact Information

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](mailto:fairbanks@marchjpa.com)
- Phone: (951) 656-7000

## Draft Environmental Justice Element

- Current draft Environmental Justice Element is available at: <https://marchjpa.com/wp-content/uploads/2023/11/Draft-Environmental-Justice-Element.pdf>



**GP 23-02 March JPA Environmental Justice Element**

Approximately 4,400 acres of the former March Air Force Base now within the March Joint Powers Authority

## Cindy Camargo

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**From:** Hannah Simon <admin@channellawgroup.com>  
**Sent:** Thursday, January 4, 2024 12:39 PM  
**To:** Dan Fairbanks  
**Cc:** Jamie Hall; Veronica Lebron  
**Subject:** GP 23-02: Objection to Approval of Environmental Justice Element without Environmental Review  
**Attachments:** 2024-01-04 Letter to March JPA.pdf

Good afternoon,

Please see attached. Please confirm receipt.

Thank you.

Hannah Simon  
Legal Assistant  
Channel Law Group, LLP  
8383 Wilshire Blvd., Suite 750  
Beverly Hills, CA 90211  
Office Phone No. (310) 347-0050  
Direct Phone No. (424) 276-7263

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JULIAN K. QUATTLEBAUM, III  
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Writer's Direct Line: (310) 982-1760  
jamie.hall@channellawgroup.com

---

\*ALSO Admitted in Texas

January 4, 2024

## VIA ELECTRONIC MAIL

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

fairbanks@marchjpa.com

**Re: GP 23-02: Objection to Approval of Environmental Justice Element without  
Environmental Review**

Dear Mr. Fairbanks:

This firm represents Riverside Neighbors Opposing Warehouses (R-NOW). We hereby advise the March Joint Powers Authority that it must conduct the required environmental review under the California Environmental Quality Act (CEQA) before adopting an Environmental Justice Element for its General Plan.

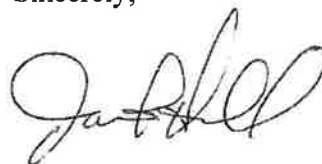
Under CEQA, public agencies must conduct an initial study to determine if a project may have significant environmental impacts. If the initial study shows that the project may have significant impacts, the agency must prepare an Environmental Impact Report (EIR). As stated in *Laurel Heights Improvements Association v. Regents of University of California* (1988) 47 Cal. Bd 376, 394, "If post approval environmental review were allowed, EIRs would likely become nothing more than post hoc rationalizations to support action already taken."

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. 4<sup>th</sup> 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.

I may be contacted at 310-982-1760 or at [jamie.hall@channellawgroup.com](mailto:jamie.hall@channellawgroup.com) if you have any questions, comments or concerns. Thank you for your attention to this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being more prominent and the last name "Hall" following in a similar style.

Jamie T. Hall

## Cindy Camargo

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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.

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)

## Cindy Camargo

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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.

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.

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 whom you reside. Thank you for your time.

Sincerely,

Alissa Chitwood  
92508



## Cindy Camargo

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**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 sunseting 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.

Sincerely,

Ana Ramirez  
92508

Sent from my iPhone

## **Cindy Camargo**

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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 sunseting 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.

Sincerely,

The Balmer Family  
92508

## Cindy Camargo

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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 "putting 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 sunset 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.

Please consider our input, as residents/taxpayers and our families.

Sincerely,

Beverly M. Arias

92504

[Sent from Yahoo Mail on Android](#)

## Cindy Camargo

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**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 sunseting 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.

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.

Sincerely,  
Bobby Robinette  
92508

## Cindy Camargo

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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 sunseting 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.

Sincerely,

Carolina Rodriguez  
92508

## Cindy Camargo

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**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.

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 sunset 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.

Sincerely,

Claire Grimes  
92320

## Cindy Camargo

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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 sunset 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.

Sincerely,

Eunhee Kim  
Raleigh, NC 27615

## Cindy Camargo

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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 sunset 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.

Sincerely,

Fera S.Momtaz  
Orange Crest community  
92508

Sent from my iPhone



## Cindy Camargo

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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 sunseting 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. Our families deserve better!

Sincerely,

Ira and Rajean Long  
92506

## Cindy Camargo

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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.

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 sunseting 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.

Sincerely,  
Janice Oien  
<name>  
<zip code>92508

Sent from my iPhone

## Cindy Camargo

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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 sunseting 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.

Sincerely,

Jason Gonsman  
92508

## Cindy Camargo

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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 sunseting 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.

Sincerely,

Jean Aklufi  
92506

Jean

## Cindy Camargo

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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 sunseting 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,

Joe Aklufi  
Riverside, 92506

## Cindy Camargo

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**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 sunset in July 2025.

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.

[Great Park | City of Irvine](#)

# GREAT PARK FRAMEWORK PLAN

Great Park will be one of the largest municipal parks in the country. Through careful planning and community engagement, it is on track to bring a wide variety of unique cultural and recreational opportunities to Irvine. Great Park has a rich history as the former Marine Corps Air Station and its 1,300 acres embrace recreation, competitive sports, cultural activities, and the natural environment. Over 500 acres of the park are built and operating, and in 2022, the City of Irvine adopted the Great Park Framework Plan to guide the next phase of development. The plan's initial phase includes 300 acres of exciting new park amenities, including a world-class outdoor amphitheater, sports complex, cultural terrace, and expansive space dedicated to unprogrammed passive enjoyment. The City of Irvine's Great Park draws on extensive community input to deliver an expanding array of new cultural and recreational amenities 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.

Sincerely,

John Lyell  
92508



## Cindy Camargo

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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 sunset 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.

Sincerely,  
John Viafora  
Indigo point 92508, Orange Crest

Sent from my iPhone

## Cindy Camargo

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**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 sunseting 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.

Sincerely,

John W. Hagmann,  
Mission Grove, 92506

Sent from my Verizon, Samsung Galaxy smartphone

## Cindy Camargo

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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 sunseting 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.

Sincerely,

Josie Sosa  
92508

Josie Sosa

## Cindy Camargo

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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 sunset 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.

Sincerely,

Kristy Doty  
92508

Sent from my iPhone

## Cindy Camargo

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**From:** Lenora Mitchell <raeturner@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 sunset 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. 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

## Cindy Camargo

---

**From:** Linda Tingly <linda.tingly@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 sunset 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.

Sincerely,

Linda Rivera  
92508

Sent from my iPhone

## Cindy Camargo

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**From:** Linda Tingly <linda.tingly@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 sunset 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.

Sincerely,

Blanca Rivera  
92508

Sent from my iPhone

## Cindy Camargo

---

**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 sunset 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.

*\*\*\*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 its 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.

Sincerely,

Lisa Alfred,  
92504



## Cindy Camargo

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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 sunseting 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.

Sincerely,

Luis Rodriguez  
Orangecrest 92508

## Cindy Camargo

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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 sunseting 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.

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.

Sincerely,

Mark Calhoun  
92508

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## Cindy Camargo

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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 sunseting 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.

Sincerely,  
Mary Peters  
92508

Sent from my iPhone

## Cindy Camargo

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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 sunseting 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.

Sincerely,

matt Silveous  
92508

## Cindy Camargo

---

**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.

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 should have been drafted years before the 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.

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.

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

## Cindy Camargo

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**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 sunseting 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. Sincerely, <name>  
<zip code>

## Cindy Camargo

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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 sunseting 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 & Sandra Cook 92508



## Cindy Camargo

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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 sunseting 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 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.

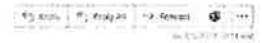
Sincerely,

Mike Cachat  
92507

Public comment for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304

Mike Cachat (mikecachat@earthlink.net)  
Cc: mcache@earthlink.net

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.



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 sunset in July 2025.

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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

Mike Cachat  
Founder and CEO  
o 1 (951) 544-1022  
m mcache@earthlink.net  
w www.mcache.com  
1616 Eastwood Ave, Riverside, CA 92507

## Cindy Camargo

---

**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.

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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

## Cindy Camargo

---

**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 sunset 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. Sincerely,

Randall Lindegard  
20769 Freeport Dr  
Riverside CA 92508

## Cindy Camargo

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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 sunseting 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.

Sincerely,

Raymond Or  
CA 92508

## Nina Schumacher

---

**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 sunseting 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,

Steve Balmer  
92508

## Nina Schumacher

---

**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 sunseting in July 2025.

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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

## Nina Schumacher

---

**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 sunseting 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.

Sincerely,

Steven McElroy  
92508

Sent from my iPhone



## Nina Schumacher

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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 sunseting 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. Our community deserved better.

Sincerely,

Suzanne Page  
92508

Sent from my iPhone

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Tia Ballesteros  
92508

## Nina Schumacher

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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 sunseting 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. 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

## Nina Schumacher

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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 sunseting 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.

Sincerely,

William Landa  
92518

## Nina Schumacher

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**From:** Linda Tingly <linda.tingly@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 sunseting 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.  
Linda Tingly Rivera  
92508

Sent from my iPhone

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Christine Martin  
92506

## Nina Schumacher

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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 sunseting 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,  
David Doty  
92508

Sent from my iPhone

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Estevan J Gonzalez  
92507



## Nina Schumacher

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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 sunseting 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.

Sincerely,

Frank and Michelle Erdodi  
92508

Sent from my iPad

## Nina Schumacher

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**From:** John Alfred <jandalalfred@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 sunset 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.

*\*\*\*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 its 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.

Sincerely,

Lisa Alfred,  
92504

## Nina Schumacher

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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.

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 sunset 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,

Molly Brooke Becker  
92506

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Nancy Ward  
92504

## Nina Schumacher

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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 sunseting 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,

Abdallah Karim  
92508

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Amber Peaslee  
92508

## Nina Schumacher

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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.

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 sunset 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 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. 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

## Nina Schumacher

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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 sunseting 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.

Sincerely,

<name>  
<zip code>

Jenna Pontious She/Hers  
C is for Cookie   
Sent from my iPad



## Nina Schumacher

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**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.

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.

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 sunseting 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. We want better for our community as a whole.

Sincerely,  
Lindsay Barnes  
92506

## Nina Schumacher

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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 sunseting 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. 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!

Sincerely,

Mary Viafora  
92508

Sent from my iPhone

## Nina Schumacher

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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 sunseting 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

## Nina Schumacher

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**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 sunseting in July 2025.

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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

## Nina Schumacher

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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 sunseting in July 2025.

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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

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Brian Barnes  
92506

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Brian Wardle  
Orangecrest Neighborhood  
92508

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Cindy Chiek  
92508



## Nina Schumacher

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**From:** David Quirarte <davidquirarte14455@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 sunset 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.

Sincerely,

David Quirarte

92507

## Nina Schumacher

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**From:** Elizabeth Iribe <elizabeth.iriibe@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 sunseting 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.

Sincerely,

Elizabeth Iribe, LMFT, Psy. D.  
Psych Social Worker

## Nina Schumacher

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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.

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.

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.

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.

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.

## Nina Schumacher

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**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 sunseting 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.

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).

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,  
Esmeralda M 92553

## Nina Schumacher

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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 sunseting in July 2025.

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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

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.

Sincerely,  
Faith J. Mata



**Faith Mata**

STORE ASSOCIATE I

o. 19513002877

e. [fmata@jensonusa.com](mailto:fmata@jensonusa.com) | w. [JensonUSA.com](http://JensonUSA.com)

1615 Eastridge Ave. Riverside, CA 92507



## Nina Schumacher

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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 sunseting 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.

Sincerely,

Michele Bello Muehls  
Hawarden, 92506

Sent from my iPhone

## Nina Schumacher

---

**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 sunseting 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.

Sincerely,

Nicolette Rohr  
92506

## Nina Schumacher

---

**From:** Patrick Traylor <ptraylor@jensonusa.com>  
**Sent:** Monday, January 8, 2024 4:44 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 sunseting 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. This area can provide much more to the community than just empty warehouses that plague this area, as it sits on a plateau with 360 degree view of the surrounding area. This is an asset that would be wasted in its current plan. I feel sorrow for those in the community that are immediately impacted by this project. The Mission Grove area is a thriving Southern California community, and this does nothing to support it. An industrial plan is not the answer for this land.

Sincerely,

Patrick Traylor  
92504



**Patrick Traylor**  
Replenishment Manager  
o.  
e. [ptraylor@jensonusa.com](mailto:ptraylor@jensonusa.com) | w. [JensonUSA.com](http://JensonUSA.com)  
1615 Eastridge Ave. Riverside, CA 92507





**Nina Schumacher**

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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.

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.

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 sunseting 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.

Sincerely,

Ryan Pezer  
92501

## Nina Schumacher

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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 recirculated draft still does not address the concerns of community members, whose lives will be directly impacted by this environmentally costly project.

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.

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.

Sincerely,

Senanu Spring-Pearson  
Riverside, CA 92506

## Nina Schumacher

---

**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 sunseting 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,

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Laila Derak  
92882

## Nina Schumacher

---

**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 sunset in July 2025.

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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](mailto:smclean@jensonusa.com) | w. [JensonUSA.com](http://JensonUSA.com)  
1615 Eastridge Ave. Riverside, CA 92507





## Nina Schumacher

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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 sunseting 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

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Annabelle Porter  
92508



## Nina Schumacher

---

**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 sunseting 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. Thank you for your time and attention to my request.

Sincerely,

Gabriella Zlaket  
92508

Sent from my iPhone

## Nina Schumacher

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**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 sunseting 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.

Sincerely,

James Mysliwicz  
20672 Iris Canyon Rd  
Riverside, CA 92508  
702-281-8375

## Nina Schumacher

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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.

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 sunseting 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.

Sincerely,  
Jeanette Sharpe  
Agapanthus Court, 92508

\*Grove Community neighborhood backing to the fields for the proposed warehouses

## Nina Schumacher

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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 sunseting 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.

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.

Sincerely,

Kelly Wrightstone

92508

## Nina Schumacher

---

**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 sunseting 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. This impacts our way of living, the added traffic and pollution will affect our lives in a negative way.

Sincerely,

Patricia Welbourne  
92508

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*Trish*  
*Volunteer Adoption Coordinator*

## Nina Schumacher

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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 sunseting in July 2025.

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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

## Nina Schumacher

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**From:** Arianna Thornton <ariannagr@hotmai.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 sunseting 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](#)

## Nina Schumacher

---

**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 sunset in July 2025.

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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.

Sincerely,  
Allison Shelton  
Orange Crest community member  
92508



## Nina Schumacher

---

**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 sunseting 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 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.

Sincerely,

Elias Valencia  
Mission Grove Resident

## Nina Schumacher

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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 sunseting 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.

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.

Sincerely,  
Michael Hampton  
92506

## Nina Schumacher

---

**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 sunseting 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,

Tim Martin  
92506

## Nina Schumacher

---

**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 sunseting 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.

Sincerely,

Carlos Lliguin  
92508

## Nina Schumacher

---

**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 sunseting in July 2025.

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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>

## Nina Schumacher

---

**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

## Nina Schumacher

---

**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 sunset 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

## Nina Schumacher

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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 sunseting in July 2025.

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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



## Nina Schumacher

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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 sunseting in July 2025.

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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

## Nina Schumacher

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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 sunseting in July 2025.

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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

## Nina Schumacher

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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 sunseting in July 2025.

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Dwight Woodward

## Nina Schumacher

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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 sunseting in July 2025.

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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,

Everardo Carvajal

92501

## Nina Schumacher

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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 sunseting 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. No more warehouses. The community deserves better!

Sincerely,  
Fernando Jose  
92501

## Nina Schumacher

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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 sunseting in July 2025.

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As the community has continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

## Nina Schumacher

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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 sunseting in July 2025.

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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



**Nina Schumacher**

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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 sunseting in July 2025.

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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

## Nina Schumacher

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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 sunseting in July 2025.

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## Nina Schumacher

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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 sunseting in July 2025.

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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

## Nina Schumacher

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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 sunset in July 2025.

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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

## Nina Schumacher

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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 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,

Alejandra Joseph  
92506

## Nina Schumacher

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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 sunseting in July 2025.

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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

## Nina Schumacher

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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 sunseting in July 2025.

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Respectfully,  
George Robledo  
M: 951-796-2743

Sent from my iPhone

## Nina Schumacher

---

**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 sunseting in July 2025.

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Respectfully,  
George Robledo  
M: 951-796-2743

Sent from my iPhone



## Nina Schumacher

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**From:** Jorge Robledo <jorge\_robledo@icloud.com>  
**Sent:** Saturday, January 13, 2024 6:47 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,

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 sunseting in July 2025.

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Respectfully,  
George Robledo  
M: 951-796-2743

Sent from my iPhone

## Nina Schumacher

---

**From:** John Ramirez <mavonyour6@icloud.com>  
**Sent:** Saturday, January 13, 2024 12:16 PM  
**To:** Dan Fairbanks  
**Subject:** Sycamore canyon

To: [fairbanks@marchjpa.com](mailto:fairbanks@marchjpa.com)  
Bcc: [rivnowgroup@gmail.com](mailto: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 sunseting in July 2025.

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As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

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.

Sincerely,

John Ramirez  
92336

## Nina Schumacher

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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 sunseting 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.

Sincerely,  
Mario Salgado  
Orangecrest Resident

Sent from Yahoo Mail - [Shop Smart](#), [Shop Organized](#)

## Nina Schumacher

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**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 sunseting 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,

Milton Solorzano

92563

## Nina Schumacher

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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.

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,  
Nick Ryan  
92504

## Nina Schumacher

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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 sunset 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

Respectfully,  
George Robledo  
M: 951-796-2743

Sent from my iPhone



## Nina Schumacher

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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.

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,  
Bobby Vacco  
92882

## Nina Schumacher

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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.

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,  
Aaron Bernstein  
92324

Sent from my iPhone

## Nina Schumacher

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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.

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,

Aaron Peterson

92081

## Nina Schumacher

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**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.

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,  
Alex Allred  
91765

## Nina Schumacher

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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.

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,  
Angel Roldan  
92253

I've 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 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.

## Nina Schumacher

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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.

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,

Anthony Jones  
92392

Sent from my iPhone

## Nina Schumacher

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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.

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,

Jake

92605

Sent from my iPhone

## Nina Schumacher

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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.

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 befriended 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.

Sincerely,

Christopher Manivong  
91706



## Nina Schumacher

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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

## Nina Schumacher

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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

## Nina Schumacher

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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.

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.

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.

Thank you for considering my views on this important matter.

Sincerely,  
debora trujillo  
91748

Sent from my T-Mobile 5G Device

## Nina Schumacher

---

**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.

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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.

-Ethan Ortega

## Nina Schumacher

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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.

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,

Frank Ramirez  
Kraken Insurance Services

92584



## Nina Schumacher

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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 sunseting 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.

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.

Thanks,

Jaime Tatenco  
Field Service Tech | Captiveaire  
P: 323-633-3488  
jaime.tatenco@captiveaire.com  
business P: 760-290-1271

## Nina Schumacher

---

**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.

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,  
Janette Aragon  
91786

Janette Aragon

## Nina Schumacher

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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 sunseting in July 2025.

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Get Outlook for iOS



## Nina Schumacher

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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.

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,  
Keri  
92371

Sent from my iPhone

## Nina Schumacher

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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.

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,  
Kristen Lane  
92805

Sent from my iPad

## Nina Schumacher

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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 sunseting in July 2025.

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## Nina Schumacher

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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.

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,  
Michael Burt  
91761

Sent from my iPhone

## Nina Schumacher

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**From:** Heinrich Paul Pastor <heinrichpaulpastor@gmail.com>  
**Sent:** Sunday, January 14, 2024 1:34 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 sunseting in July 2025.

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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".

Blessings,

Paul Pastor  
Riverisde CA

## Nina Schumacher

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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.

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.

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.

Thank you for considering my views on this important matter.

Sincerely,

Richard Gate  
951 Bikes  
Moreno Valley

## Nina Schumacher

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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.

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,

Robert sanderson  
92503

Sent from my iPhone

## Nina Schumacher

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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.

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,  
Victor Reyes  
92555



## Nina Schumacher

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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.

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,

Brendon Allen

91786

## Nina Schumacher

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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.

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,  
Christian Kasey  
95062

Chris Kasey  
(831) 234-7772  
1287 Brommer St.  
Santa Cruz, CA 95062

## Nina Schumacher

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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 sunseting 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.

There is a vibrant community of hikers and bikers that use this land. Please consider the opportunity cost of developing it into warehouses.

Sincerely,

Damon Monticello  
92507

Damon Monticello  
Jenson USA Warranty  
dmonticello@jensonusa.com



**Damon Monticello**

o. 19513002949

e. [dmonticello@jensonusa.com](mailto:dmonticello@jensonusa.com) | w. [JensonUSA.com](http://JensonUSA.com)

1615 Eastridge Ave. Riverside, CA 92507



## Nina Schumacher

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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.

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,  
Erik Ramirez  
92583

## Nina Schumacher

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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.

Moreover, I urge you to consider non-industrial alternatives for the West Campus Upper Plateau. The community loves the preserve and it has so many use cases that benefit the general public. I really hope this does not go through

Thank you for considering my views on this important matter.

Sincerely,

Gared Lin

92354

## Nina Schumacher

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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.

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,  
George fickett  
92399

Sent from my iPhone

## Nina Schumacher

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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 sunset 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

Respectfully,  
George Robledo  
M: 951-796-2743

Sent from my iPhone



## Nina Schumacher

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**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 sunseting 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.

Sincerely,

Greg Renne  
92508

## Nina Schumacher

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**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.

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

Guillermo Trujillo

91748

## Nina Schumacher

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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.

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,  
Daniel Cuevas  
91106

Sent from my iPhone

## Nina Schumacher

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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.

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,  
Joel macias  
92336

Sent from my iPhone

## Nina Schumacher

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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

## Nina Schumacher

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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.

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,

Matthew Muzzy

91786

## Nina Schumacher

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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.

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,

Mike savicky

92883

## Nina Schumacher

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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.

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,  
Sabrina Walsberg  
92563



## Nina Schumacher

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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.

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,

Sean Donovan

92883

## Nina Schumacher

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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.

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.

We want to protect this land for the community! Thank you for considering my views on this important matter.

Sincerely,  
Shiloh Sanders  
92083

## Nina Schumacher

---

**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.

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,

Derrick Sartain

92335

## **Nina Schumacher**

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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.

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,

*Sterling Martin*

92506

## Nina Schumacher

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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.

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,

Taylor Spinogatti  
92882

## Nina Schumacher

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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.

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 sunset 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,

Preston Jordan Jr.



## Nina Schumacher

---

**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.

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,

Devon Hauser

92882

Sent from my iPhone



## Nina Schumacher

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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.

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,  
Aaron Solis  
92507

Sent from my iPhone

## Nina Schumacher

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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.

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,  
Al Serna  
92508

Al Serna

## Nina Schumacher

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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 sunseting 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. 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.

Sincerely,  
**ANDREA WOOD**  
Riverside, CA 92521

## Nina Schumacher

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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.

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,  
Blake Rossi  
93561

Sent from my iPhone

## Nina Schumacher

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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 term 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 sunseting 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.

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

## Nina Schumacher

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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.

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.

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.

Thank you for considering my views on this important matter.  
Sincerely,  
Brian Backman  
92505

Sent from Yahoo Mail on Android

## Nina Schumacher

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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 sunseting 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"

Sincerely  
CJ

Zip code: 92694  
Address: 1 merriam st.

## Nina Schumacher

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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.

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.

Thank you for considering my views on this important matter.

Sincerely,

Daniel Beveridge

92883



## Nina Schumacher

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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 sunseting 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 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

## Nina Schumacher

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**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 sunseting 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,

Eunhee Kim  
Raleigh, NC 27615

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Fera S.Momtaz  
Orange Crest community  
92508

Sent from my iPhone

## Nina Schumacher

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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.

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,  
Gerald Tiangco  
92555

Sent from my iPhone

## Nina Schumacher

---

**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.

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,

Jason  
92563

Sent from my iPhone

## Nina Schumacher

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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.

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.

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.

Sincerely,

Juan Garcia  
Syracuse Street 92508

## Nina Schumacher

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**From:** Kelsey Dorfmeier <k.dorfmeier@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.

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,  
Kelsey Dorfmeier  
92508

Sent from my iPhone

## Nina Schumacher

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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.

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,  
Kyle cregg  
92882

Sent from my iPhone



## Nina Schumacher

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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 sunset 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.

Sincerely,

Larry Iest  
92508

## Nina Schumacher

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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 sunset 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. 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

## Nina Schumacher

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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 sunseting 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,

Matt Silveous  
92508

## Nina Schumacher

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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.

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,

Matthew Petersen

90290

## Nina Schumacher

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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.

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,  
Michael Messer  
92507

Sent from my iPhone

## Nina Schumacher

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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 sunseting 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

## Nina Schumacher

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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 sunseting 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,

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Dr. Scott Barlow  
92508



## Nina Schumacher

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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 50 years. 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.

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 sunset 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.

Sincerely,

Shawn McDonald  
92530

## **Nina Schumacher**

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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 sunseting 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.

**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

## Nina Schumacher

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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 sunset 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.

Sincerely,  
Francisco Sola  
92506

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Lon Walcker  
92506

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Molly Nazeck  
Green Acres resident 92518

## Nina Schumacher

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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.

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,  
David Chavers  
92562

Sent from my iPhone

## Nina Schumacher

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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.

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,  
Larry Colen  
92507

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Larry Colen  
lrc@red4est.com sent from ret13est

## Nina Schumacher

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**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 sunseting 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.

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.

Sincerely,  
E. N. Anderson  
1846 Blgelow Rd., Riverside 92506  
<name>  
<zip code>



## Nina Schumacher

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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 sunseting 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

*Jay Davis*

## Nina Schumacher

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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

## Nina Schumacher

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**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 sunseting 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.

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.

Finally, as the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

John Alfred  
92504

## Nina Schumacher

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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 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.

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

## Nina Schumacher

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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.

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.

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.

Sincerely,  
Erika, Miles, and Gwen Cruz  
92508

## Nina Schumacher

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**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 sunseting 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.

Sincerely

Janet Bernabe  
92571

[bernabejanet22@gmail.com](mailto: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

## Nina Schumacher

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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.

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.

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.

Sincerely,  
Leo Cruz  
92508

## Nina Schumacher

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**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.

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.

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.

Sincerely,  
Leonides Cruz II  
92508



## Nina Schumacher

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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.

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.

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.

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. 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. 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.

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 sunseting 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.

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.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Uribe', written in a cursive style.

Sira Uribe  
President, LULAC of Riverside, Council #3190

## Nina Schumacher

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**From:** Bertha Morales <berthamoralesrealor@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 sunseting 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,

Bertha Morales  
92507

## Nina Schumacher

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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.

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,  
Michael  
92672

Sent from my iPhone

## Nina Schumacher

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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 sunseting 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 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

## Nina Schumacher

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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.

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,

Branden Aguilera  
92405



**Branden 'BZ' Aguilera**

Creative Direction | Design | Communications

[www.BZealous.com](http://www.BZealous.com)

txt: 909-991-3441

## Nina Schumacher

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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 sunseting 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



## Nina Schumacher

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**From:** Aaron Bushong <aaron.bushong@verizon.net>  
**Sent:** Monday, January 29, 2024 6:55 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW, like myself, are disgusted by the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged.

Additionally, R-NOW members have sent hundreds of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. The MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed Zoom access in May, 2023, making the 3 PM meetings even more inaccessible. The MJPA has demonstrated that it is comprised of cowards who are intentionally hiding from the public because they recognize that their actions are disgraceful and shameful.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so. Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Thank you,  
Aaron Bushong  
24-year resident of the Orangecrest neighborhood (92508)

## Nina Schumacher

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**From:** peasleeamber <peasleeamber@gmail.com>  
**Sent:** Monday, January 29, 2024 1:56 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Amber & Jonathan Peaslee  
92508

## Nina Schumacher

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**From:** Amisha Shah <amiaj2008@gmail.com>  
**Sent:** Monday, January 29, 2024 4:01 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Amisha Shah  
92508

## Nina Schumacher

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**From:** aramjim09@gmail.com  
**Sent:** Monday, January 29, 2024 6:31 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Ana Ramirez  
92508

Sent from my iPhone

## Nina Schumacher

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**From:** aramjim09@gmail.com  
**Sent:** Monday, January 29, 2024 6:31 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Ana Ramirez  
92508

Sent from my iPhone

## Nina Schumacher

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**From:** ANTHONY SCIMIA JR <tscimia@sbcglobal.net>  
**Sent:** Monday, January 29, 2024 2:07 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Anthony Scimia Jr  
20829 Indigo Point,  
Riverside CA, 92508  
Orangecrest

Sent from my iPhone

## Nina Schumacher

---

**From:** Eunhee Kim <eunster@yahoo.com>  
**Sent:** Monday, January 29, 2024 1:02 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

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Sincerely,

Eunhee Kim  
Raleigh, NC 27615

## Nina Schumacher

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**From:** fera momtaz <fera\_momtaz@yahoo.com>  
**Sent:** Monday, January 29, 2024 7:50 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

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Sincerely,  
Fera S.Momtaz  
Orange Crest Community  
92508

Sent from my iPhone



## Nina Schumacher

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**From:** Ira and Rajean Long <longfam6@att.net>  
**Sent:** Monday, January 29, 2024 4:29 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Ira and Rajean Long  
Mission Grove, 92506

## Nina Schumacher

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**From:** Janice Oien <gdojlo@yahoo.com>  
**Sent:** Monday, January 29, 2024 7:50 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
<name>  
<zip code>

Sent from my iPhone

## Nina Schumacher

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**From:** Jennifer Zamora <jen.zamorarios@gmail.com>  
**Sent:** Monday, January 29, 2024 1:05 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

I understand that things change and evolve, but we very much appreciate our community the way it is now. I came here 7 years ago and a major plus for me was the open space around this community to breath. We live in nothing but warehouse. We already have huge ones off Van Buren.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Jennifer Zamora  
92508

Sent from my iPhone

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Jessica Diaz

92508

## Nina Schumacher

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**From:** Joe Aklufi <jaklufi@gmail.com>  
**Sent:** Monday, January 29, 2024 12:55 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like me have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Joe Aklufi  
92506

Joe Aklufi  
(951)377-4255

## Nina Schumacher

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**From:** John Viafora <jrviafora@gmail.com>  
**Sent:** Monday, January 29, 2024 1:05 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
John Viafora,  
Indigo point, Orange Crest, 92508

Sent from my iPhone

## Nina Schumacher

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**From:** mkymsecltr <mkymsecltr@aol.com>  
**Sent:** Monday, January 29, 2024 4:39 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

<sup>79</sup>7Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
John W. Hagmann,  
Mission Grove, 92506

Sent from my Verizon, Samsung Galaxy smartphone

## Nina Schumacher

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**From:** KELLEY PAGE <kpage68684@verizon.net>  
**Sent:** Monday, January 29, 2024 4:01 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Suzanne Page  
92508

Sent from my iPhone



## Nina Schumacher

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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 sunseting 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.

Putting warehouses surrounded on 3 sides by homes, a church with daycare does not serve the community in any way.

Sincerely,

Kevin Heinemann  
92508

## Nina Schumacher

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**From:** Kevin Heinemann <kevinheinemann@gmail.com>  
**Sent:** Monday, January 29, 2024 2:21 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Clearly, MJPA does not want to have true community engagement for this project. The warehouse project provides zero benefit to the community. It only brings additional traffic, noise and air pollution. We don't need more warehouses in our neighborhoods.

Sincerely,  
Kevin Heinemann  
92508

## Nina Schumacher

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**From:** K Doty <dkdoty2@gmail.com>  
**Sent:** Monday, January 29, 2024 5:57 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The community and people (us!) who are most impacted deserve to have a voice in how the land is developed. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible. Why was the zoom option removed?

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Kristy Doty  
92508

Sent from my iPhone

## Nina Schumacher

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**From:** Larry lest <iestlarry@gmail.com>  
**Sent:** Monday, January 29, 2024 2:56 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Larry lest  
92508

## Nina Schumacher

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**From:** Lawren Dak <lawrendak@sbcglobal.net>  
**Sent:** Monday, January 29, 2024 8:11 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

As a 42 year resident of this rural area, I would like to preserve our small town feel and not see it overrun by warehouses.

Sincerely,  
Lawren Dak  
92504

Sent from my iPhone

## Nina Schumacher

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**From:** Lenora Mitchell <rageturner@gmail.com>  
**Sent:** Monday, January 29, 2024 1:00 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely  
Lenora Mitchell  
92508

## Nina Schumacher

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**From:** Maria Rodriguez <mariarod0421@gmail.com>  
**Sent:** Monday, January 29, 2024 10:18 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Maria  
92508

## Nina Schumacher

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**From:** Mary Viafora <mlviafora@gmail.com>  
**Sent:** Monday, January 29, 2024 1:23 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged!

Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan!

Sincerely,  
Mary Viafora  
92508

Sent from my iPhone



## Nina Schumacher

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**From:** Nicolette Rohr <nicolette.rohr@gmail.com>  
**Sent:** Monday, January 29, 2024 4:29 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

I have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led, but the March JPA is trying to do it through warehouse-building consulting firms (Michael Baker) and actively avoiding community engagement.

I am also concerned the draft is not specific, targeted, concrete, nor achievable. The key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Nicolette Rohr  
Riverside, 92506

## Nina Schumacher

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**From:** Richard Stalder <xcoachrs@sbcglobal.net>  
**Sent:** Monday, January 29, 2024 5:31 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Richard Stalder  
92506

Sent from my iPad

## Nina Schumacher

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**From:** rjpeters13 <rjpeters13@yahoo.com>  
**Sent:** Monday, January 29, 2024 9:21 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

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Sincerely,  
Ronald Peters  
92508

Sent from my Galaxy

## Nina Schumacher

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**From:** Sally Quintana <quintanasb@yahoo.com>  
**Sent:** Monday, January 29, 2024 7:56 PM  
**To:** Dan Fairbanks

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Sally Quintana  
92508  
Sent from my iPhone

## Nina Schumacher

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**From:** Steven Haas <stevenghaas@icloud.com>  
**Sent:** Monday, January 29, 2024 5:47 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
<Steven Haas>  
<92506>

Sent from my iPhone

## Nina Schumacher

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**From:** Teresa Clark-Skaggs <ttskaggs@att.net>  
**Sent:** Monday, January 29, 2024 2:14 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Teresa Clark-Skaggs  
92508

Sent from my iPhone

## Nina Schumacher

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**From:** TOM PARKINSON <tbckp@aol.com>  
**Sent:** Monday, January 29, 2024 2:34 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Brenda Parkinson  
Homeowner, tax payer and voter  
92508

Sent from my iPad

## Nina Schumacher

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**From:** Veronica Juarez <vjuarez0326@gmail.com>  
**Sent:** Monday, January 29, 2024 5:01 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

I have school age children who need to be picked up from school and that time slot is always impossible to make.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Veronica Juarez  
Orangecrest 92508



## Nina Schumacher

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**From:** nora jones <jnora893@gmail.com>  
**Sent:** Monday, January 29, 2024 1:32 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Victoria  
Riverside, 92508

Sent from my iPhone

## Nina Schumacher

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**From:** matt silveous <mattsilveous1812@gmail.com>  
**Sent:** Monday, January 29, 2024 1:22 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Matt Silveous  
92508

## **Nina Schumacher**

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**From:** Andrea Wood <andrea.wood@ucr.edu>  
**Sent:** Tuesday, January 30, 2024 12:20 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
**ANDREA WOOD**  
Riverside, CA 92521

## Nina Schumacher

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**From:** Carolyn Rasmussen <cgrasmus@gmail.com>  
**Sent:** Tuesday, January 30, 2024 5:30 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Carolyn Rasmussen  
92508

Sent from my iPhone

## Nina Schumacher

---

**From:** christine martin <cmcelsemartin@gmail.com>  
**Sent:** Tuesday, January 30, 2024 4:31 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Christine Martin  
92506

## Nina Schumacher

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**From:** Palafox, Daniel <DPalafox@riversideca.gov>  
**Sent:** Tuesday, January 30, 2024 10:34 AM  
**To:** Dan Fairbanks  
**Cc:** Guzman, Rafael; Tinio, Maribeth; Lilley, Jennifer; Taylor, Matthew  
**Subject:** City of Riverside's Review of a Draft Environmental Justice Element  
**Attachments:** Citywide Community Engagement Toolkit.pdf; Citywide Community Engagement Policy.pdf; 2024-01-30 MJPA Draft EJ Element Comment Memo.pdf

Hi Dan,

Please see the attached comment letter regarding the City's review of a draft Environmental Justice Element. I've also included the Citywide Community Engagement Policy/Toolkit as referenced in the letter.

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



**Daniel Palafox | Associate Planner**  
City of Riverside | Planning Division  
3900 Main Street, Riverside, CA 92522  
E: [dpalafox@riversideca.gov](mailto:dpalafox@riversideca.gov)  
P: 951-826-5985

Stay in-the-know with all things Riverside! Connect with us at [RiversideCA.gov/Connect](https://www.riversideca.gov/Connect).

## Nina Schumacher

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**From:** David Drexler <drxman@att.net>  
**Sent:** Tuesday, January 30, 2024 7:59 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks: Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02. Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy. Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible. In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so. Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan. Sincerely,

Mr. Fairbanks,

Listen to the community, and stop the building of warehouses in our areas. You're helping to ruin numerous residential communities.

David Drexler  
92506

## Nina Schumacher

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**From:** fera momtaz <fera\_momtaz@yahoo.com>  
**Sent:** Tuesday, January 30, 2024 1:00 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
<name>  
<zip code>

Sent from my iPhone



## Nina Schumacher

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**From:** Gayle Dicarlantonio <gayledmail@gmail.com>  
**Sent:** Tuesday, January 30, 2024 6:36 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
<name>  
<zip code>

## Nina Schumacher

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**From:** J Gonsman <teamgonsman@yahoo.com>  
**Sent:** Tuesday, January 30, 2024 7:31 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,

Jason Gonsman  
92508

## Nina Schumacher

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**From:** Jean Aklufi <jeanaklufi@gmail.com>  
**Sent:** Tuesday, January 30, 2024 2:27 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

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Sincerely,  
Jean Aklufi  
92506

Jean

## Nina Schumacher

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**From:** Dr. Grace Martin  
**Sent:** Tuesday, January 30, 2024 9:16 AM  
**To:** Dan Fairbanks; Sarah.Owsowitz  
**Cc:** Thomas.rice  
**Subject:** Fwd: [EXTERNAL] Recirculated Draft EIR, Meridian West Campus Upper Plateau

Fyi

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**From:** Perry, Jim <JPerry@riversideca.gov>  
**Sent:** Friday, January 5, 2024 6:13:05 PM  
**To:** Dr. Grace Martin <martin@marchjpa.com>  
**Subject:** Fwd: [EXTERNAL] Recirculated Draft EIR, Meridian West Campus Upper Plateau

FYI

Jim Perry  
City Council, Ward 6

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**From:** Jerry Shearer Jr. <jsydor@yahoo.com>  
**Sent:** Friday, January 5, 2024 5:23:23 PM  
**To:** Conder, Chuck <CConder@riversideca.gov>; Perry, Jim <JPerry@riversideca.gov>  
**Subject:** [EXTERNAL] Recirculated Draft EIR, Meridian West Campus Upper Plateau

**CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.**

Hello Council members Conder and Perry.

On behalf of the residents of Riverside and members of Riverside Neighbors Opposing Warehouses (R-NOW), I am emailing you today to share with you my objection to the project proposed in the draft and recirculated draft EIR for the March JPA West Camus Upper Plateau. I will be submitting a lengthy comment letter in response to this EIR, and rather than ask you to submit a comment letter to Dan Fairbanks of the March JPA, which I do not believe you can, I thought I should explain why the community objects to the recirculated draft EIR.

While I realize the project is outside of City of Riverside borders, it is within the OrangeCrest community, the community I live in, and it will negatively impact the City and the lives of thousands of residents. You and I have talked about this project in the past and I hope you now understand just how bad it is for Riverside residents. Outside of some revenue the City would take for allowing this project to be built as proposed, there are no benefits to anyone in the public or the City government from its existence, but there are numerous negative impacts that the developer will not mitigate. The following areas of the recirculated draft EIR are unstable, dismissive, and deceptive to the public.

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. The 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 which would require its own environmental review and EIR process. It would make sense then for the JPA to enact a temporary moratorium on new projects, especially warehouses, until the EJ element process is complete. I would ask you to consider discussing this at the next Commission meeting.
2. Page 3-24 of the REIR refers to community benefits, including a park. Simply put, this park is not real. The developer has made clear they will only fund a "park feasibility study" and that neither they nor the JPA nor the County will fund. The soonest the community might expect a park is in the year 2042 when the City of Riverside is eligible to annex this land. There is no park, and therefore, no community benefit.
3. 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 I object to the JPA giving this developer another long-term 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 that the County will inherit afterwards.
4. 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. The JPA staff claim they cannot tell the applicant what projects to propose, but that is naïve and ignores the General Plan that specifically calls for diverse land uses on this land. 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 the JPA's continued insistence that it has engaged with the public throughout this process. These dismissive actions prioritize the pocketbooks of the applicant and its investors and the revenue of JPA member agencies instead of community development as advertised on the JPA website and within its public presentations.

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 sun-setting to push through one last warehouse project.

I am happy to talk with you about this if you have questions or concerns, and please know that I appreciate your support as residents voice our opposition to this unpopular and damaging project for our region. As a leader in our community, and someone with the important responsibility of voting on this project eventually, I hope I can count on you to represent my neighbors and I as we demand better treatment by the March JPA.

Thank you and happy New Year to you and your family.

Jerry Shearer

92508

Stay in-the-know with all things Riverside! Connect with us at [RiversideCA.gov/Connect](https://www.RiversideCA.gov/Connect).

## Nina Schumacher

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**From:** Juan Garcia <cuauhtliuer@gmail.com>  
**Sent:** Tuesday, January 30, 2024 8:58 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks,

I appreciate the opportunity to share our concerns regarding the March Joint Powers Authority's (MJPA) draft Environmental Justice (EJ) element GP #23-02. As a member of R-NOW, I feel compelled to express our collective misgivings about the current approach to developing this EJ element.

Firstly, it is our firm belief that a community engagement process should be intentional and community-led. Unfortunately, the MJPA seems to be employing warehouse-building consulting firms, such as Michael Baker, to drive this process. We find this approach neither valid nor reasonable when crafting a policy as crucial as Environmental Justice.

Our reservations are further compounded by instances of the MJPA willfully refusing community engagement. A prime example is the rejection of the proposal for a community advisory board, despite around 40 R-NOW members requesting it during a public comment session in January 2023. The MJPA CEO dismissed the idea, citing the MJPA's impending sunset, and subsequent requests for reconsideration have been consistently ignored.

Furthermore, our attempts to facilitate public meetings at night for increased community participation have been met with resistance. Although the MJPA scheduled a single evening public comment period in January 2023, subsequent actions, such as removing Zoom access in May 2023, have hindered accessibility and participation.

In essence, the March JPA has not demonstrated a commitment to implementing any meaningful community engagement policies, dismissing our repeated entreaties to do so.

Adding to our concerns is the lack of specificity, targeting, concreteness, and achievability in the draft EJ Element. Given that the MJPA is set to exist for only another 18 months, our primary concern is the absence of a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. We strongly urge you to prioritize the implementation of such a moratorium in the final EJ plan to prevent further cumulative impacts on the disproportionately affected communities within the planning area.

In conclusion, we implore the MJPA to reconsider its approach, prioritize genuine community engagement, and address the pressing issue of warehouse and industrial development. Failing to do so will not only undermine the credibility of the EJ element but will also perpetuate environmental injustices in the affected communities.

Sincerely,  
Juan Garcia  
Syracuse St, 92508

## Nina Schumacher

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**From:** Melody Clark <melodyeclark@icloud.com>  
**Sent:** Tuesday, January 30, 2024 8:40 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent hundreds of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Melody Clark  
92506

Sent from my iPad



## Nina Schumacher

---

**From:** Nicole Bernas <onecosmiclove@icloud.com>  
**Sent:** Tuesday, January 30, 2024 5:43 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan and engage the community these projects will impact.

Thank you.

Sincerely,  
Nicole Bernas  
92508



## Nina Schumacher

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**From:** Shaan Saigol <shaansaigol@gmail.com>  
**Sent:** Tuesday, January 30, 2024 6:42 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

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Sincerely,  
Shaan Saigol  
Orangecrest neighborhood, 92508

## Nina Schumacher

---

**From:** Abdallah Karim <akarim23@gmail.com>  
**Sent:** Wednesday, January 31, 2024 6:59 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Abdallah Karim  
92508

## Nina Schumacher

---

**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.

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 sunseting 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 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

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**Ciro Guzman**

o.  
e. [cguzman@jensonusa.com](mailto:cguzman@jensonusa.com) | w. [JensonUSA.com](http://JensonUSA.com)  
1615 Eastridge Ave. Riverside, CA 92507



## Nina Schumacher

---

**From:** david doty <animal.adventure.army@gmail.com>  
**Sent:** Wednesday, January 31, 2024 7:09 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

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Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
David Doty  
92508

Sent from my iPhone

## Nina Schumacher

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**From:** L S <nichole19161@gmail.com>  
**Sent:** Wednesday, January 31, 2024 3:14 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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In other words, the March JPA has not seen fit to implement **any** community engagement policy and rejected our passionate request to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your priority needs to be a **moratorium** on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Laura Sandidge  
92508

## Nina Schumacher

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**From:** Lisa Everson <leverson@earthlink.net>  
**Sent:** Wednesday, January 31, 2024 7:19 AM  
**To:** Dan Fairbanks  
**Subject:** Warehouse Development

To: fairbanks@marchjpa.com (mailto:fairbanks@marchjpa.com)Subject: Comment for Environmental Justice element GP #23-02 Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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My community is already severely impacted by all of the warehouse development which has been built along the 60/215 freeways. Traffic is a nightmare, air quality is worsening, and natural areas are disappearing along with the animals and plants which inhabit them. We want to know what is being done to mitigate the effects of more truck traffic in our area. We are worried about the impact of more warehouses on our quality of life and see no positives associated with more being built.

Sincerely,

Lisa Everson  
7642 Ayr Court  
Riverside, CA 92508  
leverson@earthlink.net (mailto:leverson@earthlink.net)



## Nina Schumacher

---

**From:** Molly Nazeck <mnazeck@gmail.com>  
**Sent:** Wednesday, January 31, 2024 8:40 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

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Sincerely,  
Molly Nazeck  
Green Acres Resident, 92518

## Nina Schumacher

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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 sunseting 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

## Nina Schumacher

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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 sunseting 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 have asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

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.

Sincerely,

Nicole Bernas  
92508



## Nina Schumacher

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**From:** Cindy Jessen <cjessen022@gmail.com>  
**Sent:** Thursday, February 1, 2024 7:46 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Cynthia Jessen  
92508

## Nina Schumacher

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**From:** Linda Tingly <linda.tingly@yahoo.com>  
**Sent:** Thursday, February 1, 2024 8:45 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Linda Tingley Rivera  
92508

Sent from my iPhone

## Nina Schumacher

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**From:** Mark Jessen <mclnjessen@gmail.com>  
**Sent:** Thursday, February 1, 2024 7:43 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

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Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Mark Jessen  
92508

## Nina Schumacher

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**From:** Mary Harris <mjharris157@hotmail.com>  
**Sent:** Thursday, February 1, 2024 11:32 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Mary Harris  
92508

## Nina Schumacher

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**From:** phuddle104 <phuddle104@charter.net>  
**Sent:** Thursday, February 1, 2024 11:16 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Good morning. My name is Patty Huddleston and I live in the Mission Grove north neighborhood. Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Patty Huddleston

92506



## Nina Schumacher

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**From:** Ann Marchand <ann.marchand1@gmail.com>  
**Sent:** Friday, February 2, 2024 11:43 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a **moratorium on warehouse and industrial development on the remaining parcels of March JPA land**. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Ann & Dolores Marchand  
92506

## Nina Schumacher

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**From:** Michele Muehls <michelebello@hotmail.com>  
**Sent:** Friday, February 2, 2024 6:29 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for taking the time to read this!

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Michele Muehls  
Hawarden 92506  
Sent from my iPhone

## **Nina Schumacher**

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**From:** William Landa <wisaiahlanda@gmail.com>  
**Sent:** Friday, February 2, 2024 8:05 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
William Landa  
92518

## Nina Schumacher

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**From:** Carlos Lliguin <malinalli\_1997@yahoo.com>  
**Sent:** Sunday, February 4, 2024 3:53 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

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Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Carlos Lliguin  
92508

## Nina Schumacher

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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 sunseting 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 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

## Nina Schumacher

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**From:** Linda Tingly <linda.tingly@yahoo.com>  
**Sent:** Monday, February 5, 2024 7:54 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Linda Tingly Rivera  
92508

Sent from my iPhone

## Nina Schumacher

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**From:** matt silveous <mattsilveous1812@gmail.com>  
**Sent:** Monday, February 5, 2024 3:20 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Matt Silveous  
92508

## Nina Schumacher

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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 sunseting 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.

Sincerely,  
Peter Pettis  
92508



## Nina Schumacher

---

**From:** Peter Pettis <pettis.peter@gmail.com>  
**Sent:** Monday, February 5, 2024 9:45 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Peter Pettis  
92508

## **Nina Schumacher**

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**From:** Steven Balmer <sjgbalmer@gmail.com>  
**Sent:** Monday, February 5, 2024 9:32 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

The push for warehouses will destroy the Orangecrest environment and potential harm the health of its residents.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Steve Balmer  
92508

## Nina Schumacher

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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 sunseting 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. Our community and infrastructure can no longer support more warehouses.

Sincerely,

Veronica Juarez  
Orangecrest 92508

## Nina Schumacher

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**From:** Veronica Juarez <vjuarez0326@gmail.com>  
**Sent:** Monday, February 5, 2024 8:51 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02. It is appreciated.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy. We (R-NOW members) reside in these communities and will have to live with the impact these warehouses are making on our air and land.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Veronica Juarez  
Orangecrest 92508

## Nina Schumacher

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**From:** Vicki Broach <vbroach55@gmail.com>  
**Sent:** Monday, February 5, 2024 1:50 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks,

I am writing for a second time to offer my comments on this project. I am concerned in particular about the EJ elements that were not addressed in the previous DEIR. I am a community member who lives a few miles from the project I attend concerts and events at Westmont Village. I know many of the residents and my mother has considered moving there in the next few years. If the warehouse project is approved, I would certainly discourage her and others from moving to Westmont. Riverside already struggles from a lack of suitable senior housing and this project threatens to cause a significant negative impact to one of the few senior communities of Westmont's caliber.

As a former judicial staff attorney who is familiar with CEQA law, I find it problematic that the EJ considerations were not included originally and therefore have not been scrutinized as part of the full CEQA process. Please give due consideration to community input on this highly significant issue.

Vicki Broach  
92506

## Nina Schumacher

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**From:** Vicki Broach <vbroach55@gmail.com>  
**Sent:** Monday, February 5, 2024 1:43 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,

I am writing for a second time to offer my comments on this project. I am concerned in particular about the EJ elements that were not addressed in the previous DEIR. I am a community member who lives a few miles from the project I attend concerts and events at Westmont Village. I know many of the residents and my mother has considered moving there in the next few years. If the warehouse project is approved, I would certainly discourage her and others from moving to Westmont. Riverside already struggles from a lack of suitable senior housing and this project threatens to cause a significant negative impact to one of the few senior communities of Westmont's caliber.

As a former judicial staff attorney who is familiar with CEQA law, I find it problematic that the EJ considerations were not included originally and therefore have not been scrutinized as part of the full CEQA process.

It would be appropriate to implement a warehouse moratorium until the CEQA process is complete. Only after you've completed that process should you evaluate whether the current project plan meets its standard.

As the Riverside community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Vicki Broach, Esq.  
92506

## Nina Schumacher

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**From:** Gurumantra Khalsa <gkhalsa@worldbewell.org>  
**Sent:** Thursday, February 8, 2024 12:39 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:** Public comment on record for the West Campus Upper Plateau Project, Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2021110304.pdf

Good day Mr. Faribanks. Please accept for the record the attached comment letter.

Yours in a World Being Well,

Gurumantra Khalsa  
Founder, World Be Well Org.



[www.WorldBeWell.org](http://www.WorldBeWell.org)  
4108 Watkins Dr.  
Riverside, CA 92507-4701  
951-640-3868

## Nina Schumacher

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**From:** William Landa <wisaiahlanda@gmail.com>  
**Sent:** Tuesday, February 6, 2024 9:31 AM  
**To:** Dan Fairbanks  
**Cc:** Jen L  
**Subject:** EJ Workshop Notifications

Dr. Fairbanks,

I am a resident of Green Acres, and I am looking forward to participating in the upcoming EJ workshop. I was notified by R-Now about the workshop. However, I have not received an email from the JPA as I had previously received for the first EJ workshop. Please make sure that emails are being distributed to the community as soon as possible, so that the community has ample time to participate.

Thanks,  
William Landa  
Resident of Green Acres  
(661) 202-0831





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.

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.

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 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

<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.

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 in conjunction 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 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.

Sincerely,



Gurumantra Khalsa

President, Friends of Riverside's Hills

<https://friendsofriversideshills.org>

4477 Picacho Dr.

Riverside, CA 92507-4873

## Nina Schumacher

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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:** GM\_Bio\_Add\_Value email signature.jpg; 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.

Yours in good health,

Gurumantra Khalsa  
Publisher



Nutrition News  
4108 Watkins Dr.  
Riverside, CA 92507-4701

800-784-7550  
951-784-7500  
951-848-0595 (f)

[www.NutritionNews.com](http://www.NutritionNews.com)  
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.

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.

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

**4108 Watkins Dr. Riverside CA 92507-4701 \* 951-640-3868**

[gkhalsa@WorldBeWell.org](mailto:gkhalsa@WorldBeWell.org)

[www.WorldBeWell.org](http://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.

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 sunseting 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.

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.

Sincerely,



Gurumantra Khalsa

Executive Director, World Be Well Organization

4108 Watkins Dr. Riverside CA 92507-4701 \* 951-640-3868

[gkhalsa@WorldBeWell.org](mailto:gkhalsa@WorldBeWell.org)

[www.WorldBeWell.org](http://www.WorldBeWell.org)

## Nina Schumacher

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**From:** Shirley <fungyinandjoseph@gmail.com>  
**Sent:** Thursday, February 8, 2024 9:52 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Just to let you know, members of R-NOW have misgivings about the process by which you are trying to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA tries to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, approximately 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed Zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and has rejected our entreaties.

Moreover, the draft EJ Element is not specific, targeted, concrete, or achievable. The March JPA will only exist for another 18 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,

Shirley Ng  
CA 92508

## Nina Schumacher

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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).

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 sunseting 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.**

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.**

Sincerely,

Dr. Noemi Hernandez Alexander  
92508

## Nina Schumacher

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**From:** Carlos Lliguin <malinalli\_1997@yahoo.com>  
**Sent:** Saturday, February 17, 2024 9:06 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Carlos Lliguin  
92508



## Nina Schumacher

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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

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](mailto: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

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**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](mailto:fairbanks@marchjpa.com)



***Dan Fairbanks***

**Planning Director**

***March Joint Powers Authority***

14205 Meridian Parkway, #140

Riverside, CA 92518

Phone: (951) 656-7000

Fax: (951) 653-5558

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## Nina Schumacher

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**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.

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 husband's, 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

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?

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](http://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.

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 14<sup>th</sup> 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.

The County of Riverside's Environmental Justice Element includes 77 policies, many of which are long-range goals. However, the March JPA is sunseting 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.

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
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.

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 sunseting 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 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?

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.

“A good person is the friend of all living things.”

*Brenda Shearer*

Brenda Shearer  
Riverside, CA 92508  
shearer32@verizon.net

## Nina Schumacher

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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.

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](mailto: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

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**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](mailto:fairbanks@marchjpa.com)





***Dan Fairbanks***

**Planning Director**

***March Joint Powers Authority***

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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

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?

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](http://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. 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 14<sup>th</sup> 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.

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.

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

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.



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 sunseting 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

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?

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  
 Riverside, CA 92508  
 jsydor@yahoo.com

## Nina Schumacher

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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.

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](http://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.

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.

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.
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 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 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 sunseting 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.

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.

Sincerely,

**Board of Directors  
Riverside Neighborhood Partnership**

## Nina Schumacher

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**From:** Amisha Shah <amiaj2008@gmail.com>  
**Sent:** Monday, February 12, 2024 8:48 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Amish shah  
92508

## Nina Schumacher

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**From:** Beverly Arias <beverly951@yahoo.com>  
**Sent:** Monday, February 12, 2024 11:57 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,

Beverly M. Arias  
- R- Now Supporter  
-Community Activist

-Member of Statewide  
Seiu Local 1000  
Latinx Committee

- Inland Empire Labor Council  
Delegate



## Nina Schumacher

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**From:** Brian Wardle <wardleb@gmail.com>  
**Sent:** Monday, February 12, 2024 8:36 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Brian Wardle  
Orangecrest Neighborhood  
Riverside 92508

## Nina Schumacher

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**From:** Candy Blokland <blokland@yahoo.com>  
**Sent:** Monday, February 12, 2024 8:04 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Candy Blokland  
92508

Sent from my iPhone

## Nina Schumacher

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**From:** Cindy Jessen <cjessen022@gmail.com>  
**Sent:** Monday, February 12, 2024 5:54 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Cynthia Jessen  
92508

## Nina Schumacher

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**From:** Denette Lemons <lemonsdenette@gmail.com>  
**Sent:** Monday, February 12, 2024 9:24 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Denette lemons  
92508

## Nina Schumacher

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**From:** desiree@dfriedman.com  
**Sent:** Monday, February 12, 2024 7:03 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Desiree Friedman  
92508

## Nina Schumacher

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**From:** Dolores Reyna <dtreyna@verizon.net>  
**Sent:** Monday, February 12, 2024 7:36 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

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Sincerely,

Dolores Reyna  
92508

## Nina Schumacher

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**From:** E E\_\_\_\_\_Ha\_\_ <eestrella25@msn.com>  
**Sent:** Monday, February 12, 2024 9:15 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Elisa Estrella-Hahn  
92508

## Nina Schumacher

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**From:** Eunhee Kim <eunster@yahoo.com>  
**Sent:** Monday, February 12, 2024 11:13 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,

Eunhee Kim  
Raleigh, NC 27615



## Nina Schumacher

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**From:** George Hague <gbhague@gmail.com>  
**Sent:** Monday, February 12, 2024 12:19 PM  
**To:** Dan Fairbanks  
**Subject:** Sierra Club comments on March JPA's Draft Environmental Justice Element (EJE)  
**Attachments:** Doc2.pdf

Good afternoon Mr Fairbanks,

Please confirm that you have received the attached comments from the Sierra Club on the March JPA's Draft Environmental Justice Element (EJE) in a timely manner and that you were able to open it.

Thank you,

George Hague  
Sierra Club  
Moreno Valley Group  
Conservation Chair

## Nina Schumacher

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**From:** Josie Sosa <josie.sosa@gmail.com>  
**Sent:** Monday, February 12, 2024 11:08 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

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Sincerely,  
Josie Sosa  
92508

Josie Sosa



# SAN GORGONIO CHAPTER

*Moreno Valley Group*

<https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>

Attorney General (AG) best practices for implementing Environmental Justice (EJ) elements

Mr. Dan Fairbanks,

February 12, 2024

RE: Sierra Club comments March Joint Powers Authority (JPA) Draft Environmental Justice Element(EJE).

The Sierra Club appreciates the opportunity to provide some thoughts and comments on the March Joint Powers Authority's (JPA) own Environmental Justice Element (EJE) to meet the recommendations of Senate Bill (SB) 1000 that went into effect in 2018. During the past six years the JPA should have been putting in the work to craft a very specific plan that is designed to meet the needs of the communities they could impact with their decisions. These needed to be direct, indirect, cumulative and growth inducing impacts. The Sierra Club believes this document is inadequate in addressing all of these impacts to not only those within the JPA's Planning Area Boundaries as shown in Exhibit-7, but also beyond it with the movement and pollution of toxic diesel trucks. Your own map of Senate Bill (SB) 535 Disadvantaged Communities shown in red makes it very evident that not only your entire area, but also much of the adjacent areas meet the criteria of Disadvantage Communities. Therefore this document must also address these adjacent communities whose pollution burdens are increased by actions of the JPA.

This Draft EJE needed to be specifically tailored for not only the lands within your boundaries, but also adjacent communities who suffer because of your actions. It is quite apparent that this was not done, but instead the work by another agencies was copied and passed off as the work of the JPA. This can be seen in the following:

"HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the **Salton Sea** and other bodies of water that impact air quality and water quality and seek and pursue opportunities to address impacts to the maximum extent possible, and make public the data and other information related to the status of the effort."

"HC 16.22 Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum extent possible thereby minimizing contaminated infiltration and runoff, including runoff to the **Salton Sea** and other standing bodies of water."

The Salton Sea mentioned above is at least 100 miles away for the Disadvantaged Communities in which this EJE is supposed to address and serve. It is as if the JPA hired someone who doesn't know our area and they passed off this document as a work product for lands in Exhibit -7. How is the Salton Sea impacting "water quality" for this area and how is this area causing "runoff to the Salton Sea"? The Sierra Club sees this as a major issue that cast doubt on validity of the entire Draft EJE document. We therefore strongly recommend that the entire current Draft Environmental Justice Element (EJE) be rescinded and a new one be developed that closely models the Attorney General's (AG) Best Practices for implementing Senate Bill (SB)1000 which "promotes environmental justice through local land use planning" (Page 2 AG Best Practices SB 1000 found in the first link).

The following four paragraphs come from the Attorney General's (AG) Best Practices for implementing Senate Bill (SB)1000 that the current Draft EJE fails to utilize and implement which makes it inadequate to meet the needs of the Disadvantage Communities it must protect and serve:

"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." (page 13 AG Best Practices SB 1000 first link)

"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." (Page 13 AG Best Practice SB 1000 first link)

"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." ( Page 14 AG Best Practices SB1000 first link)

“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.”** (page 14 AG Best Practices SB 1000)

Your own document reads as follows: "The goal of the Environmental Justice Element is to **ensure the consideration** of environmental justice policies, in order to improve public health and the environment within the March JPA Planning Area." Please note you are to IMPROVE PUBLIC HEALTH AND THE ENVIRONMENT. The document, however, includes the ambiguous words "**ensure the consideration**" which the AG Best Practices states you must avoid because it is vague and requires nothing.

It is with that lens of the AG’s Best Practices that all aspects of the Environmental Justice Element (EJE) needs to be developed, written and evaluated. What is presented in this EJE is ambiguous, vague and doesn’t improve public health or the environment and therefore is inadequate.

We took large portions of the Health Risk Reduction element of the document found below as an example to show how the entire EJE uses ambiguous words which are not "complete, specific, concrete, and targeted". They are also not "binding", and fail to "use mandatory language" as well as fails to "contain implementation measures".

### *Health Risk Reduction*

'This category includes policies that work towards reducing unique and compounded health risks. The following policies address pollution exposure and access to food and **encourage** safe and sanitary homes and an environment conducive to engaging in physical activity.'

HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the Salton Sea and other bodies of water that impact air quality and water quality and **seek and pursue opportunities** to address impacts to the **maximum extent possible**, and make public the data and other information related to the status of the effort.

HC 16.2 **Pursue funding and other opportunities** from state, federal, and local government and non- government sources and allocate March JPA general funds to improve public health and limit pollution exposure and promote efforts to ameliorate environmental justice constraints in environmental justice communities.

HC 16.3 **Assist communities in seeking funding** for community initiated clean air projects including the installation of on-site air monitoring equipment in areas of high exposure to air contaminants.

HC 16.4 **Pursue funding** to connect low-income residents and communities to municipal water and wastewater services. In the interim, **seek financial assistance** for septic system repair in order to limit groundwater contamination by poorly maintained septic systems or to provide for connections to wastewater systems as a viable alternative if such systems can be made readily available.

HC 16.5\* **Evaluate** the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. 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.

HC 16.6\* When developing and siting large scale logistics, warehouse and distribution projects, **address** the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019 and as may be subsequently amended.

HC 16.9 **Explore the feasibility** of creating a partnership with the South Coast Air Quality Management District (SCAQMD) to establish a mitigation program to reduce the impact of air pollution as well as assist with the implementation of air quality programs.

HC 16.11 Implement development of bicycle and pedestrian facilities to reduce dependency on fossil fuel-based transportation and **pursue funding** to implement mobility plans and projects.

HC 16.14\* Assure that sensitive receptors are separated and protected from polluting point sources, **as feasible**, including agricultural businesses that produce or use pesticides and chemical fertilizers.

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 through the use of barriers, distance, or similar solutions or measures from emission sources **when possible**.

HC 16.19 **Promote** reduction of vehicle miles traveled (VMT) by **encouraging** expanded multi-modal facilities, linkages between such facilities, and services that provide transportation alternatives, such as transit, bicycle and pedestrian modes.

HC 16.20 Facilitate an increase in transit options. In particular, coordinate with adjacent municipalities, transit providers and regional transportation planning agencies in the

development of mutual policies and funding mechanisms to increase the use of alternative transportation modes. All new development **should** contribute and invest in increasing access to public transit and multimodal active transportation infrastructure.

HC 16.22\* **Discourage** industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and **encourage** agricultural businesses to limit and **reduce the production and use of pesticides and chemical fertilizers to the maximum extent possible thereby minimizing contaminated infiltration and runoff, including runoff to the Salton Sea and other standing bodies of water.**

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.

HC 16.24\* Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria **addressing** noise, land, traffic and greenhouse gas emissions to avoid or **minimize** creating adverse conditions for adjacent communities.

The **bold oblique** words found above are examples of the problem with ambiguous wording throughout the entire Draft Environmental Justice Element (EJE) and shows another reason the entire document is inadequate to "improve public health and the environment".

The Sierra Club again strongly recommends the March Joint Powers Authority (JPA) rescind the current Draft Environmental Justice Element (EJE) for all the reasons listed above. The new version must closely model and adhere to the Attorney General's (AG) Best Practices for implementing Senate Bill (SB)1000 that "promotes environmental justice through local land use planning" (Page 2 AG Best Practices SB 1000 found in the first link). It must also be specifically tailored for not only the lands within your boundaries, but also adjacent communities who suffer additional pollution burdens because of your actions. It is quite apparent this was not done in this Draft EJE, but instead large portions of the work by another agencies was copied and passed off as the work of the March JPA. If we had more time, we could probably find where Policies HC 16.1 and HC 16.22 concerning the Salton Sea were originally used.

We also find it difficult to understand how the March JPA can justify approving one warehouse after another since the implementation of SB 1000 in 2018 without having an approved Environmental Justice Element. This is especially troubling since your entire area is designated a Disadvantaged Community as is much of the adjacent lands. Any proposals for more warehousing must be paused until there is an approved EJE which meets the recommendations we shared above.

Please keep the Sierra Club as well as myself informed of any documents and meetings related to the March Joint Powers Authority (JPA) Draft Environmental Justice Element (EJE).

Sincerely,

George Hague

Sierra Club

Moreno Valley Group

Conservation Chair

P.O. Box 1325

Moreno Valley, CA 92556-1325



## Nina Schumacher

---

**From:** Carney, Kevin P. <KCarney@socalgas.com>  
**Sent:** Monday, February 12, 2024 7:50 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

To: [fairbanks@marchjpa.com](mailto:fairbanks@marchjpa.com)

Subject: Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so. I and many of my neighbors are very concerned about the use of this federally protected wildlife area for commercial use. Additionally, we already have dozens of trucks everyday illegally using Trautwein, Allesandro, and Van Buren; this will only worsen this problem.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Kevin Carney  
8268 Laurel Ridge rd., Riverside, 92508

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This email originated outside of Sempra. Be cautious of attachments, web links, or requests for information.

## **Nina Schumacher**

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**From:** Linlin Zhao <fredzhaolin@gmail.com>  
**Sent:** Monday, February 12, 2024 9:11 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to comment on the March Joint Powers Authority (MJPA) draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW have misgivings about the process by which you attempt to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA tries to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed Zoom access in May 2023, making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Lin Zhao  
92508

## Nina Schumacher

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**From:** Tyftun20 <Tyftun20@protonmail.com>  
**Sent:** Monday, February 12, 2024 4:53 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

I appreciate the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged.

Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. Most residents work full-time and cannot afford to miss work which gives the impression of intentionally. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible. In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Lastly, warehouses surrounding family homes are a shameful and potentially dangerous legacy for the March JPA to put upon a vulnerable community without adequate opportunities for representation.

Sincerely,

Maria Estabrooks  
92508 Neighborhood

Sent from ProtonMail Mobile

## Nina Schumacher

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**From:** Mark Jessen <mclnjessen@gmail.com>  
**Sent:** Monday, February 12, 2024 5:52 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Mark Jessen  
92508

## Nina Schumacher

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**From:** Mike Munoz <mikmunoz1111@gmail.com>  
**Sent:** Monday, February 12, 2024 11:07 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Mike Munoz  
92508



## **GP 23-02 March JPA Environmental Justice Element**

Approximately 4,400 acres of the former March Air Force Base now within the March Joint Powers Authority

# MARCH JOINT POWERS AUTHORITY



## GP 23-02: March JPA Environmental Justice Element

### Overview

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.

Consistent with the recently adopted 14th Amendment to the Joint Powers Agreement by and between the Cities of Moreno Valley, Perris, Riverside and the County of Riverside, the March Joint Powers Authority is planned to sunset on July 1, 2025. As the March JPA planning jurisdiction will be absorbed by Riverside County, with the County fully responsible for future land use reviews and approvals after July 1, 2025, March JPA is reviewing the adoption of an Environmental Justice Element based on Riverside County’s adopted Environmental Justice Element.

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 map of the March JPA planning jurisdiction is attached to this notice.

### Why is an Environmental Justice Element Necessary?

In California, state law requires every local jurisdiction to prepare and adopt a comprehensive and long-range general plan to guide its growth and physical development. The General Plan provides a consistent framework for land use and development decisions in accordance with an established community vision. In 2016, the State of California passed Senate Bill 1000 - the Planning for Healthy Communities Act requiring cities and counties to address environmental justice within their general plans.

### What will be included in the JPA’s Environmental Justice Element?

The March JPA Environmental Justice Element will include objectives and policies consistent with Government Code section 65302(h) that have as a goal:



a) Promote Civic Engagement

b) Health Risk Reduction (e.g., Food Access, Safe and Sanitary Homes, Physical Activity, and Reduce Pollution exposure)

c) Public Facilities and Health Care Facilities

d) Other Environmental Justice Objectives (e.g., stormwater capture, solar and renewable energy, and implementation of climate action plans)

## Public Engagement

Community participation is an important component in the development of the March JPA's Environmental Justice Element. The March JPA will schedule workshops to provide opportunities for the public to participate in the development of the element.

During the development of the Environmental Justice Element, the March JPA hosted the first of two workshops, on December 19, 2023, to support the Environmental Justice Element planning process. The time and place of the second community workshop meeting is listed below:

**Second Community Workshop - Tuesday, February 20, 2024, at the Moreno Valley Conference Center, 14075 Frederick St, Moreno Valley, CA 92553. The meeting starts at 6:30 PM.**

## Contact Information

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](mailto:fairbanks@marchjpa.com)
- Phone: (951) 656-7000

## Draft Environmental Justice Element

- Current draft Environmental Justice Element is available at: <https://marchjpa.com/wp-content/uploads/2023/11/Draft-Environmental-Justice-Element.pdf>

## Nina Schumacher

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**From:** Molly Nazeck <mnazeck@gmail.com>  
**Sent:** Monday, February 12, 2024 9:34 AM  
**To:** Dan Fairbanks  
**Subject:** Re: GP 23-02 Environmental Justice Element Community Workshop 2/20/24 @ 6:30 PM  
**Attachments:** Environmental Justice Notification.II.pdf; Project Area.pdf

Good morning,

I am a resident of Green Acres, one of the impacted communities mentioned in the Environmental Justice Element. Our community has not been notified of the second workshop that is being held next week. If the JPA intends to make a good faith effort to engage the communities that are impacted by its actions, you need to provide adequate notification of this workshop. Our community and the other two impacted communities are occupied by working class families, veterans and retirees who have jobs, family responsibilities and disability accommodations that need to be accounted for in advance in order to attend such a meeting. Please ensure the residents of these communities are notified of the meeting as soon as possible.

Regards,

Molly Nazeck  
Green Acres Resident  
760-793-5292

On Feb 7, 2024, at 3:22 PM, Dan Fairbanks <fairbanks@marchjpa.com> wrote:

This item is being sent to you because March JPA has received comments from you pertaining to the March JPA Environmental Justice Element.

March Joint Powers Authority (March JPA) has scheduled the second community workshop for the March JPA Environmental Justice Element. 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.

**Second Community Workshop: Tuesday, February 20, 2024, at the Moreno Valley Conference Center, 14075 Frederick St, Moreno Valley, CA 92553. The meeting starts at 6:30 PM.**

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](mailto:fairbanks@marchjpa.com)



**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](mailto:fairbanks@marchjpa.com)

## Nina Schumacher

---

**From:** Nancy Magi <troutquilt@sbcglobal.net>  
**Sent:** Monday, February 12, 2024 8:25 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Too many 18 wheelers coming down Alessandro - their "shortcut". NO MORE WAREHOUSES!

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Nancy Magi  
92506

Nancy  
Sent from my iPhone

## Nina Schumacher

---

**From:** Sally Quintana <quintanasb@yahoo.com>  
**Sent:** Monday, February 12, 2024 2:50 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Sally Quintana  
92508

Sent from my iPhone

## Nina Schumacher

---

**From:** Sue Nipper <markel221@gmail.com>  
**Sent:** Monday, February 12, 2024 7:43 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Susan Nipper  
92508

## Nina Schumacher

---

**From:** Mark Calhoun <mcalhoun@orepac.com>  
**Sent:** Monday, February 12, 2024 8:24 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,

Mark and Amy Calhoun  
92508

**Mark Calhoun**

Operations Manager  
OrePac Building Products – Ontario, Ca

O: 909.627.4043 | M: 909.816.5125 | [mcalhoun@orepac.com](mailto:mcalhoun@orepac.com)

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*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 notify the sender immediately.*



## Nina Schumacher

---

**From:** Christine Heinemann <caheinemann@gmail.com>  
**Sent:** Tuesday, February 13, 2024 7:44 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible. I am a middle class full-time working mother who does not have daytime availability to attend these meetings.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Christine Heinemann  
92508

## Nina Schumacher

---

**From:** George Hague <gbhague@gmail.com>  
**Sent:** Tuesday, February 13, 2024 12:33 PM  
**To:** Dan Fairbanks  
**Subject:** Sierra Club comments on March JPA's Draft Environmental Justice Element (EJE)  
**Attachments:** Doc2.pdf

Please confirm

Begin forwarded message:

**From:** George Hague <gbhague@gmail.com>  
**Subject:** **Sierra Club comments on March JPA's Draft Environmental Justice Element (EJE)**  
**Date:** February 12, 2024 at 12:18:55 PM PST  
**To:** Dan Fairbanks <fairbanks@marchjpa.com>

Good afternoon Mr Fairbanks,

Please confirm that you have received the attached comments from the Sierra Club on the March JPA's Draft Environmental Justice Element (EJE) in a timely manner and that you were able to open it.

Thank you,

George Hague  
Sierra Club  
Moreno Valley Group  
Conservation Chair

## Nina Schumacher

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**From:** The Harvilla Family <harvilla4@msn.com>  
**Sent:** Tuesday, February 13, 2024 9:31 PM  
**To:** Dan Fairbanks  
**Cc:** Jen L  
**Subject:** Comment on Environmental Justice Element GP #23-02

Dear Mr. Fairbanks,

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the Draft Environmental Justice (EJ) Element GP #23-02.

Environmental justice is “the fair treatment of people of all races, cultures, and incomes with respect to development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” (Gov. Code, § 65040.12).

I believe the Draft Environmental Element is not specific, targeted, concrete, or achievable. For example, the proposed Health Risk Reduction Activity HC 16.3 states its goal is to assist communities in seeking funding for community initiated clean air projects, including the installation of on-site air monitoring equipment in areas of high exposure to air contaminants.

If March JPA stopped building unnecessary, polluting warehouses, no on-site air monitoring equipment would be required.

The Environmental Justice Element cannot be considered in a vacuum. It must be discussed along with the proposed Upper Plateau Warehouses, which are unnecessary and are a prime example of ENVIRONMENTAL INJUSTICE.

The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
George Harvilla  
Orangecrest, Riverside  
92508



# SAN GORGONIO CHAPTER

*Moreno Valley Group*

<https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>

Attorney General (AG) best practices for implementing Environmental Justice (EJ) elements

Mr. Dan Fairbanks,

February 12, 2024

RE: Sierra Club comments March Joint Powers Authority (JPA) Draft Environmental Justice Element(EJE).

The Sierra Club appreciates the opportunity to provide some thoughts and comments on the March Joint Powers Authority's (JPA) own Environmental Justice Element (EJE) to meet the recommendations of Senate Bill (SB) 1000 that went into effect in 2018. During the past six years the JPA should have been putting in the work to craft a very specific plan that is designed to meet the needs of the communities they could impact with their decisions. These needed to be direct, indirect, cumulative and growth inducing impacts. The Sierra Club believes this document is inadequate in addressing all of these impacts to not only those within the JPA's Planning Area Boundaries as shown in Exhibit-7, but also beyond it with the movement and pollution of toxic diesel trucks. Your own map of Senate Bill (SB) 535 Disadvantaged Communities shown in red makes it very evident that not only your entire area, but also much of the adjacent areas meet the criteria of Disadvantage Communities. Therefore this document must also address these adjacent communities whose pollution burdens are increased by actions of the JPA.

This Draft EJE needed to be specifically tailored for not only the lands within your boundaries, but also adjacent communities who suffer because of your actions. It is quite apparent that this was not done, but instead the work by another agencies was copied and passed off as the work of the JPA. This can be seen in the following:

"HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the **Salton Sea** and other bodies of water that impact air quality and water quality and seek and pursue opportunities to address impacts to the maximum extent possible, and make public the data and other information related to the status of the effort."

"HC 16.22 Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum extent possible thereby minimizing contaminated infiltration and runoff, including runoff to the **Salton Sea** and other standing bodies of water."

The Salton Sea mentioned above is at least 100 miles away for the Disadvantaged Communities in which this EJE is supposed to address and serve. It is as if the JPA hired someone who doesn't know our area and they passed off this document as a work product for lands in Exhibit -7. How is the Salton Sea impacting "water quality" for this area and how is this area causing "runoff to the Salton Sea"? The Sierra Club sees this as a major issue that cast doubt on validity of the entire Draft EJE document. We therefore strongly recommend that the entire current Draft Environmental Justice Element (EJE) be rescinded and a new one be developed that closely models the Attorney General's (AG) Best Practices for implementing Senate Bill (SB)1000 which "promotes environmental justice through local land use planning" (Page 2 AG Best Practices SB 1000 found in the first link).

The following four paragraphs come from the Attorney General's (AG) Best Practices for implementing Senate Bill (SB)1000 that the current Draft EJE fails to utilize and implement which makes it inadequate to meet the needs of the Disadvantage Communities it must protect and serve:

#### "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." (page 13 AG Best Practices SB 1000 first link)

#### "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." (Page 13 AG Best Practice SB 1000 first link)

"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." ( Page 14 AG Best Practices SB1000 first link)

“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.”** (page 14 AG Best Practices SB 1000)

Your own document reads as follows: "The goal of the Environmental Justice Element is to **ensure the consideration** of environmental justice policies, in order to improve public health and the environment within the March JPA Planning Area." Please note you are to IMPROVE PUBLIC HEALTH AND THE ENVIRONMENT. The document, however, includes the ambiguous words "**ensure the consideration**" which the AG Best Practices states you must avoid because it is vague and requires nothing.

It is with that lens of the AG’s Best Practices that all aspects of the Environmental Justice Element (EJE) needs to be developed, written and evaluated. What is presented in this EJE is ambiguous, vague and doesn’t improve public health or the environment and therefore is inadequate.

We took large portions of the Health Risk Reduction element of the document found below as an example to show how the entire EJE uses ambiguous words which are not "complete, specific, concrete, and targeted". They are also not "binding", and fail to "use mandatory language" as well as fails to "contain implementation measures".

### *Health Risk Reduction*

'This category includes policies that work towards reducing unique and compounded health risks. The following policies address pollution exposure and access to food and **encourage** safe and sanitary homes and an environment conducive to engaging in physical activity.'

HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the Salton Sea and other bodies of water that impact air quality and water quality and **seek and pursue opportunities** to address impacts to the **maximum extent possible**, and make public the data and other information related to the status of the effort.

HC 16.2 **Pursue funding and other opportunities** from state, federal, and local government and non- government sources and allocate March JPA general funds to improve public health and limit pollution exposure and promote efforts to ameliorate environmental justice constraints in environmental justice communities.

HC 16.3 **Assist communities in seeking funding** for community initiated clean air projects including the installation of on-site air monitoring equipment in areas of high exposure to air contaminants.

HC 16.4 **Pursue funding** to connect low-income residents and communities to municipal water and wastewater services. In the interim, **seek financial assistance** for septic system repair in order to limit groundwater contamination by poorly maintained septic systems or to provide for connections to wastewater systems as a viable alternative if such systems can be made readily available.

HC 16.5\* **Evaluate** the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. 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.

HC 16.6\* When developing and siting large scale logistics, warehouse and distribution projects, **address** the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019 and as may be subsequently amended.

HC 16.9 **Explore the feasibility** of creating a partnership with the South Coast Air Quality Management District (SCAQMD) to establish a mitigation program to reduce the impact of air pollution as well as assist with the implementation of air quality programs.

HC 16.11 Implement development of bicycle and pedestrian facilities to reduce dependency on fossil fuel-based transportation and **pursue funding** to implement mobility plans and projects.

HC 16.14\* Assure that sensitive receptors are separated and protected from polluting point sources, **as feasible**, including agricultural businesses that produce or use pesticides and chemical fertilizers.

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 through the use of barriers, distance, or similar solutions or measures from emission sources **when possible**.

HC 16.19 **Promote** reduction of vehicle miles traveled (VMT) by **encouraging** expanded multi-modal facilities, linkages between such facilities, and services that provide transportation alternatives, such as transit, bicycle and pedestrian modes.

HC 16.20 Facilitate an increase in transit options. In particular, coordinate with adjacent municipalities, transit providers and regional transportation planning agencies in the

development of mutual policies and funding mechanisms to increase the use of alternative transportation modes. All new development **should** contribute and invest in increasing access to public transit and multimodal active transportation infrastructure.

HC 16.22\* **Discourage** industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and **encourage** agricultural businesses to limit and **reduce the production and use of pesticides and chemical fertilizers to the maximum extent possible thereby minimizing contaminated infiltration and runoff, including runoff to the Salton Sea and other standing bodies of water.**

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.

HC 16.24\* Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria **addressing** noise, land, traffic and greenhouse gas emissions to avoid or **minimize** creating adverse conditions for adjacent communities.

The **bold oblique** words found above are examples of the problem with ambiguous wording throughout the entire Draft Environmental Justice Element (EJE) and shows another reason the entire document is inadequate to "improve public health and the environment".

The Sierra Club again strongly recommends the March Joint Powers Authority (JPA) rescind the current Draft Environmental Justice Element (EJE) for all the reasons listed above. The new version must closely model and adhere to the Attorney General's (AG) Best Practices for implementing Senate Bill (SB)1000 that "promotes environmental justice through local land use planning" (Page 2 AG Best Practices SB 1000 found in the first link). It must also be specifically tailored for not only the lands within your boundaries, but also adjacent communities who suffer additional pollution burdens because of your actions. It is quite apparent this was not done in this Draft EJE, but instead large portions of the work by another agencies was copied and passed off as the work of the March JPA. If we had more time, we could probably find where Policies HC 16.1 and HC 16.22 concerning the Salton Sea were originally used.

We also find it difficult to understand how the March JPA can justify approving one warehouse after another since the implementation of SB 1000 in 2018 without having an approved Environmental Justice Element. This is especially troubling since your entire area is designated a Disadvantaged Community as is much of the adjacent lands. Any proposals for more warehousing must be paused until there is an approved EJE which meets the recommendations we shared above.



Please keep the Sierra Club as well as myself informed of any documents and meetings related to the March Joint Powers Authority (JPA) Draft Environmental Justice Element (EJE).

Sincerely,

George Hague

Sierra Club

Moreno Valley Group

Conservation Chair

P.O. Box 1325

Moreno Valley, CA 92556-1325

## Nina Schumacher

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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.

Please email me confirming receipt of these attachments.

Thank you!

Jen Larratt-Smith  
Riverside Neighbors Opposing Warehouses





Jennifer Larratt-Smith, Chair  
19069 Van Buren Blvd #114-314  
Riverside, CA 92508  
951-384-1916  
jlarrattsmith@gmail.com

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.

#### **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 sunseting 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

—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

Justice (DOJ)?<sup>1</sup> 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,<sup>2</sup> 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:

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<sup>1</sup> California Department of Justice’s Best Practices for EJ policies:

<https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>

<sup>2</sup> 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.

### **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.”<sup>3</sup>

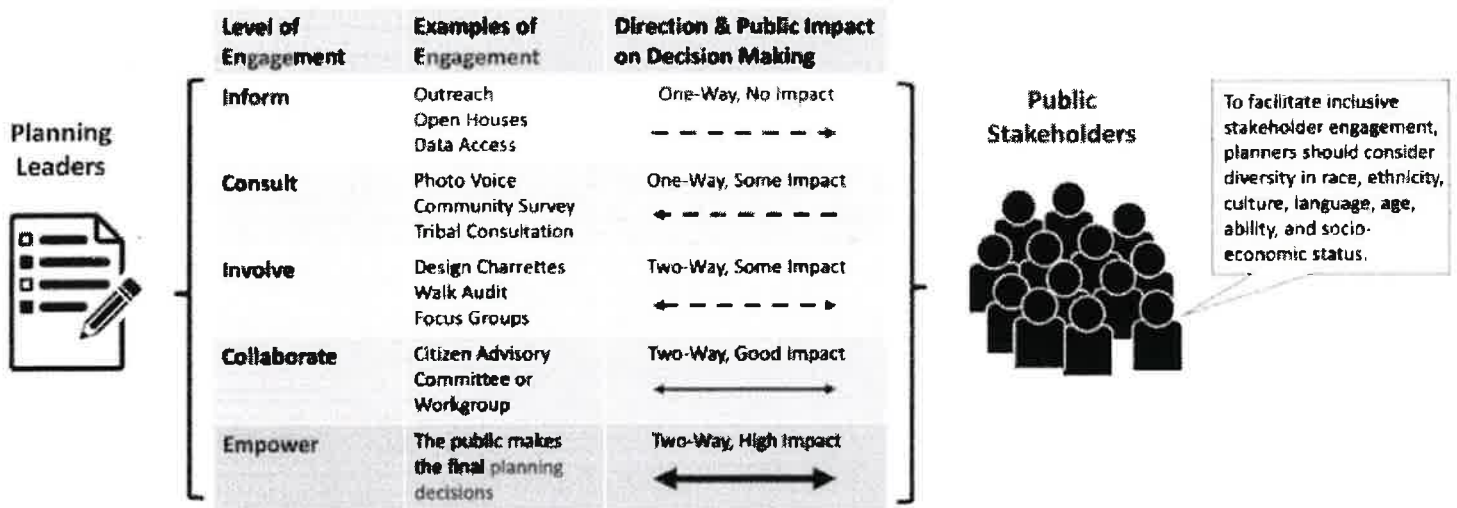
In the document they also provide a figure showing a spectrum of levels of community engagement:<sup>4</sup>

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<sup>3</sup> 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](https://opr.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf)

<sup>4</sup>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



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

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?

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.

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.<sup>5</sup> 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.

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

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<sup>5</sup> 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.<sup>6</sup> 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.<sup>7</sup> 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.<sup>8</sup> The Committee incorporated community feedback obtained at these meetings to prioritize next steps.

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<sup>6</sup> 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)

<sup>7</sup> Report:

<https://riversideca.legistar.com/View.ashx?M=F&ID=11482653&GUID=4CEADEDCEB30-4EDB-9AF1-490A80BC14DA>

<sup>8</sup> 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.<sup>9</sup>

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.<sup>10</sup> 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.

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<sup>9</sup> Report:

<https://riversideca.legistar.com/View.ashx?M=F&ID=12081908&GUID=30A6D156-5E9C-4CC4-8F24-5600ADF90DEE>

<sup>10</sup> 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.

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,

A handwritten signature in cursive script, reading "Jennifer Larratt-Smith". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right.

Jennifer Larratt-Smith

## Nina Schumacher

---

**From:** kaelan barrios <kaelanbarrios@gmail.com>  
**Sent:** Tuesday, February 13, 2024 7:21 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

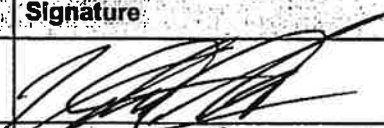

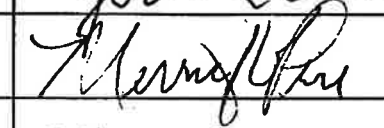

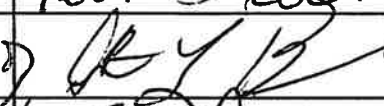
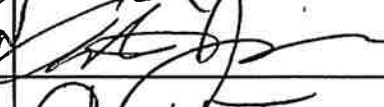
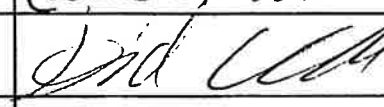
Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Kaelan Barrios  
92508

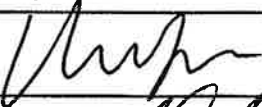

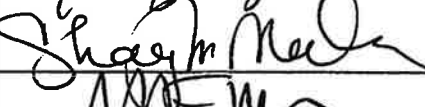
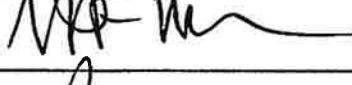
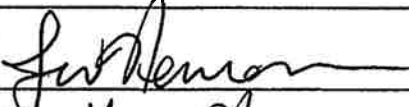





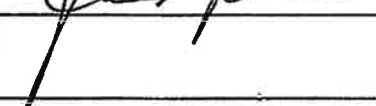
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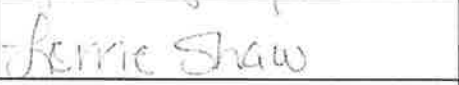
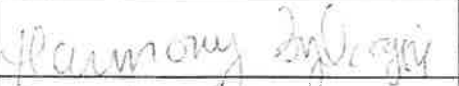
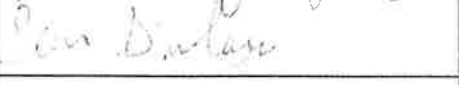



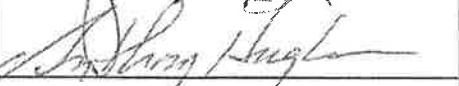
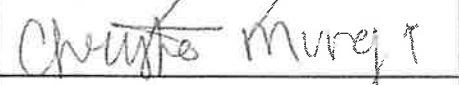
The March Joint Powers Authority (MJPA) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJPA prohibit 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 Capacate     |    | GA                     |
| ERNIE ROUX          |    | VV Veterans Village    |
| Wayne Jones         | Wayne Jones   | GA / VV                |
| William Bell        | William Bell  | GA / VV                |
| John Collins        | John Collins  | GA / VV                |
| Merrick Price       |  | MVV                    |
| HENRY MARIN         |  | MVV                    |
| ROBERT ELKINS       | Robert Elkins   | MVV                    |
| ARTHUR BEAUREGARD   |  | MVV                    |
| ARTHUR JENSEN       |  | MVV                    |
| Carroll Turner      | Carroll Turner  | V.V.                   |
| David Cleveland     |  | MVV                    |
| Alvin Jones         | al Jones  | MVV                    |
|                     |   |                        |



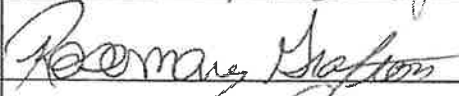
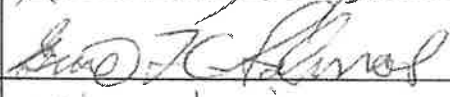




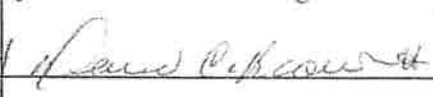




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| First and Last Name | Signature  | Community (WV, GA, VV) |
|---------------------|--|------------------------|
| WILLIAM LANDA       |     | Green Acres            |
| Molly Nazzari       |    | Green Acres            |
| Shayne Meder        |    | Green Acres            |
| SCOTT F. DONNELL    |    | GREEN ACRES            |
| JERRY W. NEWMAN     |   | GREEN ACRES            |
| FRYDANNE NEWMAN     |  | GREEN ACRES            |
| Stan Gray           | STAN GRAY  | Green                  |
| Harold Anderson     |   | Green Acres            |
| RUBEN MESTIA        |   | GREEN ACRES            |
| Stephanie Bates     |   | Green Acres            |
| Brian Ratt          |  | Green Acres            |
| Sam Baird           |  | Green Acres            |
|                     |  |                        |
|                     |  |                        |

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| First and Last Name | Signature  | Community (WV, GA, VV) |
|---------------------|--|------------------------|
| Brandi Anthony      |     | Green Acres            |
| Jacob Anthony       |    | GA                     |
| Leander Jordan      |    | Green Acres            |
| Terrie Shaw         |    | G.A.                   |
| Harmony Szilagyi    |   | Green Acres            |
| Sean Szilagyi       |  | Green Acres            |
| Suzana Conner       |  | Green Acres            |
| Maria I. CORREA     |  | Green Acres            |
| Tyler Spout         |  | Green Acres            |
| Anthony Hughes      |  | Green Acres            |
| Christie Morgan     |  | Green Acres            |
|                     |  |                        |
|                     |  |                        |
|                     |  |                        |

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| First and Last Name         | Signature  | Community (WV, GA, VV) |
|-----------------------------|--|------------------------|
| Kickey Fant                 |     | WV                     |
| <del>Ronald [unclear]</del> | <del>[unclear]</del>   | <del>WV</del>          |
| Michael Nesbitt             |    | WV                     |
| Rosemary Grafton            |    | MVV                    |
| Gino SALINAS                |   | MVV                    |
| Kim Salinas                 |   | MVV                    |
| PETER Wilson                |  | MV                     |
| JUAN FIGUEROA               |   | MV                     |
| Joni Constantine            |   | VV                     |
| DAVID C. BROWN              |  | VV                     |
| PETE [unclear]              |   | VV                     |
| Jim Cannizzaro              |  | VV                     |
| David Schenk                |  | MVV                    |
| Joseph EWINGS               |  | MVV                    |

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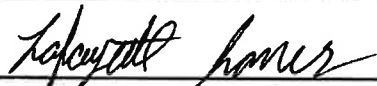






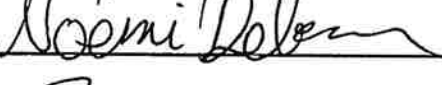

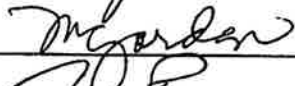



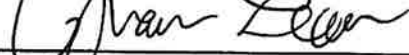
| First and Last Name | Signature | Community (WV, GA, VV) |
|---------------------|-----------|------------------------|
| CHRIS STOCK         |           | ORANGE CREST           |
| John Seth           |           | VV                     |
| Russell Thornhill   |           | VV                     |
| Jean O'Brien        |           | MVV                    |
| JAMES ANDREW        |           | MU                     |
| STEVEN NEUBAUER     |           | MVV                    |
| JOSEPH CANINO       |           | MVV                    |
| JEFF ALEXANDER      |           | MVV                    |
| Wendy Myers         |           | no val resident        |
| Louis Edgerson      |           | MVV                    |
| David Cleveland     |           | MVV                    |
| William A. Hardesty |           | MVV                    |
| ROBERT THORNHILL    |           | MVV                    |
| Jean O'Brien        |           | MVV                    |

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| First and Last Name      | Signature              | Community (WV, GA, VV) |
|--------------------------|------------------------|------------------------|
| <del>WILLIAM LANGA</del> | <del>[Signature]</del> | <del>Green Acres</del> |
| Shirley Raiford          | [Signature]            | Green Acres            |
| Anne Smith               | [Signature]            | Green Acres            |
| Chris Smith              | [Signature]            | GREEN ACRES            |
| Kristin Martin           | [Signature]            | Green Acres            |
| Aubrey Martin            | [Signature]            | Green Acres            |
| CORNELIA DAVIS           | Cornelia Davis         | GREEN ACRES            |
| Sharon Zamora            | [Signature]            | Green Acres            |
| Ana Armitia              | [Signature]            | Green Acres            |
| Victor Dominguez         | [Signature]            | Green Acres            |
| GARY RYSSO               | [Signature]            | GREEN ACRES            |
| Linda Kocian             | [Signature]            | Green Acres            |
| Son Kocian               | Son Kocian             | Green Acres            |
| Marvin Miller            | [Signature]            | Green Acres            |

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| First and Last Name | Signature  | Community (WV, GA, VV) |
|---------------------|--|------------------------|
| Lafayette Jones     |    | GA                     |
| Carol Aguirre       |     | WV                     |
| Jennifer Reynolds   |    |                        |
| Monica Taylor       |    |                        |
| FABRIZIA ASHAI      |    |                        |
| Nancy Kirchmann     |  |                        |
| TERRY ALCOCK        |   |                        |
| Noemi DeLeon        |  |                        |
| Bruce Jordan        |   |                        |
| Marietta Jordan     |   |                        |
| Alex Bradford       |  |                        |
| Diana Martinez      |  |                        |
| Castro Richard A    |  |                        |
| Leon, Juan          |  |                        |

The March Joint Powers Authority (MIPA) 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 MIPA 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 SOLANOCA       | <i>Rita Solanaca</i>        | Westmont Village       |
| CAROL WICKER        | <i>Carol Wicker</i>         | W.V.                   |
| RUTH BLATTNER       | <i>Ruth Blattner</i>        | W.V.                   |
| Henette Agosta      | <i>Henette Agosta</i>       | WV                     |
| BEVERLY SHORT       | <i>Beverly Short</i>        | WV                     |
| NORM GIBBS          | <i>Norm Gibbs</i>           | WV                     |
| SHARON BIVINS       | <i>Sharon L Bivins</i>      | WESTMONT VLG           |
| John March          | <i>John March</i>           | WV                     |
| E.D. Bartel         | <i>E.D. Bartel</i>          | WV                     |
| Edwin Peterse       | <i>Edwin Peterse</i>        | WV                     |
| SONNIE BOCKMAN      | <i>Sonnice Bockman</i>      | WV                     |
| CHUCK SENNEWOLD     | <i>Chuck Sennewold</i>      | WV                     |
| ROBERT CURROW       | <i>Robert Currow</i>        | W.V.                   |
| JENNIFER FRENKEL    | <i>Jennifer Freudenburg</i> | W.V.                   |



The March Joint Powers Authority (MJA) 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 MJA 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) |
|---------------------|---|------------------------|
| CHESTER GILBERTS    |  | WV                     |
| Ron Englebrecht     | R E Englebrecht   | WV                     |
| Ray Younger         | Ray Younger   | W.V.                   |
| RON AKERS           | Ronald J Akers  | WV                     |
| Shahin Ikezawa      | Shahin Ikezawa  | WV                     |
| Joyce O'Keefe       | Joyce O'Keefe   | WV                     |
| Mildred Akers       | Mildred J. Akers  | WV                     |
| Susan Jennings      | Susan Jennings  | WV                     |
| Roshlee Chiara      | Roshlee Chiara  | WV                     |
| Audrey Beck         | Audrey Beck   | WV                     |
| Roberta Kenison     | Roberta Kenison   | W.V.                   |
| Anne Stalder        | Anne Stalder  | W.V.                   |
| Sheila Buchan       | Sheila Buchan   | W.V.                   |
| VICTOR BARNETT      | Victor Barnett  | WV                     |

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) |
|--------------------------|---------------------------------|------------------------|
| Christina Miller         | <i>Christina Miller</i>         | Westmont Village       |
| Ziana West               | <i>Ziana West</i>               | WV                     |
| DAN WALDO                | <i>Dan Waldo</i>                | WV                     |
| Martina Waldo            | <i>Martina Waldo</i>            | WV                     |
| Adlene Jorune            | <i>Adlene Jorune</i>            | WV                     |
| Charles Hale             | <i>Charles Hale</i>             | WV                     |
| Marica Tennell           | <i>Marica Tennell</i>           | WV                     |
| Bill Salzman             | <i>Bill Salzman</i>             | WV                     |
| TEO GONZALEZ             | <i>Teo Gonzalez</i>             | WV                     |
| MARGARET TYRRELL         | <i>Margaret Tyrrell</i>         | WV                     |
| RICHARD SHORT            | <i>Richard Short</i>            | WV                     |
| SUSAN E. VELASCO         | <i>Susan E. Velasco</i>         | WV                     |
| Deborah McManigal        | <i>Deborah McManigal</i>        | WV                     |
| <del>ROBERT CARMON</del> | <del><i>Robert Carmon</i></del> | <del>WV</del>          |

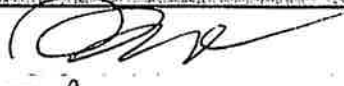
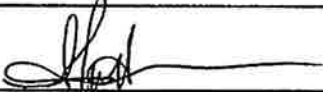

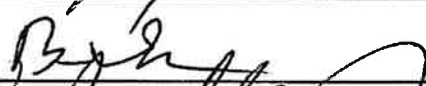

The March Joint Powers Authority (MJP) has three communities living within its planning area that are disproportionately burdened with environmental pollution – Westmont Village (WV), Green Acres (GA), and Veteran's Village (VV). As a resident of one of these communities, I request that the MJP prohibit 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            | [Signature] | WESTMONT VILLAGE       |
| Sherry Ikezawa Haganawa | [Signature] | Westmont               |
| Cornelia                | 318 B       |                        |
| Kilda Gandy             | [Signature] | Westmont               |
| DAN WALTON              | [Signature] | WESTMONT               |
| PAM SHEA                | [Signature] | Westmont               |
| MARY LOU GREN           | [Signature] | Westmont               |
| RACHEL CARTHELL         | [Signature] | Westmont (WV)          |
| Cindy Callister         | [Signature] | Westmont               |
| DEANNA COLLINS          | [Signature] | Westmont               |
| MARGARET TYRRELL        | [Signature] | Westmont               |
| PAM WAGNER              | [Signature] | Westmont               |
| Doris Hega              | [Signature] | Westmont               |
| Albert DeBorja          | [Signature] | WESTMONT               |

The March Joint Powers Authority (MJP) 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 MJP 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 Briskin      | [Signature] | Westmont               |
| Nancy Tourville     | [Signature] | Westmont               |
| Amy Hanigan         | [Signature] | ✓                      |
| Doris Weingart      | [Signature] | ✓                      |
| Grace Sylvester     | [Signature] | WV                     |
| Eleanor Maer        | [Signature] | ✓                      |
| Lea Sackel          | [Signature] | WHRV                   |
| RICHARD CALLISTER   | [Signature] | WESTMONT               |
| VERA MADISON        | [Signature] | WESTMONT               |
| MARY JONES          | [Signature] | W.M                    |
| Kay Stump           | [Signature] | Westmont               |
| SUSAN HILL          | [Signature] | Westmont               |
| Glenda Willison     | [Signature] | Westmont               |
| Carolyn DeCourse    | [Signature] | Westmont               |

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         | Ray Blevins  | VV                     |
| Kylene              | Kylene   | VL                     |
| COOPER, TONY        |   | VV                     |
| Bill Graham         |  | M.V.V.                 |
| Russell SIMPSON     |  | MV                     |
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## Nina Schumacher

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**From:** Linda Tingly <linda.tingly@yahoo.com>  
**Sent:** Tuesday, February 13, 2024 12:00 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Linda Tingley Rivera  
92508

Sent from my iPhone

## Nina Schumacher

---

**From:** Michael McCarthy <MikeM@radicalresearch.Illc>  
**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.

Please email me confirming receipt of this letter.

Mike McCarthy  
Riverside Neighbors Opposing Warehouses  
92508





## **Nina Schumacher**

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**From:** MJ Rivera <milo.rivera21052@gmail.com>  
**Sent:** Tuesday, February 13, 2024 11:48 AM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
**Milo Rivera**

92508

## Nina Schumacher

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**From:** Steven Balmer <sjgbalmer@gmail.com>  
**Sent:** Tuesday, February 13, 2024 1:01 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Again, this will ruin our area and ruin our health.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
The Balmer Family  
92508

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<sup>1</sup>. A paid consultant drafted the EJ element with no input from community members (or even notification that an EJ element was under consideration), no agenda review by the MJPA Technical Advisory Committee, and no agenda 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.

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<sup>2</sup>, assumed 1999 date – last updated 3/07/2023 (General Plan, 1999)

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<sup>1</sup> [https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification\\_.pdf](https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification_.pdf)

<sup>2</sup> [https://www.marchjpa.com/documents/docs\\_forms/general\\_plan\\_update\\_02172022.pdf](https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf)

- County of Riverside General Plan, Healthy Communities Element (Revised September 2021)<sup>3</sup>
- SB 1000 Implementation Toolkit: Planning for Healthy Communities (2018) – California Environmental Justice Alliance and PlaceWorks<sup>4</sup>
- Best Practices for Implementing SB 1000 (2023)– California Department of Justice<sup>5</sup>
- CalEnviroScreen4.0<sup>6</sup> 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<sup>7</sup>
- City of Moreno Valley EJ policies<sup>8</sup>
- City of Perris EJ policies<sup>9</sup>

## 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 98<sup>th</sup> percentile impact census tract and being adjacent to a 99<sup>th</sup> 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** – 98<sup>th</sup> 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 80<sup>th</sup> percentile rank are shown in **Table 1**.

**Table 1.** CalEnviroScreen4.0 scores for individual pollution and population characteristics above the 80<sup>th</sup> percentile in the March JPA census tract. Data from CalEnviroScreen4.0 (released 2021).

| Tract      | variable  | Percentile rank (0-100) | Description                                    |
|------------|-----------|-------------------------|--|
| 6065046700 | ClScoreP  | 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           |

<sup>3</sup> <https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-Ch10-HCE-092121.pdf>

<sup>4</sup> <https://caleja.org/2017/09/sb-1000-toolkit-release/>

<sup>5</sup> <https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>

<sup>6</sup> <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

<sup>7</sup> [https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/2021/Housing\\_Element/2021-09%20EJ%20-%20City%20Council%20Draft.pdf](https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/2021/Housing_Element/2021-09%20EJ%20-%20City%20Council%20Draft.pdf)

<sup>8</sup> <https://moval.gov/cdd/documents/general-plan-update/draft-docs/GP-Elements/08.pdf>

<sup>9</sup> <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 98<sup>th</sup> percentile high ozone pollution and groundwater pollution (PFAS spills, see hazards letter). Communities are exposed to 80<sup>th</sup>+ 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 8<sup>th</sup> 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 **99.8<sup>th</sup>** 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 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.

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<sup>10</sup>. 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

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<sup>10</sup> [https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification\\_.pdf](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<sup>11</sup>. 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 sunseting 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)

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<sup>11</sup> <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. ‘14<sup>th</sup> 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.

*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 policies 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.

- 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.

### Promote Food Access

I ask that the MJPA establish at least one grocery store or health food option within its planning area. To date 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

## Nina Schumacher

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**From:** Clinton Clark <clintonc27bel@gmail.com>  
**Sent:** Tuesday, February 13, 2024 6:53 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely, Clinton Clark  
<name>  
<zip code> 92508

Sent from my iPhone

## Nina Schumacher

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**From:** Fernando sosa jr. <sosa1977@gmail.com>  
**Sent:** Wednesday, February 14, 2024 9:05 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

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Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Fernando Sosa Jr.  
Concerned Orangecrest Resident

## Nina Schumacher

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**From:** Perez, Corinne <perezc@ajjusa.com>  
**Sent:** Thursday, February 15, 2024 5:57 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunseting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

It is incomprehensible that we cannot receive transparent information that we as the community most impacted, deserve. The project at the bunker location is *INSIDE* our community and not along industrial zoning as expected. More and more hazards are occurring where communities are impacted with industrial buildings which I am certain were not in any Environmental Impact Report. This community should have consideration.

Sincerely,  
Corinne Perez  
92508

## Nina Schumacher

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**From:** Marven Norman <marven.n@ccaaj.org>  
**Sent:** Thursday, February 15, 2024 5:05 PM  
**To:** Dan Fairbanks  
**Cc:** Ana Gonzalez  
**Subject:** Draft EJ Element Comments  
**Attachments:** march\_jpa\_ej\_element\_15feb24.pdf

Hello,

Please find attached a letter from CCAEJ addressing the proposed March JPA EJ Element. A response confirming receipt would be appreciated.

Cheers,

Marven E. Norman (he/him/his), Policy Coordinator  
Center for Community Action and Environmental Justice  
Centro de Acción Comunitaria y Justicia Ambiental  
| C: (951) 543-1743 | E: [marven.n@ccaaj.org](mailto:marven.n@ccaaj.org) | W: <https://www.ccaaj.org>



## Nina Schumacher

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**From:** Susan Phillips <susan\_phillips@pitzer.edu>  
**Sent:** Thursday, February 15, 2024 9:46 AM  
**To:** Dan Fairbanks  
**Cc:** Jennifer Larratt-Smith  
**Subject:** Environmental Justice Element comment  
**Attachments:** March JPA EJ EIR Redford Conservancy.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.

If you could confirm receipt of this letter, that would be appreciated.

Best wishes,  
Susan

Susan A. Phillips  
Professor of Environmental Analysis  
Associate Dean, Pitzer College  
Director, Robert Redford Conservancy for Southern California Sustainability

Drop by, in-person office hours in Scott 232 @ Pitzer: Th 9:30-11  
Please schedule virtual meetings using the link below  
[https://calendly.com/susan\\_phillips/meetings](https://calendly.com/susan_phillips/meetings)

February 15, 2024

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

*Submitted via email to [fairbanks@marchjpa.com](mailto:fairbanks@marchjpa.com).*

Re: March JPA Draft Environmental Justice Element

Dear Mr. Fairbanks,

This letter is in response to the Draft Environmental Justice Element which has been made available for review and comment. Please see Table 1 for our comments on the proposal.

Sincerely,



Marven E. Norman  
Policy Coordinator

*CCA EJ* is a long-standing community based organization with over 40 years of experience advocating for stronger regulations through strategic campaigns and building a base of community power. Most notably, *CCA EJ*'s founder Penny Newman won a landmark federal case against Stringfellow Construction which resulted in the 'Stringfellow Acid Pits' being declared one of the first Superfund sites in the nation. *CCA EJ* prioritizes community voices as we continue our grassroots efforts to bring lasting environmental justice to the Inland Valley Region.

**Mailing Address**

PO Box 33124

Jurupa Valley, CA 92519

[www.ccaej.org](http://www.ccaej.org)

Table 1: CCAEJ comments on select proposed EJ policies.

| Policy   | Current  | Notes or suggestion  |
|----------|--|--|
| HC 16.11 | Implement development of bicycle and pedestrian facilities to reduce dependency on fossil fuel-based transportation and pursue funding to implement mobility plans and projects.   | Implement development of low-stress bicycle and pedestrian facilities to reduce dependency on fossil fuel-based transportation and pursue funding to implement mobility plans and projects.  |
| HC 16.12 | Plan and implement complete streets which include sidewalks, greenbelts, and trails to facilitate use by pedestrians and bicyclists where such facilities are well separated from parallel or cross through traffic to ensure pedestrian and cyclist safety and rehabilitate/expand existing to achieve same of similar design features. | Plan and implement complete streets which include sidewalks, greenbelts, separated bikeways, and trails to facilitate use by pedestrians and bicyclists where such facilities are well separated from parallel or cross through traffic to ensure pedestrian and cyclist safety and rehabilitate/expand existing to achieve same of similar design features.   |
| 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 through the use of barriers, distance, or similar solutions or measures from emissions sources when possible.       | 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 through the use of barriers, adequate distance, or similar solutions or measures from emissions sources when possible. Larger projects may require larger separation distances. |
| HC 16.19 | Promote reduction of vehicle miles traveled (VMT) by encouraging expanded multi-modal facilities, linkages between such facilities, and services that provide transportation alternatives, such as transit, bicycle and pedestrian modes.  | Promote reduction of vehicle miles traveled (VMT) by encouraging expanded multi-modal facilities, linkages between such facilities, and services that provide transportation alternatives, such as transit, bicycle and pedestrian modes. Include the expected VMT reductions as inputs in traffic modeling for projects and ensure that multi-modal transportation is eligible for the same funding |

Mailing Address  
 PO Box 33124  
 Jurupa Valley, CA 92519  
[www.ccae.org](http://www.ccae.org)

Mr.CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE  
"Bringing People Together to Improve Our Social and Natural Environment"

| Policy  | Current  | Notes or suggestion   |
|---------|--|---|
|         |  | sources as roads.   |
| HC 22.5 | New specific plans or existing specific plans that includes a substantial revision that are within "disadvantaged communities," as identified by CalEPA should address Environmental Justice goals and include appropriate policies similarly to this section. | New specific plans or existing specific plans that includes a substantial revision that are within or directly adjacent "disadvantaged communities," as identified by CalEPA should address Environmental Justice goals and include appropriate policies similarly to this section. |

**Mailing Address**  
PO Box 33124  
Jurupa Valley, CA 92519  
[www.ccae.org](http://www.ccae.org)



February 14, 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 a professor of environmental analysis, I have a long history in working for and teaching about environmental justice. For over two decades, I have worked in community engaged settings within the Inland Empire. Since 2020, I have also been the director of the Robert Redford Conservancy at Pitzer College, where we support “community-first, climate-first” pathways toward local decision making.

The draft EJ element is unfit for adoption for several reasons, which I outline below. But first I would like to flag that the pending West Campus Upper Plateau project directly conflicts with most if not all of the listed aspects of the EJ element. Attempting to both comply with the principles of this document while at the same paving the way for warehouses in an already disproportionately burdened community is incongruent with EJ principles. Warehouses are the most significant environmental justice issue in the Inland Empire currently. Warehouse development runs counter to community voice, divides the working class against itself, and exacerbates existing environmental justice inequities including air quality, noise, light and traffic concerns, as well as contributing to greenhouse gas emissions and a host of additional environmental, infrastructural, economic, and climate-based harms.

Second, in relation to the West Campus Upper Plateau project, this EJ element is being adopted and considered well into a planning process, which has moved forward without the benefit of an EJ element, which has long been required by law for the purposes of local land use planning such as this.

Additionally, it is an omission to fail to consider cumulative impacts and the way these bypass the formal boundaries of the March JPA land to impact others through truck routes, pollution and GHG generation, and light, noise, and heat. The EJ element seems to excuse the March JPA of this responsibility by outlining boundaries, but that is not a true accounting of impacts upon adjacent EJ communities. This recognition should be included in the EJ Element.

In terms of the EJ Element itself, the document does have clear topic areas, including health risks, civic engagement, and prioritization of needs of disadvantaged communities. However, the language remains vague because it includes recommendations to “consider and evaluate” issues, but little or no commitment to actually act in accordance with those considerations.

Perhaps most important, the production of the environmental justice element without abiding by the fundamental point of such an element—meaningful community involvement—immediately sets the principles in the EJ element in contrast to the practices used to create that self-same document. The use of an environmental consulting firm without any direct community engagement is an inappropriate way to develop an EJ element per SB 1000 and the Attorney General’s DOJ recommended best practices.

This runs counter to the statement that: “In order to fully address environmental justice, the general plans must include new or existing policies intended to: (1) reduce unique or compounded health risks in disadvantaged communities; (2) promote civic engagement in public decision-making process; and (3) prioritize improvements and programs that address the needs of disadvantaged communities. (Gov. Code, § 65302(h)).” The current project slated for the March JPA violates the principles of each of these three policies.

Perhaps the vaguest part of the document is that statement about levels of compliance being along a continuum: “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.”

Given the text of the draft EJ element, your consultants have missed the mark of “appropriate determinations.” They have clearly utilized the CA DOJ’s Best Practices for SB 1000. But unfortunately they have created a cafeteria-style copy/paste of that document by incorporating select aspects of the best practices and not others. The most obvious omission is the very first recommendation within the Best Practices document: that “community engagement is necessary to create compliant policies [...] Community engagement is also necessary in order to understand the ‘unique or compounded health risks’ of disadvantaged communities. (Gov. Code, § 65302, subd. (h)(1)(A).)” I am unaware of a meaningful community engagement process associated with the March JPA EJ element.

At the Redford Conservancy, we have developed several tools to measure land use decision-making on the part of local authorities through an environmental justice lens. These tools are based upon the academic literature as well as on SB 1000. Most specifically, the provision of SB 1000 Best Practices that calls for “meaningful” engagement of community members in the planning process. Neither the outreach around the EJ element or the draft document come close to meeting these standards.

Standards for EJ can indeed be clearly articulated along a continuum as you suggest. But that does not mean that the document need be vague: indeed, in the best practices are recommendations that language be complete, specific, targeted, and binding. The March JPA EJ element is incomplete, lacking in specificity, vague, and non-binding. It is thus out of compliance with the spirit and letter of SB 1000.

My recommendation is to take your consultants to task, ask them to actually engage with local communities in the production of this EJ element, or simply ask the community groups to lead the process themselves. The Redford Conservancy would also be happy to engage with this process as well. It is inappropriate as it stands and needs remedy.

Sincerely,

A handwritten signature in black ink, appearing to read 'SAP', with a stylized flourish at the end.

Susan A. Phillips  
Director, Robert Redford Conservancy  
Associate Dean, Pitzer College  
Professor of Environmental Analysis  
susan\_phillips@pitzer.edu

## Nina Schumacher

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**From:** Carlos Lliguin <malinalli\_1997@yahoo.com>  
**Sent:** Saturday, February 17, 2024 9:06 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02.

Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy.

Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible.

In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so.

Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,  
Carlos Lliguin  
92508



## Nina Schumacher

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**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.

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,  
Elijah Sbar  
92506

Sent from my iPhone

## Nina Schumacher

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**From:** robertdoty32@aol.com  
**Sent:** Monday, February 19, 2024 4:57 PM  
**To:** Dan Fairbanks  
**Subject:** Comment for Environmental Justice element GP #23-02

Dear Mr. Fairbanks:

Thank you for the opportunity to provide comments to the March Joint Powers Authority (MJPA) on the draft Environmental Justice (EJ) element GP #23-02. Members of R-NOW like myself have misgivings about the process by which you are attempting to draft this EJ element. A community engagement process needs to be intentional and community-led. The March JPA is trying to do it through warehouse-building consulting firms (Michael Baker). That is not a valid or reasonable process when developing an EJ policy. Unfortunately, R-NOW has many examples of the March JPA willfully refusing community engagement. For example, over 40 R-NOW members requested a community advisory board in January 2023 through public comment at the only evening meeting held by the March JPA commission in two years. The MJPA CEO recommended against the idea because the MJPA is sunsetting (email, Dr. Martin – MJPA CEO, February 7th, 2023). Since that time, repeated requests that the MJPA reconsider have been ignored and unacknowledged which is shameful. Additionally, R-NOW members have sent 100s of emails asking for public meetings of the MJPA commission to be held at night to allow community members to attend and speak. MJPA commission scheduled a single evening public comment period in January 2023 again another shameful and corrupt move. Then, MJPA commission members removed zoom access in May 2023 making the 3 PM meetings even more inaccessible. In other words, the March JPA has not seen fit to implement any community engagement policy and rejected our entreaties to do so. Moreover, the draft EJ Element is not specific, targeted, concrete, nor achievable. The March JPA will only exist for another 16 months. Your key achievable priority needs to be a moratorium on warehouse and industrial development on the remaining parcels of March JPA land. This would help the MJPA avoid any additional cumulative impacts on the disproportionately affected communities in the planning area. Please make this a key priority in your final EJ plan.

Sincerely,

Robert Walker  
Orangethree

## Nina Schumacher

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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 sunseting 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. 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.

Sincerely,  
**ANDREA WOOD**  
Riverside, CA 92521

## Nina Schumacher

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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.

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 sunset 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,

Connie Ransom  
92507

## Nina Schumacher

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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 sunseting 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.

Please do not add another infrastructure project to the already overflowing pool of warehouses in the Inland Empire.

Sincerely,

Esmeralda M, 92553

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Esther Munoz  
92567

Sent from my iPad

## Nina Schumacher

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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 sunseting 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.

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

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Mary Moran  
92567 Nuevo, CA



## Nina Schumacher

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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.

Mohsen Lesani  
92508

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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 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 sunseting 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,

## Nina Schumacher

---

**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.

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.

Sincerely,

A very concerned resident Patricia Welbourne  
92508

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Raymond Or

CA 92508

## Nina Schumacher

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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 sunseting 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,

John Lyell

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Candi Erwin>  
<92506>

[Get Outlook for iOS](#)

## Nina Schumacher

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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, <BR> <BR>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. <BR> <BR>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 sunseting in July 2025. <BR> <BR>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. <BR> <BR>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. <BR> <BR>As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau. <BR> <BR>Sincerely, <BR> <BR><name> <BR><zip code> <BR>

Sent from my iPad

## Nina Schumacher

---

**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 sunseting 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.

**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.**

As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

**Roseann M. Reynolds**  
**Green Acres resident**

**92518**

## Nina Schumacher

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**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 sunseting 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.

Sincerely,

Ying Shen  
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 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.

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<sup>1</sup>. A paid consultant drafted the EJ element with no input from community members (or even notification that an EJ element was under consideration), no agenda review by the MJPA Technical Advisory Committee, and no agenda 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.

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<sup>2</sup>, assumed 1999 date – last updated 3/07/2023 (General Plan, 1999)

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<sup>1</sup> [https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification\\_.pdf](https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification_.pdf)

<sup>2</sup> [https://www.marchjpa.com/documents/docs\\_forms/general\\_plan\\_update\\_02172022.pdf](https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf)

- County of Riverside General Plan, Healthy Communities Element (Revised September 2021)<sup>3</sup>
- SB 1000 Implementation Toolkit: Planning for Healthy Communities (2018) – California Environmental Justice Alliance and PlaceWorks<sup>4</sup>
- Best Practices for Implementing SB 1000 (2023)– California Department of Justice<sup>5</sup>
- CalEnviroScreen4.0<sup>6</sup> 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<sup>7</sup>
- City of Moreno Valley EJ policies<sup>8</sup>
- City of Perris EJ policies<sup>9</sup>
- Governor’s Office of Planning and Research documents on Environmental Justice<sup>10</sup>, Community Engagement<sup>11</sup>, and General Plan amendments<sup>12</sup>

## 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 98<sup>th</sup> percentile impact census tract and being adjacent to a 99<sup>th</sup> 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** – 98<sup>th</sup> 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 80<sup>th</sup> percentile rank are shown in **Table 1**.

**Table 1.** CalEnviroScreen4.0 scores for individual pollution and population characteristics above the 80<sup>th</sup> percentile in the March JPA census tract. Data from CalEnviroScreen4.0 (released 2021).

| Tract      | variable | Percentile rank (0-100) | Description                                    |
|------------|----------|-------------------------|--|
| 6065046700 | ClScoreP | 98                      | CalEnviroScreen Impact Score                   |
| 6065046700 | PolBurdP | 95                      | Pollution Burden Score                         |
| 6065046700 | PopCharP | 95                      | Population vulnerability characteristics Score |

<sup>3</sup> <https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-Ch10-HCE-092121.pdf>

<sup>4</sup> <https://caleja.org/2017/09/sb-1000-toolkit-release/>

<sup>5</sup> <https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>

<sup>6</sup> <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

<sup>7</sup> [https://riversideca.gov/cedd/sites/riversideca.gov.chedd/files/pdf/planning/2021/Housing\\_Element/2021-09%20EJ%20-%20City%20Council%20Draft.pdf](https://riversideca.gov/cedd/sites/riversideca.gov.chedd/files/pdf/planning/2021/Housing_Element/2021-09%20EJ%20-%20City%20Council%20Draft.pdf)

<sup>8</sup> <https://moval.gov/cdd/documents/general-plan-update/draft-docs/GP-Elements/08.pdf>

<sup>9</sup> <https://www.cityofperris.org/home/showpublisheddocument/15026/637807115505230000>

<sup>10</sup> [https://opr.ca.gov/docs/20200706-GPG\\_Chapter\\_4\\_EJ.pdf](https://opr.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf)

<sup>11</sup> [https://opr.ca.gov/docs/OPR\\_C3\\_final.pdf](https://opr.ca.gov/docs/OPR_C3_final.pdf)

<sup>12</sup> [https://opr.ca.gov/docs/OPR\\_C10\\_final.pdf](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 98<sup>th</sup> percentile high ozone pollution and groundwater pollution (PFAS spills, see hazards letter). Communities are exposed to 80<sup>th</sup>+ 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 8<sup>th</sup> 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 **99.8<sup>th</sup>** 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).

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<sup>13</sup>. 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

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<sup>13</sup> [https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification\\_.pdf](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

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**”)).’

### EJ Workshops Railroad 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.

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.

## 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<sup>14</sup>. 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 sunseting 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.

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

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<sup>14</sup> <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. '14<sup>th</sup> 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.

*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 policies 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.

- 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.

### Promote Food Access

I ask that the MJPA establish at least one grocery store or health food option within its planning area. To date 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

## Nina Schumacher

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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 sunseting 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.

Sincerely,

Carlos Lliguin  
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.

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.

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, 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<sup>1</sup>, 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.

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<sup>1</sup> [https://www.marchjpa.com/documents/docs\\_forms/general\\_plan\\_update\\_02172022.pdf](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 6<sup>th</sup> Screencheck dated July 31, 2023.

## 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'.

### 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.

### 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

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.

- 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. Aesthetics 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

- **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<sup>2</sup> revision doesn’t include any mention of environmental justice at all. Inconsistent.
- **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.

#### 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 99.8<sup>th</sup> 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.

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<sup>2</sup> <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.

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.

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.

## 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.
- **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.

### 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.

- **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.

#### 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 sunseting 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.

#### 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

#### **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

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:

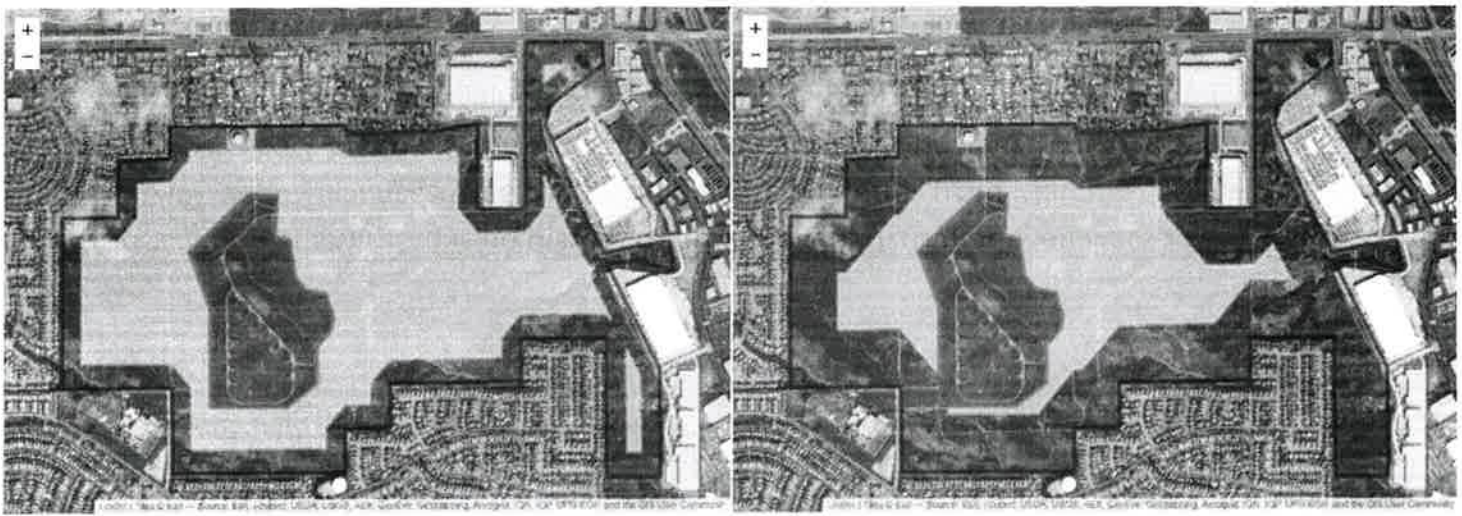
*'Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space (Figure 3-2). The March JPA General 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.'*

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.
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.
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 9<sup>th</sup> 2023 EIR letter which documents how there is no history of proposed industrial or even warehouse use.



**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.

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.

### 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 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).<sup>3</sup>*

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.

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

<sup>3</sup> [https://opr.ca.gov/docs/OPR\\_C10\\_final.pdf](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.

Sincerely,

Mike McCarthy, PhD

Riverside Neighbors Opposing Warehouses

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

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?

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](http://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. 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 14<sup>th</sup> 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.

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.

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

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.

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 sunseting 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

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?

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  
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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.

### **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 sunseting 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?

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<sup>1</sup> and is finalized. There is no way to

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<sup>1</sup> 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.

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,<sup>2</sup> 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.

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<sup>2</sup> 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.**

### 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.”<sup>3</sup>

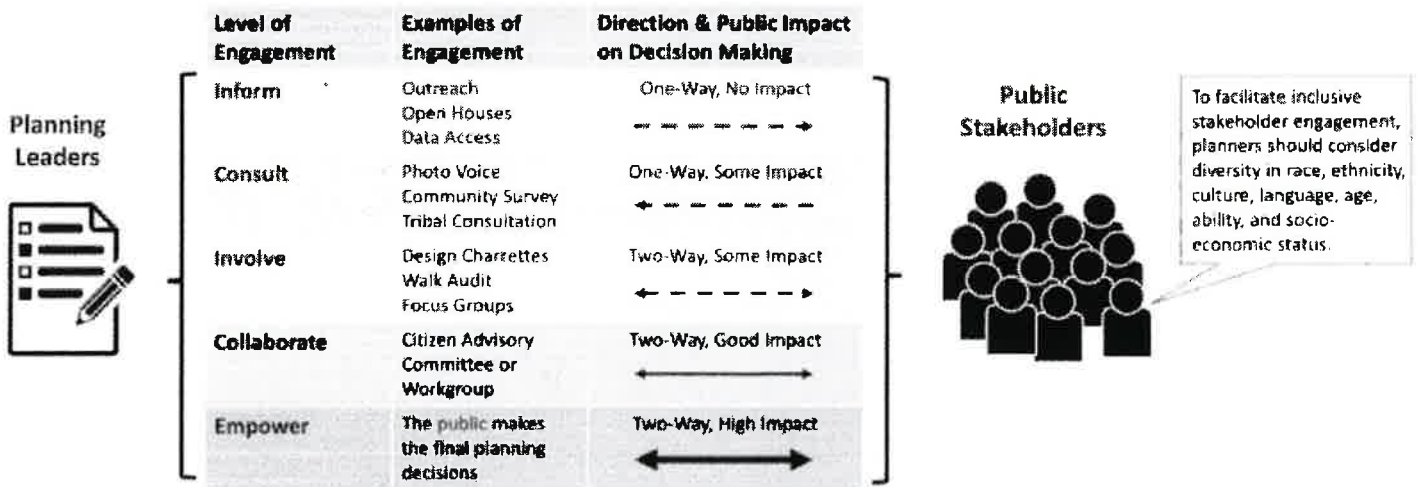
In the document they also provide a figure showing a spectrum of levels of community engagement:<sup>4</sup>

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<sup>3</sup> 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](https://opr.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf)

<sup>4</sup>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.

- 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 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?

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.

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.

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.

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)

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.

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.”

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.<sup>5</sup> In it, the

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<sup>5</sup> 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?

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.<sup>6</sup> 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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<sup>6</sup> 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.

Thank you for the opportunity to provide comments on the REIR. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in cursive script, reading "Jennifer Larratt-Smith". The signature is written in dark ink and is positioned above the printed name.

Jennifer Larratt-Smith

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.

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)

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.

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.

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 sunseting 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.

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.

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.

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.

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



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.

### **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?

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

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.

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

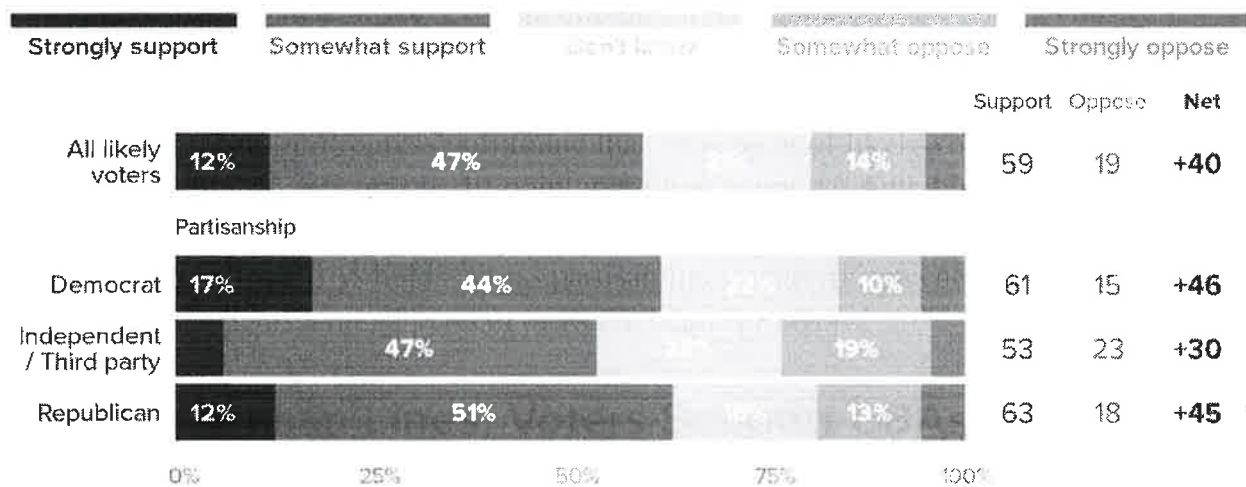
warehouse project because the City felt it fell beyond the City’s legal authority to approve as CEQA-related Mitigation Measures or as the Conditions of Approval related to the requested entitlements. This applicant was motivated to work with the government to win a project, but they did not engage with 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.

## Across Partisan Lines, Voters Support CBAs for Development Projects

A Community Benefits Agreement (CBA) is a legally binding agreement between a project developer and a community where a project will be built. The CBA describes the benefits a project developer promises to give to a community in exchange for the community’s support for the project.

Do you support or oppose the use of CBAs on development projects?



June 10–13, 2022 survey of 1,268 likely voters

DATA FOR PROGRESS

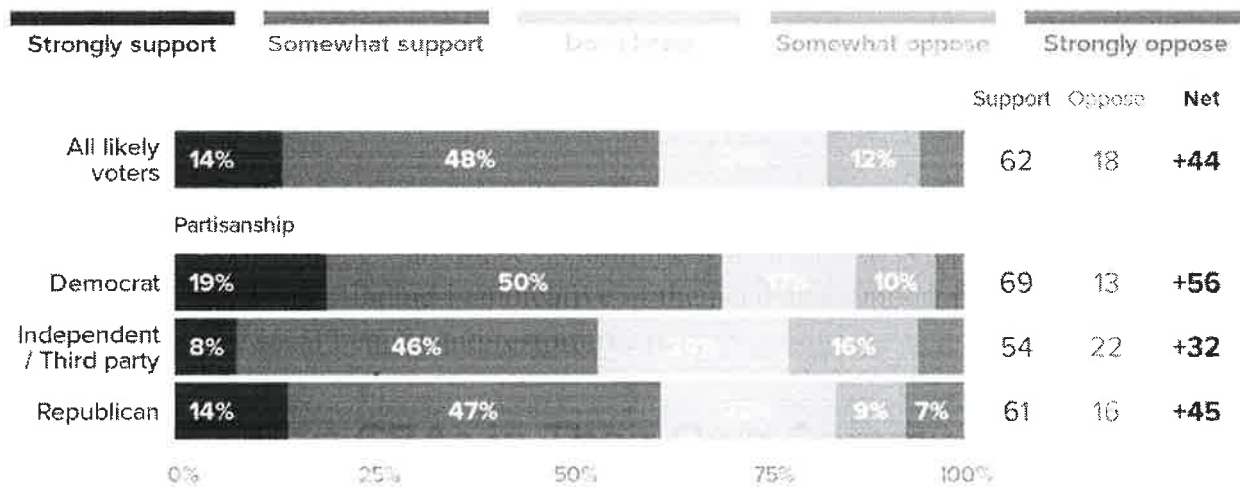
This same report identifies support for CBAs increases when voters think about their own communities, with 62 percent of respondents in favor of local CBAs. Notably, when asked if they would support or oppose the use of a CBA for a proposed development project in their community, 17 percent of both Black and Latina/o voters indicate they would “strongly support” a CBA. Given historical and ongoing systemic racism and the predatory siting of development

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.

## Voters Support CBAs in Their Own Communities

A Community Benefits Agreement (CBA) is a legally binding agreement between a project developer and a community where a project will be built. The CBA describes the benefits a project developer promises to give to a community in exchange for the community's support for the project.

If there was a proposed development project in **your community**, would you support or oppose the use of a CBA?



June 10–13, 2022 survey of 1,268 likely voters

DATA FOR PROGRESS

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.

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

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.

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.

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 much 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.

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 CNDDDB.
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

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.

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.

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

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.

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.



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?

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.

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

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 intend to adhere to the settlement requirements and guidelines. How do you justify not considering the main truck traffic routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Why don't you consider the cumulative impacts for traffic within a five-mile radius of this project? Ignoring it is irresponsible.

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the 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.

Your revised plan also does not account for the noise pollution associated 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.

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.

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.

## **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.

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.

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

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.

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.

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.

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

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,

without oversight, they will do so and their predatory nature will continue without government protection of residents like me and my neighbors.

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 sunseting 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 sunseting 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.

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.

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)



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.

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.

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 it 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 contracts 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.

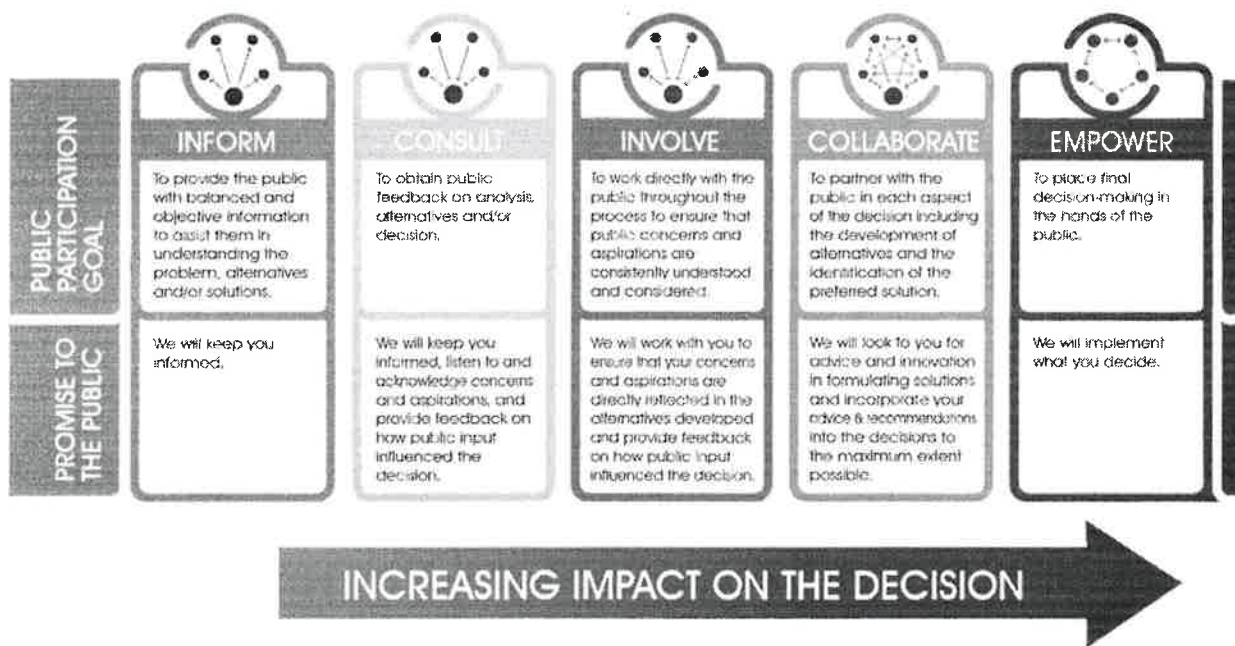
Another example of a one-way community engagement event was on August 18, 2022 when you hosted a presentation of the proposed plan at an open house at the March Air Museum. This event was open to the public and the public believed we were going to be able to discuss the plans with you, provide meaningful 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 false 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 inclined 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 sunseting 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 statute 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 statute," 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 muddled, 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 statute, 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 statute. 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.

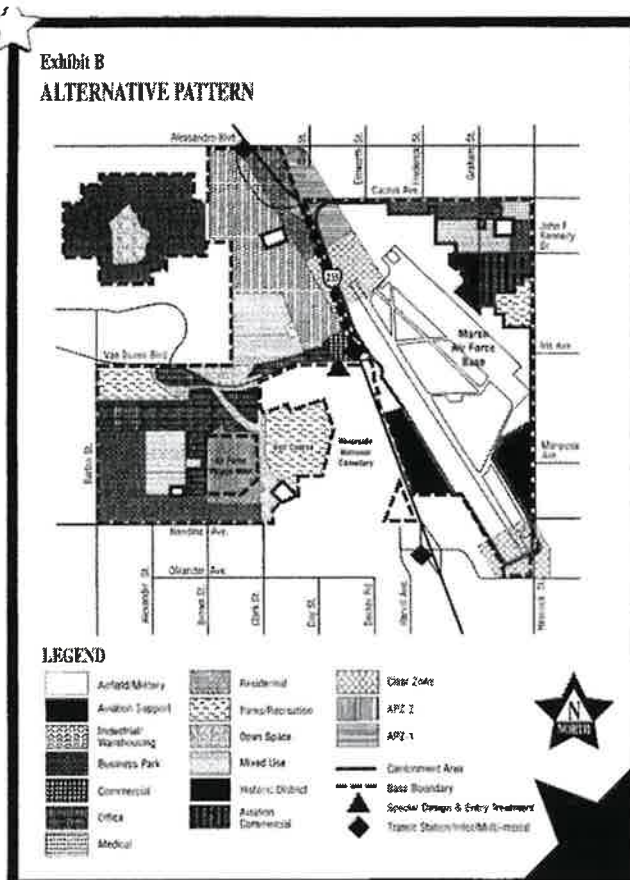
Therefore, I once again urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference (found in both the General Plan and draft Environmental 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.





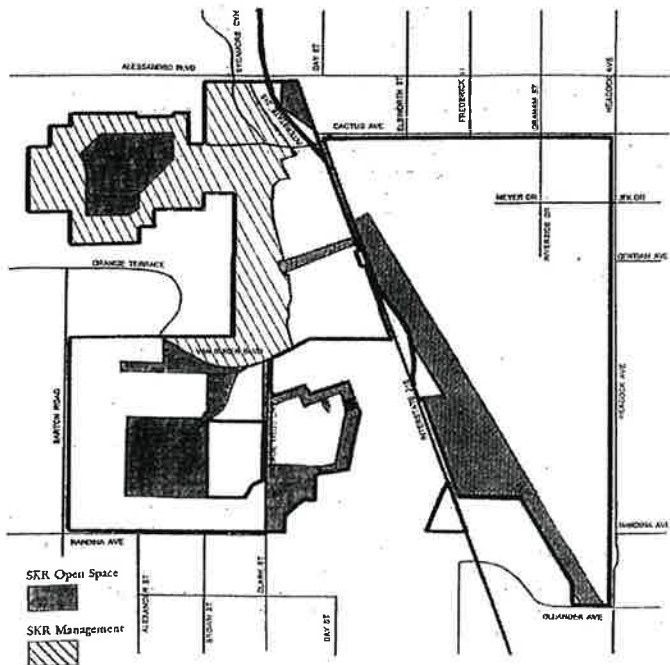
**TABLE 3-1**  
**BUILDOUT MARCH JPA PLANNING AREA**

| Land Use Designation           | Acres GROSS | Density            |                    | Buildout Capacity*                       |
|--------------------------------|-------------|--------------------|--------------------|--|
|                                |             | MAX.               | AVG.               |  |
| <b>INDUSTRY</b>                |             |                    |                    |  |
| Business Park                  | 1278        | .75                | .20                | 7,793,755 sf                             |
| Industrial                     | 433         | .60                | .15                | 1,980,455 sf                             |
| <b>SUBTOTAL:</b>               |             |                    |                    | <b>9,774,210 sf</b>                      |
| <b>COMMERCE</b>                |             |                    |                    |  |
| 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                             |
| <b>SUBTOTAL:</b>               |             |                    |                    | <b>5,136,377 sf</b>                      |
| <b>PUBLIC</b>                  |             |                    |                    |  |
| Park/Recreation/<br>Open Space | 777         | .25                | .025               | 592,307 sf                               |
| Public Facility                | 449         | .50                | .10                | 1,369,091 sf                             |
| <b>SUBTOTAL:</b>               |             |                    |                    | <b>1,961,398 sf</b>                      |
| <b>SPECIAL</b>                 |             |                    |                    |  |
| Military Operations            | 2102        | n/a                | n/a                | 2,500,000 sf                             |
| Aviation                       | 316         | .40                | .15                | 1,445,321 sf                             |
| Historic District              | 58          | 2 <sub>dw/uc</sub> | 2 <sub>dw/uc</sub> | 111 units                                |
| AEVW Expansion                 | 75          | .60                | .30                | 686,070 sf                               |
| Cemetery Expansion             | 160         | .10                | .005               | 24,394 sf                                |
| <b>SUBTOTAL:</b>               |             |                    |                    | <b>4,655,786 sf</b><br><b>111 units</b>  |
| <b>TOTAL</b>                   |             |                    |                    | <b>21,527,769 sf</b><br><b>111 units</b> |

ac - acre      sf - square feet      du/ac - dwelling unit per acre  
FAR - floor area ratio      \* based on average FAR, of net acre

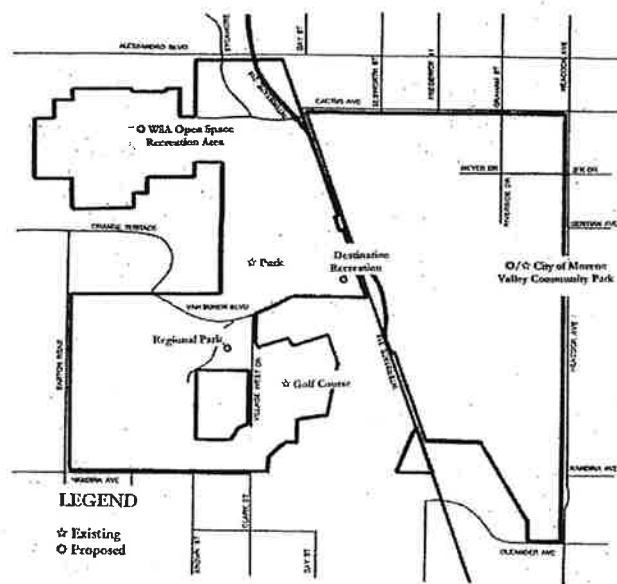
The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. This was the same map and designation I was presented with when I bought my house in 2009. In fact, 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.

Exhibit 5-1  
SKR Management & Open Space Areas



March Joint Water Authority - General Plan  
Final  
5-22

Exhibit 5-4  
Recreation Facilities (Existing & Proposed)



March Joint Water Authority - General Plan  
Profile Reports  
5-37

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 disproportionately impacted by these warehouses thanks to the JPA and the predatory nature of the developer.



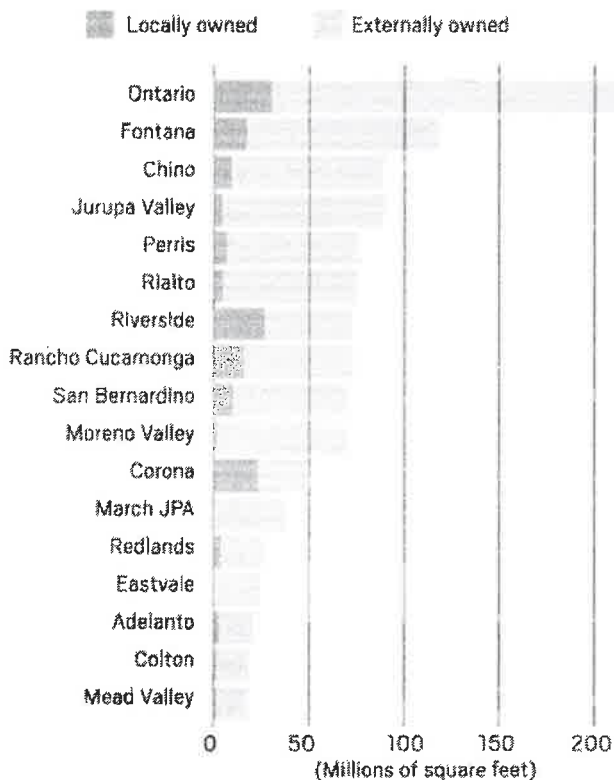


As the updated maps above demonstrate, the 215/60 freeway corridor is disproportionately impacted by the sprawl of warehouses and logistics as is most of the Inland Empire. The JPA has specialized in placing warehouses on a majority of the land it was tasked with repurposing. So, one has to ask why build 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)."

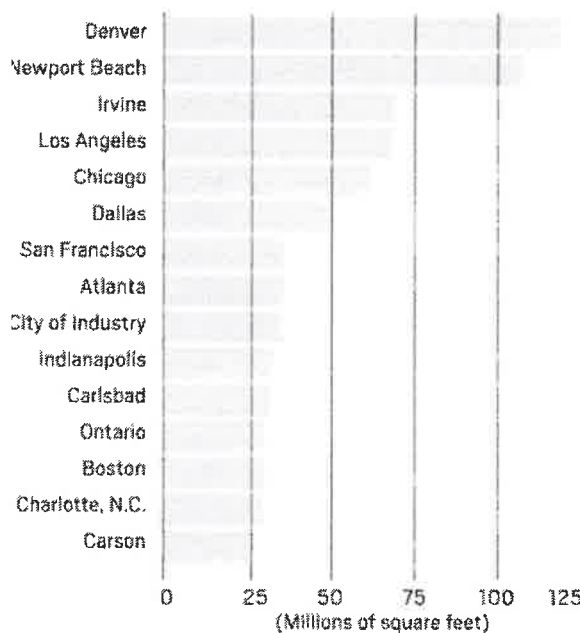
Fortunately, a little work and publicly available information provides me with some insight to avoid the conspiracies about why there are so many warehouses in the JPA's territory. In a meeting with the JPA in April 2022, I was told that most of these warehouses are built as speculative developments, 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.

## Inland warehouses, non-Inland owners

Most of the Inland Empire's logistics footprint is owned by companies with addresses outside the two-county region.



## Top 15 cities with companies that own inland warehouses



Source: Mike McCarthy, Riverside environmental consultant

JEFF GOERTZEN, SCNG

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?

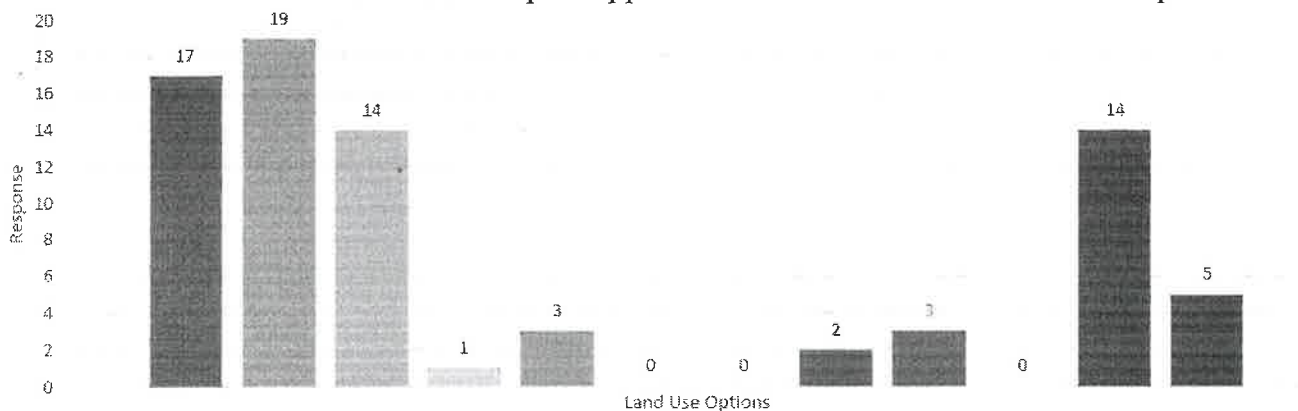
You do not explain this in your recirculated draft EIR. How will you hold them accountable on our behalf (a function of government)? How will you enforce your own mission identified in the General Plan, the one that protects community values, health, and history from narrowly focused and neglectful land 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 sunseting?

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:



- 1,226 acres of parks, open-space, recreation, and public services that provide opportunities for leisure, enjoyment, relaxation, and visual relief
- A state or county park to preserve the historical, cultural, and natural heritage of this landscape and provide recreation opportunities
- A community park and memorial to the US Air Force and the history of March Air Force Base
- A collaborative private and public research campus to address clean energy and new technology
- A veterans village promoting short-term housing, career training, and business spaces
- 348,532 acres of industrial, warehouses, business park, and retail space
- 383,042 acres of industrial, warehouses, business park, and retail space
- 60.28 acre park for active and passive uses
- Retail business park and shopping center
- Low-density, affordable housing
- 445 acre conservation easement
- A medical campus for veterans

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 such 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 MIPA 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 sunseting 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 sunseting 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 an 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 here 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 sunset 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?

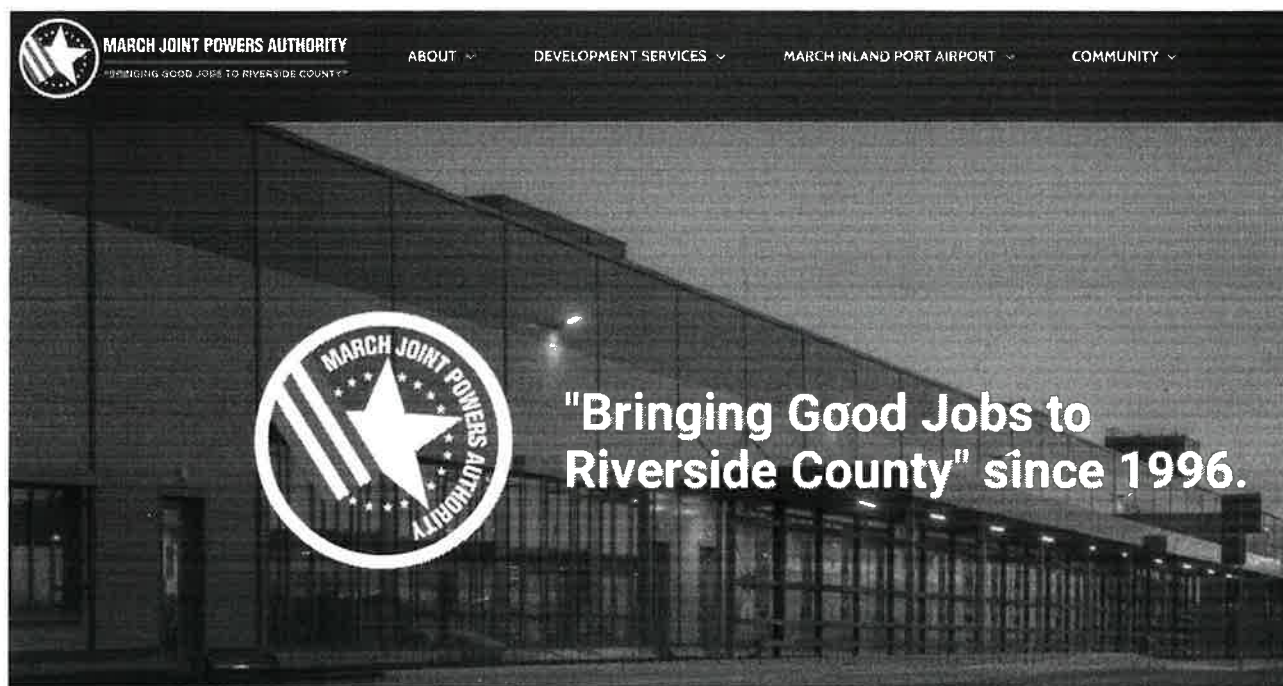
- Pages 4.8-40-41, Section 4.8.6 Mitigation Measures-HAZ1: If this project does not begin demolition prior to the March JPA sunset in July 2025, what assurances and procedures exist that the County of Riverside will be able to adhere to these same findings and mitigations, or that during the time between 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.

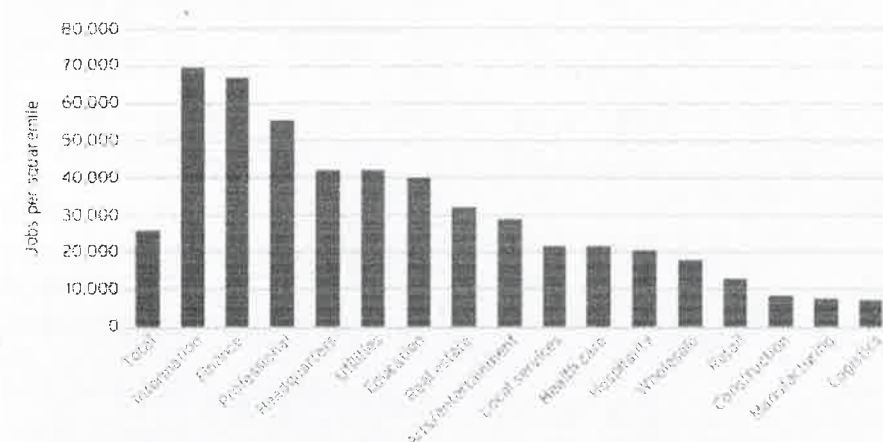
The continued insistence for only industrial and logistics jobs and buildings in western Riverside County is a slide backwards economically and socially. Some may argue it is a form of social and economic injustice. By forcing a specific industry or employer on people who live in an area, you are forcing 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.

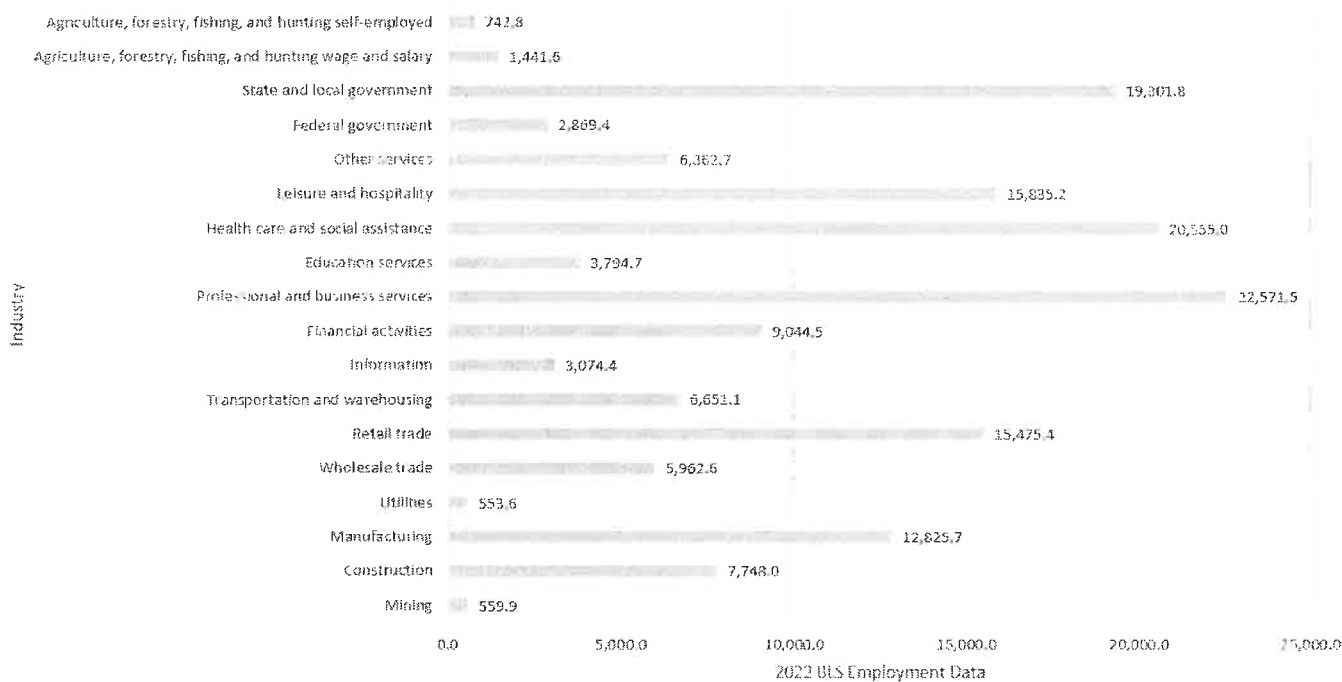


**Figure 10. Jobs in advanced services sectors are located in the densest parts of metro areas on average**

Job density by sector in 2015



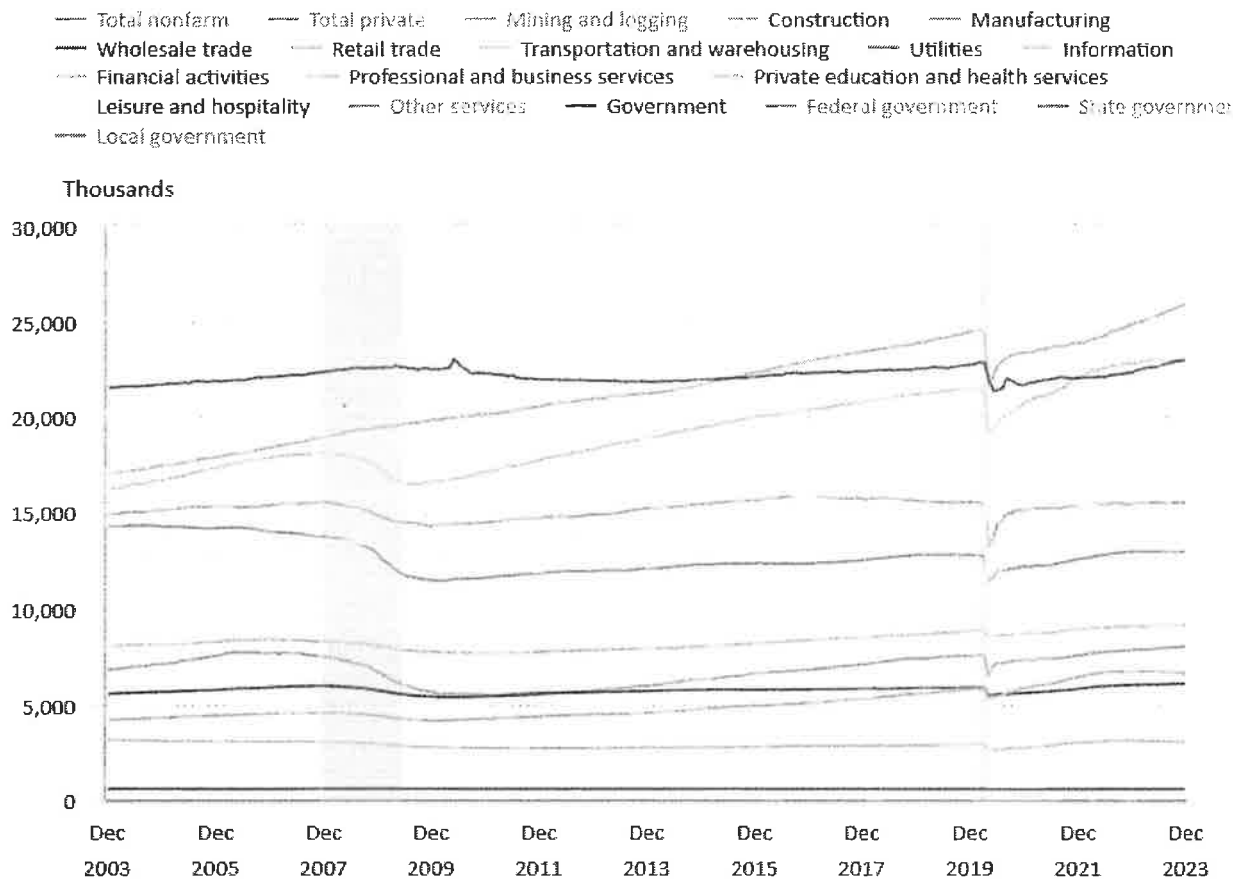
Note: Agriculture and mining are not shown due to their small number of jobs but count toward the total.  
 Source: Brookings analysis of Census LEHD Origin-Destination Employment Statistics



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.

## Employment levels by industry, seasonally adjusted

Click and drag inside chart to change dates displayed



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/CCA EJ 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.

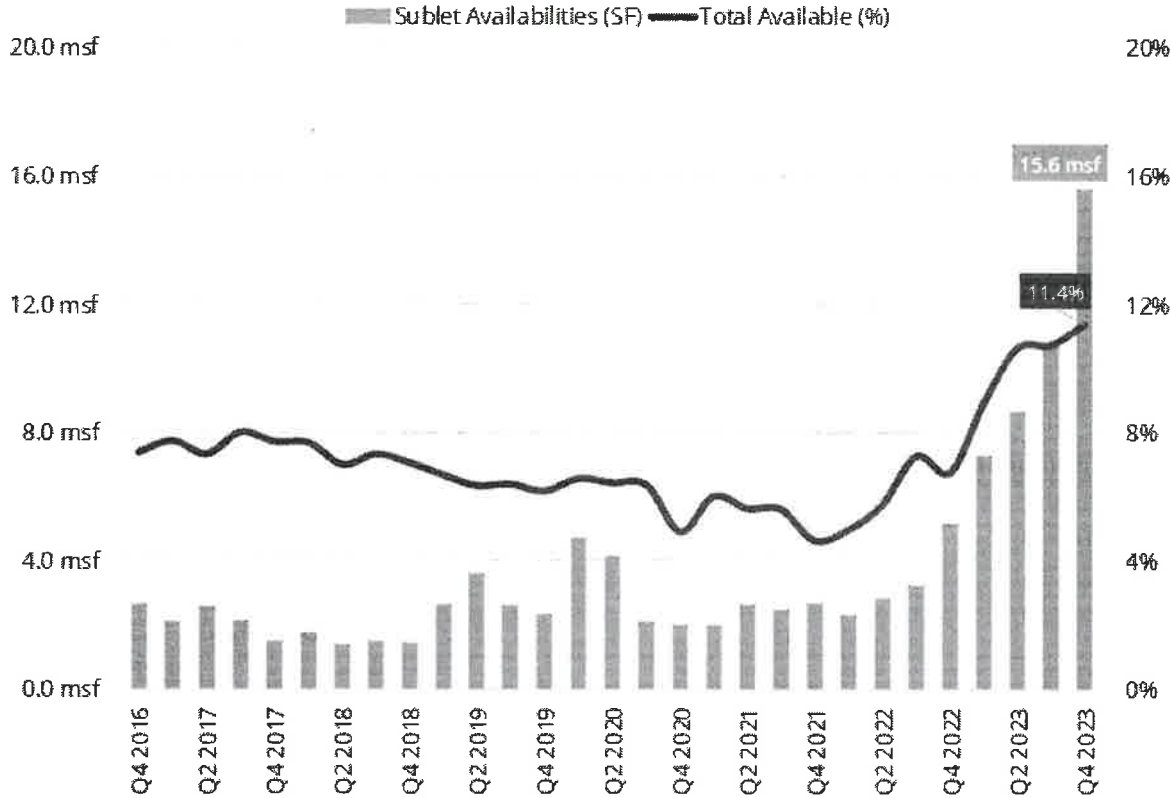
A once-booming U.S. warehousing market is coping with signs of contraction as businesses consolidate warehouses and, in some cases, upgrade existing sites rather than add facilities. The shift comes as retailers have turned the corner on a big drawdown of inventories and are working to align their supply 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.

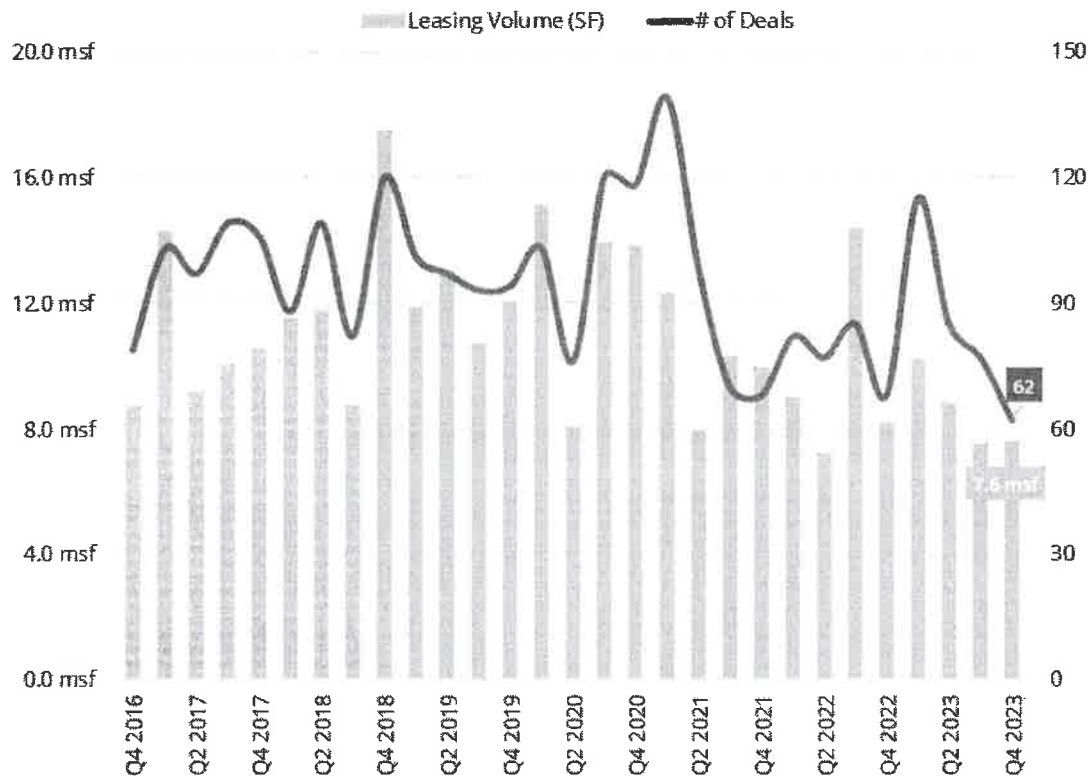
The following graphs illustrate just how quickly the need for MORE warehouses, and specifically the developments being proposed for the West Campus Upper Plateau area, can turn from boom to bust.

## Total Availabilities





# Leasing Activity



## Inland Empire Industrial development pipeline

### 272 properties

97 under construction  
175 proposed

### 151.9 million sf

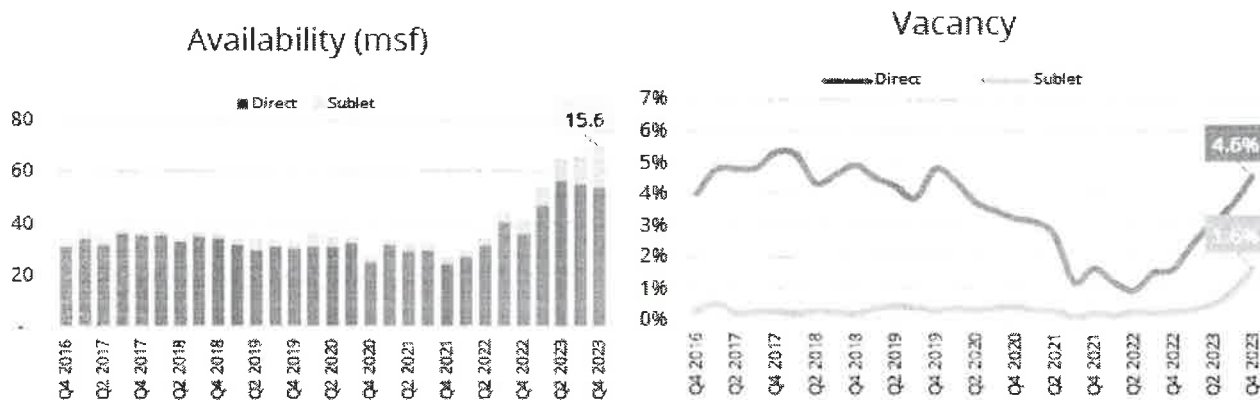
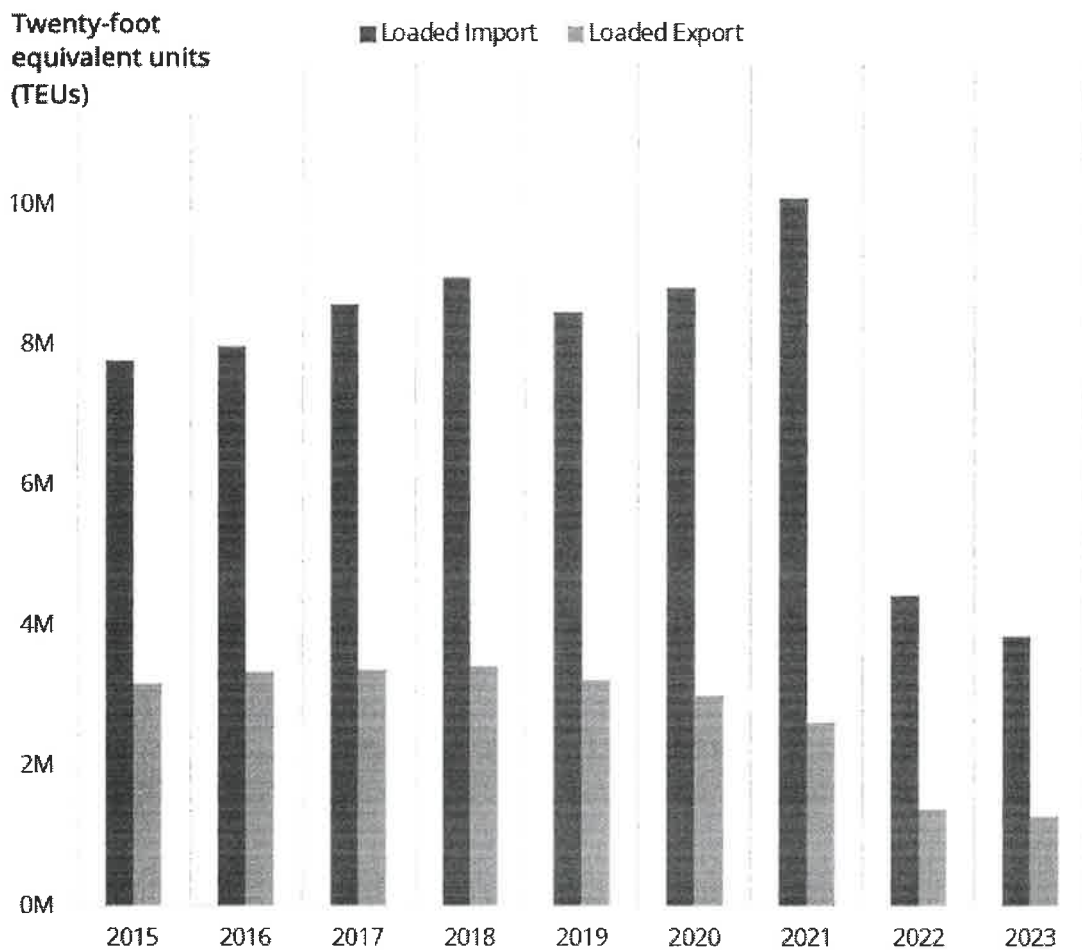
28.4 million sf under construction  
123.5 million sf proposed

### 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-healthy 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, 1<sup>st</sup> paragraph; p.1-5, 1<sup>st</sup> 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

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.

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)

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.

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.

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 sunseting 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.

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.

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.

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.

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



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.

### **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?

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

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.

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

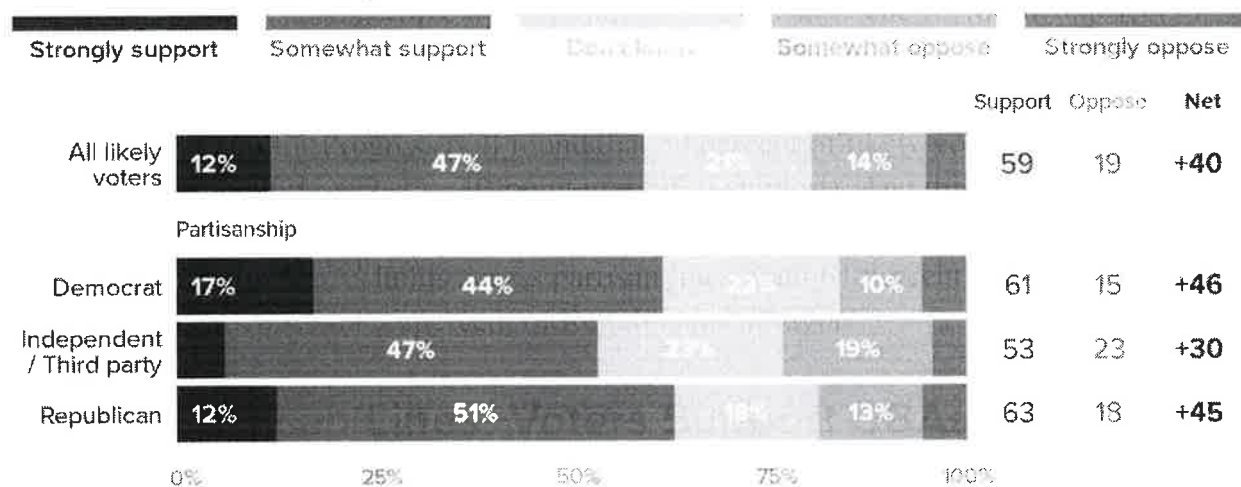
warehouse project because the City felt it fell beyond the City’s legal authority to approve as CEQA-related Mitigation Measures or as the Conditions of Approval related to the requested entitlements. This applicant was motivated to work with the government to win a project, but they did not engage with 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.

## Across Partisan Lines, Voters Support CBAs for Development Projects

A Community Benefits Agreement (CBA) is a legally binding agreement between a project developer and a community where a project will be built. The CBA describes the benefits a project developer promises to give to a community in exchange for the community’s support for the project.

Do you support or oppose the use of CBAs on development projects?



June 10–13, 2022 survey of 1,268 likely voters

DATA FOR PROGRESS

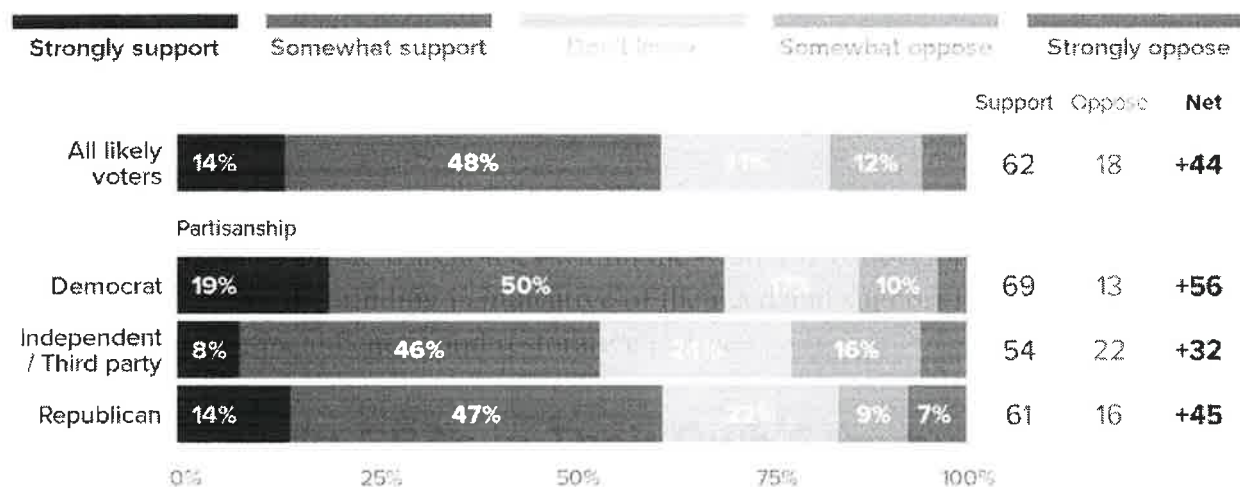
This same report identifies support for CBAs increases when voters think about their own communities, with 62 percent of respondents in favor of local CBAs. Notably, when asked if they would support or oppose the use of a CBA for a proposed development project in their community, 17 percent of both Black and Latina/o voters indicate they would “strongly support” a CBA. Given historical and ongoing systemic racism and the predatory siting of development

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.

## Voters Support CBAs in Their Own Communities

A Community Benefits Agreement (CBA) is a legally binding agreement between a project developer and a community where a project will be built. The CBA describes the benefits a project developer promises to give to a community in exchange for the community's support for the project.

If there was a proposed development project in **your community**, would you support or oppose the use of a CBA?



June 10–13, 2022 survey of 1,268 likely voters

DATA FOR PROGRESS

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.

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

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.

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.

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.

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 CNDDDB.
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

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.

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.

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

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.

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.



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?

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.

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

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 intend to adhere to the settlement requirements and guidelines. How do you justify not considering the main truck traffic routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Why don't you consider the cumulative impacts for traffic within a five-mile radius of this project? Ignoring it is irresponsible.

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the 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.

Your revised plan also does not account for the noise pollution associated 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.

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.

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.

## **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.

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.

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

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.

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.

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.

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

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,

without oversight, they will do so and their predatory nature will continue without government protection of residents like me and my neighbors.

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 sunseting 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 sunseting 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.

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.

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)



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.

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.

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 it 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 contracts 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.

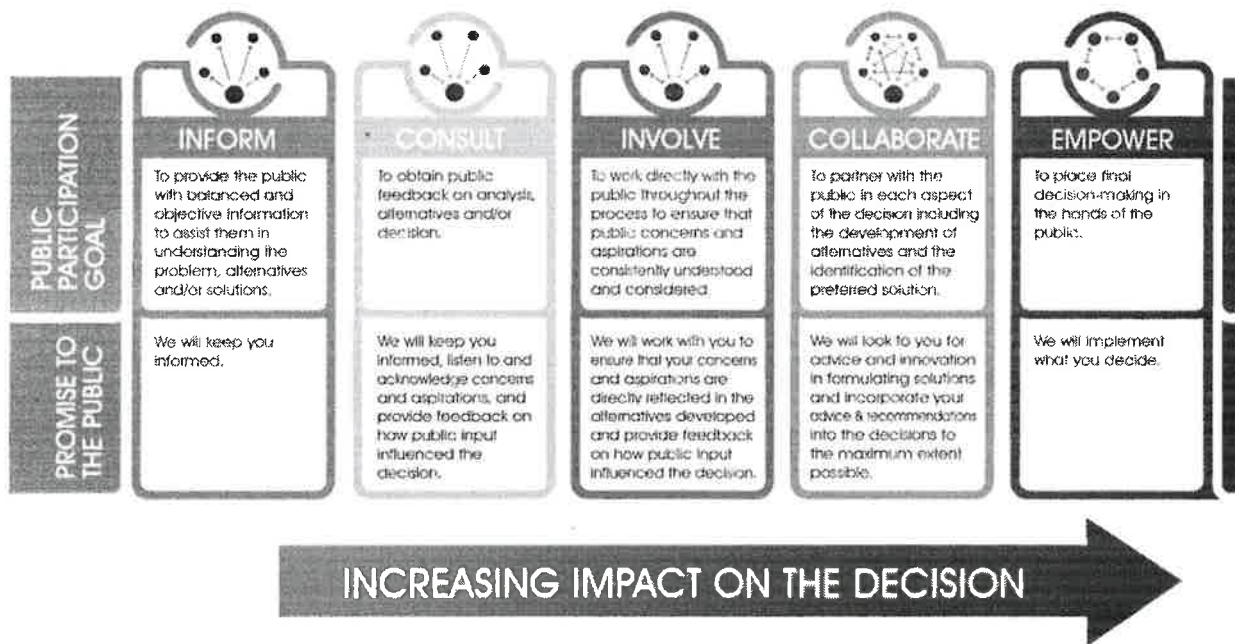
Another example of a one-way community engagement event was on August 18, 2022 when you hosted a presentation of the proposed plan at an open house at the March Air Museum. This event was open to the public and the public believed we were going to be able to discuss the plans with you, provide meaningful 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 false 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 inclined 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 sunseting 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 statute 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 statute," 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 muddled, 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 statute, 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 statute. 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.

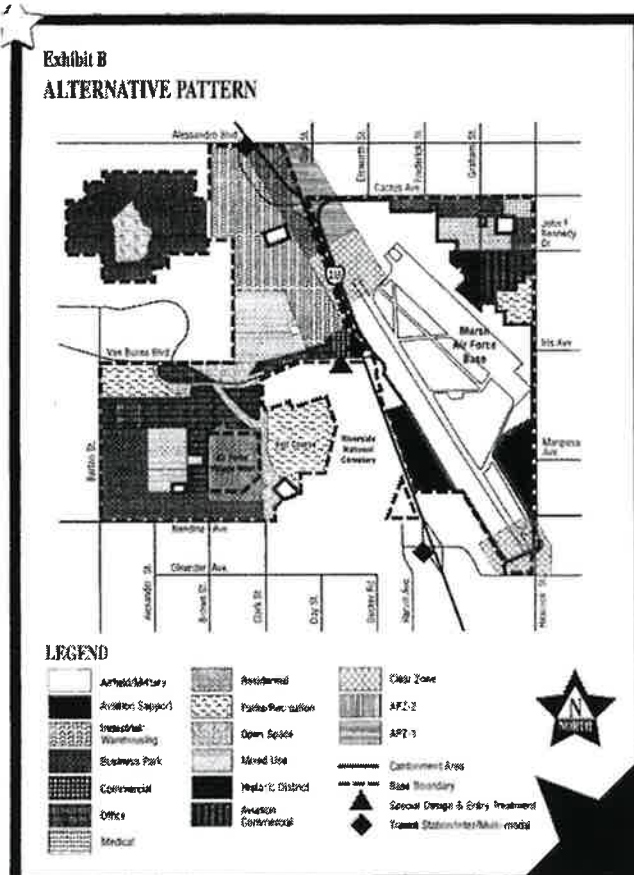
Therefore, I once again urge the March JPA to reject any Specific Plan that includes more than 50 total acres of warehouses in any zoning type (industrial, business park, mixed-use) as incompatible with its pledge to maximize community preference (found in both the General Plan and draft Environmental 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.





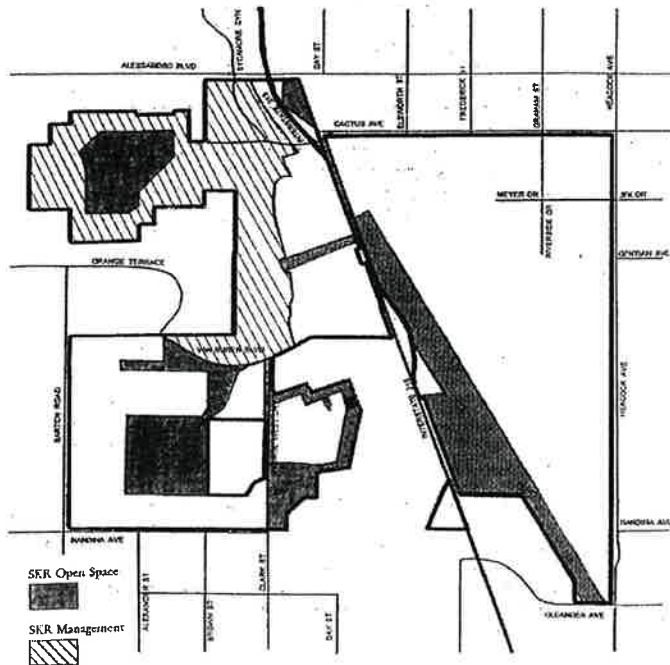
**TABLE 3-1**  
**BUILDOUT MARCH JPA PLANNING AREA**

| Land Use Designation           | Acres GROSS | Density  |          | Buildout Capacity*   |
|--------------------------------|-------------|----------|----------|----------------------|
|                                |             | MAX.     | AVG.     |                      |
| <b>INDUSTRY</b>                |             |          |          |                      |
| Business Park                  | 1278        | .75      | .20      | 7,793,755 sf         |
| Industrial                     | 433         | .60      | .15      | 1,980,455 sf         |
| <b>SUBTOTAL</b>                |             |          |          | <b>9,774,210 sf</b>  |
| <b>COMMERCE</b>                |             |          |          |                      |
| 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         |
| <b>SUBTOTAL</b>                |             |          |          | <b>5,136,377 sf</b>  |
| <b>PUBLIC</b>                  |             |          |          |                      |
| Park/Recreation/<br>Open Space | 777         | .25      | .025     | 592,307 sf           |
| Public Facility                | 449         | .50      | .10      | 1,369,091 sf         |
| <b>SUBTOTAL</b>                |             |          |          | <b>7,961,398 sf</b>  |
| <b>SPECIAL</b>                 |             |          |          |                      |
| Military Operations            | 2102        | n/a      | n/a      | 2,500,000 sf         |
| Aviation                       | 316         | .40      | .15      | 1,445,321 sf         |
| Historic District              | 58          | 2dw/acre | 2dw/acre | 111 units            |
| AFVW Expansion                 | 75          | .60      | .30      | 686,070 sf           |
| Cemetery Expansion             | 160         | .10      | .005     | 24,394 sf            |
| <b>SUBTOTAL</b>                |             |          |          | <b>4,656,786 sf</b>  |
| <b>TOTAL</b>                   |             |          |          | <b>21,527,769 sf</b> |
|                                |             |          |          | <b>111 Units</b>     |

ac - acre      sf - square feet      du/ac - dwelling unit per acre  
FAR - floor area ratio      \* based on average FAR, of net acre

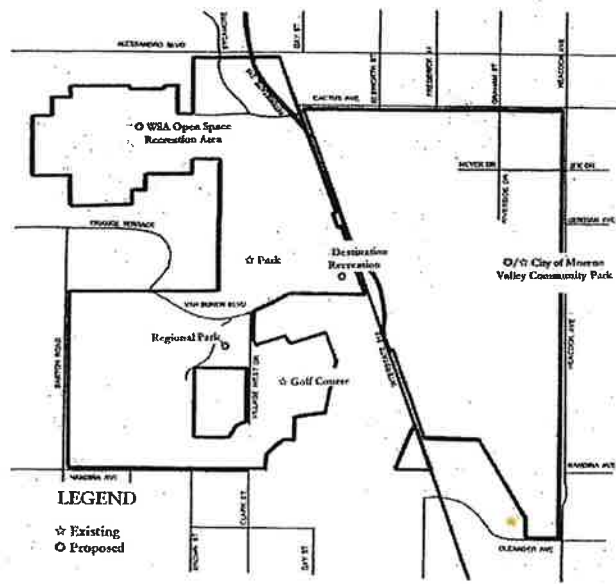
The adopted 1999 General Plan reflects the planning assumptions and again designates the West Campus Upper Plateau as Business Park or reserved space for the previously endangered Stephen's Kangaroo Rat. This was the same map and designation I was presented with when I bought my house in 2009. In fact, 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.

Exhibit 5-1  
SKR Management & Open Space Areas



March Joint Powers Authority - General Plan  
Final  
5-22

Exhibit 5-4  
Recreation Facilities (Existing & Proposed)



March Joint Powers Authority - General Plan  
Profile Reports  
5-37

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 disproportionately impacted by these warehouses thanks to the JPA and the predatory nature of the developer.



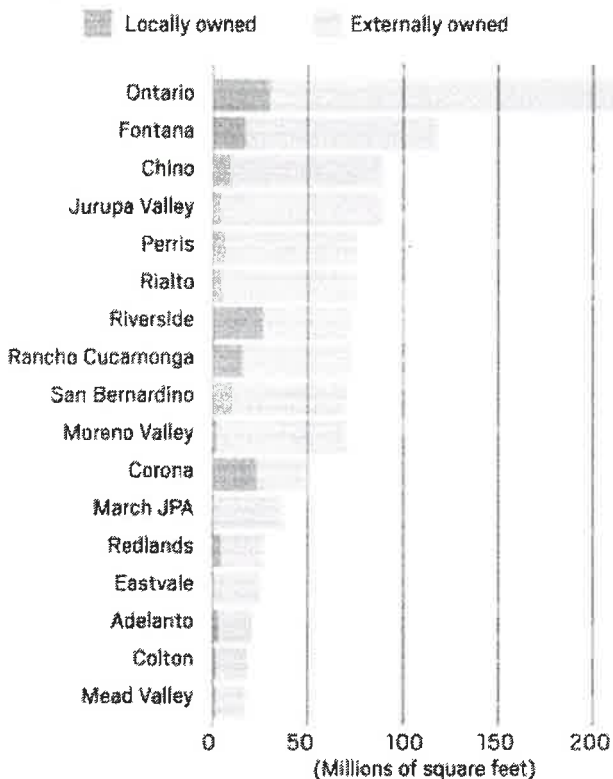


As the updated maps above demonstrate, the 215/60 freeway corridor is disproportionately impacted by the sprawl of warehouses and logistics as is most of the Inland Empire. The JPA has specialized in placing warehouses on a majority of the land it was tasked with repurposing. So, one has to ask why build 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)."

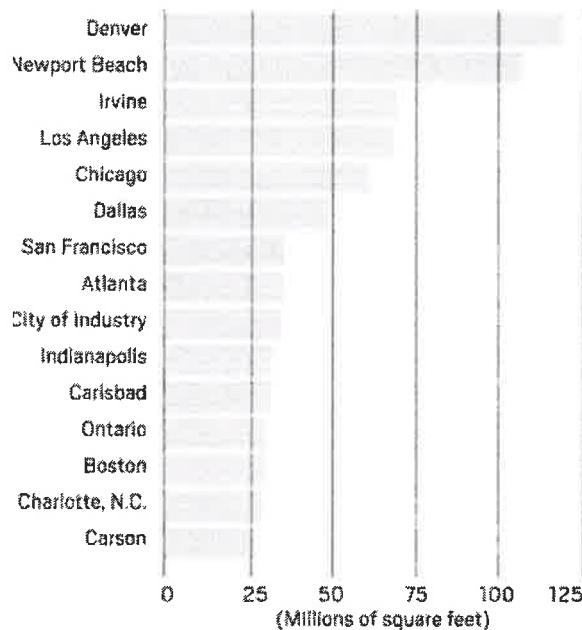
Fortunately, a little work and publicly available information provides me with some insight to avoid the conspiracies about why there are so many warehouses in the JPA's territory. In a meeting with the JPA in April 2022, I was told that most of these warehouses are built as speculative developments, 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.

## Inland warehouses, non-Inland owners

Most of the Inland Empire's logistics footprint is owned by companies with addresses outside the two-county region.



## Top 15 cities with companies that own inland warehouses



Source: Mike McCarthy, Riverside environmental consultant

JEFF GOERTZEN, SCNG

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?

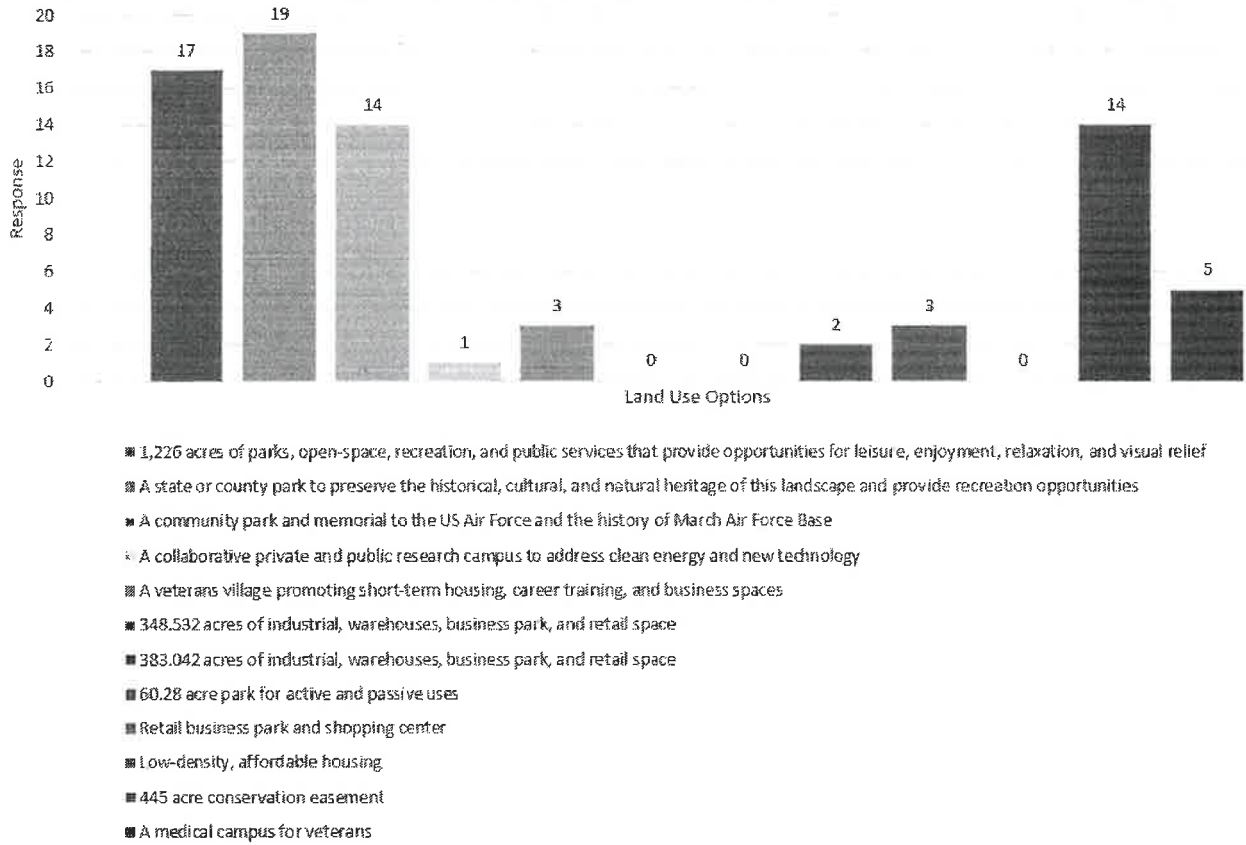
You do not explain this in your recirculated draft EIR. How will you hold them accountable on our behalf (a function of government)? How will you enforce your own mission identified in the General Plan, the one that protects community values, health, and history from narrowly focused and neglectful land 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 such 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 MIPA 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 MIPA 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 an 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 sunset 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 sunset 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 an 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 here 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 sunset 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 sunset 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.

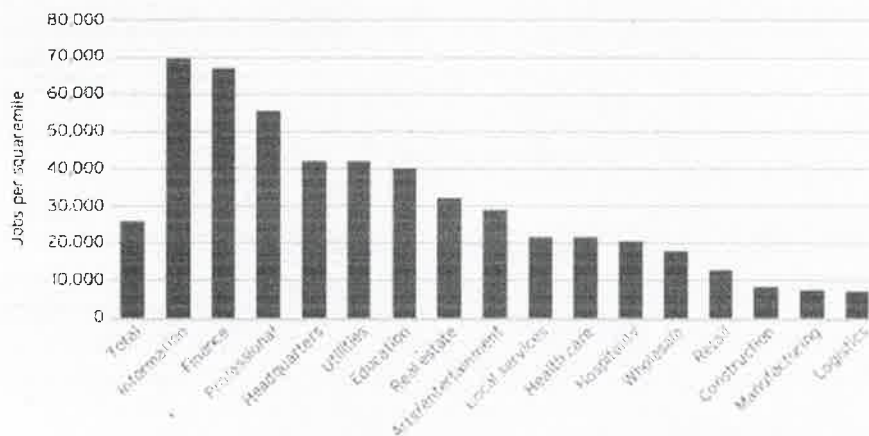
The continued insistence for only industrial and logistics jobs and buildings in western Riverside County is a slide backwards economically and socially. Some may argue it is a form of social and economic injustice. By forcing a specific industry or employer on people who live in an area, you are forcing 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.

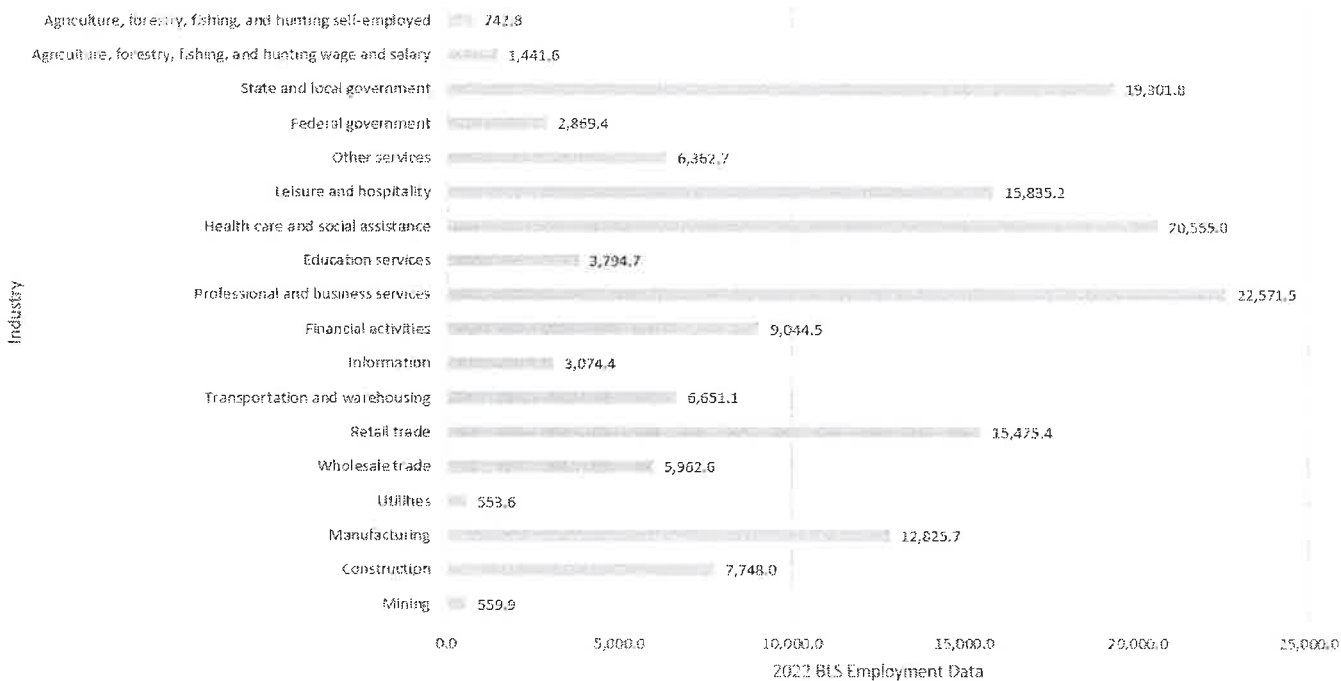


**Figure 10. Jobs in advanced services sectors are located in the densest parts of metro areas on average**

Job density by sector in 2015



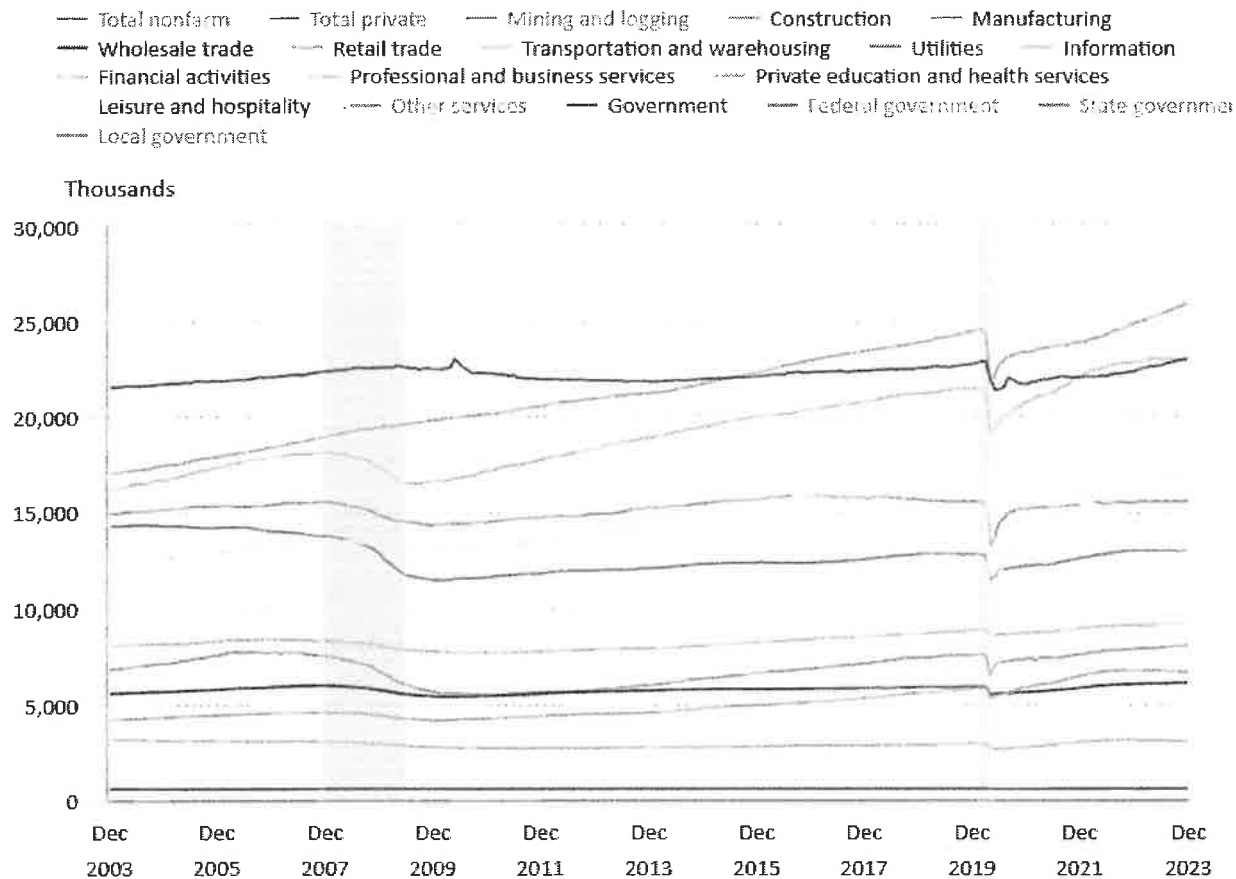
Note: Agriculture and mining are not shown due to their small number of jobs but count toward the total.  
Source: Brookings analysis of Census LEHD Origin-Destination Employment Statistics



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.

## Employment levels by industry, seasonally adjusted

Click and drag inside chart to change dates displayed



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/CCA EJ 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.

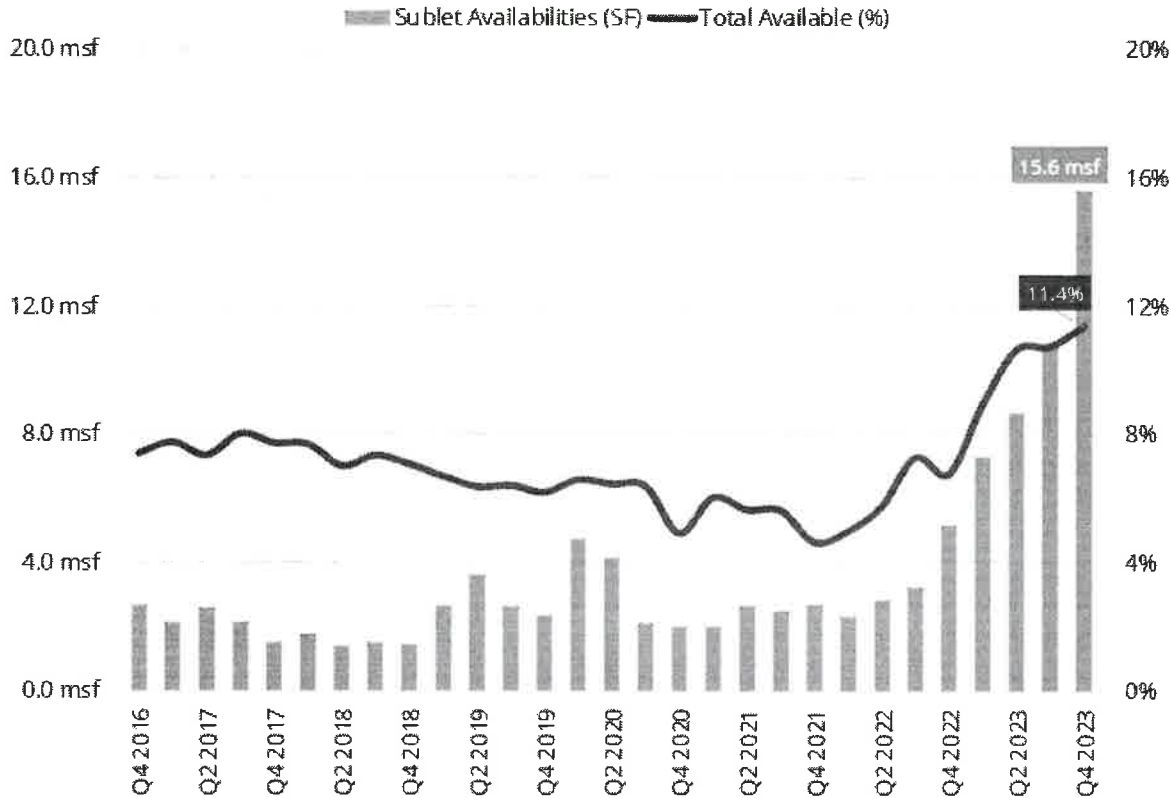
A once-booming U.S. warehousing market is coping with signs of contraction as businesses consolidate warehouses and, in some cases, upgrade existing sites rather than add facilities. The shift comes as retailers have turned the corner on a big drawdown of inventories and are working to align their supply 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.

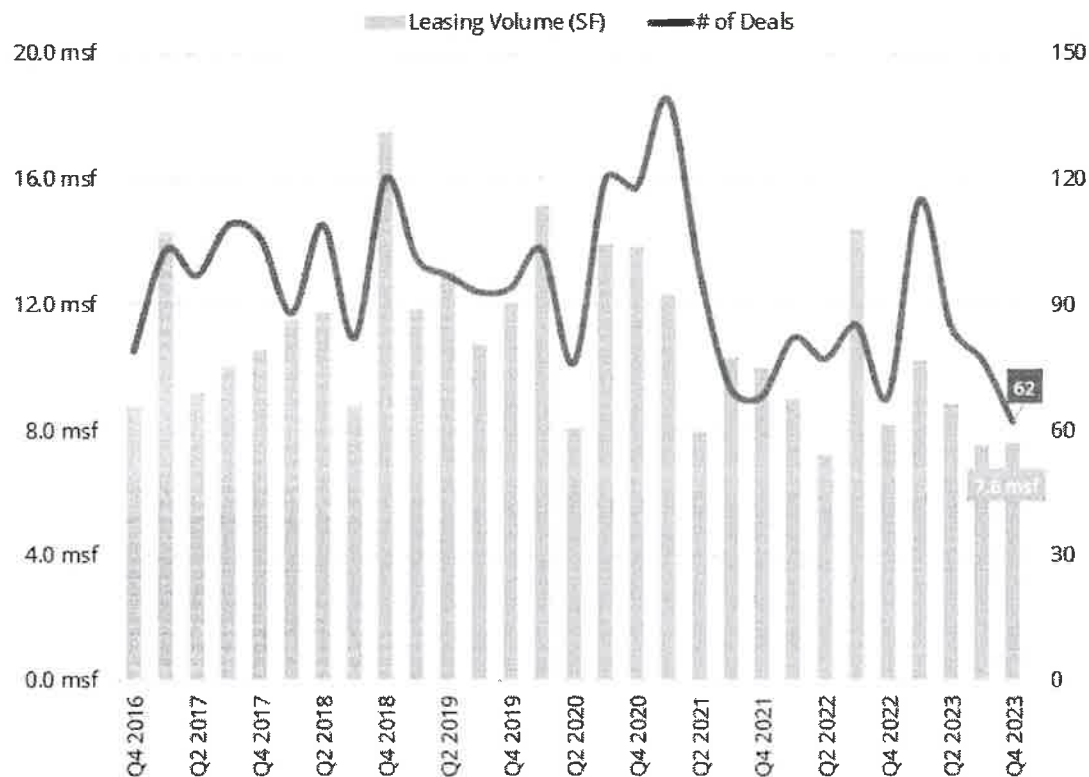
The following graphs illustrate just how quickly the need for MORE warehouses, and specifically the developments being proposed for the West Campus Upper Plateau area, can turn from boom to bust.

## Total Availabilities





# Leasing Activity



## Inland Empire Industrial development pipeline

### 272 properties

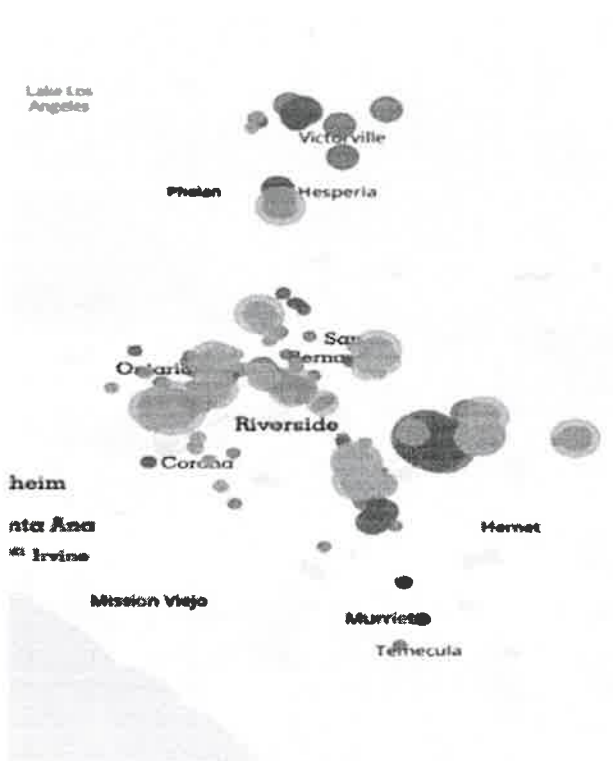
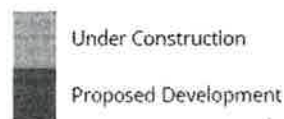
97 under construction  
175 proposed

### 151.9 million sf

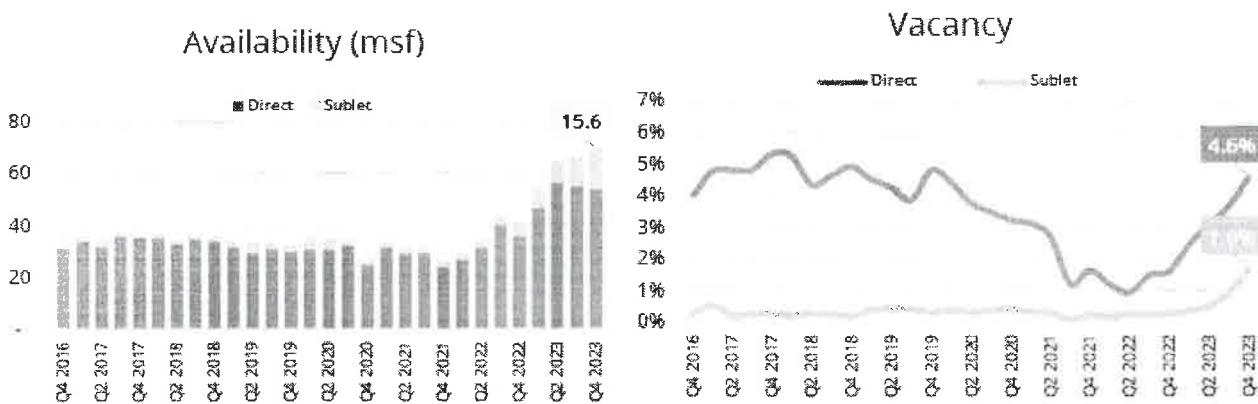
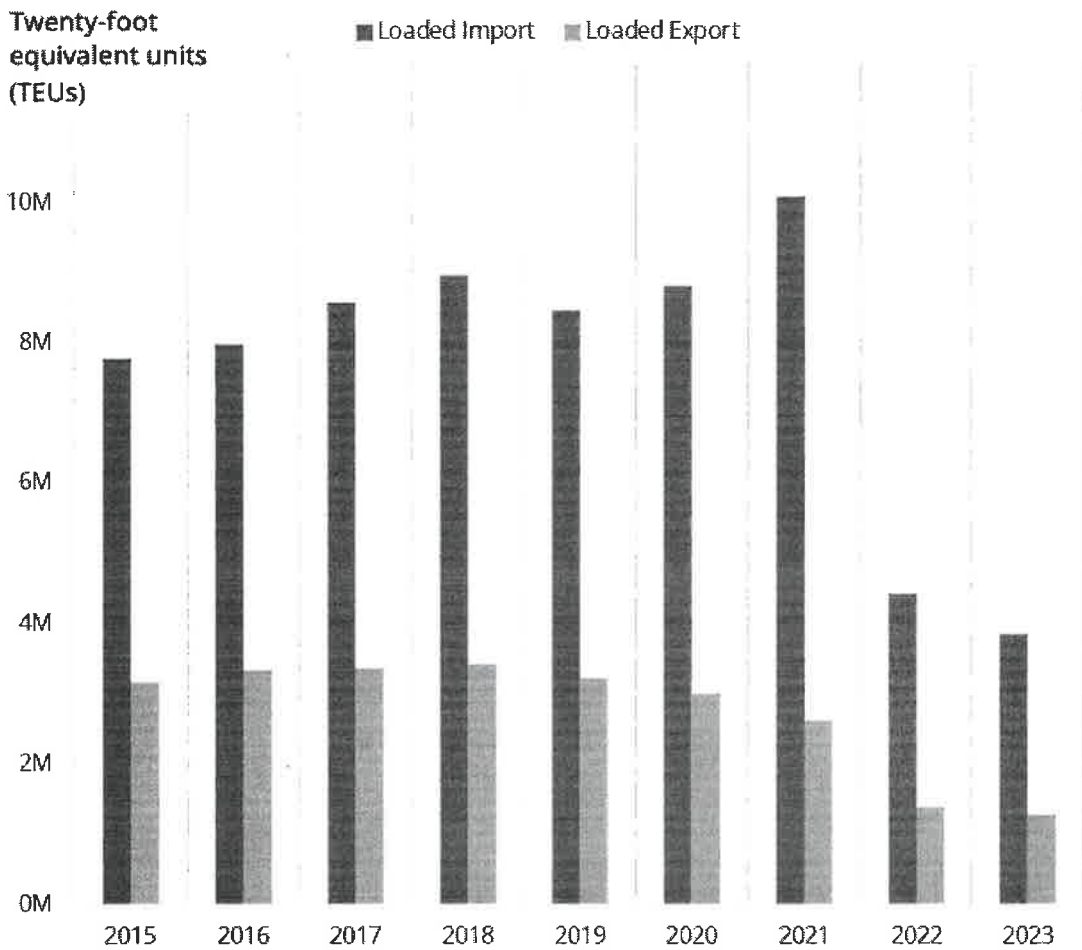
28.4 million sf under construction  
123.5 million sf proposed

### 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-healthy 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, 1<sup>st</sup> paragraph; p.1-5, 1<sup>st</sup> 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

## Nina Schumacher

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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 sunseting 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 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

## Nina Schumacher

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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 sunseting in July 2025.

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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.

Sincerely,

Christina and Kelly Barhorst  
Orangecrest, 92508

## Nina Schumacher

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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 sunseting in July 2025.

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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



## Nina Schumacher

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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 sunseting in July 2025.

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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>

## Nina Schumacher

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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 quality 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.

REIR Community Email TemplateDear Mr. Fairbanks,

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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 sunseting in July 2025.

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As the community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

## Nina Schumacher

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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 sunseting in July 2025.

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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

## Nina Schumacher

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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.

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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

## Nina Schumacher

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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 sunset 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.

Sincerely,

Beverly Arias  
R-Now Supporter

## Nina Schumacher

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**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 sunset 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.

Sincerely, Deb Whitney 6790 Mission Grove Pkwy N Riverside CA 92506

## Nina Schumacher

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**From:** Linda Tingly <linda.tingly@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 sunseting in July 2025.

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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

## Nina Schumacher

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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 sunset 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, Mary Humboldt



## Nina Schumacher

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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.

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.

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 sunset 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.

Sincerely,

Carolyn Rasmussen  
92508

Sent from my iPhone

## Nina Schumacher

---

**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 sunseting 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.

Sincerely,

Rick and Christine Miller  
92508

Sent from my iPhone



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.

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.

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 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 sunseting 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

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.

Sincerely,

Ciara Thrower  
Inland Empire Regional Organizer, California Environmental Voters

**Nina Schumacher**

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**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.

Please reach out if you have any questions.

Thank you,



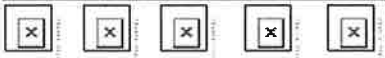
**Ciara Thrower** (she/her)  
**Inland Empire Regional Organizer**  
California Environmental Voters

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E [ciara@envirovoters.org](mailto:ciara@envirovoters.org) | W [www.envirovoters.org](http://www.envirovoters.org)  
M 909.827.8790

***We are now EnviroVoters, formerly CLCV.***

***Learn about the name change.***



## Nina Schumacher

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**From:** Perez, Corinne <perezc@ajjusa.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 sunset 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. 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.

Sincerely,

Corinne Perez  
92508

## Nina Schumacher

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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 sunseting 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,

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.

David Drexler  
92506.



## Nina Schumacher

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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 sunseting 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.

Sincerely,  
Frank and Michelle Erdodi  
92508

Sent from my iPad

## Nina Schumacher

---

**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 sunseting 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. More warehouses are not the answer!

Sincerely,

Gabriella Zlaket  
92508

## Nina Schumacher

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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 sunset 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.

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.

Sincerely,

Honey Bernas  
Orangecrest Resident

## Nina Schumacher

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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 sunseting 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.

Sincerely,  
Jack Katzanek  
92508

## Nina Schumacher

---

**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 sunseting 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.

Sincerely,  
Jason Gonsman  
92508

## Nina Schumacher

---

**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 sunseting 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.

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!!

Sincerely,

Jeannine Sabel  
92506

## Nina Schumacher

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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.

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)

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.

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

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.

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/>

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 sunseting 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,

Sincerely,

Jennifer Diaz



## Nina Schumacher

---

**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 sunseting 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.

Sincerely,

Josie Sosa  
92508

## Nina Schumacher

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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 sunset 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.

Sincerely,  
Lani Creely  
92508

Sent from the all new AOL app for iOS

**Nina Schumacher**

---

**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 sunseting 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.

Sincerely,

<name>  
<zip code>

## Nina Schumacher

---

**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 sunseting 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,  
Lin Zhao  
92508

## Nina Schumacher

---

**From:** Linda Tingly <linda.tingly@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 sunseting in July 2025.

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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

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.

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.

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:

- 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<sup>[1]</sup>, 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)

## 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<sup>[2]</sup>, 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.

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.*

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"<sup>[1]</sup>; 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."

## **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 present at 11 mg/kg (regulatory level 5.0 mg/L)<sup>[2]</sup>; 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.

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.

[1][https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjw697KqMqEAxUJJJEQIHXLdAi8QFnoECA8QAQ&url=https%3A%2F%2Fwww.osha.gov%2Fsites%2Fdefault%2Ffiles%2FGUIDELINE\\_FOR\\_DEVELOPING\\_SAMPLING\\_AND\\_ANALYTICAL\\_METHODS.docx&usg=AOvVaw2p0B1KfVN4aneCBuGZhTWi&opi=89978449](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjw697KqMqEAxUJJJEQIHXLdAi8QFnoECA8QAQ&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.**

Sincerely,

Linlin Zhao  
Riverside, CA 92508

**Nina Schumacher**

---

**From:** Lorelee 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 sunseting 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,

Loralee Larios  
92506

## Nina Schumacher

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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 sunseting in July 2025.

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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

## Nina Schumacher

---

**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 sunseting 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. There are many empty warehouses and building more makes no sense.

Sincerely,  
Marko Spasojevic  
Riverside 92506

## Nina Schumacher

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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**

Steering Committee

Mission Grove Neighborhood Association  
[missiongrovena@gmail.com](mailto: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.

## **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.

**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.

**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.

**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.

**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.

**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.

Sincerely,

Steering Committee  
Mission Grove Neighborhood Association  
[missiongrovena@gmail.com](mailto:missiongrovena@gmail.com)  
<https://www.missiongrovena.org/>  
951-394-2526

## Nina Schumacher

---

**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 sunseting 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,

Peter Pettis  
92508



## Nina Schumacher

---

**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 sunseting in July 2025.

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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

**Nina Schumacher**

---

**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.

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.

The people of Riverside deserve better-- please preserve one of our last open spaces and help protect the aesthetic value of our city.

Sincerely,

Rich Priebe  
92508

## Nina Schumacher

---

**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 sunseting in July 2025.

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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

# Channel Law Group, LLP

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8383 Wilshire Blvd.  
Suite 750  
Beverly Hills, CA 90211

Phone: (310) 347-0050  
Fax: (323) 723-3960  
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III  
JAMIE T. HALL \*  
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760  
jamie.hall@channellawgroup.com

---

\*ALSO Admitted in Texas

January 4, 2024

## VIA ELECTRONIC MAIL

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

fairbanks@marchjpa.com

**Re: GP 23-02: Objection to Approval of Environmental Justice Element without  
Environmental Review**

Dear Mr. Fairbanks:

This firm represents Riverside Neighbors Opposing Warehouses (R-NOW). We hereby advise the March Joint Powers Authority that it must conduct the required environmental review under the California Environmental Quality Act (CEQA) before adopting an Environmental Justice Element for its General Plan.

Under CEQA, public agencies must conduct an initial study to determine if a project may have significant environmental impacts. If the initial study shows that the project may have significant impacts, the agency must prepare an Environmental Impact Report (EIR). As stated in *Laurel Heights Improvements Association v. Regents of University of California* (1988) 47 Cal. Bd 376, 394, "If post approval environmental review were allowed, EIRs would likely become nothing more than post hoc rationalizations to support action already taken."

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. 4<sup>th</sup> 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.

I may be contacted at 310-982-1760 or at [jamie.hall@channellawgroup.com](mailto:jamie.hall@channellawgroup.com) if you have any questions, comments or concerns. Thank you for your attention to this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being the most prominent part.

Jamie T. Hall



**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.

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.

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. 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. 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.

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 sunseting 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.

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.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Uribe', written in a cursive style.

Sira Uribe  
President, LULAC of Riverside, Council #3190

# CITYWIDE COMMUNITY ENGAGEMENT POLICY



CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

NEIGHBORHOOD ENGAGEMENT DIVISION

3900 MAIN STREET

RIVERSIDE, CA 92522

ADOPTED \_\_\_\_\_ 2023





# INTRODUCTION

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Geographic locations only become places when people assign meaning and importance to them.

Riverside means a lot to many people – it is special to those who live here and to those who serve the community. Riverside residents and Riverside public servants care a lot about how the community is maintained and how it evolves, grows, and changes – thus, the role of meaningful community engagement is essential to Riverside’s future and to strengthening the connection between people and place. Meaningful community engagement depends on high levels of public trust and organizational competence. When quality community input occurs, community voices are heard, captured, and shared with the Riverside City Council and Boards and Commissions, which results in more well-informed recommendations and decision-making on important matters affecting the community.

Communities work best when residents, organizations, and institutions are engaged and working together for the greater good of all. The City of Riverside is no exception. The promise and potential of Riverside is strengthened by accommodating different perspectives and encouraging more residents to be informed and involved in making recommendations and decisions. Recognizing there’s no single way to conduct effective community engagement, this Citywide Community Engagement Policy and its accompanying Community Engagement Toolkit (Toolkit), are intended to assist the City of Riverside in developing customized engagement plans serve the Riverside community. The Policy provides a consistent approach to future community engagement efforts and the Toolkit to guides City staff in creating inclusive community engagement plans for the benefit of the Riverside community and Riverside elected and appointed officials. Depending on the issue/topic, intended audience, and available timeframe, the Toolkit allows the City of Riverside to scale engagement efforts to fit the community’s needs and interests.

In addition, the Policy and Toolkit set a common language among Riverside community members, City departments, Riverside elected and appointed leaders, and others, for the development of effective community engagement processes. The Policy and Toolkit also set expectations for community engagement related to a range of projects and programs.

The City of Riverside is responsible and responsive to all residents. The Policy explains the City of Riverside’s approach and commitment to the community. Through the Riverside City Council’s **Envision Riverside 2025 Strategic Plan**, the City of Riverside is committed to building community and trust through information, education, and engagement. The public servants comprising the City of Riverside Team are committed to excellent customer service that strives to provide a high quality of life for all who live and work here – the Policy and Toolkit will further contribute to these ends.

Further, the Policy and Toolkit will expand the range of contributions by the Riverside community that will reinforce **Envision Riverside 2025** Cross-Cutting Threads<sup>1</sup> of:

- **Community Trust** – Riverside is transparent and makes decisions based on sound policy, inclusive community engagement, involvement of City Boards & Commissions, and timely and reliable information. Activities and actions by the City serve the public interest, benefit the City’s diverse populations, and result in greater public good.
- **Equity** – Riverside is supportive of the City’s racial, ethnic, religious, sexual orientation, identity, geographic, and other attributes of diversity and is committed to advancing the fairness of treatment, recognition of rights, and equitable distribution of services to ensure every member of the community has equal access to share in the benefits of community progress.

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<sup>1</sup> Cross-cutting threads are major themes that exist within the Envision Riverside 2025 Strategic Plan and should be reflected in all outcomes.

- **Fiscal Responsibility** – Riverside is a prudent steward of public funds and ensures responsible management of the City's financial resources while providing quality public services to all.
- **Innovation** – Riverside is inventive and timely in meeting the community's changing needs and prepares for the future through collaborative partnerships and adaptive processes.
- **Sustainability and Resiliency** – Riverside is committed to meeting the needs of the present without compromising the needs of the future and ensuring the City's capacity to persevere, adapt and grow during good and difficult times alike.

Additionally, the Policy and Toolkit will be instrumental in advancing the indicators, goals, and work plan at the foundation of the six Strategic Priorities framing **Envision Riverside 2025**:

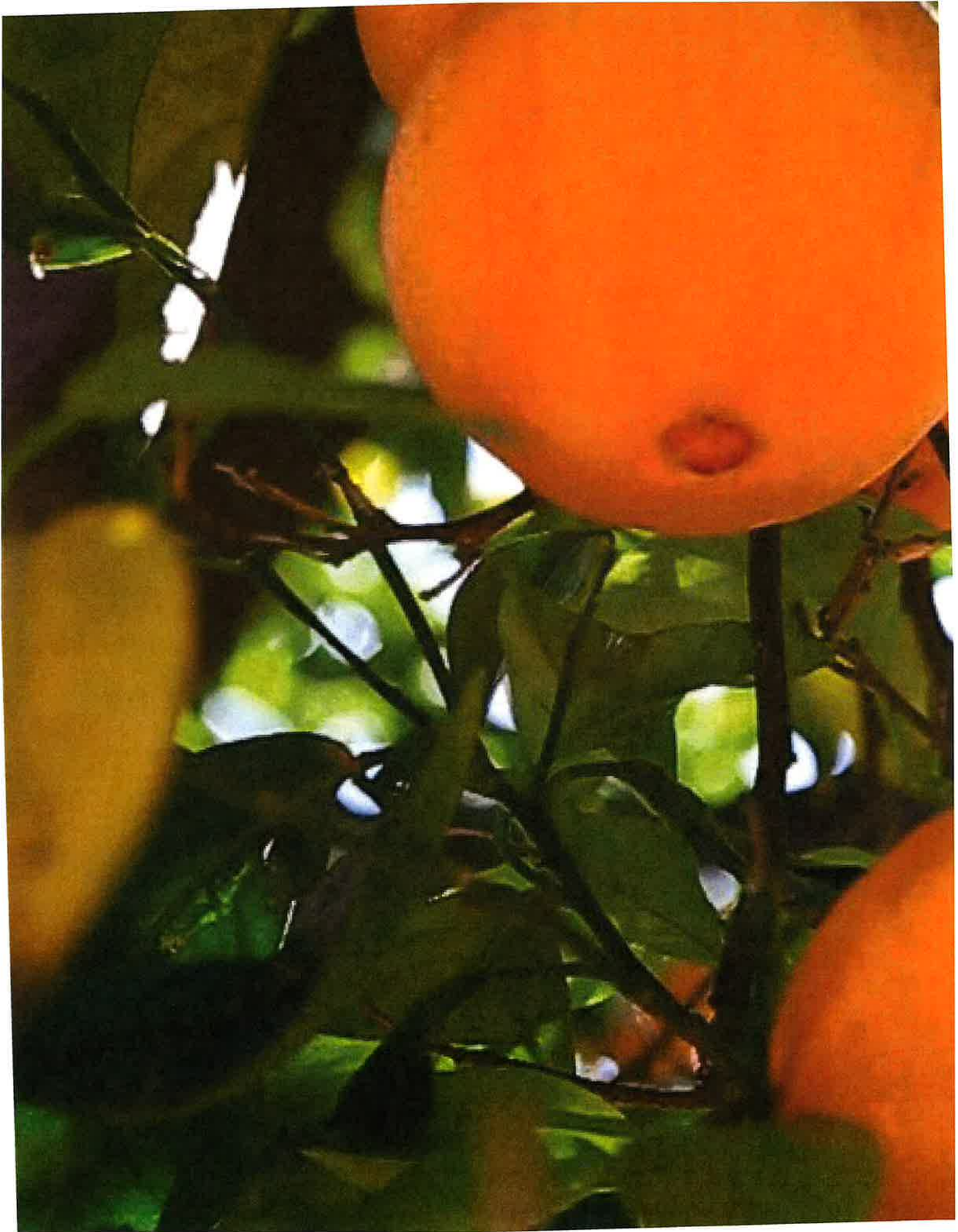
- **Arts, Culture and Recreation** – Provide diverse community experiences and personal enrichment opportunities for people of all ages.
- **Community Well-Being** – Ensure safe and inclusive neighborhoods where everyone can thrive.
- **Economic Opportunity** – Champion a thriving, enduring economy that provides opportunity for all.
- **Environmental Stewardship** – Champion proactive and equitable climate solutions based in science to ensure clean air, safe water, a vibrant natural world, and a resilient new green economy for current and future generations.
- **High Performing Government** – Provide world class public service.
- **Infrastructure, Mobility & Connectivity** – Ensure safe, reliable infrastructure that benefits the community and facilitates connection between people, place, and information.

The demand by the Riverside community – and communities across the United States – for genuine and open community engagement is on the rise and the City of Riverside has created this Policy and Toolkit to provide a more structured and consistent approach to meet this demand. The Policy and Toolkit have been developed through an engagement process that involved the community in understanding needs and incorporating relevant provisions in the Policy and Toolkit. This process has opened the hearts and minds of all regarding how interactions between the City of Riverside and the Riverside community can improve— these expanded and enlightened mindsets resulted in these two practical and responsive documents.

By utilizing the Policy and Toolkit in service to the Riverside community, the benefits of good community engagement will be made apparent over time through quantifiable improvements to the Riverside community's quality of life and advancement of the Cross Cutting Threads and Strategic Priorities embodied in the **Envision Riverside 2025 Strategic Plan**.



**Al Zelinka, FAICP**  
City Manager, City of Riverside





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# ACKNOWLEDGEMENT

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This work has been a collaboration between Riverside community members, City of Riverside leaders, and City of Riverside staff, and would not have been possible without the time, knowledge, and energy of those listed below. The community engagement policy working group meetings were held virtually in 2021 during the COVID-19 pandemic. The feedback and information collected highlighted key themes which helped us develop our approach to community engagement as outlined in this Policy.

Along with 12 staff members, this project benefited from 24 community members collaborating to form a Working Group. The group, comprised of residents, neighborhood group members, nonprofits, major institutions, businesses, and government agencies represents many neighborhoods and most Council Wards within the City of Riverside. The Working Group met throughout the project development to review best practices and examples of other policies and toolkits, gave feedback on what was important to include in Riverside's Policy & Toolkit, and worked with staff to co-create the content of the documents.

## RIVERSIDE COMMUNITY MEMBERS

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Riverside community members raised the need for a community engagement policy and the following members, listed alphabetically, dedicated their time, ideas, and passion towards bringing meaningful opportunities for community engagement to the City of Riverside.

- **Dean Ayer**, Casa Blanca Neighborhood. Group Affiliations: PTA, March of Dimes, Riverside County Office of Education
- **Janice Bielman**, Magnolia Center Neighborhood. Group Affiliations: Magnolia Area Neighborhood Alliance, Neighbors Better Together, Beatty Drive Neighbors
- **Julie Carman**, Orangecrest Neighborhood. Group Affiliations: Asian Pacific Counseling and Treatment Center
- **Stephanie Campbell**, Ramona Neighborhood
- **Aurora Chavez**, Arlington Neighborhood. Group Affiliations: Neighbors Better Together, Friday Morning Group, RTA Customer Advocate, Community Advocate Senior Transportation-City
- **Kevin Dawson**, University Neighborhood. Group Affiliations: Friends of Riverside's Hills, Reform Riverside, University Neighborhood Association
- **Tom Donahue**, Downtown Neighborhood. Group Affiliations: Riverside Neighborhood Partnership
- **Tinka Friend**, La Sierra South Neighborhood. Group Affiliations: Riverside Neighborhood Partnership, Riverside Woman's Club, Neighbors Better Together, Residents for Responsible Representation, Social and Environmental Justice Committee of the Unitarian Universalist Church of Riverside

- Steve Fuji, Magnolia Center Neighborhood. Group Affiliations: Universalist Unitarian Church of Riverside, Riverside Mutual Aid Network, Family Promise of Riverside, the SouthWest Intentional Communities Alliance, BIPOC (Asian-American), senior, LGBTIQ, disabled, and low-income populations
- **Jennifer Gamble**, Magnolia Center Neighborhood. Group Affiliations: Riverside Historical Society, Old Riverside Foundation, Cultural Heritage Board
- Lynn Heatley, Victoria Neighborhood. Group Affiliations: Love Riverside, Community Food Pantry Partner
- **Jason Hunter**, Wood Streets Neighborhood. Group Affiliations: Neighbors of the Wood Streets, Neighbors Better Together
- Gurumantra Khalsa, University Neighborhood. Group Affiliations: University Neighborhood Alliance
- **Nanci Larsen**, Downtown Neighborhood. Group Affiliations: Chair of DANA, Board member of Old Riverside Foundation Second Vice President of the Riverside Woman's Club, Board of Directors Riverside Downtown Partnership, RDP Safety Committee
- Linda Lawyer, Grand Neighborhood. Group Affiliations: Riverside Community Sailing Group, Keep Riverside Clean and Beautiful, The Friends of Fairmount Park
- **Clarissa Manges**, Victoria Neighborhood
- Sharon Mateja, La Sierra Neighborhood Group Affiliations: Residents for Responsible Representation (RRR), Neighbors Better Together (NBT), La Sierra University Music Advisory Board
- **Carol McDoniel**, Wood Streets Neighborhood. Group Affiliations: Historic Wood Streets Association, Old Riverside Foundation
- Lorna Seitz, Mission Grove Neighborhood. Group Affiliations: UCR, ExCite
- Justin Scott-Coe, Wood Streets Neighborhood
- **Greta Valenti**, Downtown Neighborhood
- **Richard Vandenberg**, Canyon Crest Neighborhood
- **Mimi Velazquez**, Ramona Neighborhood. Group Affiliation: Anti-Racist Riverside
- Betty Vu, Orangecrest Neighborhood. Group Affiliations: Inland Chinese American Alliance, Inland Empire Elite Mutual Association

Additionally, gratitude goes to the many Riverside residents who attended various community workshops and public meetings associated with this work.

## CITY OF RIVERSIDE LEADERS

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Appreciation is expressed for the **Envision Riverside 2025 Strategic Plan**, which provides significant insight into the Mayor and City Council's commitment to community engagement. For example, the vision statement guiding **Envision Riverside 2025** states: "Riverside is a city where every person is respected and cherished, where equity is essential to community well-being, where residents support one another, and where opportunities exist for all to prosper. In Riverside, everyone comes together to help the community, economy and environment reach their fullest potential for the public good." Additionally, the Mayor and City Council's cross cutting threads and priorities, as well as the operational workplan, as conveyed in **Envision Riverside 2025** provide specific policy direction and actions:

- **Community Trust** cross-cutting thread reads: "Riverside is transparent and makes decisions based on sound policy, **inclusive community engagement**, involvement of City Boards & Commissions, and timely and reliable information. Activities and actions by the City serve the public interest, benefit the City's diverse populations, and result in greater public good."
- Goal 2.4 of the **Community Well-Being** priority reads: "Support programs and innovations that enhance community safety, **encourage neighborhood engagement**, and build public trust."
- Action 5.3.1 under the **High Performing Government** priority reads: "Establish an organizational strategy centered on effective **community engagement** through a variety of mediums; and develop **community engagement methods** that use innovative and creative tools that create an open, respectful, and intentional dialogue regarding inclusion, diversity and equity."

Importantly, Riverside's elected officials understand and appreciate the need for a community engagement policy, and through their leadership and policy direction, the Riverside community and City of Riverside staff will have the tools in place to uphold and carryout **Envision Riverside 2025**. Gratitude goes to:

- Mayor Patricia Lock Dawson
- Councilmember Erin Edwards, Ward 1
- Councilmember Clarissa Cervantes, Ward 2
- Councilmember Ronaldo Fierro, Ward 3
- Councilmember Chuck Conder, Ward 4
- Councilwoman Gaby Plascencia, Ward 5
- Councilmember Jim Perry, Ward 6
- Councilmember Steve Hemenway, Ward 7

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## CITY OF RIVERSIDE STAFF

Working alongside the Riverside community, and under the direction of the Riverside City Council, a team of City staff invested time in developing a first-of-its-kind community engagement policy applicable citywide. Much appreciation goes to:

- **Yvette Sennewald:** Project Manager, Community & Economic Development, Neighborhood Engagement Division
- **Eva Arseo:** Deputy City Clerk, City Clerk's Office
- **Erin Christmas:** Director, Riverside Public Library
- **Ceri Dowsett:** Utilities Public Benefits/Customer Relations Manager, Riverside Public Utilities
- **George Khalil:** Chief Innovation Officer
- **Ed Lara:** Principal Civil Engineer, Public Works
- **Randy McDaniel:** Deputy Director, Parks, Recreation & Community Services Department
- **Nathan Mustafa:** Deputy Director, Public Works Department
- **Carlie Myers:** Assistant General Manager, Riverside Public Utilities
- **Robyn Peterson:** Director, Museum of Riverside
- **Gema Ramirez:** Project Manager, Community & Economic Development, Arts & Cultural Affairs Division
- **Matthew Taylor:** Senior Planner, Community & Economic Development, Planning Division

Additionally, appreciation abounds for the many other City of Riverside employees who provided support at the meetings and feedback on the development of this work.

Thank you for making a difference.



**Al Zelinka, FAICP**

City Manager April 5, 2022





## POLICY PURPOSE

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This document aims to create a clear, streamlined, and predictable public participation process. Effective community engagement requires a shared understanding between community members and City staff. The Citywide Community Engagement Policy (Policy) and accompanying Community Engagement Toolkit (Toolkit) are both a resource guide for the City and an overview of the engagement process for community members. These documents increase accountability on both ends – City staff has an agreed-upon path to follow, and the community has a standard to expect from the City.

The Policy formally expresses the City Council and staff's commitment to engaging Riverside's community using appropriate, effective, and inclusive practices. The City is committed to engaging effectively with its community in a meaningful, accountable, responsive, and equitable way. This Policy outlines the City's position, role, and commitments to ensure that community engagement is integrated into the decision-making process and will assist in building relationships, strengthening the community, and increasing resident involvement.

The Envision Riverside 2025 Strategic Plan notes cross-cutting threads that are to be reflected in all outcomes. The cross-cutting threads are: Community Trust, Equity, Fiscal Responsibility, Innovation, as well as Sustainability, and Resiliency. While community engagement is important in each cross-cutting thread, providing a Citywide Community Engagement Policy that outlines a standardized approach to community engagement is most aligned with:

**Community Trust:** Riverside is transparent and makes decisions based on sound policy, inclusive community engagement, involvement of City Boards & Commissions, and timely, reliable information. Activities and actions by the City serve the public interest, benefit the City's diverse populations, and result in greater public good.

**Equity:** Riverside is supportive of the City's racial, ethnic, religious, sexual orientation, identity, geographic, and other attributes of diversity and is committed to advancing fairness of treatment, recognition of rights, and equitable distribution of services to ensure every member of the community has equal access to share in the benefits of community progress.

The Policy seeks to improve the City's community engagement processes and outcomes by encouraging a consistent approach and continual learning through evaluation, and expanding the range of engagement methods used.

There are many reasons to engage the public. Examples include, but are not limited to:

- The City has a legal obligation to consult with the public
- A new policy is being developed
- A new program is being designed or implemented
- There is a significant change to the City's Charter, Riverside Municipal Code, or other State/County law, policy, process, procedure, and/or program
- Public expertise is required to inform and develop solutions to a problem
- The City requires resident input to ensure the end "product" has relevance or meets the identified need

This Policy will be applied at the planning stage of a project. Community engagement may be required at multiple stages within a project, program, initiative, or development. Community engagement is the responsibility of all City employees with public-facing roles. To ensure the effective application of community engagement principles and consistent processes, a Community Engagement Toolkit will be developed to provide guidance for City staff.

To ensure that the City can deliver on its commitment to community engagement as outlined in this Policy, additional support may require:

- Access to a suite of resources to support the design, delivery, reporting, and evaluation of community engagement, including process guides, templates, and checklists;
- Access to training and professional development opportunities; and
- Access to subject matter expert staff members to give advice on matters relating to project planning, resource allocation, communications, and best practice community engagement methods.



## VISION

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A City where community engagement is valued as an important part of the decision-making process and is inclusive, meaningful, accountable, and responsive to the public's perspectives and needs.

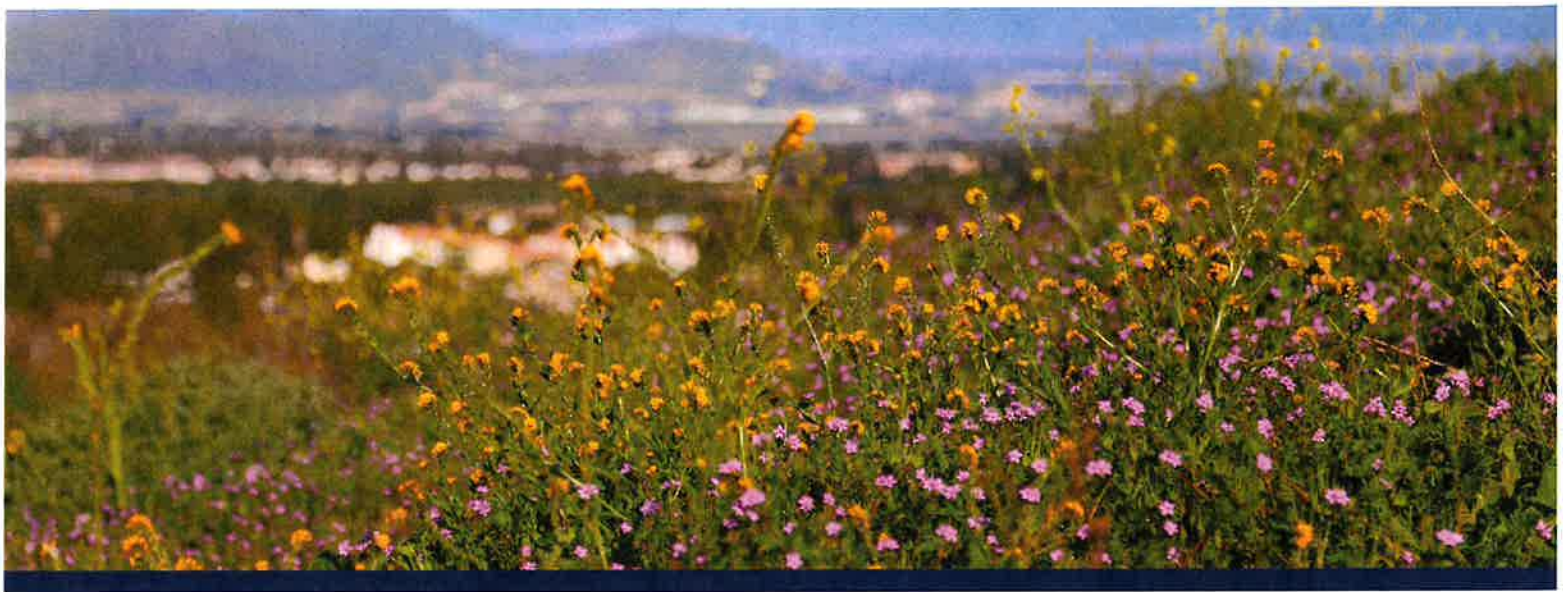
## WHAT IS COMMUNITY ENGAGEMENT?

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Community engagement is defined as the range of opportunities for public involvement in the decision-making process, relationship building, and community strengthening. Community engagement is achieved when the community is and feels a part of a process.

Some community engagement processes are undertaken to support decision-making, some are about relationship building, while others are focused on community strengthening (or capacity building). Often, the community engagement process supports more than one of these objectives.

The City engages with stakeholders and the community at large at different levels along a spectrum of increasing involvement. The community engagement process is dynamic, which means there is likely to be a movement back and forth through different levels as a community engagement process is implemented.



## OUR COMMITMENT TO THE COMMUNITY

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The City of Riverside's Community Engagement Policy is built upon a set of commitments that guide the planning, development, implementation, evaluation, and continuous improvement of community engagement processes undertaken for City projects.

When engaging the community, City staff will be open and accountable in the decision-making process. The commitments to the Riverside community are as follows:

1. To ensure that the purpose of community engagement is clear, relevant, and the methods used are well suited to generate highly effective community engagement.
2. To provide information that is clear, easy to understand, and accessible to all people.
3. To proactively engage with our community in an ethical manner using a range of methods and enable everyone to have a voice on matters of importance to them. We will provide engagement opportunities that are mutually respectful, undertaken in reasonable time frames, and with a shared understanding of how the input will inform decision-making processes.
4. To value all participants' knowledge, expertise, and experiences, acknowledging that everyone has different views and needs.
5. To undertake evaluation processes to continually improve our approach to community engagement.
6. To report back to our community in a timely manner about how their input was considered and influenced the outcome.
7. To use information provided by community engagement to advocate on behalf of our community to relevant parties.

These commitments are built upon the core values identified by the International Association for Public Participation (IAP2).

## **PRINCIPLES AND COMMITMENT TO COMMUNITY ENGAGEMENT**

To ensure that community engagement activities are meaningful, the following key principles are critical:

### **1. Careful Planning and Preparation**

Through adequate and inclusive planning, ensure that the design, organization, and convening of the process serves both a clearly defined purpose and needs of the participants.

### **2. Inclusion and Demographic Diversity**

Equitably incorporate diverse people, voices, ideas, and information to lay the groundwork for quality outcomes and democratic legitimacy.

### **3. Collaboration and Shared Purpose**

Support and encourage participants, government, and others to work together to advance the common good.

### **4. Openness and Learning**

Help those involved listen to each other, explore new ideas unconstrained by predetermined outcomes, apply information in ways that generate new options, and evaluate community engagement activities for effectiveness.

### **5. Transparency and Trust**

Be clear and open about the process and provide a public record of the organizers, outcomes, and range of views and ideas expressed.

### **6. Impact and Action**

Ensure each participatory effort has real potential to make a difference, and that participants are aware of that potential.

### **7. Sustained Engagement and Participatory Culture**

Promote a culture of participation with programs and institutions that support ongoing quality community engagement.

Preparation and planning ensure that the design, organization, and convening of the process clearly defines the purpose and the participant's needs.



## WHY WE ENGAGE

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Community engagement is a collaborative process that connects City Staff with the community in a mutually beneficial way by the sharing of new ideas, skills, knowledge, expertise, and experience.

Effective community engagement benefits both the City and community members. Better identifying the priorities, needs, and aspirations of the community will assist City Council and Staff to improve strategic planning and service delivery. A regular, two-way conversation ensures transparency, accountability, and an informed governing body in its decision-making process, which demonstrates integrity and builds trust within the community.

Where appropriate, community engagement should go above and beyond legislative requirements. The information and knowledge gained through hearing a range of community perspectives assist in making informed decisions, develop strong partnerships and creates sustainable outcomes.

The community also benefits from participating in engagement activities. Participating in matters that may have an impact on them can create a sense of belonging and connection, increases community involvement, unites, and empowers individuals and communities, and leads to greater community ownership and resilience.

The knowledge and experience gained also provides the City with a foundation to advocate to other relevant parties, including federal and state government bodies, on issues of community importance that are out of its direct control.

There is a broad range of benefits to effective and authentic community engagement, both to the City and to the community.

Some of the benefits include:

- 1. Increasing community involvement and connections.**
- 2. Developing strong relationships and partnerships with the community, leading to a shared understanding of community needs, aspirations, and priorities.**
- 3. Meeting legislative requirements.**
- 4. Providing a valuable source of evidence-based information that gives a wider perspective on issues and supports future planning and service delivery activities.**
- 5. By supporting transparency and accountability, integrity is demonstrated, and trust is built between all parties.**
- 6. Ensuring the community's right to assist with the democratic process.**
- 7. Ensuring informed decision-making occurs and issues are addressed.**
- 8. Helping inform and assist with advocacy.**
- 9. Leading to more sustainable outcomes.**
- 10. Building community resilience and capacity leads to community empowerment.**





## WHO WE ENGAGE

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The City of Riverside is a diverse community with a mix of people from all walks of life, with unique interest groups. Everyone has a role to play in the community, so it is important that the methods used are accessible and have a broad reach.

For the purpose of this Policy, the Riverside community is defined as individuals or groups who live, work, play, visit, study, invest in, or pass through the City. They could share a geographical location, characteristic, or interest.

The term "stakeholder" defines community groups or individuals who are directly impacted by, involved with, or interested in, the City's decision-making, relationship-building, or community-strengthening process.

Each person within the community has the potential to be a stakeholder in the City's community engagement activities. Throughout the engagement process we will focus our efforts to be inclusive of stakeholders and groups that provide insight on how to be more inclusive and diverse in our efforts. A list of potential partners and stakeholders are included on page twenty-six of the Community Engagement Toolkit.





## WHEN WE ENGAGE

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Community engagement will take place at the planning stage of a project or initiative or when a need arises such as a change in service, activities, or infrastructure is considered. Community engagement is likely to be undertaken at multiple stages within a project, program, or development.

### CIRCUMSTANCES THAT TRIGGER COMMUNITY ENGAGEMENT ACTIVITIES

City staff will promote opportunities for the community to actively participate in the following processes:

- Where a proposed change to activities or strategic direction may significantly affect the community in terms of the economy, lifestyle, environment, well-being, or amenity of the municipality
- When developing new or reviewing existing policies, strategies, or plans
- Introducing a new service, discontinuing an existing service, substantially changing, or reviewing a service that may significantly affect how services are provided
- Proposals for changing the way in which public space looks, is used, or enjoyed
- Planning and development of major projects and capital improvement works, including public buildings, centers, or other infrastructure
- Urban development/redevelopment proposals, such as infrastructure plans, that may significantly alter the existing amenity or characteristics of a geographical area
- Any circumstance where more information or evidence was needed to make an informed decision

## **MANDATORY ENGAGEMENT**

While the City of Riverside Administrative Manual and a range of legislation sets out minimum requirements for public involvement, each community engagement process will be considered on an individual basis. In many instances, City staff will go above and beyond the minimum requirements to gain a strong understanding of the community's vision to ensure we are achieving the best possible outcomes for the City of Riverside.

Some of these specific matters may include, but are not limited to:

- Adopting Citywide plans
- Adopting budgets
- Creating local laws
- Declaring special rates or charges
- Selling, exchanging, or leasing land
- Entering into regional agreements
- Deviating or discontinuing a road
- Making amendments to the General Plan

## **CIRCUMSTANCES WHERE COMMUNITY ENGAGEMENT WILL BE LIMITED**

There are times when the City's level of community engagement and key stakeholders will be limited. In certain circumstances, staff may only be able to inform the community and stakeholders of the decisions and actions taken.

Examples include when:

- An immediate resolution is required
- Technical or other expertise is required
- An initiative involves confidential information
- There are clear and defined legislative responsibilities that legally require compliance
- Developing or reviewing internal policies and procedures
- Emergency response is necessary
- There is a risk to public safety

## **INFLUENCING DECISION-MAKING**

Where decision-making is the purpose of a community engagement process, it must be identified that the final decision rests with the City Council.

Good governance is based on the belief that those impacted by a decision may have important contributions to make in the decision-making process. In planning a community engagement process, staff will determine at which levels they will engage and what corresponding commitment they will make to stakeholders and/or the community. This decision is likely to impact the nature and methods of community engagement.



## HOW TO ENGAGE

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There is no one-size-fits-all approach to community engagement activities. A variety of methods will be required to cater for the different purposes of community engagement, as well as a broad range of groups and individuals in the community.

### PLAN

The planning stage is critical to ensuring a successful and authentic community engagement process. During this stage we will understand, outline, and gain agreement on:

- Why we are engaging (purpose)
- What we are trying to achieve through the process (engagement objectives)
- How results will be used (engagement outcomes)
- Whom we want to engage with (stakeholder analysis)
- At what level do we wish to engage
- How we will engage (engagement methods)
- When should we engage (time frame)

During this stage, it is also important to consider the monitoring and evaluation steps that will be embedded into the process.

### DO

Those undertaking the community engagement process will do so in a non-judgmental and respectful way. They will follow the community engagement principles as outlined in the "Our Commitments" section. The following steps will be considered to ensure the activity is successful.

1. Decide on the most appropriate ways of informing the community and stakeholder groups of the planned community engagement activity.

2. Organize resources, including identifying who will conduct the community engagement activities, where meeting locations will be held, event logistics, and the supplies needed for the activity. It is also important to consider specific needs, such as transportation, childcare, and translation services.
3. Invite previously identified stakeholders to participate in the community engagement activity.
4. Provide information to participants in clear and simple terms. Use case studies or examples to assist in explaining the initiative. Provide translation services as needed.
5. Conduct community engagement activities.

## SHARE

Following the community engagement process, we will report the results and outcomes of the community engagement activity back to the community. This will be done in a timely, accessible, and informative manner so that participants understand how their involvement influenced the process, and therefore, the outcomes or decisions.

If the community engagement process is lengthy, it is important that we regularly report on the project's development to ensure that the community remains involved and engaged.

## EVALUATE

An evaluation of the community engagement process will be planned at the beginning of the project to be aware of the outcomes that will be measured. Evaluation will be continuous so that the process can be adjusted should any aspect need refinement. After completion, the community engagement process will be reviewed to ensure we understand what happened and why. We will objectively reflect on what did and didn't work. We will prepare an evaluation report to share observations and recommendations.

## IMPROVE

We will take the lessons learned throughout the project, capturing them in an accessible format. Ideas for improvement of the community engagement process will be shared across the organization and will aid in informing future versions of this policy, as well as the City's broader community engagement framework.





## SUPPORTING INFORMATION

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The International Association for Public Participation (IAP2) is an international organization advancing the practice of public participation. The IAP2 framework is underpinned by seven core values that are aimed at ensuring organizations make better decisions that reflect the interests and concerns of potentially affected people and entities.

These values are:

1. Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.
2. Public participation includes the promise that the public's contribution will influence the decision.
3. Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including the decision-makers.
4. Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
5. Public participation seeks input from participants in designing how they participate.
6. Public participation provides participants with the information they need to participate in a meaningful way.
7. Public participation communicates to participants how their input affected the decision.

## ROLES AND RESPONSIBILITIES

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Community engagement is the responsibility of all City Departments as appropriate to their role and functions. Engaging the community should be a core process considered by staff in the delivery of services, development of projects, or building relationships.

## RELATIONSHIP TO THE ENVISION RIVERSIDE 2025 STRATEGIC PLAN

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Community engagement processes support the delivery of all outcome areas identified in the Envision Riverside 2025 Strategic Plan. The principles and processes of community engagement outlined in this policy are aligned with the Strategic Plan's Vision and Mission.

## VISION

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Riverside is a city where every person is respected and cherished, where equity is essential to community well-being, where residents support one another, and where opportunities exist for all to prosper. In Riverside, everyone comes together to help the community, economy, and environment reach their fullest potential for the public good.

## ENVISION RIVERSIDE 2025 MISSION

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The City of Riverside is committed to providing high-quality municipal services to ensure a safe, inclusive, and livable community.

## RELATED KEY GOALS

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### **Arts, Culture & Recreation:**

1.1: Strengthen Riverside's portfolio of arts, culture, recreation, senior, and lifelong learning programs, and amenities through expanded community partnerships, shared use opportunities, and fund development.

### **Community Well-Being:**

2.2: Collaborate with partner agencies to improve household resiliency and reduce the incidence and duration of homelessness.

2.3: Strengthen neighborhood identities and improve community health and the physical environment through amenities and programs that foster an increased sense of community and enhanced feelings of pride and belonging citywide.

2.4: Support programs and innovations that enhance community safety, encourage neighborhood engagement, and build public trust.

2.5: Foster relationships between community members, partner organizations, and public safety professionals to define, prioritize, and address community safety, and social service needs.

### **Economic Opportunity:**

3.1: Facilitate partnerships and programs to develop, attract and retain innovative business sectors.

3.2 : Work with key partners in implementing workforce development programs and initiatives that connect local talent with high-quality employment opportunities and provide access to education and training in Riverside.

3.4: Collaborate with key partners to implement policies and programs that promote local business growth and ensure equitable opportunities for all.

### **High-Performing Government:**

5.3: Enhance communication and collaboration with community members to improve transparency, build public trust, and encourage shared decision-making.

# POLICY CONTROL SCHEDULE

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|   |   |  |   |
|---|---|--|---|
| <b>Policy Title:</b><br>Citywide Community Engagement Policy  |   | <b>Policy Number:</b><br>TBD               | <b>Policy Type:</b><br>City Council Policy<br>and toolkit |
| <b>Policy Creation Date:</b><br>April 2021  | <b>Current Version Adopted by City Council:</b><br>TBD                          | <b>Current Version number:</b><br>03       | <b>Policy Review Date:</b><br>May 16, 2023                |
| <b>Parent Policy:</b><br>None   | <b>Policy responsibility:</b><br>Community & Economic Development<br>Department |  | <b>Resolution Number:</b><br>TBD                          |
| <b>Revised by: Neighborhood Engagement Division</b><br>Agueda Padilla, Division Manager<br>Amaris Gonzalez, Project Coordinator<br>Jesus Noriega, Project Assistant |   | <b>Revised date:</b><br>September 22, 2023 |   |

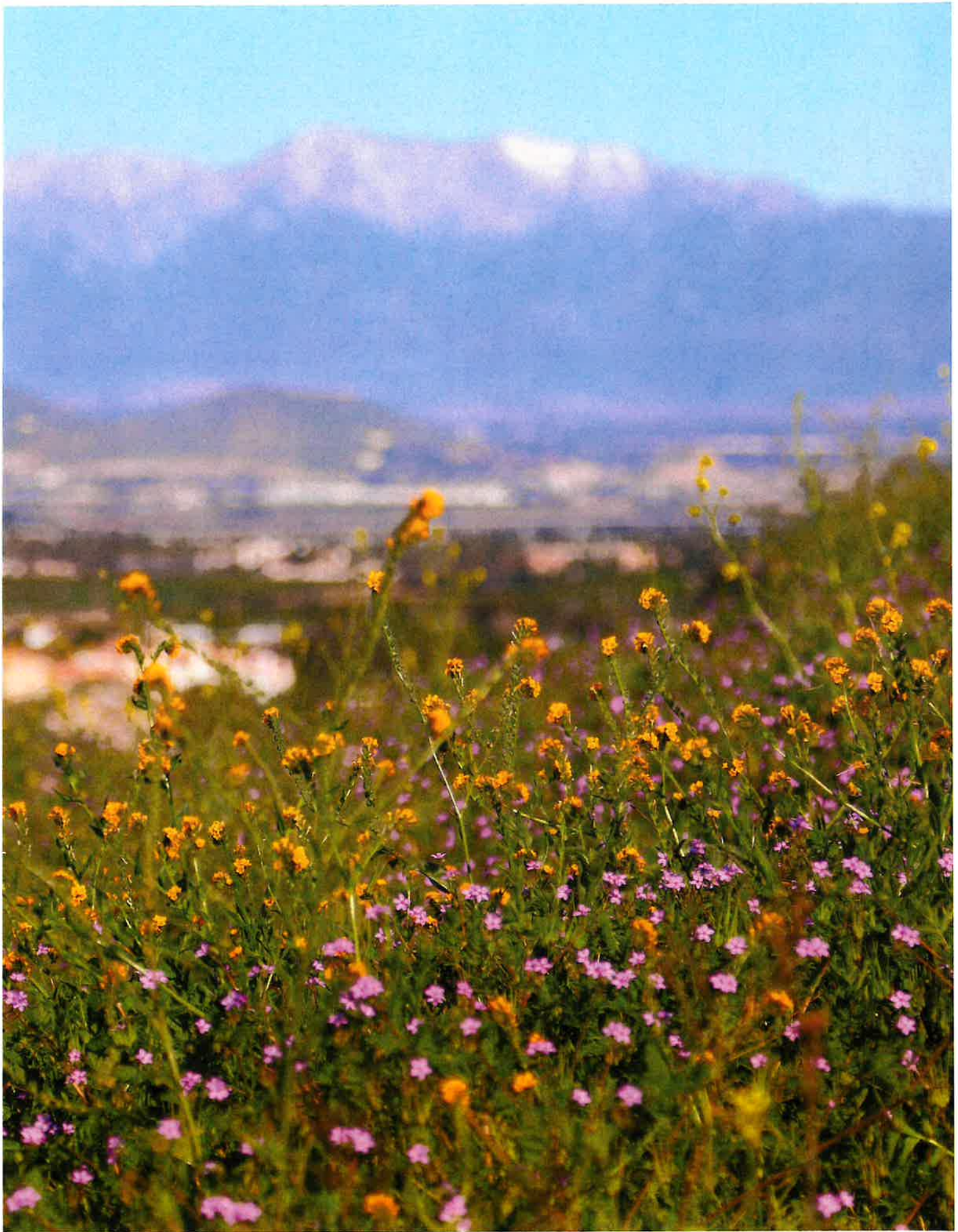




# CITYWIDE COMMUNITY ENGAGEMENT TOOLKIT



CITY OF RIVERSIDE



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## PURPOSE AND SUPPORT

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The City of Riverside is committed to engaging effectively with its community in a meaningful, accountable, responsive, and equitable way.

This Community Engagement Toolkit builds upon the principles laid out in the Citywide Community Engagement Policy. This toolkit serves as a resource for City Departments and community members because these documents work in conjunction with one another. The Citywide Community Engagement Policy should be read before working through the Community Engagement Toolkit.

Riverside's residents have high expectations when it comes to community engagement. **Never underestimate the level of public interest in your project.** The City's use of this guide across all departments will result in community engagement efforts that are productive, meaningful, and successful. Community engagement is NOT merely checking a box, it is a commitment to deliver the best government services possible to our community. **As City staff, we have a responsibility to bring people together to share knowledge about projects and changes in their community.**

This guide is a living document meant to help anyone at any level of involvement within the City whom work together to understand and develop broad community engagement plans that align with the City's Envision Riverside 2025 Strategic Plan.

All documents and tools referred to in this guide are available in either the Appendix, on the Community Engagement Policy webpage, or both.

## GOALS OF THE TOOLKIT:

1. Design a comprehensive Community Engagement Plan and complete documentation.
2. Determine the appropriate level of community engagement needed.
3. Identify stakeholders and create an engaged representative group of involved community members.
4. Create outreach, education, and engagement methods that represent the City's brand.
5. Implement timelines and strategies that fit individual projects and ensure public access to accurate information.
6. Share successful tools and methods with all City employees.
7. Ensure each project, program, or service is internally supported.
8. Spread awareness of performance measures by which community engagement programs can be assessed.
9. Streamline the processes of community engagement both internally and externally.

## SUPPORT NETWORK

- Agueda Padilla  
Policy and Project Manager
- Amaris Gonzales  
Community Engagement Liaison
- Jesus Noriega  
Community Engagement Liaison
- HR Training Team  
Community Engagement Team

### Get Some Help! Community Engagement Round Tables

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#### WHAT IS IT?

Round Tables are gatherings coordinated by the Neighborhood Engagement Team. They will provide support, discussion time, trainings, and guest speakers. They are opportunities to collaborate with each other and receive assistance

#### HOW WILL THIS HELP?

- Brainstorm and coordinate outreach
- Assistance completing worksheets
- Voice concerns and discuss ideas
- Opportunity to have community engagement plans reviewed
- Receive insight and support from team that specializes in public involvement
- Present Community Engagement summaries

#### HOW CAN YOU ATTEND?

Want the scoop on community engagement? Look for e-mails about training opportunities as well as invitations to Round Table discussions!



## GETTING STARTED

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There may not be a checklist for the perfect Community Engagement Plan, but there are principles and guidelines provided to assist you in creating a well-designed plan that will increase the likelihood of achieving your outreach goals.

### THINGS TO REMEMBER ABOUT COMMUNITY ENGAGEMENT

- Not suitable for every situation.
- Using it incorrectly or at inappropriate times can do more harm than good.
- **Once feedback is received, there must be follow-through or participants may feel that their contribution was ignored or not valued.**

- Note: This doesn't mean that feedback is automatically implemented, but why or why not and how must be conveyed to the participants.

- An engagement strategy must be considered during the initial stage of project planning.
- The opportunity for input, if part of outreach, should be open during the planning stages to allow the chance to help inform and/or influence the decision.

### COMMUNITY ENGAGEMENT IS A DIALOGUE, NOT A PRESENTATION

- The City and the public both speak and listen
- Ideas are shared and discussed
- There is a flow of information, insights, and opinions
- Additional resources are available, and conversations can continue

## Invite Innovation

Getting community members truly engaged and involved can be one of the most challenging parts of a project. It can also be the most fun. It offers endless room for new ideas and creativity. The list below and the Community Engagement Implementation Plan/Toolbox in the Appendix are far from exhaustive, and the sky is the limit when it comes to creating new ways to engage and get people excited about a project. An example: turn a focus group into a game of Trivial Pursuit to educate participants or make the subject line in a newsletter a riddle-like question to spur interest. Is it possible to incorporate an informational tour, a 3-D model, or other props into your meeting?

## Managing Gathered Data

You will need to create a system for collecting and managing the information you receive and conversations you hear. Determining the purpose of the information should be the first step to assist you in identifying the details you need to capture. Often a spreadsheet will be sufficient. From there, you can summarize or present the data in whatever way it is needed. Consider the following:

- Will you need to create codes to track feedback from different groups?
- Will you need exact numbers to create a summary report or graph?
- How will the information collected be delivered to the public?

Quotes and comments can be useful and engaging for creating presentations, in social media posts, and in further stages of your outreach efforts.

## DO

- Complete the project plan and answer "Why?" prior to going to the public for input. This avoids confusion and undesirable results.
- Trust your resources. The Marketing and Communications Team and Neighborhood Engagement Team has many years of combined experience. They want what is best for your project too, so don't be afraid to take their advice.
- Develop a strategy for community engagement at the beginning of a project.
- Identify and involve key stakeholders as early as possible.

## DON'T

- Underestimate the level of interest in your project.
- Use technical jargon or acronyms that aren't easily understood.
- Forget to involve City Council, boards, commissions, and key stakeholder groups in conversations about your project and in invites to public meetings.
- Set unrealistic expectations about how the input received will be used.

## DETERMINE APPROPRIATE LEVEL OF COMMUNITY ENGAGEMENT

Community engagement does not mean you will invite as many people as possible or make a profile on every social media platform. Sometimes just one event can be sufficient.

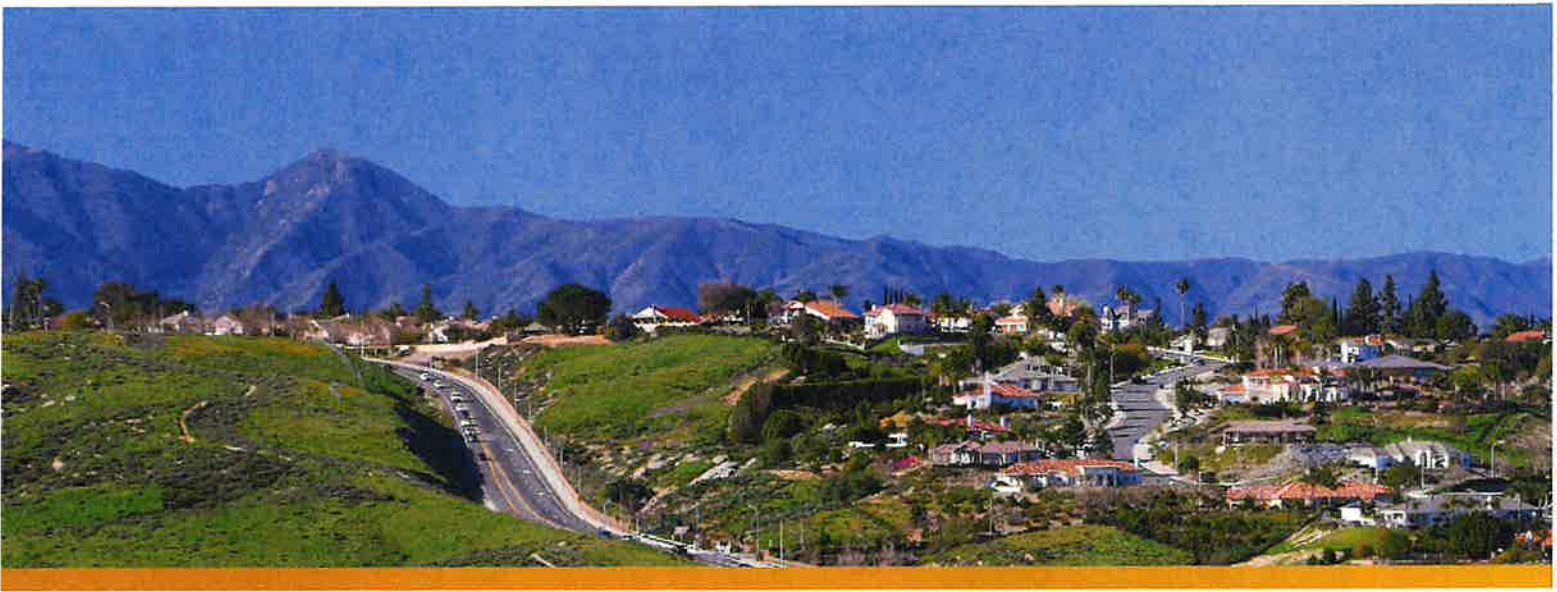
Other times you will need several engagement opportunities. The International Association of Public Participation's (IAP2) Spectrum of Public Participation will assist in determining the appropriate level of community engagement for your project or program. **Determining the accurate level of engagement is the foundation for your community engagement plan.**



|  | <b>INFORM</b>  | <b>CONSULT</b>   | <b>INVOLVE</b>   | <b>COLLABORATE</b>   | <b>EMPOWER</b>   |
|--|--|--|--|--|--|
| <b>GOAL</b>  | One-way communication to provide balanced and objective information to assist in understanding about something that is going to happen or has already happened.  | Two-way communication process aimed at obtaining feedback on ideas, alternatives, and proposals to inform decision-making process.       | Participatory process designed to help identify issues and views to ensure that concerns and aspirations are understood and considered.  | Working Together to develop an understanding of all issues and interests to work out alternatives and identify preferred collective solutions.                                   | To build the capacity of the community to lead their own plans for change.   |
| <b>ROLE OF COMMUNITY AND/OR STAKEHOLDERS</b>                     | Listen   | Contribute   | Participate  | Partner  | Lead   |
| <b>PROMISE TO THE PUBLIC</b>                                     | We will keep you informed.   | We will keep you informed, listen to, and acknowledge concerns, and provide feedback and support to help influence the decision.         | We will work with you to ensure that your concerns and issues are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision. | We will look to you for direct advice and innovating in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible. | We will implement what you decide.   |
| <b>EXAMPLES OF WHEN THIS ENGAGEMENT LEVEL MAY BE APPROPRIATE</b> | In the event of an emergency.  | Undertaking a survey on playground redevelopment.  | Seeking input from an Advisory Committee on sustainability initiatives and plans.  | Stakeholder-led discussions on developing community visions.   | Building capacity skills of small business employees through skills-based training.  |
| <b>POSSIBLE METHODS</b>  | <ul style="list-style-type: none"> <li>• Advertisements</li> <li>• Fact sheets</li> <li>• Newsletter</li> <li>• Public Notices</li> <li>• Social Media</li> <li>• Websites</li> <li>• Open Houses</li> </ul> | <ul style="list-style-type: none"> <li>• Public Comment</li> <li>• Focus groups</li> <li>• Public Meetings</li> <li>• Surveys</li> </ul> | <ul style="list-style-type: none"> <li>• Advisory Committees</li> <li>• Deliberate Polling</li> <li>• Workshops</li> </ul>   | <ul style="list-style-type: none"> <li>• Consensus Building</li> <li>• Participatory Decision Making</li> <li>• Advisory Committees</li> </ul>                                   | <ul style="list-style-type: none"> <li>• Training Events</li> <li>• Practical Skills Workshops</li> <li>• Ballots</li> </ul> |

Your project's level of community engagement can range from keeping the public informed to involving them in the decision-making process. Including community members early and at the appropriate level helps create buy-in for both the process and final decisions.





# ENGAGING WITH STAKEHOLDERS

## STAKEHOLDERS AND DECISION-MAKERS

The term "stakeholder" refers to anyone who has a stake, or interest, in an outcome. This includes people who will benefit from a project or program, people who could be negatively impacted by a decision, and those who are simply interested.

Who are the decision-makers and when will a formal decision be made? Staff will identify who will make the formal decision about a specific project. For many of our activities City Council will be the ultimate decision-makers. Your audience must know and understand the decision-making process. This helps to avoid false expectations. Take a moment to brainstorm all potential stakeholders whom your project or program might have.

## WHO SHOULD BE INVOLVED AND WHY?

Your list of stakeholders will be different for every project or program. This list will be created by the Project Manager and can be supplemented by reaching out to the Neighborhood Engagement Team. Your stakeholders' time is valuable; use it wisely and strategically. Ask the questions on the following page and then complete your **Community Engagement Plan Worksheet (Appendix page 26)**.

We want to ensure that stakeholders do not experience "over-outreach" which can be difficult as there is a risk that multiple City projects occurring simultaneously might involve overlapping community interests. There may be several projects that are connected to a specific group of community members at one time, for example, our senior population, but we need to ensure that multiple departments are not reaching out to the same organizations repeatedly in a short period of time.

## REACHING THE COMMUNITY

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It is important to determine who exactly constitutes “the community” in relation to your project. Given your limited resources, you will need to decide the best methods to reach the greatest number of people most affected by your project—educating them about the project and inviting their input. A blend of “active” and “passive” methods of community engagement should be considered.

Active methods: Require approaching and reaching out directly to individuals or groups.

Passive methods: Require community members to approach the City for information about the issue or project.

Information about your project should be made available to anyone who comes seeking it by posting it online. Your department pages on the City website can provide descriptions of your project and also list the project timeline and methods for providing input, such as meeting dates/locations and contact information for key staff including their phone numbers, e-mail addresses, and physical mailing addresses. Websites are now optimized for mobile use, which is how most people are accessing information.

Suggested web tools that can help project managers communicate ongoing issues and regularly analyze community feedback:

- A form requesting feedback
- A Q&A or FAQ that anticipates and answers questions, including difficult and controversial ones.
- Lists of policies, the rationale behind them, and how they fit into the grand scheme of the department's operations.
- Lists of internal policies, such as policies on recording an event.

### TOOLS TO CONSIDER

- Online surveys
- Interactive applications (e.g., participatory budgeting)
- Social media (Facebook, Twitter, Instagram, YouTube, NextDoor)
- Marketing Brand Manual

### WAYS TO AVOID OVER-REACH

- Submit Community Engagement Plan summaries so other teams can see which projects have overlapping stakeholder groups, timelines, or other concerns.
- Hold staff Round Table meetings for group discussions.
- Utilize the Neighborhood Engagement Team to help develop stakeholder groups or when questions arise.
- Check the Community Calendar to see what other public events are planned and if there is an opportunity to work together.

## TIPS FOR ENGAGING WITH INTERNAL AND EXTERNAL STAKEHOLDERS:

- Reach out to stakeholders whenever possible.
  - Ask to attend any existing/ongoing meetings or events rather than creating a competing time commitment.
- Plan to involve external stakeholders adequately throughout the project, whether it's a simple notification or involving them directly in planning and implementation.
- Prepare for your stakeholder list to grow as the project progresses or groups show interest in the project.
- Be flexible enough to involve new stakeholders at any time in the process.
- Don't forget internal stakeholders. **City staff is filled with experts on multiple topics. Early and systematic consideration of internal stakeholders for your project can help identify issues before they become critical.**
  - Involve other City departments during your planning phase. Consider sending an e-mail or initial coordination meeting to present project basics to various departments and to ask if there are any special communication needs.
  - Check calendars and ask around so that the City doesn't inadvertently overschedule an evening or isn't competing for stakeholders.
  - Always check the Community Calendar for potential conflicts with large events or activities.

## HARD-TO-REACH STAKEHOLDERS

Some groups face barriers that can make establishing relationships or communicating with them much more difficult. The City of Riverside places great value on comprehensive involvement. In some cases, extra consideration will be needed to ensure equal access to information is provided for all members of the community. An awareness of potential barriers community members face is vital when creating a Community Engagement Plan.

The City's Neighborhood Engagement Team may be a helpful resource in connecting you with hard-to-reach stakeholders. Please consider the following questions during your planning stage:

- Will the meeting need a translator or sign language specialist?
- Would people from different cultures feel welcome at this event?
- Are there technology or literacy skills needed that may be difficult for people with less education or from another generation?
- Is there a history of mistrust or neglect?
- Is the event held in an ADA-compliant location?
- Are informational sessions held at a variety of times to accommodate people with alternative work schedules?
- Would it be appropriate for children to accompany a parent to the event if childcare is an issue?
- Should childcare be provided?



## 6 BASIC STEPS TO CREATING A COMMUNITY ENGAGEMENT PLAN

This is a roadmap for you and your team. It will take time and thought but it is a vital resource for your project. Before getting started with your Community Engagement Plan, be sure to have a statement of purpose that outlines the overall goal of the project or program. This will help you identify the "why" to your community engagement process.

### Characteristics of Successful Plans



Clear Purpose

Audience



Education



Records



Outreach



Follow Up



### STEP 1: CREATE OUTLINE

- Draft a clear and complete project/program/activity outline defining goals and outcomes from the department, project manager, or other city employees requesting public engagement.
- Identify who the decision-makers will be and the dates when formal decisions will be made.
- Determine the level of public engagement based on the scope and impact of the project. (see table on Page 9 for guidance)
- Determine which stakeholder to target and how you will engage them.
- Develop a timeline to achieve the remainder of the public engagement steps.
- Determine how public engagement results will be measured and archived.
- Determine how the results will be shared with the public.

**Note:** If assistance from the Office of Communications will be needed for graphic design, PowerPoint templates, social media posting, or any other services they provide, schedule a pre-planning meeting with them as soon as you have drafted your project description as there will need to be some coordination that may affect your timeline.

## CREATING YOUR INTERNAL TIMELINE

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- Work backwards from your identified target dates for final decisions to determine how much time your community engagement efforts will require.
- For small projects, begin planning your outreach efforts at least two to three months before the date final decisions are to be made; medium and large projects will require additional time. If you need to go before City Council, think about getting on the calendar three to six months prior, depending on the political sensitivity of the project.
- Provide your Stakeholders one month's notice for community engagement activities. Get your Public Information Officer involved early in the planning process so press releases can be sent out at least two weeks before your public events.
- Be sure to connect with community organizations a month before your event so they can assist you in distributing the information to their members. Also use the Community Calendar, City Council newsletters, and the City's social media along with any other communication tool available to assist in getting the information out.

## CREATING AN EXTERNAL TIMELINE

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A timeline is a valuable tool both for planning an effective community engagement process and for educating members of the public on the overall project process. Share the timeline with the community early in the process to avoid complaints about being "left out of the loop."

### Develop a one-page timeline for the public:

- Outline the "who, what, when, where, why, and how" of the overall process.
  - List dates related to formal decision-making processes and deadlines related to the project.
  - Include brief descriptions of each item that can be easily understood by community members.
  - Define any technical terms or use alternative simple language.
  - Share the draft timeline with other staff members and ask for feedback on the process.
  - Keep electronic versions of information up-to-date and provide important changes in schedule.
  - Include the timeline in your Community Engagement Plan as well as your Community Engagement summary after project completion.
-



## STEP 2: NOTIFY STAKEHOLDERS

After completing your outline, the second step is to sufficiently notify the public about your project and Community Engagement Plan. This will require getting the word out early, and to as many stakeholders as possible. The notification step sends the message to the public that “this project may affect you” and educates community members of the public engagement and decision-making processes planned for the project.

Depending on the scope and type of project, initial notification may include:

- Postcards
- Letters
- Emails (through City and external distribution lists)
- Social media
- Temporary signage at project site or on electronic reader boards
- Press releases
- initial visits to community organization meetings
- open houses
- phone calls to neighborhood leaders
- posting on your department’s webpage.

It is always helpful to demonstrate for the public how the project can affect them.

### ACTIVE OUTREACH:

It is important to include metrics about input received through these additional outlets in project summaries delivered to City Council.

While the internet is an excellent tool for community engagement, your outreach should also include active efforts to reach out directly to the public. Some examples of active outreach are sending flyers or e-mails directly to stakeholders and presenting at community or City board meetings. Often, active outreach is accomplished through collaboration with local community organizations and neighborhood groups. It is best to meet with these organizations and groups where they normally gather. Traveling physically to locations where they meet is most convenient for them and they will be more likely to attend.

Community organizations and neighborhood groups can be helpful vehicles through which public engagement can occur. However, do not assume that a community organization or neighborhood group fully represents all the interests of the community at large. You should always practice diversity when choosing tools and doing outreach.

**Note:** All projects are important, but not all are newsworthy. Consider what aspects of your project, if any, might be vital or interesting to the public. Is it imperative? Engaging? Entertaining? If not, it might not be a good fit for social media platforms and different tools should be considered.



## STEP 3: EDUCATE

The third step is when you will engage the public to educate them about the project and encourage participation in the engagement process. Community members cannot provide input without a clear understanding of the project. Education will develop meaningful discussion and dialogue and may prevent myths about the project's costs and benefits by opponents, either inadvertently or strategically.

Take time to clarify the decision-making process, the scope and impacts of the project, and the variables and alternatives to be considered. It is easy for a project manager who is involved in the project daily to forget that it may not be as easy for community members to grasp the project's details, so summarize in lay terms but also provide opportunities for people to read entire reports/documents on your website for additional information.



## STEP 4: LISTEN

The fourth step is to execute activities, gather input, and show the public that you are listening. Once educated on the project, community members can provide informed opinions. The methods you choose for obtaining input will depend on the nature and scope of your project. Consider the costs and benefits of one-time, one-way input versus involvement and dialogue over time.

### **Plan where to store public input and how to organize it.**

Create folders on the City's drive in a safe and easily accessible place for other members of your team. Move it into those folders immediately as input is received or create spreadsheets/databases so nothing is missed. This includes saving emails on the network drive – not in Outlook – with public comments that will be relevant for the length of your project. This input should be provided to City Council if your project is going before City Council. By

carefully recording and archiving all public input, you can reassure community members that opinions will be considered as decisions are made.

### **Determine how oral input will be recorded.**

Phone calls may be received, and community members may voice their opinion at meetings. Generally, in government business, only items in writing and oral comments during formal meetings and public hearings are considered "official" but project managers are encouraged to be flexible in receiving oral input in addition to those formal methods.

### **Consider what types of questions you will ask the public.**

People can be quick to come to conclusions about whether they are in favor of or opposed to a project and community groups will often want to take a vote to that end. However, many projects involve several components, each with more than one alternative.

Ask open-ended (not yes/no) questions and ask follow-up questions as to why someone is opposed to the project. Ask whether they have suggestions on addressing those concerns.

Many projects offer some flexibility to allow modifications in response to public deliberation. Projects can be shaped and molded by public opinion to the point where individuals who disliked the initial proposal may come to accept or even like the final proposal.

When possible and early in the process, provide a list of alternative approaches to a policy or project and their associated pros and cons. Allow the opportunity for members of the community to comment on the list and add other alternatives, pros, and cons.

This provides an opportunity for community members to discuss each alternative, the underlying community values, how desirable the new policy or project is, the intended consequences, and potential unintended consequences. When presenting the list of alternatives, remember the "do nothing alternative," which is the option to keep things as they are.

Approach the community with an open and willing attitude.

Avoid communicating in ways that would suggest reluctance, as though the community engagement effort is required of you against your will. Pay special attention to your nonverbal cues. Some members of the public may have cultivated an attitude that community engagement is "just a formality" and that the proposed project will move forward regardless of public input. It is important to overcome this barrier by approaching the public in a way that conveys you are willing to alter or even halt (the "do nothing alternative") the project if there is enough input to warrant it.

Listening and summarizing can be the hardest part of a project. It is important to show community members that you are listening by summarizing what you have heard, thanking them for their time, and reassuring them that they have been heard and their input will be considered.



## STEP 5: FOLLOW THROUGH

The fifth step is to follow through by sending the community input to decision-makers and to follow through again by providing community members with the rationale for the decision considering all relevant facts and opinions. Whatever input methods are used, communicate to individuals and groups that you have heard them. Acknowledge them. Throughout the process, summarize questions and concerns that have been heard. An issues summary and/or frequently asked questions (FAQ) sheet may be useful. Describe how input will be communicated and presented to the decision-makers. This is often accomplished through staff reports or memos, but other methods may be used as well.



Depending on the amount of community input received, you may need to summarize it for decision-makers in a way that provides a succinct report while preserving the intent of individual comments. General categorization of individual comments is an effective way to communicate results. If community groups provide unified opinions, write a brief description of the individuals who participated in forming that opinion including the number of people who were present. This will help decision-makers gain an understanding of the strength and representation of a group's opinion.

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## STEP 6: EVALUATE & ADAPT

The sixth step is to evaluate the effectiveness of your community engagement strategy, adapt, and be flexible. During implementation of your Community Engagement Plan, regularly assess whether goals and expectations related to community engagement are being met, and revise the plan as needed. This may require changes such as pushing back decision dates, creating additional education material in response to confusion or erroneous rumors that have surfaced, meeting an additional time with a community group to provide sufficient time for discussion on the topics, adding time for a new group of stakeholders not previously identified to catch up with others in the process, or expanding the community engagement process because the level of impact was found to be greater than previously thought.

Summarize the rationale for decisions considering all the facts, including public opinion. Document the rationale and make it available to the public. If possible, provide the rationale for why one alternative was chosen over others and why decisions were made to move forward considering opposition, if there was any.

Some questions to consider when evaluating your community engagement activities:

- Did you satisfy the goals you set during the planning process?
- Did your engagement activity adhere to the principles of community engagement set out in this guide?
- Did you effectively assess all stakeholders?
- Did you include potential participants in the design of your Community Engagement Plan?
- Were the tools you chose most appropriate given your unique circumstances and constraints?
- Were individuals and stakeholders given adequate opportunity to participate in all aspects of the process?
- Were the needs of persons with disabilities considered?

- Were conversations relevant and valuable?
- Were all critical concerns addressed?
- Did you effectively record and analyze the input you received?
- Did you allocate sufficient resources (time, human, financial)?
- Was the activity completed within the budget allotted?
- Were participants provided with feedback regarding how their contribution was/will be used?
- Were participants generally satisfied with the activity? Were organizers?

Also, some tips to track and evaluate engagement:

- Create separate tracking links for online surveys to determine which channels of communication are most effective.
- Ask demographic questions in surveys and at events to determine how representative participants are of the audiences you are trying to reach.
- Debrief individual events and the project with internal and external participants.

During your project, consider gathering feedback from community members and your internal working group on the quality of the process and whether it is meeting community member expectations. After completing your project, consider debriefing both internally and externally with discussions about how community engagement for future similar projects can be improved.

The City is collecting case studies from which to learn lessons on public engagement best practices. All City Departments are encouraged to regularly write case studies and contribute them to the collection for future reference. For details of these case studies, contact the Neighborhood Engagement Team.



## TOOLS AND RESOURCES

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The following section includes information and resources that will assist in ensuring your project has the necessary elements and involvement of other departments, which may supplement your project. For example, some projects need to include Marketing and Communications for print materials or the City Attorney's Office for legal advice. It will also help define how to assemble a team and identify the role of each member.

It may take a few minutes to review the tools, but they will save you time and effort in the long run.

If assistance is needed with any of the following:

- Advice and open discussion at a Round Table
- Creating a Stakeholder List or a Community Engagement Plan
- Information on locations in town and in City buildings to host events
- Connecting with Stakeholders
- Planning worksheets

Please contact the Neighborhood Engagement Team for assistance.

### **Community Engagement Tools and Methods**

The tools that will work best for your project will depend on the level of participation chosen and the groups you would like to engage. This is where the Participation Spectrum and Community Engagement Plan Worksheet are essential. Use your evaluation of the level of impact and your stakeholder's potential level of concern to prioritize your outreach and choose appropriate methods.

# COMMUNITY ENGAGEMENT PLAN WORKSHEET

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Use these questions to help design the strategy for your Community Engagement Plan.

## PREPARE

1. What is the project? (define in detail)

2. Who is the Project Lead?

3. Which other internal departments and individuals are involved?

4. What are the objectives?

5. What questions need to be answered to proceed with the project/decision?

6. Who are the stakeholders?

7. What are the potential impacts of the project to those stakeholders?

8. What information do the stakeholders require?

9. How might the stakeholders influence the decision?

10. Why do we need to engage?

11. What are the risks of NOT engaging?

12. How broadly should we engage?

## DESIGN

13. What influence or impacts will participants have on the decisions? \*  
(Refer back to the Levels of Community Engagement)

*\*Important note: If stakeholders have no opportunity to influence the decision or outcome with their participation, do not continue planning a community engagement process. In this case, the appropriate action is to "Inform."*

14. What specific engagement tactics will be used?

15. How long will the process be? Is it a simple question we need to answer, or is it a major item requiring ongoing/multiple engagement opportunities and/or decision points?

16. What platforms are best suited for telling this project's story?

17. How will participants be invited?

18. How will the findings be reported – to participants, to City Council?

## IMPLEMENT

19. Now is the time to execute your plan, tell your story and invite response.

## EVALUATE

20. Did we achieve our objectives? Why or why not?  Yes  No

21. Diversity – Did we engage with a wide range of voices? How?  Yes  No

22. Accessibility – Did we ensure that barriers to participation were removed?  Yes  No

23. Inclusion – Were all relevant stakeholders identified and included?  Yes  No

24. Relevancy – Were the materials and questions provided meaningful and relevant to participants?  Yes  No

25. **Responsiveness** – How did the community engagement team respond to participant questions? Did the team follow up with participants to share results? Yes No

26. **Respect** – Was the process respectful of participants' time and input? How? Yes No

27. **Communication** – Did the communication materials provide clear, objective, and helpful information to participants at appropriate phases of the project? Yes No

28. **Transparency** – Were the levels of involvement and influence clearly communicated with participants? Were results and updates reported back to participants? Yes No

29. Overall comments regarding the effectiveness of community engagement.



30. Was the process effective? Why or why not?

31. What would you do differently next time?

**Please send completed evaluation form along with participant feedback to the Neighborhood Engagement Division (<https://riversideca.gov/cedd/neighborhood-engagement>) once your process is complete.**

# IDENTIFY STAKEHOLDERS

Who should you engage with? Consider all types of community-based organizations, neighborhood groups, and other audiences. Identify stakeholders at the beginning of a project and notify them of key decision points or opportunities to provide input. Stakeholders can provide community expertise that enhances the engagement process. They can also help you reach more and broader networks. This list is not inclusive of all community stakeholder groups, it is just an example to get you thinking about who should be included on your list.

| GROUPS/AUDIENCES        | RIVERSIDE-SPECIFIC EXAMPLES   |
|-------------------------|---|
| Arts/Culture            | Adrian Dell & Carmen Roberts Foundation, Mission Inn Museum & Foundation, Old Riverside Foundation, Riverside Arts Council, Riverside Museum, The Fox Foundation,   |
| Business                | Arlington Business Partnership, Greater Riverside Chambers of Commerce, Greater Riverside Hispanic Chamber of Commerce, Riverside County Black Chamber of Commerce, Riverside Downtown Partnership, The Pick Group, local businesses, large corporations, employers |
| Community At Large      | Arts Walk, National Night Out, Riverside Farmer's Markets, Riverside Public Library, ratepayers, commuters  |
| Education               | Alvord Unified School District, California Baptist University, California School for the Deaf, La Sierra University, Riverside Community College, Riverside Unified School District, University of California Riverside, private and public schools, PTSA's         |
| Government              | City Council, boards, commissions, volunteers, other agencies (RTA, RCTC, State, etc.)  |
| Human Services          | Casa Blanca Home of Neighborly Services, Community Settlement Association, Feeding America, Second Harvest Food Bank  |
| Media                   | Black Voice News, KVCR, La Prensa, The Press Enterprise   |
| Mobility                | Riverside Bicycle Club, Riverside Transit Agency, transit users   |
| Neighborhoods           | Contact Neighborhood Engagement Division for a list   |
| Nonprofits              | American Legions, Elks, Family Service Association, Habitat for Humanity, Operation Safe House, Riverside Women's Club, Rotary clubs, faith-based organizations   |
| Outdoors                | Friends of Mt. Rubidoux, Friends of Riverside's Hills, Riverside Garden Council   |
| Property Owners         | Commercial brokers, real estate professionals   |
| Students                | Alvord School District, Riverside Unified School District, Riverside Youth Council, individual schools, youth groups  |
| Parks & Recreation      | Park Advisory Boards, park and trail users, PR&CS customers   |
| Diversity and Inclusion | Deaf and hard of hearing and indigenous communities, people with disabilities   |
| Seniors                 | Dales Senior Center, Janet Goeske Center, La Sierra Senior Center   |

# CREATING YOUR STAKEHOLDER LIST

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From your answers to the questions below, you will develop your Stakeholder List. This list of organizations and individuals will also include up-to-date contact information. Though the general public has a stake in the outcome and are considered stakeholders in the broad sense, your stakeholders are a distinct group who may include community members, businesses, and organizations that will be affected by the project and should be strategically engaged. While the broader "public" should be informed and included on a project, the stakeholder groups generally spend more time and effort contributing throughout the conversation.

Stakeholders can be both external and internal to the organization. External stakeholders can include other governmental agencies, nonprofit organizations, community groups, special interest groups, businesses, and individual residents. Internal stakeholders can be other City departments or committees that could be impacted or included.

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## **1. Who will be impacted (positively or negatively)?**

Consider geography – who lives, works, or plays nearby?

## **2. Who NEEDS to know about this?**

Is there a legal requirement?

Is there a group with an imperative interest?

## **3. Who will contribute to this conversation?**

Who are the experts?

Are there outside sources who discuss the same topics?

#### 4. Who or what group is missing?

Each stakeholder list should include:

Experts

Clubs

Personal interest groups

Residents

Professionals

Hard-to-reach populations

#### 5. Who has the potential to stop this project?

Is there anyone or any group who will dislike the idea or be impacted to an extreme extent?

#### 6. Who could make the project better?

How could this be more inviting to the public?

Who would have a unique perspective?

#### 7. What questions would I ask a resident?

If you were on the outside of this issue or project, what would you want to know?

#### 8. Whose life or schedule stands to be alerted by any aspect of this project?

# DEVELOPING A VISION & MISSION STATEMENT

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## Considerations for developing your Vision Statement:

- A vision statement is a statement about ideal conditions or how things would look if the issue important to you were completely, perfectly addressed.
- Common characteristics of vision statements:
  - Understood and shared by members of the community
  - Broad enough to include a variety of local perspectives
  - Inspiring and uplifting to everyone involved in your effort
  - Easy to communicate- for example, they are generally short enough to fit on a T-shirt
- Examples:
  - Caring communities
  - Safe streets, safe neighborhoods
  - Health for All

## Instructions:

1. Identify one person to take notes while the group brainstorms ideas and one person to document the decision reached through consensus
2. Ask the following questions, record key points, and discuss common themes: (30 minutes)
  - a. *Essential why*: What is the dream or ideal that you and your community seek?
  - b. *Essential what*: What would have to change for this dream to come true?
3. Come to consensus about what the vision statement should be by considering the following: (10 minutes)
  - a. Will it draw people to the common work?
  - b. Does it give hope for a better future?
  - c. Will it inspire community members through positive, effective action?
  - d. Does it provide a basis for developing the other aspects of your action planning process?
4. Record the agreed upon statement on your handout.

Notes:

### Considerations for developing your Mission Statement:

- A mission statement describes *what* the group is going to do and *why* it is going to do that.
- Guiding principles for mission statements include:
  - *Concise*. Mission statements generally get their point across in one sentence.
  - *Outcome-oriented*. Explain the fundamental outcomes your organization is working to achieve.
  - *Inclusive*. Make broad statements about your groups' key goals but are not limiting to specific strategies or sectors of the community.
- Examples:
  - Promoting child health and development through a comprehensive family and community initiative.
  - To develop a safe and healthy neighborhood through collaborative planning, community action, and policy advocacy.
  - Promoting community health and development by connecting people, ideas and resources.

### Instructions:

1. Identify one person to take notes while the group brainstorms ideas and one person to document the decision reached through consensus.
2. Carry forward ideas generated in developing your vision statement. Gather the ideas generated that described the "*essential why*" or the dream/ideal you seek and the "*essential what*" or what would have to happen for the dream to come true.
3. As a group select the statements that have particular relevance for the vision statement identified and brainstorm potential mission statements (e.g. Our mission is to \_\_\_\_\_ (essential why) through (or by) \_\_\_\_\_ (essential what). (30 minutes)
4. Come to consensus by considering the following: (10 minutes)
  - a. Does it describe the *what* your group will do and *why* it will do it?
  - b. Is it concise (one sentence)?
  - c. Is it outcome oriented?
  - d. Is it inclusive of the goals and people who may become involved in the work?
5. Record the agreed upon statement on your handout.

#### Notes:

The Mission of our initiative is (*the essential why*):

through (or by) (*the essential what*):

# DEVELOPING OBJECTIVES AND STRATEGIES

## Considerations for developing objectives:

- Objectives are specific measurable results of an initiative. They provide specifics about *how much of what* will be accomplished and by *when* (e.g., By (date), \_\_\_\_\_ will increase/decrease by X%.)
- There are three basic types of objectives:
  - *Process objectives*: aim to measure the extent to which progress is made toward other objectives (e.g., By 2020, establish a comprehensive plan to improve emergency preparedness.)
  - *Behavioral objectives*: aim to measure changes in behaviors of people (what they are doing and saying) and the products (or results) of their behavior (e.g., By 2025, the percentage of 15-19-year-old youth reporting use of alcohol in the past 30 days will decrease by 25%)
  - *Community-level outcomes objectives*: aim to measure the product or result of behavior change in many people (e.g., By 2025, the percentage of people living adequate housing in X community will increase by 30%.)
- Common characteristics include:
  - **Specific**: they tell how much of what by when
  - **Measurable**: information can be collected, detected, or obtained from records
  - **Achievable**: they are possible to achieve AND it's feasible for your group to reach them
  - **Relevant**: there is a clear connection to how they fit with the overall vision and mission of the group
  - **Timed**: timing by which it will be achieved is clear in the objective itself and an overall timeline
  - **Challenging**: they stretch the group to set its aims on significant improvements that are important

## Instructions:

1. Identify one person to take notes while the group brainstorms ideas and one person to document the decision reached through consensus.
2. Begin by drawing on expertise from the group to determine what needs to occur to see real progress toward your vision and mission. Then, together, form a list of *one or two* general goals (e.g., Improve emergency preparedness programs; Increase understanding of the causes and solutions to address school-shootings).
3. Then for each goal, develop *one or two objectives*. Consider what would have to change to suggest you are making progress toward that goal. Describe how much of what would change and by when and state your objectives. Consider the following questions:
  - a. What measures of activities or outputs would help us assess whether key activities are completed?
  - b. What changes in behavior would we see if the effort is successful?
4. Critique your objective based on SMART+C attribute and come to consensus about what the objective(s) should be. Record the agreed upon objective below.

**Goal(s):**

**Objective(s):**

**Considerations for developing strategies:**

- A strategy is a way of describing *how* you are going to get things done. It tries to broadly answer the question, “How do we get there from here?”
- A good strategy considers barriers and resources, stay in-line with the overall vision, mission, and objectives. Often initiatives use many different strategies to achieve their goals.
- Common characteristics of good strategies include:
  - *Give overall direction*- points to an overall path without dictating a narrow approach
  - *Fit resources and opportunities*- takes advantage of current resources and assets
  - *Minimize resistance and barriers*- good strategies attract allies and deter opponents
  - *Reaches those affected*- strategies connect interventions with those who it should benefit
  - *Advance the mission*- likely to make a difference on the mission and objectives
- Examples:
  - Increase collaboration among key sectors and stakeholders to develop improved emergency preparedness protocols
  - Increase coordination and integration of existing services to increase access to adequate housing
  - Assist schools in the development of substance abuse curriculum for health classes

**Instructions:**

1. Identify one person to take notes while the group brainstorms ideas and one person to document the decision reached through consensus.
2. Begin by considering your goals and objectives. Consider the following:
  - a. What risk and/or protective factors contribute to challenges in this area? Use the “Understanding Factors that Contribute to the Problem” worksheet to generate discussion.
  - b. Who are the *targets* of change (people who experience or at risk for experiencing the issue or problem) and *agents* of change (those in a position to help contribute to the solution)?
3. Generate *one or two* potential strategies that aligns with your goals and objectives, addresses factors contributing to the issue, and considers agents and targets of change. Consider the following:
  - a. What resources and assets exist that can be used to achieve the vision and mission?
  - b. What obstacles or resistance exist that could make it difficult?
  - c. What are potential agents of change willing to do to serve the mission?
  - d. Which strategies reach those especially at risk for experiencing the problem?
4. Come to consensus about which strategy/strategies to focus on for action planning and record your agreed upon strategy below.

|  |
|--|
| <p><b>Risk/protective factors:</b></p><br><br><p><b>Targets of change:</b></p><br><br><p><b>Agents of change:</b></p><br><br><p><b>Strategy:</b></p> |
|--|





## 15 Participation Techniques

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These 15 techniques were chosen strategically from the dozens available. The list is far from exhaustive, but these were chosen because they fit the goals of the policy, are innovative, and/or underutilized.

Open meetings are over-utilized, especially since there are so many other options. Please consider alternative methods when planning outreach events. Also, please review the Community Calendar to see if there is an event that covers a similar topic or involves the same stakeholders as well as events that attendance is expected to be high as it will detract from your event. Your outcome will be better if you are not competing for the community's time.

Several City staff members have been trained extensively on these tools and many more through training courses, research, and experience. This number will continue to grow with additional opportunities for trainings in the future. If you are interested in more information on how to use a tool or participating in trainings, please contact a member of the Neighborhood Engagement Division.

| TECHNIQUE   | CONSIDER  | WHY IT WORKS  | POTENTIAL ISSUES  |
|---|---|---|---|
| <b>Briefings</b>  |   |   |   |
| <p>Use existing meetings of social groups, neighborhood organizations, and clubs as a platform to provide information, education, and hold discussions</p> <p>Groups often need speakers and look for ways to be more involved</p> <p>Which groups are stakeholders for your project? Examples: Rotary Clubs, parent groups, Kiwanis, businesses, HOA's, neighborhood organizations, special interest groups.</p> | <p>KISS – Keep It Short and Sweet</p> <p>Be engaging by including visual aids, props, and provide opportunities for interaction</p> <p>Excellent tool for the “go-to-them” approach</p>   | <p>Control of information</p> <p>Reaches a wide variety of individuals who may not have been attracted to another format</p> <p>Opportunity to expand mailing lists</p> <p>Similar presentations can be used for different groups</p> <p>Excellent relationship-building tool</p>   | <p>Can get mixed groups of stakeholders, so you will need to speak to multiple interest areas and concerns</p> <p>Some organizations have tight agendas, time may be limited</p>  |
| <b>Expert Panels</b>  |   |   |   |
| <p>Public meeting designed in “Meet the Press” format</p> <p>Staff member from various departments or communications team interviews experts from different perspectives</p> <p>Can be conducted by a neutral moderator and include the option for the community to submit questions beforehand</p>   | <p>Agree on ground rules beforehand</p> <p>Be clear about the topics that will be discussed</p> <p>Choose your “experts” wisely – Can they answer a variety of questions? Are they comfortable with public speaking?</p> <p>Be sure questions are unbiased and include different topics</p> | <p>Encourages education to a diverse audience and potentially the media that will cover the story</p> <p>Presents opportunity to display the facts, showcase the complexities of an issue, and dispel scientific misinformation</p>   | <p>Requires substantial preparation and organization</p> <p>May enhance public concerns by increasing visibility of issues</p> <p>Success easily affected by participating parties</p>  |
| <b>Electronic Forums, Social Media Groups, E-mail</b>   |   |   |   |
| <p>Utilization of electronic mailing lists and social media platforms that members can easily join and leave</p> <p>Can provide access to an array of information formats such as video, photos, and links to more resources</p>  | <p>Online resources are useful but should be supplemented by hard copy versions</p> <p>The Internet is saturated and competitive</p> <p>Extra effort needs to be taken for messages to stand out or for stakeholders to read an email</p>   | <p>Easily accessible for most people including hard-to-reach populations such as low income and homeless – these groups often rely heavily on their mobile devices because they do not have access to full computers. Take this into account when writing emails and creating social media content</p> <p>Very inexpensive or free way to directly reach stakeholders</p> | <p>Be careful not to overuse social media platforms</p> <p>People can easily suffer from “over-reach” and not all projects warrant groups, email, or social media posts</p> <p>Substantial effort is needed to maintain accurate email addresses and engagement</p> <p>Won't attract older generations or people who are not tech savvy</p> |

| TECHNIQUE  | CONSIDER   | WHY IT WORKS   | POTENTIAL ISSUES  |
|--|--|--|---|
| <b>Response Summaries</b>  |  |  |   |
| <p>An ongoing form of documentation that provides feedback to the public regarding comments received and how they are being incorporated</p>     | <p>May be used to comply with legal requirements for comment documentation</p> <p>Use publicly and openly to announce and show all comments were addressed</p>   | <p>Strongly supports the City's goal of transparency and co-creation</p> <p>Demonstrates active listening and how responses are being incorporated</p> <p>Can also address why some ideas would not work</p>   | <p>Can be time consuming to stay on top of comments and keep stakeholders up to date, especially if there is a large audience or social media comments are included</p>   |
| <b>Television – Riverside Cable Access Channel 3</b>   |  |  |   |
| <p>Television programming and video creation to be shared through television and online platforms such as YouTube</p>                            | <p>Video creation and recording is openly available to you though Cable Channel 3 but may come at a cost to your Department</p> <p>Video is the fastest growing method of information – the brain interprets images much more quickly than it does text</p> <p>Capability to access video through mobile devices has made it even more effective</p> | <p>Our Riverside TV crew is creative and highly experienced</p> <p>Can be used in multiple areas and reach several stakeholder groups at once</p> <p>Many people will take the time to watch rather than read</p> <p>Provides opportunity for positive media coverage at ground breakings and other significant events</p> | <p>Difficult to gauge impact on audience</p> <p>Needs several layers of involvement and planning</p> <p>Cable Channel 3 is available but their schedule often fills quickly, be sure to reach out well in advance if you plan to use their services</p> |
| <b>Community Facilitators</b>  |  |  |   |
| <p>Use qualified individuals in local community organizations to conduct project outreach</p>  | <p>Define roles, responsibilities, and limitations up front</p> <p>Select and train facilitators carefully</p>   | <p>Promotes community-based involvement and co-creation</p> <p>Capitalizes on existing networks and relationships</p> <p>Enhances project credibility</p>  | <p>Can be difficult to control information flow</p> <p>Extra effort is needed to maintain expectations</p>  |
| <b>Interviews</b>  |  |  |   |
| <p>One-to-one meetings with stakeholders to gain information for developing or refining public participation and consensus-building programs</p> | <p>Conduct in person when possible, particularly useful when considering candidates for committees</p> <p>Plan your questions well</p>   | <p>Provides in-depth and personalized information in a non-threatening environment.</p> <p>Builds deeper relationships and gives interviewees a sense of empowerment</p>   | <p>Can be time consuming and difficult to schedule multiple interviews</p> <p>Extra efforts needed to accurately record conversations and thoughts</p>  |

| TECHNIQUE   | CONSIDER   | WHY IT WORKS   | POTENTIAL ISSUES  |
|---|--|--|---|
| <b>Charettes</b>  |  |  |   |
| Intensive sessions where participants design project features   | Best used to foster creative ideas<br><br>Be clear about how results will be used  | Promotes co-creation and problem solving<br><br>Opportunity for innovation and pilot projects  | Participants may not be seen as representative by larger public – don't assume their opinion is representative of entire  |
| <b>Citizen Juries</b>   |  |  |   |
| Small groups of citizens empaneled to learn about an issue, cross-examine witnesses, and make a recommendation<br><br>ALWAYS non-binding with no legal standing   | Requires skilled moderator<br><br>Commissioning body must follow recommendations or explain why not<br><br>Be clear about how results will be used and that it is NOT a vote   | Great opportunity to develop deep understanding<br><br>Pinpoint fatal flaws or gauge public reaction   | Resource-intensive<br><br>Extra emphasis is needed to manage expectations   |
| <b>Surveys and Polls</b>  |  |  |   |
| Questions created to gather a sampling of opinion for targeted feedback<br><br>City does not externally use the term "survey" unless it is statistically valid<br><br>Externally say questionnaire, feedback form, poll, etc. | If you need statistically valid results, a consultant should be obtained, which can be expensive<br><br>Take great care in formulating questions – have several people review them to ensure they are clear, won't be misinterpreted, and will gather useful information<br><br>Most suitable for general aptitude gauging | Provides input from individuals who would be unlikely to attend meetings<br><br>Gathers input from cross-section of the public<br><br>Higher response rate than mail-in surveys<br><br>Easily shared, can be very engaging and fun | Statistically valid surveys are expensive and time-consuming<br><br>"Over-surveyed, under-represented" is a common phrase or thought from some groups within Riverside so be sure to thoroughly consider if you need a survey, what is the purpose of the questions, and how will the results be used |
| <b>Coffee Klatches – Kitchen Table Meetings</b>   |  |  |   |
| Small meetings within a neighborhood usually at someone's home or welcoming communal space  | Be sure to be extra polite, appreciative, and supportive   | Relaxed setting is conducive to open dialogue<br><br>Maximizes two-way communication   | Often need existing relationships and trust to organize   |
| <b>Fairs and Events</b>   |  |  |   |
| Central event with multiple activities to provide project information and raise awareness   | All issues – large and small – must be considered<br><br>Make sure adequate resources are available<br><br>Think about the thought process and interest of your stakeholders – what would make them picture themselves at your event   | Focuses public attention on one element<br><br>Conducive to media coverage<br><br>Allows for different levels of information sharing<br><br>Good opportunity for interactive activities  | Public must be motivated to attend<br><br>Can be expensive<br><br>Can quickly lose a crowd if not done well   |

| TECHNIQUE  | CONSIDER   | WHY IT WORKS  | POTENTIAL ISSUES  |
|--|--|---|---|
| <b>Study Circles</b>   |  |   |   |
| A highly participatory process for involving numerous small groups in making a difference in their communities | <p>What works best is multiple groups work at the same time in different locations and then coming together to share out</p> <p>Structured around an actual study guide</p>  | <p>Large numbers of people are involved without having them all meet at the same place</p> <p>A diverse group of people agrees on opportunities for action to create social change</p> <p>Allows for strategic discussion of targeted information</p> | <p>Participants may find that the results are hard to assess or feel that the process didn't lead to concrete action</p> <p>May be difficult to get segments of the community to commit</p> |
| <b>Symposia</b>  |  |   |   |
| A meeting or conference to discuss a particular topic involving multiple speakers                              | <p>Provides an opportunity for presentations by experts, professionals, and a variety of people highly involved</p> <p>Requires upfront planning to identify appropriate and interesting speakers</p> <p>Needs strong publicity</p>                          | <p>People learn new and diverse information</p> <p>Educational foundation for informed participation and discussions</p> <p>Great tool for early in your outreach or at points of contention</p>  | <p>Experts might not represent different perspectives</p> <p>Controversial presenters may draw protests or negative views</p>   |
| <b>Tours and Field Trips</b>   |  |   |   |
| Provide tours for key stakeholders, elected officials, advisory groups, and the media                          | <p>Know the number of participants to accommodate and plan for</p> <p>Include refreshments and transportation options when possible</p> <p>Can be self-guided with additional tools such as recordings or maps</p> <p>ALWAYS consider safety precautions</p> | <p>Often seen as a special treat or "reward" for extra involvement</p> <p>Opportunity to provide rapport and a feeling of being an "insider"</p> <p>Reduces outrage and misinformation by making choices more familiar</p>                            | <p>Number of participants can be limiting logistically</p> <p>Potentially attractive to protestors</p> <p>Transportation and liability come in to play</p>                                  |

Modeled from IAP2's Public Participation Toolbox

# ELEMENTS OF AN EVALUATION PLAN

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An evaluation plan should be an integral part of your overall written plan for a quality reporting project. To support the planning of an evaluation, this page covers the following topics:

- Purpose of the Evaluation
- Evaluation Questions
- Evaluation Criteria
- Starting Early on Data Collection
- Collecting Data for an Evaluation
- Data Collection Methods To Answer Evaluation Questions
- Data Collection Tools and Activities
- Data Analysis
- Reporting Evaluation Findings

## **Purpose of the Evaluation**

To clarify the purpose of your evaluation, start by identifying what you need to learn in the short and long term. Think specifically about the decisions you and your partners are facing and when they have to be made. Key issues include:

- What are you hoping to learn from the evaluation?
- What decisions do you expect to make as a result of the evaluation?
- When do you hope to make those decisions?

Since your resources are sure to be limited, answering these questions will help to set priorities for learning.

## Evaluation Questions

Evaluations are most useful when they inform key decisions by answering the right question at the right time. What specific questions do you need to answer to adequately inform your decisions? Note that you may have several questions and that different questions may be appropriate to ask at different stages of your effort. For example, you will probably need answers to questions about your process sooner than you need answers to questions about results.

- Learn about [evaluating the process](#)
- Learn about [evaluating the results](#)

The number of questions you can address depends largely on the time and resources available. It also depends on whether you can save money by using the same data collection methods to gather the answers to more than one question at a time. For example, you might use a single community survey to address questions about whether your audience was aware of the report, sought it out, or used it. But this type of survey probably wouldn't work for determining whether people understood the report.

### Evaluation Criteria

To properly evaluate your efforts, develop specific criteria for success. Here are some issues to consider:

- What would count as success in reaching your audience?
  - What will you consider a successful process?
  - What will you consider a successful result?
- How would you determine whether someone had used your information?
- How would you know whether you did enough outreach?

The credibility of your evaluation with various stakeholders will depend in part on whether you define success in a way that resonates with them. They may have different points of view about the most important criteria for success. Make sure you get their input and come up with a clear set of criteria that reflect a shared vision. You might find that clarifying your criteria leads to useful, if sometimes thorny, discussions about exactly what you are trying to achieve, for whom, in your initiative.

### Starting Early on Data Collection

Planning your evaluation as early as possible makes it easier to start on your assessment when you want to. People who start late often find themselves playing "catch up" and end up struggling getting the information they need.

As early as possible, decide when you will start work on collecting feedback. If you are evaluating your processes, you need to move quickly to gather the data you need. If you are evaluating your results, you may also need to start early if you hope to collect data on the situation before your report is issued. This information is often called baseline data.

However, even if you are well along in your efforts, and have not been able to focus on evaluation yet, you can and should start as soon as possible. If you are in this for the long haul, you need to harness evaluation tools to help the project move forward in the right direction as you get more sophisticated and perhaps more ambitious.

### Collecting Data for an Evaluation

How will you measure whether each of your criteria has been met? When you're thinking about what data to track, keep in mind that the things that are easiest to count are not necessarily the most informative. For instance, the number of reports mailed out to residents does not tell you whether they read it, understood it, or used it.

When you develop your plan, answer these questions:

- Are there existing or standard measures or will you have to devise your own?
- What data sources will you use?
- Are some data already available that you can use? Most of the time, there is relatively little existing information relevant to quality reports. This means you will need to collect "primary" data from a variety of sources. Some of your primary data will be qualitative in nature; some will be quantitative.

One important thing to consider is whether you are collecting data on individuals or groups/organizations:

- If you collect data on individuals, you will likely focus on their:
  - Knowledge.
  - Attitudes, beliefs, and preferences.
  - Experiences and responses.
  - Behavioral intentions (what they intend to do in the future).
  - Actual behaviors.
- When you collect data about groups or organizations, you may also collect data on their:
  - Plans.
  - Policies.
  - New initiatives.

When you collect data about groups or organizations, you are typically collecting the data from individual people in the group or organization who



are knowledgeable about the group or organization in question. These people are sometimes called "key informants."

#### Data Collection Methods, Tools, and Activities

How will you collect data on your measures? You are likely to be using a mix of qualitative and quantitative methods in your evaluation as well as perhaps tapping into existing data, especially if you are evaluating a web-based report.

The method you use depends on the question you are asking as well as the time, resources, and talent that you have available. You must also consider what will be credible to the audience for your evaluation findings. The tools you need and the activities you carry out depend on your data collection methods. When you are collecting primary data, you typically have to develop tools specifically for your situation.

When you develop your plan, consider these questions:

- What tools will you need to collect data?
- Do some tools already exist that you can use as is?
- Can you get samples of tools that you can adapt or simply use as a template for your own?
- Who will collect the information—one of your own staff or people hired for this specific purpose as consultants or contractors?

#### Surveys

A survey asks a systematic sample of a population a set of questions that they answer using a specified set of responses. The sample population could be community members (including those you hope to reach), people who actually use reports, or representatives of purchasers, providers, plans, or policymakers.

Surveys ask a series of questions that can be closed-ended (where a limited set of answers is provided for each question) or open-ended. The use of closed-ended questions means that survey results are quantifiable.

Surveys may be administered by mail, by telephone, in person, or over the Web. Some Web sites incorporate a survey "feedback" function that asks questions and solicits comments from site visitors.

#### What's needed for surveys?

- A "sampling frame" from which you can choose a representative (i.e., random) sample.
- The survey instrument, preferably one that has gone through some initial testing.
- A cover letter or other form of invitation to motivate survey response.
- A way to distribute the survey (mail, telephone, or Web).
- A way to follow up with people who don't respond to the survey.
- A system for creating and managing a database of survey responses.
- A plan and a method for analyzing the results.
- Either a "vendor" that will conduct the survey for you or staff skilled in survey design, administration, and analysis.

### Focus Groups

In a focus group, a small group of individuals spends 1 to 2 hours in a guided discussion of a small set of questions. The individuals typically have certain characteristics in common, but they may also be diverse on other characteristics.

Unlike questions on surveys, the questions asked in focus groups can be answered in any way that the participants choose. No predetermined answers are provided.

The interaction among participants and how they influence each other are both part of the "data" that is of interest. In some focus groups, participants complete a brief survey at the beginning to capture their demographic characteristics or other information. In others, participants respond to a stimulus provided by the moderator.

### What's needed for focus groups?

- Access to a pool of people from whom you can recruit focus group participants who fit your criteria (often provided by a private vendor that specializes in commercial and/or academic focus group research).
- A detailed moderator guide, with primarily or exclusively open-ended questions.
- A skilled moderator.
- A facility to hold the focus group session(s) that is convenient, neutral, and attractive without being too plush. Focus group firms often rent their facilities for this purpose.
- Any materials that you want to use to stimulate the groups' responses.
- One or more ways to record the focus group (audiotape, videotape, or notes) and summarize or transcribe the conversation. Focus group firms can provide this service.
- A method to analyze the results of all your groups. This may include a qualitative data analysis software program.
- Staff who have skills in qualitative data analysis.

## Key Informant Interviews

A key informant interview focuses on a single individual or a very small group of individuals who are chosen because they:

- Have had a particular experience.
- Have played a particular role.
- Are likely to reflect a particular perspective on your report.

One or two interviewers ask the key informants a set of "open-ended" questions that permit respondents to say what they want in their own language. These interviews can be conducted in person or by telephone.

In some cases, interviews are highly structured: questions are asked in the same order, with the same wording, of everyone. Semi-structured interviews are more common; in such interviews, interviewers can reword the questions to fit the situation and change the order of questions. In all kinds of interviews, one can use "probes" (either specified ahead of time or identified during the interview) to delve deeper into a topic or issue.

### What's needed for interviews?

- A method to identify and recruit the people you want to interview.
- An interview protocol with primarily or exclusively open-ended questions.
- Skilled interviewers.
- A way to record the interviews and either summarize or transcribe them.
- A method to analyze the results of all your interviews. This may include a qualitative data analysis software program.
- Staff who have skills in qualitative data analysis.

## Web Analytics

With the growth of the Internet has come a parallel growth in methods to assess how and by whom a given Web site is being used. Analytics can also indicate whether links or ads you have placed to let people know about your report are actually being used. These methods are carried out by private companies, sometimes for a fee. Certain search sites, for example, offer free Web analytic services.

## Data Analysis

Analysis methods vary by how you collect the data. Quantitative data require typical statistical analyses. Be sure you have the expertise and the software required to conduct these analyses.

The analysis of qualitative data is less familiar to most people, but there are systematic and rigorous ways to analyze transcripts from interviews and focus groups. Qualitative analyses of the content of these transcripts are used to identify themes, patterns, and variations across different kinds of respondents.

When you develop your plan, answer these questions:

- What techniques will you use to analyze and interpret the data?
- How will you ensure your analysis is rigorous and viewed as trustworthy by your audience?
- Who will do the analysis? Many report sponsors contract with consultants to conduct the analysis and report their findings.

### Reporting Evaluation Findings

Over the years, evaluators have learned that how, when, and to whom they report their findings has a big influence on whether the results ever get used. Just as you need to be very aware of your audience in designing and distributing a quality report, you have to be clear about the audience(s) for your evaluation results.

### Considerations in Developing an Evaluation Report

- When developing the report on your evaluation findings, consider the following questions:
  - Who needs to act on the results?
  - Who needs to make decisions based on the results?
- Who would be interested in your findings from outside your community?
- How can these findings be used to promote your efforts?
- How much time will each audience want to spend looking at your findings?
- What's the best way to communicate with them?
  - A long, detailed report?
  - A brief summary report?
- An in-person briefing with some PowerPoint slides and adequate time for discussion?
- Something else that fits into your organization's "standard operating procedures?"
- What kind of presentation will resonate most with each audience?
  - Graphs and charts?
  - Stories and examples?
  - A combination?



## SUCCESSFUL FACILITATION

---

Our role is to provide a safe, welcoming, and informative space for public involvement. As such, we are facilitators, and as difficult as it may be, staff's opinions cannot be included in our outreach efforts. This can be difficult, especially if you have spent months and countless hours on a project that you are passionate about. As facilitators, staff must act only as catalysts for productive conversations. Effective facilitation skills are essential to successful public deliberation, especially when dealing with what could be a contentious issue. It is crucial to have a leader in the room who enables all opinions to be heard and stimulates conversation.

If a facilitator is needed for your project, there are members of City staff who are trained in Technology of Participation (ToP) facilitation methods that can be helpful to you in your outreach efforts. Outside consultants can perform in this capacity as well.

### Tips for Effective Facilitation:

- A. Facilitators set and enforce ground rules. They design the conversation, set an expectation of respect, and make it known that all voices are equal. If somebody is using disrespectful language, it is the facilitator's responsibility to ask them to stop.
  - Try: "That term makes me uncomfortable and might be hurtful to others. Could you please refrain from using it?"
- B. Facilitators allow everyone to speak. If somebody is dominating the conversation, don't try to stop them from talking, but rather get others involved in the discussion. As City staff, this can be difficult because exceptional customer service is a vital part of our job. It is helpful to remember that if you are giving your undivided attention to just one person, you are not providing good customer service to the other participants in the room.
  - Try: "Those are good points. Let's be sure to hear what others have to say as well."

- Try: Setting the event into smaller working groups or designating specific comment times.

C. Skilled facilitators have the ability to look beneath emotional responses and bring to light the underlying interest, need, or concern.

- Consider: Someone may be speaking loudly or seem angry, but it just might be that they fear an aspect of their life will significantly change.

CI. Room setup creates the stage for your outreach event. It gives participants clear direction and helps facilitate feelings of equality if done properly. This includes everything from lighting to background noise.

- Consider: Creating smaller working groups and circular table/chair formations when possible.
- Consider: Don't isolate speakers by putting them on a stage or behind a podium. This sets a tone of "us versus them."

CII. Attitude and context are extremely important! If you set a conversation in a negative tone or come at it from what is perceived as the wrong angle, your outreach efforts can be doomed from the beginning.

CIII. Facilitators must always maintain neutrality and must avoid giving any preferential treatment.

- Consider: During discussions, we often nod our heads as a way of participating in the conversation, but this can be construed as agreement.
- Try: Statements like, "I hear what you're saying" or "that's an interesting perspective."
- Try: Someone on staff should actively take notes or record conversations. This shows the audience that responses are being taken into account and has a future purpose.

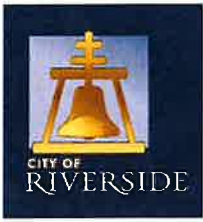
CIV. Asking purposeful questions is an understated art form. Facilitators are allowed to have an outside perspective, which should not be used to see who isn't speaking and what's not being said. Where are gaps in the conversation?

- Consider: If the group is stuck on a seemingly impossible resolution, ask "What would we need in order to make that happen?" instead of telling the group that isn't an option.
- Try: Empowering and open-ended questions that show you value in your participants opinion, such as: "You have a great deal of experience in XXX. What do you think?"
- Try: Summarizing thoughts and concerns by saying "I am hearing that the group is concerned that."

# PROJECT OUTLINE TEMPLATE - EXTERNAL USE

|              |                 |                |
|--------------|-----------------|----------------|
| PROJECT NAME | PROJECT MANAGER | PROJECT LEADER |
|              |                 |                |

|                    |      |                |
|--------------------|------|----------------|
| PROJECT SUMMARY    |      |                |
| PROJECT OBJECTIVES |      |                |
| SCOPE OF WORK      |      |                |
| KEY DELIVERABLES   |      |                |
| PROJECT TIMELINE   |      |                |
| PROJECT TEAM       | ROLE | RESPONSIBILITY |
|                    |      |                |
|                    |      |                |
|                    |      |                |
| COMMENTS           |      |                |



**Meeting Name/Topic**

**Meeting Location**

**Meeting Date, Meeting Time**

Welcome and Introductions

**6:00 – 6:20 pm, Name of the person leading**

- Initiative History and Background
- Team Introductions

Presentation(s):

**6:10-6:20 pm – Name of the person(s)**

- Topic:
- Any other information

Activity:

**6:10-6:20 pm – Name of the person(s)**

- Topic/Instructions
  - 
  -

Other Information:

**6:30-6:40 pm – Name of the person(s)**

- 
- 

Questions & Answers:

**6:30-6:50 pm – Lead person(s)**

- 
- 

Closing & Announcements:

**6:50-6:50 pm – Lead person(s)**

- **Next Meeting/Workshop/Follow Up**



# SIGN-IN SHEET

Meeting Title: \_\_\_\_\_

Location: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

|     | Name/Nombre | Email Address/Correo Electrónico | Phone Number/<br>Número Telefónico | What Ward do you live in?<br>¿En qué distrito vive? |
|-----|-------------|----------------------------------|------------------------------------|---|
| 1.  |             |                                  |                                    |   |
| 2.  |             |                                  |                                    |   |
| 3.  |             |                                  |                                    |   |
| 4.  |             |                                  |                                    |   |
| 5.  |             |                                  |                                    |   |
| 6.  |             |                                  |                                    |   |
| 7.  |             |                                  |                                    |   |
| 8.  |             |                                  |                                    |   |
| 9.  |             |                                  |                                    |   |
| 10. |             |                                  |                                    |   |

# ADDITIONAL RESOURCES AND MOTIVATION

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Community Engagement and Project Management Homepage

<https://riversideca.gov/cedd/neighborhood-engagement>

Resource Guide on Public Engagement by the National Coalition for Dialogue & Deliberation [https://www.ncdd.org/files/NCDD2010\\_Resource\\_Guide.pdf](https://www.ncdd.org/files/NCDD2010_Resource_Guide.pdf)

Southern California Chapter of the International Association of Public Participation

<https://www.iap2.org/page/26/Southern-California-Chapter.htm>

Video: "Song of a Citizen" interview with Pete Peterson

<https://www.youtube.com/watch?v=kDlxTRB4Z8g>

Video: To Manage Stakeholder Expectations

<https://www.youtube.com/watch?v=0EkufUCo5qI>

Video: Ted Talk Dave Meslin: The Antidote to Apathy

[https://www.ted.com/talks/dave\\_meslin\\_the\\_antidote\\_to\\_apathy?language=en#t-1471](https://www.ted.com/talks/dave_meslin_the_antidote_to_apathy?language=en#t-1471)

Video: Difficult People and How to Deal

<https://www.youtube.com/watch?v=Rx6Abkn--Zc>

Video: Parks and Rec Town Hall

<https://www.youtube.com/watch?v=ln9oSjltOs>

Video: The Future of Public Engagement in a Hybrid World

<https://www.youtube.com/watch?v=cqE0oIHxeYo>

CEDD – Neighborhood Engagement Division Library

We have a physical library of books on community engagement that range from using gamification, to inspirational stories and innovative methods. Contact Neighborhood Engagement Division staff to inquire about particular topics, pitch a book you think we should own, or to check out a book.

## DEFINITIONS

**Community:** Includes individuals or groups who live, work, play, study, visit, invest in or pass through the City of Riverside municipality.

**Community Consultation:** A form of community engagement that relates to the tools and practices used by staff to enable public involvement in decisions and actions that shape the community.

**Community Engagement:** Refers to the range of opportunities for public involvement in decision-making, relationship building, and community strengthening. Community engagement is achieved when the community is and feels part of the process.

**Community Strengthening:** Refers to a sustained effort of building cohesive and inclusive communities. This process aims to increase the connectedness, active community engagement, and partnership among members of the community, community groups, and organizations to enhance social, economic, and environmental well-being.

**IAP2:** The International Association for Public Participation (IAP2) is an international organization advancing the practice of public participation. IAP2 supports people who implement or participate in public decision-making processes.

**Plan:** A plan outlines a detailed future course of action aimed at achieving specific goals or objectives within a specific time frame. A plan should identify roles and responsibilities long with resources that are required for execution and/or implementation.

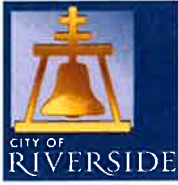
**Policy:** A policy sets out City Council's views with respect to a particular matter. It includes a set of principles or rules that provide a definite direction for the organization.

**Project:** A planned undertaking (including strategy and policy development) that builds, enhances, and maintains City assets or enhances City services in order to achieve a desired outcome, within a defined scope and funding requirements.

**Stakeholder:** A stakeholder is anybody who has the ability to influence a project's outcomes either positively or negatively. Stakeholders include identified subsets within the community. These subsets may compromise individuals and/or organizations from across the community that are directly involved in, or significantly affected by the project. Stakeholders may have an interest if the project has specific change implications or has lifestyle, social, environmental, or economic impacts. For most projects there are likely to be several stakeholders.

# TOOLKIT CONTROL SCHEDULE

|   |   |  |   |
|---|---|--|---|
| <b>Policy Title:</b><br>Citywide Community Engagement Toolkit   |   | <b>Policy Number:</b><br>TBD               | <b>Policy Type:</b><br>City Council Policy<br>and Toolkit |
| <b>Policy Creation Date:</b><br>April 2021  | <b>Current Version Adopted by City Council:</b><br>TBD                          | <b>Current Version number:</b><br>03       | <b>Policy Review Date:</b><br>May 16, 2023                |
| <b>Parent Policy:</b><br>None   | <b>Policy responsibility:</b><br>Community & Economic Development<br>Department |  | <b>Resolution Number:</b><br>TBD                          |
| <b>Revised by: Neighborhood Engagement Division</b><br>Agueda Padilla, Division Manager<br>Amaris Gonzalez, Project Coordinator<br>Jesus Noriega, Project Assistant |   | <b>Revised date:</b><br>September 22, 2023 |   |



Community Development  
Department  
Planning Division

*City of Arts & Innovation*

January 30, 2024

Dan Fairbanks  
Planning Director  
Development Services Department – Planning  
14205 Meridian Parkway, Ste. 140  
Riverside, CA 92518

**Subject: City of Riverside's Review of GP 23-02: March JPA Environmental Justice Element**

Dear Mr. Fairbanks:

Thank you for the opportunity to comment on the preparation of March JPA's Environmental Justice Element.

The City of Riverside (City) has reviewed the draft Environmental Justice Element, and would like to provide the following comments:

Community and Economic Development Department – Planning Division:

**Section – Civic Engagement**

**Policies:**

- Environmental Justice Policies HC 15.1 – 15.3:
  - Civic Engagement is interwoven within the Planning process for good reason. Effective engagement benefits both the agency and its constituents and stakeholders, and better identifying the priorities, needs, and aspirations of the community enables the agency to improve strategic planning and service delivery. A regular, two-way conversation ensures transparency, accountability, and an informed governing body in its decision-making process, which demonstrates integrity and builds trust within the community. It is important for community members to feel empowered to share their vision for any given planning area. In general, the civic engagement policies reflect this. Still, there is room to strengthen policies HC 15.1 – 15.3 by consolidating into a singular policy with clear, meaningful, and achievable goals. We encourage the Authority to review the City's [Citywide Community Engagement Policy](#) and associated [Engagement Toolkit](#) as a potential resource.

**Section – Health Risk Reduction**

**Pollution Exposure Policies:**

- Environmental Justice Policy HC 16.5:
  - While the policy does specify that sensitive receptors should be located away from polluting sources, the inverse is not true. The policy states that polluting land uses should evaluate compatibility with surrounding sensitive receptors but does not

stipulate that future polluting land uses be oriented away from sensitive receptors. This language should be revised to promote siting new development that may be harmful away from sensitive receptors.

- Environmental Justice Policy HC 16.6:
  - The policy articulates that new warehousing and distribution, and large logistics projects should address the Good Neighbor Policy for Logistics and Warehouse/Distribution adopted by the Riverside County Board of Supervisors. The City agrees that future warehousing projects should abide by the Good Neighbor Policy guidelines adopted by Riverside County, but the environmental justice policy should expand this requirement to include that future development projects also achieve consistency with Good Neighbor Policies adopted by surrounding jurisdictions which about March JPA. Since Riverside County's adoption of a Good Neighbor Policy in November 2019, several jurisdictions neighboring March JPA have either adopted or modified Good Neighbor Policies. The City most recently modified the in November 2020 and is in the process of evaluating whether further changes are needed based on community feedback. The City of Perris adopted its in September 2022 which similarly emphasize protecting sensitive receptors from these uses. It is important that the environmental justice policy encompass and plan for continued changes to not only Riverside County's Good Neighbor Policy but also policies of surrounding jurisdictions. Lastly, the policy should be amended to require that new logistics and warehousing development projects not only address the Good Neighbor Policies but require that the project meet the development and design requirements established therein. Modification of project plans should be required as necessary.

The City of Riverside appreciates your consideration of the comments provided in this letter. Should you have any questions regarding this letter, please contact me at (951) 826-5944, or by e-mail at [mtaylor@riversideca.gov](mailto:mtaylor@riversideca.gov).

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

Sincerely,



Matthew Taylor  
Principal Planner

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

Phaedra Norton, City Attorney

## Roxanne Corona

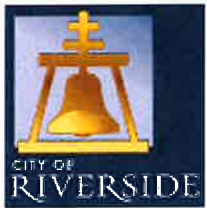
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**From:** Palafox, Daniel <DPalafox@riversideca.gov>  
**Sent:** Tuesday, January 30, 2024 10:34 AM  
**To:** Dan Fairbanks  
**Cc:** Guzman, Rafael; Tinio, Maribeth; Lilley, Jennifer; Taylor, Matthew  
**Subject:** City of Riverside's Review of a Draft Environmental Justice Element  
**Attachments:** Citywide Community Engagement Toolkit.pdf; Citywide Community Engagement Policy.pdf; 2024-01-30 MJPA Draft EJ Element Comment Memo.pdf

Hi Dan,

Please see the attached comment letter regarding the City's review of a draft Environmental Justice Element. I've also included the Citywide Community Engagement Policy/Toolkit as referenced in the letter.

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



**Daniel Palafox | Associate Planner**  
City of Riverside | [Planning Division](#)  
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# CITYWIDE COMMUNITY ENGAGEMENT TOOLKIT



CITY OF RIVERSIDE



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## PURPOSE AND SUPPORT

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The City of Riverside is committed to engaging effectively with its community in a meaningful, accountable, responsive, and equitable way.

This Community Engagement Toolkit builds upon the principles laid out in the Citywide Community Engagement Policy. This toolkit serves as a resource for City Departments and community members because these documents work in conjunction with one another. The Citywide Community Engagement Policy should be read before working through the Community Engagement Toolkit.

Riverside's residents have high expectations when it comes to community engagement. **Never underestimate the level of public interest in your project.** The City's use of this guide across all departments will result in community engagement efforts that are productive, meaningful, and successful. Community engagement is NOT merely checking a box, it is a commitment to deliver the best government services possible to our community. **As City staff, we have a responsibility to bring people together to share knowledge about projects and changes in their community.**

This guide is a living document meant to help anyone at any level of involvement within the City whom work together to understand and develop broad community engagement plans that align with the City's Envision Riverside 2025 Strategic Plan.

All documents and tools referred to in this guide are available in either the Appendix, on the Community Engagement Policy webpage, or both.

## GOALS OF THE TOOLKIT:

1. Design a comprehensive Community Engagement Plan and complete documentation.
2. Determine the appropriate level of community engagement needed.
3. Identify stakeholders and create an engaged representative group of involved community members.
4. Create outreach, education, and engagement methods that represent the City's brand.
5. Implement timelines and strategies that fit individual projects and ensure public access to accurate information.
6. Share successful tools and methods with all City employees.
7. Ensure each project, program, or service is internally supported.
8. Spread awareness of performance measures by which community engagement programs can be assessed.
9. Streamline the processes of community engagement both internally and externally.

## SUPPORT NETWORK

- Agueda Padilla  
Policy and Project Manager
- Amaris Gonzales  
Community Engagement Liaison
- Jesus Noriega  
Community Engagement Liaison
- HR Training Team  
Community Engagement Team

### Get Some Help! Community Engagement Round Tables

---

#### WHAT IS IT?

Round Tables are gatherings coordinated by the Neighborhood Engagement Team. They will provide support, discussion time, trainings, and guest speakers. They are opportunities to collaborate with each other and receive assistance

#### HOW WILL THIS HELP?

- Brainstorm and coordinate outreach
- Assistance completing worksheets
- Voice concerns and discuss ideas
- Opportunity to have community engagement plans reviewed
- Receive insight and support from team that specializes in public involvement
- Present Community Engagement summaries

#### HOW CAN YOU ATTEND?

Want the scoop on community engagement? Look for e-mails about training opportunities as well as invitations to Round Table discussions!



## GETTING STARTED

---

There may not be a checklist for the perfect Community Engagement Plan, but there are principles and guidelines provided to assist you in creating a well-designed plan that will increase the likelihood of achieving your outreach goals.

### THINGS TO REMEMBER ABOUT COMMUNITY ENGAGEMENT

- Not suitable for every situation.
- Using it incorrectly or at inappropriate times can do more harm than good.
- **Once feedback is received, there must be follow-through or participants may feel that their contribution was ignored or not valued.**

- Note: This doesn't mean that feedback is automatically implemented, but why or why not and how must be conveyed to the participants.

- An engagement strategy must be considered during the initial stage of project planning.
- The opportunity for input, if part of outreach, should be open during the planning stages to allow the chance to help inform and/or influence the decision.

### COMMUNITY ENGAGEMENT IS A DIALOGUE, NOT A PRESENTATION

- The City and the public both speak and listen
- Ideas are shared and discussed
- There is a flow of information, insights, and opinions
- Additional resources are available, and conversations can continue

## Invite Innovation

Getting community members truly engaged and involved can be one of the most challenging parts of a project. It can also be the most fun. It offers endless room for new ideas and creativity. The list below and the Community Engagement Implementation Plan/Toolbox in the Appendix are far from exhaustive, and the sky is the limit when it comes to creating new ways to engage and get people excited about a project. An example: turn a focus group into a game of Trivial Pursuit to educate participants or make the subject line in a newsletter a riddle-like question to spur interest. Is it possible to incorporate an informational tour, a 3-D model, or other props into your meeting?

## Managing Gathered Data

You will need to create a system for collecting and managing the information you receive and conversations you hear. Determining the purpose of the information should be the first step to assist you in identifying the details you need to capture. Often a spreadsheet will be sufficient. From there, you can summarize or present the data in whatever way it is needed. Consider the following:

- Will you need to create codes to track feedback from different groups?
- Will you need exact numbers to create a summary report or graph?
- How will the information collected be delivered to the public?

Quotes and comments can be useful and engaging for creating presentations, in social media posts, and in further stages of your outreach efforts.

## DO

- Complete the project plan and answer "Why?" prior to going to the public for input. This avoids confusion and undesirable results.
- Trust your resources. The Marketing and Communications Team and Neighborhood Engagement Team has many years of combined experience. They want what is best for your project too, so don't be afraid to take their advice.
- Develop a strategy for community engagement at the beginning of a project.
- Identify and involve key stakeholders as early as possible.

## DON'T

- Underestimate the level of interest in your project.
- Use technical jargon or acronyms that aren't easily understood.
- Forget to involve City Council, boards, commissions, and key stakeholder groups in conversations about your project and in invites to public meetings.
- Set unrealistic expectations about how the input received will be used.

## DETERMINE APPROPRIATE LEVEL OF COMMUNITY ENGAGEMENT

Community engagement does not mean you will invite as many people as possible or make a profile on every social media platform. Sometimes just one event can be sufficient.

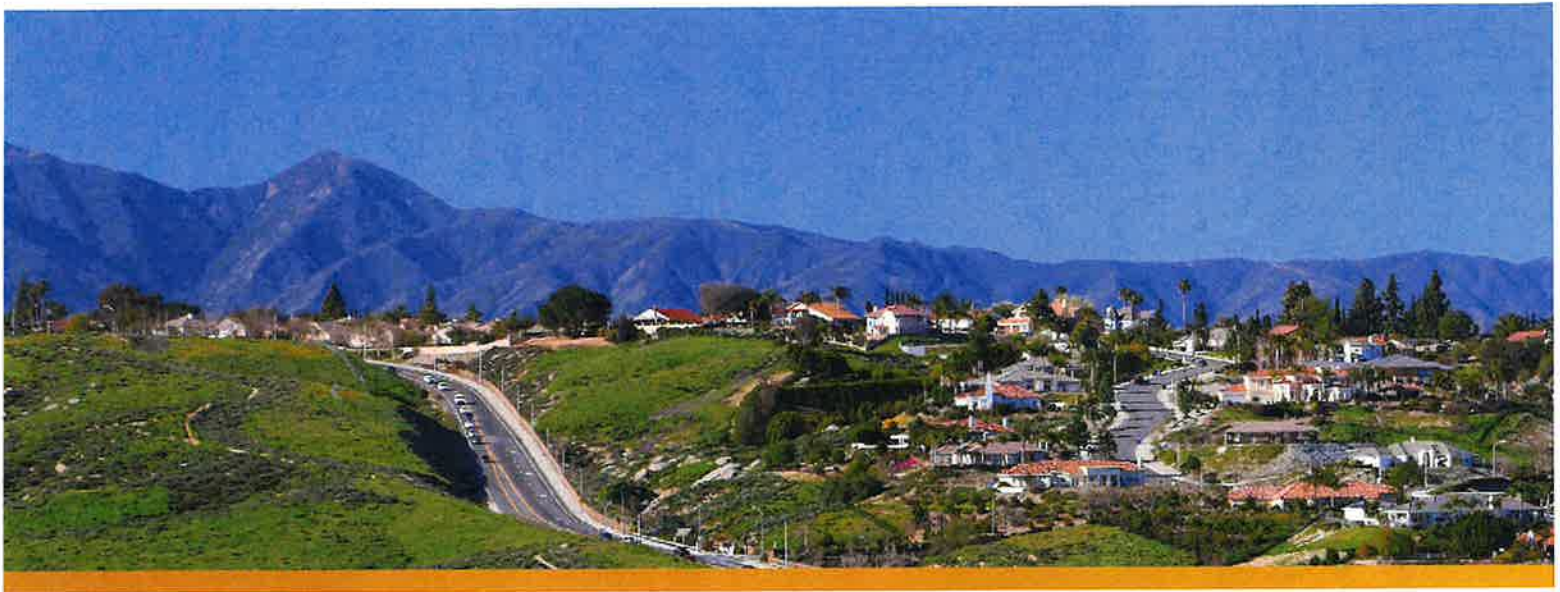
Other times you will need several engagement opportunities. The International Association of Public Participation's (IAP2) Spectrum of Public Participation will assist in determining the appropriate level of community engagement for your project or program. **Determining the accurate level of engagement is the foundation for your community engagement plan.**



|  | <b>INFORM</b>  | <b>CONSULT</b>   | <b>INVOLVE</b>   | <b>COLLABORATE</b>   | <b>EMPOWER</b>   |
|--|--|--|--|--|--|
| <b>GOAL</b>  | One-way communication to provide balanced and objective information to assist in understanding about something that is going to happen or has already happened.  | Two-way communication process aimed at obtaining feedback on ideas, alternatives, and proposals to inform decision-making process.       | Participatory process designed to help identify issues and views to ensure that concerns and aspirations are understood and considered.  | Working Together to develop an understanding of all issues and interests to work out alternatives and identify preferred collective solutions.                                   | To build the capacity of the community to lead their own plans for change.   |
| <b>ROLE OF COMMUNITY AND/OR STAKEHOLDERS</b>                     | Listen   | Contribute   | Participate  | Partner  | Lead   |
| <b>PROMISE TO THE PUBLIC</b>                                     | We will keep you informed.   | We will hear your input, listen to concerns, and provide feedback on how public input influenced the decision.                           | We will work with you to ensure that your concerns and issues are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision. | We will look to you for direct advice and innovating in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible. | We will implement what you decide.   |
| <b>EXAMPLES OF WHEN THIS ENGAGEMENT LEVEL MAY BE APPROPRIATE</b> | In the event of an emergency.  | Undergoing a street or playground redevelopment.   | Seeking input from an Advisory Committee on sustainability initiatives and plans.  | Stakeholder-led discussions on developing community visions.   | Building capacity skills of small business employees through skills-based training.  |
| <b>POSSIBLE METHODS</b>  | <ul style="list-style-type: none"> <li>• Advertisements</li> <li>• Fact sheets</li> <li>• Newsletter</li> <li>• Public Notices</li> <li>• Social Media</li> <li>• Websites</li> <li>• Open Houses</li> </ul> | <ul style="list-style-type: none"> <li>• Public Comment</li> <li>• Focus groups</li> <li>• Public Meetings</li> <li>• Surveys</li> </ul> | <ul style="list-style-type: none"> <li>• Advisory Committees</li> <li>• Deliberate Polling</li> <li>• Workshops</li> </ul>   | <ul style="list-style-type: none"> <li>• Consensus Building</li> <li>• Participatory Decision Making</li> <li>• Advisory Committees</li> </ul>                                   | <ul style="list-style-type: none"> <li>• Training Events</li> <li>• Practical Skills Workshops</li> <li>• Ballots</li> </ul> |

Your project's level of community engagement can range from keeping the public informed to involving them in the decision-making process. Including community members early and at the appropriate level helps create buy-in for both the process and final decisions.





# ENGAGING WITH STAKEHOLDERS

## STAKEHOLDERS AND DECISION-MAKERS

The term "stakeholder" refers to anyone who has a stake, or interest, in an outcome. This includes people who will benefit from a project or program, people who could be negatively impacted by a decision, and those who are simply interested.

Who are the decision-makers and when will a formal decision be made? Staff will identify who will make the formal decision about a specific project. For many of our activities City Council will be the ultimate decision-makers. Your audience must know and understand the decision-making process. This helps to avoid false expectations. Take a moment to brainstorm all potential stakeholders whom your project or program might have.

## WHO SHOULD BE INVOLVED AND WHY?

Your list of stakeholders will be different for every project or program. This list will be created by the Project Manager and can be supplemented by reaching out to the Neighborhood Engagement Team. Your stakeholders' time is valuable; use it wisely and strategically. Ask the questions on the following page and then complete your **Community Engagement Plan Worksheet (Appendix page 26)**.

We want to ensure that stakeholders do not experience "over-outreach" which can be difficult as there is a risk that multiple City projects occurring simultaneously might involve overlapping community interests. There may be several projects that are connected to a specific group of community members at one time, for example, our senior population, but we need to ensure that multiple departments are not reaching out to the same organizations repeatedly in a short period of time.

## REACHING THE COMMUNITY

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It is important to determine who exactly constitutes "the community" in relation to your project. Given your limited resources, you will need to decide the best methods to reach the greatest number of people most affected by your project—educating them about the project and inviting their input. A blend of "active" and "passive" methods of community engagement should be considered.

**Active methods:** Require approaching and reaching out directly to individuals or groups.

**Passive methods:** Require community members to approach the City for information about the issue or project.

Information about your project should be made available to anyone who comes seeking it by posting it online. Your department pages on the City website can provide descriptions of your project and also list the project timeline and methods for providing input, such as meeting dates/locations and contact information for key staff including their phone numbers, e-mail addresses, and physical mailing addresses. Websites are now optimized for mobile use, which is how most people are accessing information.

Suggested web tools that can help project managers communicate ongoing issues and regularly analyze community feedback:

- A form requesting feedback
- A Q&A or FAQ that anticipates and answers questions, including difficult and controversial ones.
- Lists of policies, the rationale behind them, and how they fit into the grand scheme of the department's operations.
- Lists of internal policies, such as policies on recording an event.

### TOOLS TO CONSIDER

- Online surveys
- Interactive applications (e.g., participatory budgeting)
- Social media (Facebook, Twitter, Instagram, YouTube, NextDoor)
- Marketing Brand Manual

### WAYS TO AVOID OVER-REACH

- Submit Community Engagement Plan summaries so other teams can see which projects have overlapping stakeholder groups, timelines, or other concerns.
- Hold staff Round Table meetings for group discussions.
- Utilize the Neighborhood Engagement Team to help develop stakeholder groups or when questions arise.
- Check the Community Calendar to see what other public events are planned and if there is an opportunity to work together.

## TIPS FOR ENGAGING WITH INTERNAL AND EXTERNAL STAKEHOLDERS:

- Reach out to stakeholders whenever possible.
  - Ask to attend any existing/ongoing meetings or events rather than creating a competing time commitment.
- Plan to involve external stakeholders adequately throughout the project, whether it's a simple notification or involving them directly in planning and implementation.
- Prepare for your stakeholder list to grow as the project progresses or groups show interest in the project.
- Be flexible enough to involve new stakeholders at any time in the process.
- Don't forget internal stakeholders. **City staff is filled with experts on multiple topics. Early and systematic consideration of internal stakeholders for your project can help identify issues before they become critical.**
  - Involve other City departments during your planning phase. Consider sending an e-mail or initial coordination meeting to present project basics to various departments and to ask if there are any special communication needs.
  - Check calendars and ask around so that the City doesn't inadvertently overschedule an evening or isn't competing for stakeholders.
  - Always check the Community Calendar for potential conflicts with large events or activities.

## HARD-TO-REACH STAKEHOLDERS

Some groups face barriers that can make establishing relationships or communicating with them much more difficult. The City of Riverside places great value on comprehensive involvement. In some cases, extra consideration will be needed to ensure equal access to information is provided for all members of the community. An awareness of potential barriers community members face is vital when creating a Community Engagement Plan.

The City's Neighborhood Engagement Team may be a helpful resource in connecting you with hard-to-reach stakeholders. Please consider the following questions during your planning stage:

- Will the meeting need a translator or sign language specialist?
- Would people from different cultures feel welcome at this event?
- Are there technology or literacy skills needed that may be difficult for people with less education or from another generation?
- Is there a history of mistrust or neglect?
- Is the event held in an ADA-compliant location?
- Are informational sessions held at a variety of times to accommodate people with alternative work schedules?
- Would it be appropriate for children to accompany a parent to the event if childcare is an issue?
- Should childcare be provided?



## 6 BASIC STEPS TO CREATING A COMMUNITY ENGAGEMENT PLAN

This is a roadmap for you and your team. It will take time and thought but it is a vital resource for your project. Before getting started with your Community Engagement Plan, be sure to have a statement of purpose that outlines the overall goal of the project or program. This will help you identify the “why” to your community engagement process.

### Characteristics of Successful Plans



Clear Purpose

Audience



Education



Records



Outreach



Follow Up



### STEP 1: CREATE OUTLINE

- Draft a clear and complete project/program/activity outline defining goals and outcomes from the department, project manager, or other city employees requesting public engagement.
- Identify who the decision-makers will be and the dates when formal decisions will be made.
- Determine the level of public engagement based on the scope and impact of the project. (see table on Page 9 for guidance)
- Determine which stakeholder to target and how you will engage them.
- Develop a timeline to achieve the remainder of the public engagement steps.
- Determine how public engagement results will be measured and archived.
- Determine how the results will be shared with the public.

**Note:** If assistance from the Office of Communications will be needed for graphic design, PowerPoint templates, social media posting, or any other services they provide, schedule a pre-planning meeting with them as soon as you have drafted your project description as there will need to be some coordination that may affect your timeline.

## CREATING YOUR INTERNAL TIMELINE

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- Work backwards from your identified target dates for final decisions to determine how much time your community engagement efforts will require.
- For small projects, begin planning your outreach efforts at least two to three months before the date final decisions are to be made; medium and large projects will require additional time. If you need to go before City Council, think about getting on the calendar three to six months prior, depending on the political sensitivity of the project.
- Provide your Stakeholders one month's notice for community engagement activities. Get your Public Information Officer involved early in the planning process so press releases can be sent out at least two weeks before your public events.
- Be sure to connect with community organizations a month before your event so they can assist you in distributing the information to their members. Also use the Community Calendar, City Council newsletters, and the City's social media along with any other communication tool available to assist in getting the information out.

## CREATING AN EXTERNAL TIMELINE

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A timeline is a valuable tool both for planning an effective community engagement process and for educating members of the public on the overall project process. Share the timeline with the community early in the process to avoid complaints about being "left out of the loop."

### Develop a one-page timeline for the public:

- Outline the "who, what, when, where, why, and how" of the overall process.
  - List dates related to formal decision-making processes and deadlines related to the project.
  - Include brief descriptions of each item that can be easily understood by community members.
  - Define any technical terms or use alternative simple language.
  - Share the draft timeline with other staff members and ask for feedback on the process.
  - Keep electronic versions of information up-to-date and provide important changes in schedule.
  - Include the timeline in your Community Engagement Plan as well as your Community Engagement summary after project completion.
-



## STEP 2: NOTIFY STAKEHOLDERS

After completing your outline, the second step is to sufficiently notify the public about your project and Community Engagement Plan. This will require getting the word out early, and to as many stakeholders as possible. The notification step sends the message to the public that “this project may affect you” and educates community members of the public engagement and decision-making processes planned for the project.

Depending on the scope and type of project, initial notification may include:

- Postcards
- Letters
- Emails (through City and external distribution lists)
- Social media
- Temporary signage at project site or on electronic reader boards
- Press releases
- initial visits to community organization meetings
- open houses
- phone calls to neighborhood leaders
- posting on your department's webpage.

It is always helpful to demonstrate for the public how the project can affect them.

### ACTIVE OUTREACH:

It is important to include metrics about input received through these additional outlets in project summaries delivered to City Council.

While the internet is an excellent tool for community engagement, your outreach should also include active efforts to reach out directly to the public. Some examples of active outreach are sending flyers or e-mails directly to stakeholders and presenting at community or City board meetings. Often, active outreach is accomplished through collaboration with local community organizations and neighborhood groups. It is best to meet with these organizations and groups where they normally gather. Traveling physically to locations where they meet is most convenient for them and they will be more likely to attend.

Community organizations and neighborhood groups can be helpful vehicles through which public engagement can occur. However, do not assume that a community organization or neighborhood group fully represents all the interests of the community at large. You should always practice diversity when choosing tools and doing outreach.

**Note:** All projects are important, but not all are newsworthy. Consider what aspects of your project, if any, might be vital or interesting to the public. Is it imperative? Engaging? Entertaining? If not, it might not be a good fit for social media platforms and different tools should be considered.



## STEP 3: EDUCATE

The third step is when you will engage the public to educate them about the project and encourage participation in the engagement process. Community members cannot provide input without a clear understanding of the project. Education will develop meaningful discussion and dialogue and may prevent myths about the project's costs and benefits by opponents, either inadvertently or strategically.

Take time to clarify the decision-making process, the scope and impacts of the project, and the variables and alternatives to be considered. It is easy for a project manager who is involved in the project daily to forget that it may not be as easy for community members to grasp the project's details, so summarize in lay terms but also provide opportunities for people to read entire reports/documents on your website for additional information.



## STEP 4: LISTEN

The fourth step is to execute activities, gather input, and show the public that you are listening. Once educated on the project, community members can provide informed opinions. The methods you choose for obtaining input will depend on the nature and scope of your project. Consider the costs and benefits of one-time, one-way input versus involvement and dialogue over time.

### **Plan where to store public input and how to organize it.**

Create folders on the City's drive in a safe and easily accessible place for other members of your team. Move it into those folders immediately as input is received or create spreadsheets/databases so nothing is missed. This includes saving emails on the network drive – not in Outlook – with public comments that will be relevant for the length of your project. This input should be provided to City Council if your project is going before City Council. By

carefully recording and archiving all public input, you can reassure community members that opinions will be considered as decisions are made.

### **Determine how oral input will be recorded.**

Phone calls may be received, and community members may voice their opinion at meetings. Generally, in government business, only items in writing and oral comments during formal meetings and public hearings are considered "official" but project managers are encouraged to be flexible in receiving oral input in addition to those formal methods.

### **Consider what types of questions you will ask the public.**

People can be quick to come to conclusions about whether they are in favor of or opposed to a project and community groups will often want to take a vote to that end. However, many projects involve several components, each with more than one alternative.

Ask open-ended (not yes/no) questions and ask follow-up questions as to why someone is opposed to the project. Ask whether they have suggestions on addressing those concerns.

Many projects offer some flexibility to allow modifications in response to public deliberation. Projects can be shaped and molded by public opinion to the point where individuals who disliked the initial proposal may come to accept or even like the final proposal.

When possible and early in the process, provide a list of alternative approaches to a policy or project and their associated pros and cons. Allow the opportunity for members of the community to comment on the list and add other alternatives, pros, and cons.

This provides an opportunity for community members to discuss each alternative, the underlying community values, how desirable the new policy or project is, the intended consequences, and potential unintended consequences. When presenting the list of alternatives, remember the "do nothing alternative," which is the option to keep things as they are.

Approach the community with an open and willing attitude.

Avoid communicating in ways that would suggest reluctance, as though the community engagement effort is required of you against your will. Pay special attention to your nonverbal cues. Some members of the public may have cultivated an attitude that community engagement is "just a formality" and that the proposed project will move forward regardless of public input. It is important to overcome this barrier by approaching the public in a way that conveys you are willing to alter or even halt (the "do nothing alternative") the project if there is enough input to warrant it.

Listening and summarizing can be the hardest part of a project. It is important to show community members that you are listening by summarizing what you have heard, thanking them for their time, and reassuring them that they have been heard and their input will be considered.



## STEP 5: FOLLOW THROUGH

The fifth step is to follow through by sending the community input to decision-makers and to follow through again by providing community members with the rationale for the decision considering all relevant facts and opinions. Whatever input methods are used, communicate to individuals and groups that you have heard them. Acknowledge them. Throughout the process, summarize questions and concerns that have been heard. An issues summary and/or frequently asked questions (FAQ) sheet may be useful. Describe how input will be communicated and presented to the decision-makers. This is often accomplished through staff reports or memos, but other methods may be used as well.



Depending on the amount of community input received, you may need to summarize it for decision-makers in a way that provides a succinct report while preserving the intent of individual comments. General categorization of individual comments is an effective way to communicate results. If community groups provide unified opinions, write a brief description of the individuals who participated in forming that opinion including the number of people who were present. This will help decision-makers gain an understanding of the strength and representation of a group's opinion.

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## STEP 6: EVALUATE & ADAPT

The sixth step is to evaluate the effectiveness of your community engagement strategy, adapt, and be flexible. During implementation of your Community Engagement Plan, regularly assess whether goals and expectations related to community engagement are being met, and revise the plan as needed. This may require changes such as pushing back decision dates, creating additional education material in response to confusion or erroneous rumors that have surfaced, meeting an additional time with a community group to provide sufficient time for discussion on the topics, adding time for a new group of stakeholders not previously identified to catch up with others in the process, or expanding the community engagement process because the level of impact was found to be greater than previously thought.

Summarize the rationale for decisions considering all the facts, including public opinion. Document the rationale and make it available to the public. If possible, provide the rationale for why one alternative was chosen over others and why decisions were made to move forward considering opposition, if there was any.

Some questions to consider when evaluating your community engagement activities:

- Did you satisfy the goals you set during the planning process?
- Did your engagement activity adhere to the principles of community engagement set out in this guide?
- Did you effectively assess all stakeholders?
- Did you include potential participants in the design of your Community Engagement Plan?
- Were the tools you chose most appropriate given your unique circumstances and constraints?
- Were individuals and stakeholders given adequate opportunity to participate in all aspects of the process?
- Were the needs of persons with disabilities considered?

- Were conversations relevant and valuable?
- Were all critical concerns addressed?
- Did you effectively record and analyze the input you received?
- Did you allocate sufficient resources (time, human, financial)?
- Was the activity completed within the budget allotted?
- Were participants provided with feedback regarding how their contribution was/will be used?
- Were participants generally satisfied with the activity? Were organizers?

Also, some tips to track and evaluate engagement:

- Create separate tracking links for online surveys to determine which channels of communication are most effective.
- Ask demographic questions in surveys and at events to determine how representative participants are of the audiences you are trying to reach.
- Debrief individual events and the project with internal and external participants.

During your project, consider gathering feedback from community members and your internal working group on the quality of the process and whether it is meeting community member expectations. After completing your project, consider debriefing both internally and externally with discussions about how community engagement for future similar projects can be improved.

The City is collecting case studies from which to learn lessons on public engagement best practices. All City Departments are encouraged to regularly write case studies and contribute them to the collection for future reference. For details of these case studies, contact the Neighborhood Engagement Team.



## TOOLS AND RESOURCES

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The following section includes information and resources that will assist in ensuring your project has the necessary elements and involvement of other departments, which may supplement your project. For example, some projects need to include Marketing and Communications for print materials or the City Attorney's Office for legal advice. It will also help define how to assemble a team and identify the role of each member.

It may take a few minutes to review the tools, but they will save you time and effort in the long run.

If assistance is needed with any of the following:

- Advice and open discussion at a Round Table
- Creating a Stakeholder List or a Community Engagement Plan
- Information on locations in town and in City buildings to host events
- Connecting with Stakeholders
- Planning worksheets

Please contact the Neighborhood Engagement Team for assistance.

### **Community Engagement Tools and Methods**

The tools that will work best for your project will depend on the level of participation chosen and the groups you would like to engage. This is where the Participation Spectrum and Community Engagement Plan Worksheet are essential. Use your evaluation of the level of impact and your stakeholder's potential level of concern to prioritize your outreach and choose appropriate methods.

# COMMUNITY ENGAGEMENT PLAN WORKSHEET

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Use these questions to help design the strategy for your Community Engagement Plan.

## PREPARE

1. What is the project? (define in detail)

2. Who is the Project Lead?

3. Which other internal departments and individuals are involved?

4. What are the objectives?

5. What questions need to be answered to proceed with the project/decision?

6. Who are the stakeholders?

7. What are the potential impacts of the project to those stakeholders?

8. What information do the stakeholders require?

9. How might the stakeholders influence the decision?

10. Why do we need to engage?

11. What are the risks of NOT engaging?

12. How broadly should we engage?

## DESIGN

13. What influence or impacts will participants have on the decisions? \*  
(Refer back to the Levels of Community Engagement)

*\*Important note: If stakeholders have no opportunity to influence the decision or outcome with their participation, do not continue planning a community engagement process. In this case, the appropriate action is to "Inform."*

14. What specific engagement tactics will be used?

15. How long will the process be? Is it a simple question we need to answer, or is it a major item requiring ongoing/multiple engagement opportunities and/or decision points?

16. What platforms are best suited for telling this project's story?

17. How will participants be invited?

18. How will the findings be reported – to participants, to City Council?

## IMPLEMENT

19. Now is the time to execute your plan, tell your story and invite response.

## EVALUATE

20. Did we achieve our objectives? Why or why not?  Yes  No

21. Diversity – Did we engage with a wide range of voices? How?  Yes  No

22. Accessibility – Did we ensure that barriers to participation were removed?  Yes  No

23. Inclusion – Were all relevant stakeholders identified and included?  Yes  No

24. Relevancy – Were the materials and questions provided meaningful and relevant to participants?  Yes  No

25. **Responsiveness** – How did the community engagement team respond to participant questions? Did the team follow up with participants to share results? Yes No

26. **Respect** – Was the process respectful of participants' time and input? How? Yes No

27. **Communication** – Did the communication materials provide clear, objective, and helpful information to participants at appropriate phases of the project? Yes No

28. **Transparency** – Were the levels of involvement and influence clearly communicated with participants? Were results and updates reported back to participants? Yes No

29. Overall comments regarding the effectiveness of community engagement.



30. Was the process effective? Why or why not?

31. What would you do differently next time?

**Please send completed evaluation form along with participant feedback to the Neighborhood Engagement Division (<https://riversideca.gov/cedd/neighborhood-engagement>) once your process is complete.**

# IDENTIFY STAKEHOLDERS

Who should you engage with? Consider all types of community-based organizations, neighborhood groups, and other audiences. Identify stakeholders at the beginning of a project and notify them of key decision points or opportunities to provide input. Stakeholders can provide community expertise that enhances the engagement process. They can also help you reach more and broader networks. This list is not inclusive of all community stakeholder groups, it is just an example to get you thinking about who should be included on your list.

| GROUPS/AUDIENCES        | RIVERSIDE-SPECIFIC EXAMPLES   |
|-------------------------|---|
| Arts/Culture            | Adrian Dell & Carmen Roberts Foundation, Mission Inn Museum & Foundation, Old Riverside Foundation, Riverside Arts Council, Riverside Museum, The Fox Foundation,   |
| Business                | Arlington Business Partnership, Greater Riverside Chambers of Commerce, Greater Riverside Hispanic Chamber of Commerce, Riverside County Black Chamber of Commerce, Riverside Downtown Partnership, The Pick Group, local businesses, large corporations, employers |
| Community At Large      | Arts Walk, National Night Out, Riverside Farmer's Markets, Riverside Public Library, ratepayers, commuters  |
| Education               | Alvord Unified School District, California Baptist University, California School for the Deaf, La Sierra University, Riverside Community College, Riverside Unified School District, University of California Riverside, private and public schools, PTSA's         |
| Government              | City Council, boards, commissions, volunteers, other agencies (RTA, RCTC, State, etc.)  |
| Human Services          | Casa Blanca Home of Neighborly Services, Community Settlement Association, Feeding America, Second Harvest Food Bank  |
| Media                   | Black Voice News, KVCR, La Prensa, The Press Enterprise   |
| Mobility                | Riverside Bicycle Club, Riverside Transit Agency, transit users   |
| Neighborhoods           | Contact Neighborhood Engagement Division for a list   |
| Nonprofits              | American Legions, Elks, Family Service Association, Habitat for Humanity, Operation Safe House, Riverside Women's Club, Rotary clubs, faith-based organizations   |
| Outdoors                | Friends of Mt. Rubidoux, Friends of Riverside's Hills, Riverside Garden Council   |
| Property Owners         | Commercial brokers, real estate professionals   |
| Students                | Alvord School District, Riverside Unified School District, Riverside Youth Council, individual schools, youth groups  |
| Parks & Recreation      | Park Advisory Boards, park and trail users, PR&CS customers   |
| Diversity and Inclusion | Deaf and hard of hearing and indigenous communities, people with disabilities   |
| Seniors                 | Dales Senior Center, Janet Goeske Center, La Sierra Senior Center   |

# CREATING YOUR STAKEHOLDER LIST

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From your answers to the questions below, you will develop your Stakeholder List. This list of organizations and individuals will also include up-to-date contact information. Though the general public has a stake in the outcome and are considered stakeholders in the broad sense, your stakeholders are a distinct group who may include community members, businesses, and organizations that will be affected by the project and should be strategically engaged. While the broader "public" should be informed and included on a project, the stakeholder groups generally spend more time and effort contributing throughout the conversation.

Stakeholders can be both external and internal to the organization. External stakeholders can include other governmental agencies, nonprofit organizations, community groups, special interest groups, businesses, and individual residents. Internal stakeholders can be other City departments or committees that could be impacted or included.

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## **1. Who will be impacted (positively or negatively)?**

Consider geography – who lives, works, or plays nearby?

## **2. Who NEEDS to know about this?**

Is there a legal requirement?

Is there a group with an imperative interest?

## **3. Who will contribute to this conversation?**

Who are the experts?

Are there outside sources who discuss the same topics?

#### 4. Who or what group is missing?

Each stakeholder list should include:

Experts

Clubs

Personal interest groups

Residents

Professionals

Hard-to-reach populations

#### 5. Who has the potential to stop this project?

Is there anyone or any group who will dislike the idea or be impacted to an extreme extent?

#### 6. Who could make the project better?

How could this be more inviting to the public?

Who would have a unique perspective?

#### 7. What questions would I ask a resident?

If you were on the outside of this issue or project, what would you want to know?

#### 8. Whose life or schedule stands to be alerted by any aspect of this project?

# DEVELOPING A VISION & MISSION STATEMENT

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## Considerations for developing your Vision Statement:

- A vision statement is a statement about ideal conditions or how things would look if the issue important to you were completely, perfectly addressed.
- Common characteristics of vision statements:
  - Understood and shared by members of the community
  - Broad enough to include a variety of local perspectives
  - Inspiring and uplifting to everyone involved in your effort
  - Easy to communicate- for example, they are generally short enough to fit on a T-shirt
- Examples:
  - Caring communities
  - Safe streets, safe neighborhoods
  - Health for All

## Instructions:

1. Identify one person to take notes while the group brainstorms ideas and one person to document the decision reached through consensus
2. Ask the following questions, record key points, and discuss common themes: (30 minutes)
  - a. *Essential why*: What is the dream or ideal that you and your community seek?
  - b. *Essential what*: What would have to change for this dream to come true?
3. Come to consensus about what the vision statement should be by considering the following: (10 minutes)
  - a. Will it draw people to the common work?
  - b. Does it give hope for a better future?
  - c. Will it inspire community members through positive, effective action?
  - d. Does it provide a basis for developing the other aspects of your action planning process?
4. Record the agreed upon statement on your handout.

**Notes:**

**Considerations for developing your Mission Statement:**

- A mission statement describes *what* the group is going to do and *why* it is going to do that.
- Guiding principles for mission statements include:
  - *Concise*. Mission statements generally get their point across in one sentence.
  - *Outcome-oriented*. Explain the fundamental outcomes your organization is working to achieve.
  - *Inclusive*. Make broad statements about your groups’ key goals but are not limiting to specific strategies or sectors of the community.
- Examples:
  - Promoting child health and development through a comprehensive family and community initiative.
  - To develop a safe and healthy neighborhood through collaborative planning, community action, and policy advocacy.
  - Promoting community health and development by connecting people, ideas and resources.

**Instructions:**

1. Identify one person to take notes while the group brainstorms ideas and one person to document the decision reached through consensus.
2. Carry forward ideas generated in developing your vision statement. Gather the ideas generated that described the “*essential why*” or the dream/ideal you seek and the “*essential what*” or what would have to happen for the dream to come true.
3. As a group select the statements that have particular relevance for the vision statement identified and brainstorm potential mission statements (e.g. Our mission is to \_\_\_\_\_ (essential why) through (or by) \_\_\_\_\_ (essential what). (30 minutes)
4. Come to consensus by considering the following: (10 minutes)
  - a. Does it describe the *what* your group will do and *why* it will do it?
  - b. Is it concise (one sentence)?
  - c. Is it outcome oriented?
  - d. Is it inclusive of the goals and people who may become involved in the work?
5. Record the agreed upon statement on your handout.

**Notes:**

The Mission of our initiative is (*the essential why*):

through (or by) (*the essential what*):

# DEVELOPING OBJECTIVES AND STRATEGIES

## Considerations for developing objectives:

- Objectives are specific measurable results of an initiative. They provide specifics about *how much of what* will be accomplished and by *when* (e.g., By (date), \_\_\_\_\_ will increase/decrease by X%.)
- There are three basic types of objectives:
  - *Process objectives*: aim to measure the extent to which progress is made toward other objectives (e.g., By 2020, establish a comprehensive plan to improve emergency preparedness.)
  - *Behavioral objectives*: aim to measure changes in behaviors of people (what they are doing and saying) and the products (or results) of their behavior (e.g., By 2025, the percentage of 15-19-year-old youth reporting use of alcohol in the past 30 days will decrease by 25%)
  - *Community-level outcomes objectives*: aim to measure the product or result of behavior change in many people (e.g., By 2025, the percentage of people living adequate housing in X community will increase by 30%.)
- Common characteristics include:
  - **Specific**: they tell how much of what by when
  - **Measurable**: information can be collected, detected, or obtained from records
  - **Achievable**: they are possible to achieve AND it's feasible for your group to reach them
  - **Relevant**: there is a clear connection to how they fit with the overall vision and mission of the group
  - **Timed**: timing by which it will be achieved is clear in the objective itself and an overall timeline
  - **Challenging**: they stretch the group to set its aims on significant improvements that are important

## Instructions:

1. Identify one person to take notes while the group brainstorms ideas and one person to document the decision reached through consensus.
2. Begin by drawing on expertise from the group to determine what needs to occur to see real progress toward your vision and mission. Then, together, form a list of *one or two* general goals (e.g., Improve emergency preparedness programs; Increase understanding of the causes and solutions to address school-shootings).
3. Then for each goal, develop *one or two objectives*. Consider what would have to change to suggest you are making progress toward that goal. Describe how much of what would change and by when and state your objectives. Consider the following questions:
  - a. What measures of activities or outputs would help us assess whether key activities are completed?
  - b. What changes in behavior would we see if the effort is successful?
4. Critique your objective based on SMART+C attribute and come to consensus about what the objective(s) should be. Record the agreed upon objective below.

Goal(s):

Objective(s):

**Considerations for developing strategies:**

- A strategy is a way of describing *how* you are going to get things done. It tries to broadly answer the question, “How do we get there from here?”
- A good strategy considers barriers and resources, stay in-line with the overall vision, mission, and objectives. Often initiatives use many different strategies to achieve their goals.
- Common characteristics of good strategies include:
  - *Give overall direction*- points to an overall path without dictating a narrow approach
  - *Fit resources and opportunities*- takes advantage of current resources and assets
  - *Minimize resistance and barriers*- good strategies attract allies and deter opponents
  - *Reaches those affected*- strategies connect interventions with those who it should benefit
  - *Advance the mission*- likely to make a difference on the mission and objectives
- Examples:
  - Increase collaboration among key sectors and stakeholders to develop improved emergency preparedness protocols
  - Increase coordination and integration of existing services to increase access to adequate housing
  - Assist schools in the development of substance abuse curriculum for health classes

**Instructions:**

1. Identify one person to take notes while the group brainstorms ideas and one person to document the decision reached through consensus.
2. Begin by considering your goals and objectives. Consider the following:
  - a. What risk and/or protective factors contribute to challenges in this area? Use the “Understanding Factors that Contribute to the Problem” worksheet to generate discussion.
  - b. Who are the *targets* of change (people who experience or at risk for experiencing the issue or problem) and *agents* of change (those in a position to help contribute to the solution)?
3. Generate *one or two* potential strategies that aligns with your goals and objectives, addresses factors contributing to the issue, and considers agents and targets of change. Consider the following:
  - a. What resources and assets exist that can be used to achieve the vision and mission?
  - b. What obstacles or resistance exist that could make it difficult?
  - c. What are potential agents of change willing to do to serve the mission?
  - d. Which strategies reach those especially at risk for experiencing the problem?
4. Come to consensus about which strategy/strategies to focus on for action planning and record your agreed upon strategy below.

|  |
|--|
| <p><b>Risk/protective factors:</b></p><br><br><br><p><b>Targets of change:</b></p><br><br><br><p><b>Agents of change:</b></p><br><br><br><p><b>Strategy:</b></p> |
|--|





## 15 Participation Techniques

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These 15 techniques were chosen strategically from the dozens available. The list is far from exhaustive, but these were chosen because they fit the goals of the policy, are innovative, and/or underutilized.

Open meetings are over-utilized, especially since there are so many other options. Please consider alternative methods when planning outreach events. Also, please review the Community Calendar to see if there is an event that covers a similar topic or involves the same stakeholders as well as events that attendance is expected to be high as it will detract from your event. Your outcome will be better if you are not competing for the community's time.

Several City staff members have been trained extensively on these tools and many more through training courses, research, and experience. This number will continue to grow with additional opportunities for trainings in the future. If you are interested in more information on how to use a tool or participating in trainings, please contact a member of the Neighborhood Engagement Division.

| TECHNIQUE   | CONSIDER  | WHY IT WORKS  | POTENTIAL ISSUES  |
|---|---|---|---|
| <b>Briefings</b>  |   |   |   |
| <p>Use existing meetings of social groups, neighborhood organizations, and clubs as a platform to provide information, education, and hold discussions</p> <p>Groups often need speakers and look for ways to be more involved</p> <p>Which groups are stakeholders for your project? Examples: Rotary Clubs, parent groups, Kiwanis, businesses, HOA's, neighborhood organizations, special interest groups.</p> | <p>KISS – Keep It Short and Sweet</p> <p>Be engaging by including visual aids, props, and provide opportunities for interaction</p> <p>Excellent tool for the "go-to-them" approach</p>   | <p>Control of information</p> <p>Reaches a wide variety of individuals who may not have been attracted to another format</p> <p>Opportunity to expand mailing lists</p> <p>Similar presentations can be used for different groups</p> <p>Excellent relationship-building tool</p>   | <p>Can get mixed groups of stakeholders, so you will need to speak to multiple interest areas and concerns</p> <p>Some organizations have tight agendas, time may be limited</p>  |
| <b>Expert Panels</b>  |   |   |   |
| <p>Public meeting designed in "Meet the Press" format</p> <p>Staff member from various departments or communications team interviews experts from different perspectives</p> <p>Can be conducted by a neutral moderator and include the option for the community to submit questions beforehand</p>   | <p>Agree on ground rules beforehand</p> <p>Be clear about the topics that will be discussed</p> <p>Choose your "experts" wisely – Can they answer a variety of questions? Are they comfortable with public speaking?</p> <p>Be sure questions are unbiased and include different topics</p> | <p>Encourages education to a diverse audience and potentially the media that will cover the story</p> <p>Presents opportunity to display the facts, showcase the complexities of an issue, and dispel scientific misinformation</p>   | <p>Requires substantial preparation and organization</p> <p>May enhance public concerns by increasing visibility of issues</p> <p>Success easily affected by participating parties</p>  |
| <b>Electronic Forums, Social Media Groups, E-mail</b>   |   |   |   |
| <p>Utilization of electronic mailing lists and social media platforms that members can easily join and leave</p> <p>Can provide access to an array of information formats such as video, photos, and links to more resources</p>  | <p>Online resources are useful but should be supplemented by hard copy versions</p> <p>The Internet is saturated and competitive</p> <p>Extra effort needs to be taken for messages to stand out or for stakeholders to read an email</p>   | <p>Easily accessible for most people including hard-to-reach populations such as low income and homeless – these groups often rely heavily on their mobile devices because they do not have access to full computers. Take this into account when writing emails and creating social media content</p> <p>Very inexpensive or free way to directly reach stakeholders</p> | <p>Be careful not to overuse social media platforms</p> <p>People can easily suffer from "over-reach" and not all projects warrant groups, email, or social media posts</p> <p>Substantial effort is needed to maintain accurate email addresses and engagement</p> <p>Won't attract older generations or people who are not tech savvy</p> |

| TECHNIQUE   | CONSIDER   | WHY IT WORKS   | POTENTIAL ISSUES  |
|---|--|--|---|
| <b>Response Summaries</b>   |  |  |   |
| An ongoing form of documentation that provides feedback to the public regarding comments received and how they are being incorporated     | <p>May be used to comply with legal requirements for comment documentation</p> <p>Use publicly and openly to announce and show all comments were addressed</p>   | <p>Strongly supports the City's goal of transparency and co-creation</p> <p>Demonstrates active listening and how responses are being incorporated</p> <p>Can also address why some ideas would not work</p>   | Can be time consuming to stay on top of comments and keep stakeholders up to date, especially if there is a large audience or social media comments are included  |
| <b>Television – Riverside Cable Access Channel 3</b>  |  |  |   |
| Television programming and video creation to be shared through television and online platforms such as YouTube                            | <p>Video creation and recording is openly available to you though Cable Channel 3 but may come at a cost to your Department</p> <p>Video is the fastest growing method of information – the brain interprets images much more quickly than it does text</p> <p>Capability to access video through mobile devices has made it even more effective</p> | <p>Our Riverside TV crew is creative and highly experienced</p> <p>Can be used in multiple areas and reach several stakeholder groups at once</p> <p>Many people will take the time to watch rather than read</p> <p>Provides opportunity for positive media coverage at ground breakings and other significant events</p> | <p>Difficult to gauge impact on audience</p> <p>Needs several layers of involvement and planning</p> <p>Cable Channel 3 is available but their schedule often fills quickly, be sure to reach out well in advance if you plan to use their services</p> |
| <b>Community Facilitators</b>   |  |  |   |
| Use qualified individuals in local community organizations to conduct project outreach  | <p>Define roles, responsibilities, and limitations up front</p> <p>Select and train facilitators carefully</p>   | <p>Promotes community-based involvement and co-creation</p> <p>Capitalizes on existing networks and relationships</p> <p>Enhances project credibility</p>  | <p>Can be difficult to control information flow</p> <p>Extra effort us needed to maintain expectations</p>  |
| <b>Interviews</b>   |  |  |   |
| One-to-one meetings with stakeholders to gain information for developing or refining public participation and consensus-building programs | <p>Conduct in person when possible, particularly useful when considering candidates for committees</p> <p>Plan your questions well</p>   | <p>Provides in-depth and personalized information in a non-threatening environment.</p> <p>Builds deeper relationships and gives interviewees a sense of empowerment</p>   | <p>Can be time consuming and difficult to schedule multiple interviews</p> <p>Extra efforts needed to accurately record conversations and thoughts</p>  |

| TECHNIQUE   | CONSIDER   | WHY IT WORKS   | POTENTIAL ISSUES  |
|---|--|--|---|
| <b>Charettes</b>  |  |  |   |
| Intensive sessions where participants design project features   | Best used to foster creative ideas<br><br>Be clear about how results will be used  | Promotes co-creation and problem solving<br><br>Opportunity for innovation and pilot projects  | Participants may not be seen as representative by larger public – don't assume their opinion is representative of entire  |
| <b>Citizen Juries</b>   |  |  |   |
| Small groups of citizens empaneled to learn about an issue, cross-examine witnesses, and make a recommendation<br><br>ALWAYS non-binding with no legal standing   | Requires skilled moderator<br><br>Commissioning body must follow recommendations or explain why not<br><br>Be clear about how results will be used and that it is NOT a vote   | Great opportunity to develop deep understanding<br><br>Pinpoint fatal flaws or gauge public reaction   | Resource-intensive<br><br>Extra emphasis is needed to manage expectations   |
| <b>Surveys and Polls</b>  |  |  |   |
| Questions created to gather a sampling of opinion for targeted feedback<br><br>City does not externally use the term "survey" unless it is statistically valid<br><br>Externally say questionnaire, feedback form, poll, etc. | If you need statistically valid results, a consultant should be obtained, which can be expensive<br><br>Take great care in formulating questions – have several people review them to ensure they are clear, won't be misinterpreted, and will gather useful information<br><br>Most suitable for general aptitude gauging | Provides input from individuals who would be unlikely to attend meetings<br><br>Gathers input from cross-section of the public<br><br>Higher response rate than mail-in surveys<br><br>Easily shared, can be very engaging and fun | Statistically valid surveys are expensive and time-consuming<br><br>"Over-surveyed, under-represented" is a common phrase or thought from some groups within Riverside so be sure to thoroughly consider if you need a survey, what is the purpose of the questions, and how will the results be used |
| <b>Coffee Klatches – Kitchen Table Meetings</b>   |  |  |   |
| Small meetings within a neighborhood usually at someone's home or welcoming communal space  | Be sure to be extra polite, appreciative, and supportive   | Relaxed setting is conducive to open dialogue<br><br>Maximizes two-way communication   | Often need existing relationships and trust to organize   |
| <b>Fairs and Events</b>   |  |  |   |
| Central event with multiple activities to provide project information and raise awareness   | All issues – large and small – must be considered<br><br>Make sure adequate resources are available<br><br>Think about the thought process and interest of your stakeholders – what would make them picture themselves at your event   | Focuses public attention on one element<br><br>Conducive to media coverage<br><br>Allows for different levels of information sharing<br><br>Good opportunity for interactive activities  | Public must be motivated to attend<br><br>Can be expensive<br><br>Can quickly lose a crowd if not done well   |

| TECHNIQUE  | CONSIDER   | WHY IT WORKS  | POTENTIAL ISSUES  |
|--|--|---|---|
| <b>Study Circles</b>   |  |   |   |
| A highly participatory process for involving numerous small groups in making a difference in their communities | <p>What works best is multiple groups work at the same time in different locations and then coming together to share out</p> <p>Structured around an actual study guide</p>  | <p>Large numbers of people are involved without having them all meet at the same place</p> <p>A diverse group of people agrees on opportunities for action to create social change</p> <p>Allows for strategic discussion of targeted information</p> | <p>Participants may find that the results are hard to assess or feel that the process didn't lead to concrete action</p> <p>May be difficult to get segments of the community to commit</p> |
| <b>Symposia</b>  |  |   |   |
| A meeting or conference to discuss a particular topic involving multiple speakers                              | <p>Provides an opportunity for presentations by experts, professionals, and a variety of people highly involved</p> <p>Requires upfront planning to identify appropriate and interesting speakers</p> <p>Needs strong publicity</p>                          | <p>People learn new and diverse information</p> <p>Educational foundation for informed participation and discussions</p> <p>Great tool for early in your outreach or at points of contention</p>  | <p>Experts might not represent different perspectives</p> <p>Controversial presenters may draw protests or negative views</p>   |
| <b>Tours and Field Trips</b>   |  |   |   |
| Provide tours for key stakeholders, elected officials, advisory groups, and the media                          | <p>Know the number of participants to accommodate and plan for</p> <p>Include refreshments and transportation options when possible</p> <p>Can be self-guided with additional tools such as recordings or maps</p> <p>ALWAYS consider safety precautions</p> | <p>Often seen as a special treat or "reward" for extra involvement</p> <p>Opportunity to provide rapport and a feeling of being an "insider"</p> <p>Reduces outrage and misinformation by making choices more familiar</p>                            | <p>Number of participants can be limiting logistically</p> <p>Potentially attractive to protestors</p> <p>Transportation and liability come in to play</p>                                  |

Modeled from IAP2's Public Participation Toolbox

# ELEMENTS OF AN EVALUATION PLAN

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An evaluation plan should be an integral part of your overall written plan for a quality reporting project. To support the planning of an evaluation, this page covers the following topics:

- Purpose of the Evaluation
- Evaluation Questions
- Evaluation Criteria
- Starting Early on Data Collection
- Collecting Data for an Evaluation
- Data Collection Methods To Answer Evaluation Questions
- Data Collection Tools and Activities
- Data Analysis
- Reporting Evaluation Findings

## **Purpose of the Evaluation**

To clarify the purpose of your evaluation, start by identifying what you need to learn in the short and long term. Think specifically about the decisions you and your partners are facing and when they have to be made. Key issues include:

- What are you hoping to learn from the evaluation?
- What decisions do you expect to make as a result of the evaluation?
- When do you hope to make those decisions?

Since your resources are sure to be limited, answering these questions will help to set priorities for learning.

## Evaluation Questions

Evaluations are most useful when they inform key decisions by answering the right question at the right time. What specific questions do you need to answer to adequately inform your decisions? Note that you may have several questions and that different questions may be appropriate to ask at different stages of your effort. For example, you will probably need answers to questions about your process sooner than you need answers to questions about results.

- Learn about [evaluating the process](#)
- Learn about [evaluating the results](#)

The number of questions you can address depends largely on the time and resources available. It also depends on whether you can save money by using the same data collection methods to gather the answers to more than one question at a time. For example, you might use a single community survey to address questions about whether your audience was aware of the report, sought it out, or used it. But this type of survey probably wouldn't work for determining whether people understood the report.

### Evaluation Criteria

To properly evaluate your efforts, develop specific criteria for success. Here are some issues to consider:

- What would count as success in reaching your audience?
  - What will you consider a successful process?
  - What will you consider a successful result?
- How would you determine whether someone had used your information?
- How would you know whether you did enough outreach?

The credibility of your evaluation with various stakeholders will depend in part on whether you define success in a way that resonates with them. They may have different points of view about the most important criteria for success. Make sure you get their input and come up with a clear set of criteria that reflect a shared vision. You might find that clarifying your criteria leads to useful, if sometimes thorny, discussions about exactly what you are trying to achieve, for whom, in your initiative.

### Starting Early on Data Collection

Planning your evaluation as early as possible makes it easier to start on your assessment when you want to. People who start late often find themselves playing "catch up" and end up struggling getting the information they need.

As early as possible, decide when you will start work on collecting feedback. If you are evaluating your processes, you need to move quickly to gather the data you need. If you are evaluating your results, you may also need to start early if you hope to collect data on the situation before your report is issued. This information is often called baseline data.

However, even if you are well along in your efforts, and have not been able to focus on evaluation yet, you can and should start as soon as possible. If you are in this for the long haul, you need to harness evaluation tools to help the project move forward in the right direction as you get more sophisticated and perhaps more ambitious.

### Collecting Data for an Evaluation

How will you measure whether each of your criteria has been met? When you're thinking about what data to track, keep in mind that the things that are easiest to count are not necessarily the most informative. For instance, the number of reports mailed out to residents does not tell you whether they read it, understood it, or used it.

When you develop your plan, answer these questions:

- Are there existing or standard measures or will you have to devise your own?
- What data sources will you use?
- Are some data already available that you can use? Most of the time, there is relatively little existing information relevant to quality reports. This means you will need to collect "primary" data from a variety of sources. Some of your primary data will be qualitative in nature; some will be quantitative.

One important thing to consider is whether you are collecting data on individuals or groups/organizations:

- If you collect data on individuals, you will likely focus on their:
  - Knowledge.
  - Attitudes, beliefs, and preferences.
  - Experiences and responses.
  - Behavioral intentions (what they intend to do in the future).
  - Actual behaviors.
- When you collect data about groups or organizations, you may also collect data on their:
  - Plans.
  - Policies.
  - New initiatives.

When you collect data about groups or organizations, you are typically collecting the data from individual people in the group or organization who



are knowledgeable about the group or organization in question. These people are sometimes called "key informants."

#### Data Collection Methods, Tools, and Activities

How will you collect data on your measures? You are likely to be using a mix of qualitative and quantitative methods in your evaluation as well as perhaps tapping into existing data, especially if you are evaluating a web-based report.

The method you use depends on the question you are asking as well as the time, resources, and talent that you have available. You must also consider what will be credible to the audience for your evaluation findings. The tools you need and the activities you carry out depend on your data collection methods. When you are collecting primary data, you typically have to develop tools specifically for your situation.

When you develop your plan, consider these questions:

- What tools will you need to collect data?
- Do some tools already exist that you can use as is?
- Can you get samples of tools that you can adapt or simply use as a template for your own?
- Who will collect the information—one of your own staff or people hired for this specific purpose as consultants or contractors?

#### Surveys

A survey asks a systematic sample of a population a set of questions that they answer using a specified set of responses. The sample population could be community members (including those you hope to reach), people who actually use reports, or representatives of purchasers, providers, plans, or policymakers.

Surveys ask a series of questions that can be closed-ended (where a limited set of answers is provided for each question) or open-ended. The use of closed-ended questions means that survey results are quantifiable.

Surveys may be administered by mail, by telephone, in person, or over the Web. Some Web sites incorporate a survey "feedback" function that asks questions and solicits comments from site visitors.

#### What's needed for surveys?

- A "sampling frame" from which you can choose a representative (i.e., random) sample.
- The survey instrument, preferably one that has gone through some initial testing.
- A cover letter or other form of invitation to motivate survey response.
- A way to distribute the survey (mail, telephone, or Web).
- A way to follow up with people who don't respond to the survey.
- A system for creating and managing a database of survey responses.
- A plan and a method for analyzing the results.
- Either a "vendor" that will conduct the survey for you or staff skilled in survey design, administration, and analysis.

### Focus Groups

In a focus group, a small group of individuals spends 1 to 2 hours in a guided discussion of a small set of questions. The individuals typically have certain characteristics in common, but they may also be diverse on other characteristics.

Unlike questions on surveys, the questions asked in focus groups can be answered in any way that the participants choose. No predetermined answers are provided.

The interaction among participants and how they influence each other are both part of the "data" that is of interest. In some focus groups, participants complete a brief survey at the beginning to capture their demographic characteristics or other information. In others, participants respond to a stimulus provided by the moderator.

### What's needed for focus groups?

- Access to a pool of people from whom you can recruit focus group participants who fit your criteria (often provided by a private vendor that specializes in commercial and/or academic focus group research).
- A detailed moderator guide, with primarily or exclusively open-ended questions.
- A skilled moderator.
- A facility to hold the focus group session(s) that is convenient, neutral, and attractive without being too plush. Focus group firms often rent their facilities for this purpose.
- Any materials that you want to use to stimulate the groups' responses.
- One or more ways to record the focus group (audiotape, videotape, or notes) and summarize or transcribe the conversation. Focus group firms can provide this service.
- A method to analyze the results of all your groups. This may include a qualitative data analysis software program.
- Staff who have skills in qualitative data analysis.

## Key Informant Interviews

A key informant interview focuses on a single individual or a very small group of individuals who are chosen because they:

- Have had a particular experience.
- Have played a particular role.
- Are likely to reflect a particular perspective on your report.

One or two interviewers ask the key informants a set of "open-ended" questions that permit respondents to say what they want in their own language. These interviews can be conducted in person or by telephone.

In some cases, interviews are highly structured: questions are asked in the same order, with the same wording, of everyone. Semi-structured interviews are more common; in such interviews, interviewers can reword the questions to fit the situation and change the order of questions. In all kinds of interviews, one can use "probes" (either specified ahead of time or identified during the interview) to delve deeper into a topic or issue.

### What's needed for interviews?

- A method to identify and recruit the people you want to interview.
- An interview protocol with primarily or exclusively open-ended questions.
- Skilled interviewers.
- A way to record the interviews and either summarize or transcribe them.
- A method to analyze the results of all your interviews. This may include a qualitative data analysis software program.
- Staff who have skills in qualitative data analysis.

## Web Analytics

With the growth of the Internet has come a parallel growth in methods to assess how and by whom a given Web site is being used. Analytics can also indicate whether links or ads you have placed to let people know about your report are actually being used. These methods are carried out by private companies, sometimes for a fee. Certain search sites, for example, offer free Web analytic services.

## Data Analysis

Analysis methods vary by how you collect the data. Quantitative data require typical statistical analyses. Be sure you have the expertise and the software required to conduct these analyses.

The analysis of qualitative data is less familiar to most people, but there are systematic and rigorous ways to analyze transcripts from interviews and focus groups. Qualitative analyses of the content of these transcripts are used to identify themes, patterns, and variations across different kinds of respondents.

When you develop your plan, answer these questions:

- What techniques will you use to analyze and interpret the data?
- How will you ensure your analysis is rigorous and viewed as trustworthy by your audience?
- Who will do the analysis? Many report sponsors contract with consultants to conduct the analysis and report their findings.

### Reporting Evaluation Findings

Over the years, evaluators have learned that how, when, and to whom they report their findings has a big influence on whether the results ever get used. Just as you need to be very aware of your audience in designing and distributing a quality report, you have to be clear about the audience(s) for your evaluation results.

### Considerations in Developing an Evaluation Report

- When developing the report on your evaluation findings, consider the following questions:
  - Who needs to act on the results?
  - Who needs to make decisions based on the results?
- Who would be interested in your findings from outside your community?
- How can these findings be used to promote your efforts?
- How much time will each audience want to spend looking at your findings?
- What's the best way to communicate with them?
  - A long, detailed report?
  - A brief summary report?
- An in-person briefing with some PowerPoint slides and adequate time for discussion?
- Something else that fits into your organization's "standard operating procedures?"
- What kind of presentation will resonate most with each audience?
  - Graphs and charts?
  - Stories and examples?
  - A combination?



## SUCCESSFUL FACILITATION

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Our role is to provide a safe, welcoming, and informative space for public involvement. As such, we are facilitators, and as difficult as it may be, staff's opinions cannot be included in our outreach efforts. This can be difficult, especially if you have spent months and countless hours on a project that you are passionate about. As facilitators, staff must act only as catalysts for productive conversations. Effective facilitation skills are essential to successful public deliberation, especially when dealing with what could be a contentious issue. It is crucial to have a leader in the room who enables all opinions to be heard and stimulates conversation.

If a facilitator is needed for your project, there are members of City staff who are trained in Technology of Participation (ToP) facilitation methods that can be helpful to you in your outreach efforts. Outside consultants can perform in this capacity as well.

### Tips for Effective Facilitation:

- A. Facilitators set and enforce ground rules. They design the conversation, set an expectation of respect, and make it known that all voices are equal. If somebody is using disrespectful language, it is the facilitator's responsibility to ask them to stop.
  - Try: "That term makes me uncomfortable and might be hurtful to others. Could you please refrain from using it?"
- B. Facilitators allow everyone to speak. If somebody is dominating the conversation, don't try to stop them from talking, but rather get others involved in the discussion. As City staff, this can be difficult because exceptional customer service is a vital part of our job. It is helpful to remember that if you are giving your undivided attention to just one person, you are not providing good customer service to the other participants in the room.
  - Try: "Those are good points. Let's be sure to hear what others have to say as well."

- Try: Setting the event into smaller working groups or designating specific comment times.

C. Skilled facilitators have the ability to look beneath emotional responses and bring to light the underlying interest, need, or concern.

- Consider: Someone may be speaking loudly or seem angry, but it just might be that they fear an aspect of their life will significantly change.

CI. Room setup creates the stage for your outreach event. It gives participants clear direction and helps facilitate feelings of equality if done properly. This includes everything from lighting to background noise.

- Consider: Creating smaller working groups and circular table/chair formations when possible.
- Consider: Don't isolate speakers by putting them on a stage or behind a podium. This sets a tone of "us versus them."

CII. Attitude and context are extremely important! If you set a conversation in a negative tone or come at it from what is perceived as the wrong angle, your outreach efforts can be doomed from the beginning.

CIII. Facilitators must always maintain neutrality and must avoid giving any preferential treatment.

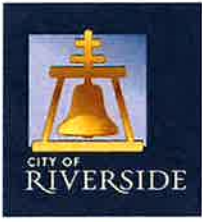
- Consider: During discussions, we often nod our heads as a way of participating in the conversation, but this can be construed as agreement.
- Try: Statements like, "I hear what you're saying" or "that's an interesting perspective."
- Try: Someone on staff should actively take notes or record conversations. This shows the audience that responses are being taken into account and has a future purpose.

CIV. Asking purposeful questions is an understated art form. Facilitators are allowed to have an outside perspective, which should not be used to see who isn't speaking and what's not being said. Where are gaps in the conversation?

- Consider: If the group is stuck on a seemingly impossible resolution, ask "What would we need in order to make that happen?" instead of telling the group that isn't an option.
- Try: Empowering and open-ended questions that show you value in your participants opinion, such as: "You have a great deal of experience in XXX. What do you think?"
- Try: Summarizing thoughts and concerns by saying "I am hearing that the group is concerned that."

# PROJECT OUTLINE TEMPLATE - EXTERNAL USE

|                    |      |                 |                |
|--------------------|------|-----------------|----------------|
| PROJECT NAME       |      | PROJECT MANAGER | PROJECT LEADER |
|                    |      |                 |                |
| PROJECT SUMMARY    |      |                 |                |
| PROJECT OBJECTIVES |      |                 |                |
| SCOPE OF WORK      |      |                 |                |
| KEY DELIVERABLES   |      |                 |                |
| PROJECT TIMELINE   |      |                 |                |
| PROJECT TEAM       | ROLE | RESPONSIBILITY  |                |
|                    |      |                 |                |
|                    |      |                 |                |
|                    |      |                 |                |
| COMMENTS           |      |                 |                |



**Meeting Name/Topic**

**Meeting Location**

**Meeting Date, Meeting Time**

Welcome and Introductions

6:00 – 6:20 pm, **Name of the person leading**

- Initiative History and Background
- Team Introductions

Presentation(s):

6:10-6:20 pm – **Name of the person(s)**

- Topic:
- Any other information

Activity:

6:10-6:20 pm – **Name of the person(s)**

- Topic/Instructions
  - 
  -

Other Information:

6:30-6:40 pm – **Name of the person(s)**

- 
- 

Questions & Answers:

6:30-6:50 pm – **Lead person(s)**

- 
- 

Closing & Announcements:

6:50-6:50 pm – **Lead person(s)**

- **Next Meeting/Workshop/Follow Up**



# SIGN-IN SHEET

Meeting Title: \_\_\_\_\_

Location: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

|     | Name/Nombre | Email Address/Correo Electrónico | Phone Number/<br>Número Telefónico | What Ward do you live in?<br>¿En qué distrito vive? |
|-----|-------------|----------------------------------|------------------------------------|---|
| 1.  |             |                                  |                                    |   |
| 2.  |             |                                  |                                    |   |
| 3.  |             |                                  |                                    |   |
| 4.  |             |                                  |                                    |   |
| 5.  |             |                                  |                                    |   |
| 6.  |             |                                  |                                    |   |
| 7.  |             |                                  |                                    |   |
| 8.  |             |                                  |                                    |   |
| 9.  |             |                                  |                                    |   |
| 10. |             |                                  |                                    |   |

# ADDITIONAL RESOURCES AND MOTIVATION

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Community Engagement and Project Management Homepage

<https://riversideca.gov/cedd/neighborhood-engagement>

Resource Guide on Public Engagement by the National Coalition for Dialogue & Deliberation [https://www.ncdd.org/files/NCDD2010\\_Resource\\_Guide.pdf](https://www.ncdd.org/files/NCDD2010_Resource_Guide.pdf)

Southern California Chapter of the International Association of Public Participation

<https://www.iap2.org/page/26/Southern-California-Chapter.htm>

Video: "Song of a Citizen" interview with Pete Peterson

<https://www.youtube.com/watch?v=kDlxTRB4Z8g>

Video: To Manage Stakeholder Expectations

<https://www.youtube.com/watch?v=0EkufUCo5qI>

Video: Ted Talk Dave Meslin: The Antidote to Apathy

[https://www.ted.com/talks/dave\\_meslin\\_the\\_antidote\\_to\\_apathy?language=en#t-1471](https://www.ted.com/talks/dave_meslin_the_antidote_to_apathy?language=en#t-1471)

Video: Difficult People and How to Deal

<https://www.youtube.com/watch?v=Rx6Abkn--Zc>

Video: Parks and Rec Town Hall

<https://www.youtube.com/watch?v=ln9oSjltOs>

Video: The Future of Public Engagement in a Hybrid World

<https://www.youtube.com/watch?v=cqE0olHxeYo>

CEDD – Neighborhood Engagement Division Library

We have a physical library of books on community engagement that range from using gamification, to inspirational stories and innovative methods. Contact Neighborhood Engagement Division staff to inquire about particular topics, pitch a book you think we should own, or to check out a book.

## DEFINITIONS

**Community:** Includes individuals or groups who live, work, play, study, visit, invest in or pass through the City of Riverside municipality.

**Community Consultation:** A form of community engagement that relates to the tools and practices used by staff to enable public involvement in decisions and actions that shape the community.

**Community Engagement:** Refers to the range of opportunities for public involvement in decision-making, relationship building, and community strengthening. Community engagement is achieved when the community is and feels part of the process.

**Community Strengthening:** Refers to a sustained effort of building cohesive and inclusive communities. This process aims to increase the connectedness, active community engagement, and partnership among members of the community, community groups, and organizations to enhance social, economic, and environmental well-being.

**IAP2:** The International Association for Public Participation (IAP2) is an international organization advancing the practice of public participation. IAP2 supports people who implement or participate in public decision-making processes.

**Plan:** A plan outlines a detailed future course of action aimed at achieving specific goals or objectives within a specific time frame. A plan should identify roles and responsibilities long with resources that are required for execution and/or implementation.

**Policy:** A policy sets out City Council's views with respect to a particular matter. It includes a set of principles or rules that provide a definite direction for the organization.

**Project:** A planned undertaking (including strategy and policy development) that builds, enhances, and maintains City assets or enhances City services in order to achieve a desired outcome, within a defined scope and funding requirements.

**Stakeholder:** A stakeholder is anybody who has the ability to influence a project's outcomes either positively or negatively. Stakeholders include identified subsets within the community. These subsets may comprise individuals and/or organizations from across the community that are directly involved in, or significantly affected by the project. Stakeholders may have an interest if the project has specific change implications or has lifestyle, social, environmental, or economic impacts. For most projects there are likely to be several stakeholders.

# TOOLKIT CONTROL SCHEDULE

|   |   |  |   |
|---|---|--|---|
| <b>Policy Title:</b><br>Citywide Community Engagement Toolkit   |   | <b>Policy Number:</b><br>TBD               | <b>Policy Type:</b><br>City Council Policy<br>and Toolkit |
| <b>Policy Creation Date:</b><br>April 2021  | <b>Current Version Adopted by City Council:</b><br>TBD                          | <b>Current Version number:</b><br>03       | <b>Policy Review Date:</b><br>May 16, 2023                |
| <b>Parent Policy:</b><br>None   | <b>Policy responsibility:</b><br>Community & Economic Development<br>Department |  | <b>Resolution Number:</b><br>TBD                          |
| <b>Revised by: Neighborhood Engagement Division</b><br>Agueda Padilla, Division Manager<br>Amaris Gonzalez, Project Coordinator<br>Jesus Noriega, Project Assistant |   | <b>Revised date:</b><br>September 22, 2023 |   |

# CITYWIDE COMMUNITY ENGAGEMENT POLICY



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CITY OF RIVERSIDE

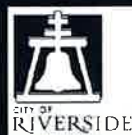
COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

NEIGHBORHOOD ENGAGEMENT DIVISION

3900 MAIN STREET

RIVERSIDE, CA 92522

ADOPTED \_\_\_\_\_ 2023



# INTRODUCTION

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Geographic locations only become places when people assign meaning and importance to them.

Riverside means a lot to many people – it is special to those who live here and to those who serve the community. Riverside residents and Riverside public servants care a lot about how the community is maintained and how it evolves, grows, and changes – thus, the role of meaningful community engagement is essential to Riverside's future and to strengthening the connection between people and place. Meaningful community engagement depends on high levels of public trust and organizational competence. When quality community input occurs, community voices are heard, captured, and shared with the Riverside City Council and Boards and Commissions, which results in more well-informed recommendations and decision-making on important matters affecting the community.

Communities work best when residents, organizations, and institutions are engaged and working together for the greater good of all. The City of Riverside is no exception. The promise and potential of Riverside is strengthened by accommodating different perspectives and encouraging more residents to be informed and involved in making recommendations and decisions. Recognizing there's no single way to conduct effective community engagement, this Citywide Community Engagement Policy and its accompanying Community Engagement Toolkit (Toolkit), are intended to assist the City of Riverside in developing customized engagement plans serve the Riverside community. The Policy provides a consistent approach to future community engagement efforts and the Toolkit to guides City staff in creating inclusive community engagement plans for the benefit of the Riverside community and Riverside elected and appointed officials. Depending on the issue/topic, intended audience, and available timeframe, the Toolkit allows the City of Riverside to scale engagement efforts to fit the community's needs and interests.

In addition, the Policy and Toolkit set a common language among Riverside community members, City departments, Riverside elected and appointed leaders, and others, for the development of effective community engagement processes. The Policy and Toolkit also set expectations for community engagement related to a range of projects and programs.

The City of Riverside is responsible and responsive to all residents. The Policy explains the City of Riverside's approach and commitment to the community. Through the Riverside City Council's **Envision Riverside 2025 Strategic Plan**, the City of Riverside is committed to building community and trust through information, education, and engagement. The public servants comprising the City of Riverside Team are committed to excellent customer service that strives to provide a high quality of life for all who live and work here – the Policy and Toolkit will further contribute to these ends.

Further, the Policy and Toolkit will expand the range of contributions by the Riverside community that will reinforce **Envision Riverside 2025** Cross-Cutting Threads<sup>1</sup> of:

- **Community Trust** – Riverside is transparent and makes decisions based on sound policy, inclusive community engagement, involvement of City Boards & Commissions, and timely and reliable information. Activities and actions by the City serve the public interest, benefit the City's diverse populations, and result in greater public good.
- **Equity** – Riverside is supportive of the City's racial, ethnic, religious, sexual orientation, identity, geographic, and other attributes of diversity and is committed to advancing the fairness of treatment, recognition of rights, and equitable distribution of services to ensure every member of the community has equal access to share in the benefits of community progress.

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<sup>1</sup> Cross-cutting threads are major themes that exist within the Envision Riverside 2025 Strategic Plan and should be reflected in all outcomes.

- **Fiscal Responsibility** – Riverside is a prudent steward of public funds and ensures responsible management of the City's financial resources while providing quality public services to all.
- **Innovation** – Riverside is inventive and timely in meeting the community's changing needs and prepares for the future through collaborative partnerships and adaptive processes.
- **Sustainability and Resiliency** – Riverside is committed to meeting the needs of the present without compromising the needs of the future and ensuring the City's capacity to persevere, adapt and grow during good and difficult times alike.

Additionally, the Policy and Toolkit will be instrumental in advancing the indicators, goals, and work plan at the foundation of the six Strategic Priorities framing **Envision Riverside 2025**:

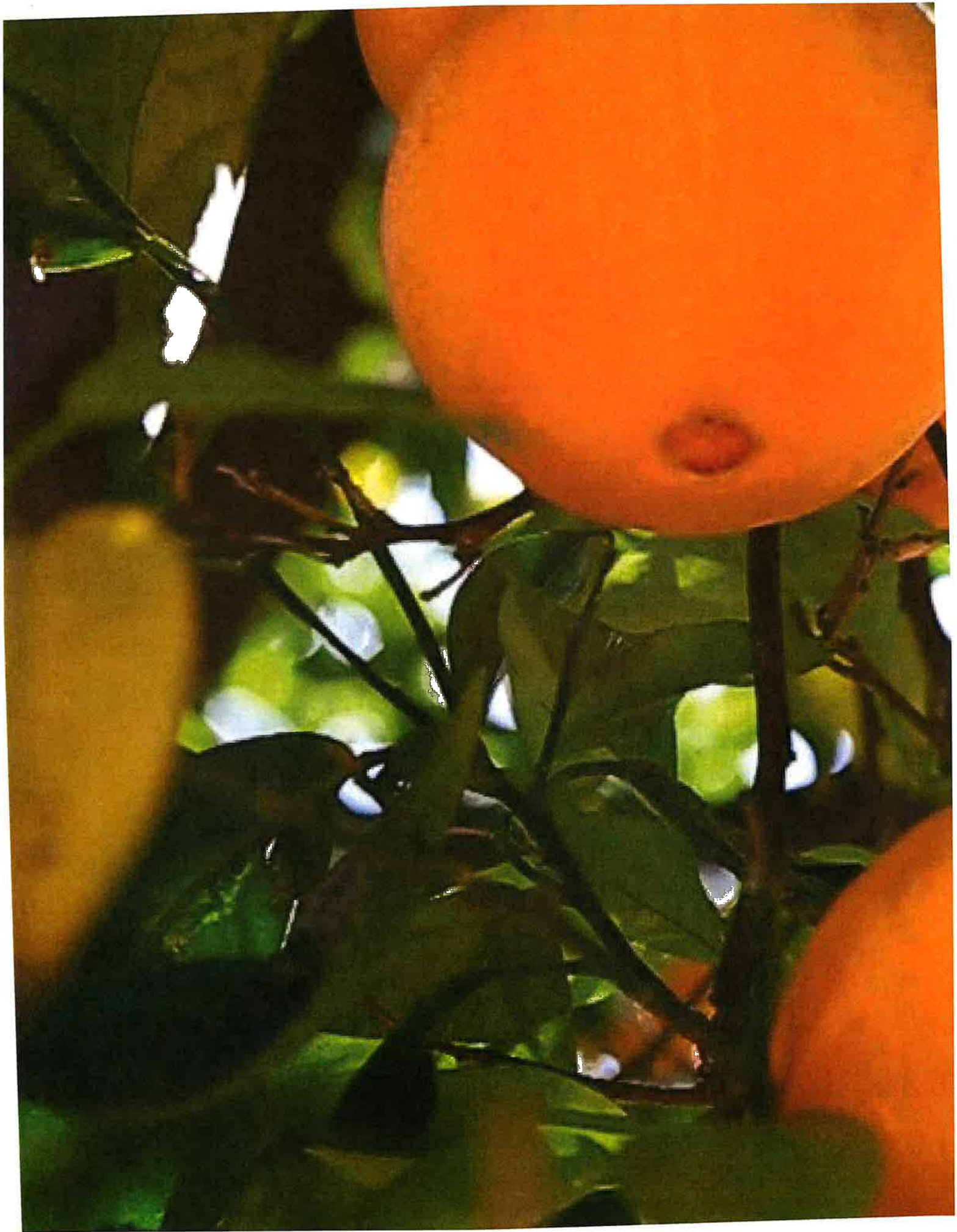
- **Arts, Culture and Recreation** – Provide diverse community experiences and personal enrichment opportunities for people of all ages.
- **Community Well-Being** – Ensure safe and inclusive neighborhoods where everyone can thrive.
- **Economic Opportunity** – Champion a thriving, enduring economy that provides opportunity for all.
- **Environmental Stewardship** – Champion proactive and equitable climate solutions based in science to ensure clean air, safe water, a vibrant natural world, and a resilient new green economy for current and future generations.
- **High Performing Government** – Provide world class public service.
- **Infrastructure, Mobility & Connectivity** – Ensure safe, reliable infrastructure that benefits the community and facilitates connection between people, place, and information.

The demand by the Riverside community – and communities across the United States – for genuine and open community engagement is on the rise and the City of Riverside has created this Policy and Toolkit to provide a more structured and consistent approach to meet this demand. The Policy and Toolkit have been developed through an engagement process that involved the community in understanding needs and incorporating relevant provisions in the Policy and Toolkit. This process has opened the hearts and minds of all regarding how interactions between the City of Riverside and the Riverside community can improve– these expanded and enlightened mindsets resulted in these two practical and responsive documents.

By utilizing the Policy and Toolkit in service to the Riverside community, the benefits of good community engagement will be made apparent over time through quantifiable improvements to the Riverside community's quality of life and advancement of the Cross Cutting Threads and Strategic Priorities embodied in the **Envision Riverside 2025 Strategic Plan**.



**Al Zelinka, FAICP**  
City Manager, City of Riverside







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# ACKNOWLEDGEMENT

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This work has been a collaboration between Riverside community members, City of Riverside leaders, and City of Riverside staff, and would not have been possible without the time, knowledge, and energy of those listed below. The community engagement policy working group meetings were held virtually in 2021 during the COVID-19 pandemic. The feedback and information collected highlighted key themes which helped us develop our approach to community engagement as outlined in this Policy.

Along with 12 staff members, this project benefited from 24 community members collaborating to form a Working Group. The group, comprised of residents, neighborhood group members, nonprofits, major institutions, businesses, and government agencies represents many neighborhoods and most Council Wards within the City of Riverside. The Working Group met throughout the project development to review best practices and examples of other policies and toolkits, gave feedback on what was important to include in Riverside's Policy & Toolkit, and worked with staff to co-create the content of the documents.

## RIVERSIDE COMMUNITY MEMBERS

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Riverside community members raised the need for a community engagement policy and the following members, listed alphabetically, dedicated their time, ideas, and passion towards bringing meaningful opportunities for community engagement to the City of Riverside.

- **Dean Ayer**, Casa Blanca Neighborhood. Group Affiliations: PTA, March of Dimes, Riverside County Office of Education
- **Janice Bielman**, Magnolia Center Neighborhood. Group Affiliations: Magnolia Area Neighborhood Alliance, Neighbors Better Together, Beatty Drive Neighbors
- **Julie Carman**, Orangecrest Neighborhood. Group Affiliations: Asian Pacific Counseling and Treatment Center
- **Stephanie Campbell**, Ramona Neighborhood
- **Aurora Chavez**, Arlington Neighborhood. Group Affiliations: Neighbors Better Together, Friday Morning Group, RTA Customer Advocate, Community Advocate Senior Transportation-City
- **Kevin Dawson**, University Neighborhood. Group Affiliations: Friends of Riverside's Hills, Reform Riverside, University Neighborhood Association
- **Tom Donahue**, Downtown Neighborhood. Group Affiliations: Riverside Neighborhood Partnership
- **Tinka Friend**, La Sierra South Neighborhood. Group Affiliations: Riverside Neighborhood Partnership, Riverside Woman's Club, Neighbors Better Together, Residents for Responsible Representation, Social and Environmental Justice Committee of the Unitarian Universalist Church of Riverside

- Steve Fuji, Magnolia Center Neighborhood. Group Affiliations: Universalist Unitarian Church of Riverside, Riverside Mutual Aid Network, Family Promise of Riverside, the SouthWest Intentional Communities Alliance, BIPOC (Asian-American), senior, LGBTIQ, disabled, and low-income populations
- **Jennifer Gamble**, Magnolia Center Neighborhood. Group Affiliations: Riverside Historical Society, Old Riverside Foundation, Cultural Heritage Board
- Lynn Heatley, Victoria Neighborhood. Group Affiliations: Love Riverside, Community Food Pantry Partner
- **Jason Hunter**, Wood Streets Neighborhood. Group Affiliations: Neighbors of the Wood Streets, Neighbors Better Together
- Gurumantra Khalsa, University Neighborhood. Group Affiliations: University Neighborhood Alliance
- **Nanci Larsen**, Downtown Neighborhood. Group Affiliations: Chair of DANA, Board member of Old Riverside Foundation Second Vice President of the Riverside Woman's Club, Board of Directors Riverside Downtown Partnership, RDP Safety Committee
- Linda Lawyer, Grand Neighborhood. Group Affiliations: Riverside Community Sailing Group, Keep Riverside Clean and Beautiful, The Friends of Fairmount Park
- **Clarissa Manges**, Victoria Neighborhood
- Sharon Mateja, La Sierra Neighborhood Group Affiliations: Residents for Responsible Representation (RRR), Neighbors Better Together (NBT), La Sierra University Music Advisory Board
- **Carol McDoniel**, Wood Streets Neighborhood. Group Affiliations: Historic Wood Streets Association, Old Riverside Foundation
- Lorna Seitz, Mission Grove Neighborhood. Group Affiliations: UCR, ExCite
- Justin Scott-Coe, Wood Streets Neighborhood
- **Greta Valenti**, Downtown Neighborhood
- **Richard Vandenberg**, Canyon Crest Neighborhood
- **Mimi Velazquez**, Ramona Neighborhood. Group Affiliation: Anti-Racist Riverside
- Betty Vu, Orangecrest Neighborhood. Group Affiliations: Inland Chinese American Alliance, Inland Empire Elite Mutual Association

Additionally, gratitude goes to the many Riverside residents who attended various community workshops and public meetings associated with this work.

## CITY OF RIVERSIDE LEADERS

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Appreciation is expressed for the **Envision Riverside 2025 Strategic Plan**, which provides significant insight into the Mayor and City Council's commitment to community engagement. For example, the vision statement guiding **Envision Riverside 2025** states: "Riverside is a city where every person is respected and cherished, where equity is essential to community well-being, where residents support one another, and where opportunities exist for all to prosper. In Riverside, everyone comes together to help the community, economy and environment reach their fullest potential for the public good." Additionally, the Mayor and City Council's cross cutting threads and priorities, as well as the operational workplan, as conveyed in **Envision Riverside 2025** provide specific policy direction and actions:

- **Community Trust** cross-cutting thread reads: "Riverside is transparent and makes decisions based on sound policy, **inclusive community engagement**, involvement of City Boards & Commissions, and timely and reliable information. Activities and actions by the City serve the public interest, benefit the City's diverse populations, and result in greater public good."
- Goal 2.4 of the **Community Well-Being** priority reads: "Support programs and innovations that enhance community safety, **encourage neighborhood engagement**, and build public trust."
- Action 5.3.1 under the **High Performing Government** priority reads: "Establish an organizational strategy centered on effective **community engagement** through a variety of mediums; and develop **community engagement methods** that use innovative and creative tools that create an open, respectful, and intentional dialogue regarding inclusion, diversity and equity."

Importantly, Riverside's elected officials understand and appreciate the need for a community engagement policy, and through their leadership and policy direction, the Riverside community and City of Riverside staff will have the tools in place to uphold and carryout **Envision Riverside 2025**. Gratitude goes to:

- Mayor Patricia Lock Dawson
- Councilmember Erin Edwards, Ward 1
- Councilmember Clarissa Cervantes, Ward 2
- Councilmember Ronaldo Fierro, Ward 3
- Councilmember Chuck Conder, Ward 4
- Councilwoman Gaby Plascencia, Ward 5
- Councilmember Jim Perry, Ward 6
- Councilmember Steve Hemenway, Ward 7

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## CITY OF RIVERSIDE STAFF

Working alongside the Riverside community, and under the direction of the Riverside City Council, a team of City staff invested time in developing a first-of-its-kind community engagement policy applicable citywide. Much appreciation goes to:

- **Yvette Sennewald:** Project Manager, Community & Economic Development, Neighborhood Engagement Division
- **Eva Arseo:** Deputy City Clerk, City Clerk's Office
- **Erin Christmas:** Director, Riverside Public Library
- **Ceri Dowsett:** Utilities Public Benefits/Customer Relations Manager, Riverside Public Utilities
- **George Khalil:** Chief Innovation Officer
- **Ed Lara:** Principal Civil Engineer, Public Works
- **Randy McDaniel:** Deputy Director, Parks, Recreation & Community Services Department
- **Nathan Mustafa:** Deputy Director, Public Works Department
- **Carlie Myers:** Assistant General Manager, Riverside Public Utilities
- **Robyn Peterson:** Director, Museum of Riverside
- **Gema Ramirez:** Project Manager, Community & Economic Development, Arts & Cultural Affairs Division
- **Matthew Taylor:** Senior Planner, Community & Economic Development, Planning Division

Additionally, appreciation abounds for the many other City of Riverside employees who provided support at the meetings and feedback on the development of this work.

Thank you for making a difference.



**Al Zelinka, FAICP**

City Manager April 5, 2022



## POLICY PURPOSE

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This document aims to create a clear, streamlined, and predictable public participation process. Effective community engagement requires a shared understanding between community members and City staff. The Citywide Community Engagement Policy (Policy) and accompanying Community Engagement Toolkit (Toolkit) are both a resource guide for the City and an overview of the engagement process for community members. These documents increase accountability on both ends – City staff has an agreed-upon path to follow, and the community has a standard to expect from the City.

The Policy formally expresses the City Council and staff's commitment to engaging Riverside's community using appropriate, effective, and inclusive practices. The City is committed to engaging effectively with its community in a meaningful, accountable, responsive, and equitable way. This Policy outlines the City's position, role, and commitments to ensure that community engagement is integrated into the decision-making process and will assist in building relationships, strengthening the community, and increasing resident involvement.

The Envision Riverside 2025 Strategic Plan notes cross-cutting threads that are to be reflected in all outcomes. The cross-cutting threads are: Community Trust, Equity, Fiscal Responsibility, Innovation, as well as Sustainability, and Resiliency. While community engagement is important in each cross-cutting thread, providing a Citywide Community Engagement Policy that outlines a standardized approach to community engagement is most aligned with:

**Community Trust:** Riverside is transparent and makes decisions based on sound policy, inclusive community engagement, involvement of City Boards & Commissions, and timely, reliable information. Activities and actions by the City serve the public interest, benefit the City's diverse populations, and result in greater public good.

**Equity:** Riverside is supportive of the City's racial, ethnic, religious, sexual orientation, identity, geographic, and other attributes of diversity and is committed to advancing fairness of treatment, recognition of rights, and equitable distribution of services to ensure every member of the community has equal access to share in the benefits of community progress.

The Policy seeks to improve the City's community engagement processes and outcomes by encouraging a consistent approach and continual learning through evaluation, and expanding the range of engagement methods used.

There are many reasons to engage the public. Examples include, but are not limited to:

- The City has a legal obligation to consult with the public
- A new policy is being developed
- A new program is being designed or implemented
- There is a significant change to the City's Charter, Riverside Municipal Code, or other State/County law, policy, process, procedure, and/or program
- Public expertise is required to inform and develop solutions to a problem
- The City requires resident input to ensure the end "product" has relevance or meets the identified need

This Policy will be applied at the planning stage of a project. Community engagement may be required at multiple stages within a project, program, initiative, or development. Community engagement is the responsibility of all City employees with public-facing roles. To ensure the effective application of community engagement principles and consistent processes, a Community Engagement Toolkit will be developed to provide guidance for City staff.

To ensure that the City can deliver on its commitment to community engagement as outlined in this Policy, additional support may require:

- Access to a suite of resources to support the design, delivery, reporting, and evaluation of community engagement, including process guides, templates, and checklists;
- Access to training and professional development opportunities; and
- Access to subject matter expert staff members to give advice on matters relating to project planning, resource allocation, communications, and best practice community engagement methods.



## VISION

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A City where community engagement is valued as an important part of the decision-making process and is inclusive, meaningful, accountable, and responsive to the public's perspectives and needs.

## WHAT IS COMMUNITY ENGAGEMENT?

---

Community engagement is defined as the range of opportunities for public involvement in the decision-making process, relationship building, and community strengthening. Community engagement is achieved when the community is and feels a part of a process.

Some community engagement processes are undertaken to support decision-making, some are about relationship building, while others are focused on community strengthening (or capacity building). Often, the community engagement process supports more than one of these objectives.

The City engages with stakeholders and the community at large at different levels along a spectrum of increasing involvement. The community engagement process is dynamic, which means there is likely to be a movement back and forth through different levels as a community engagement process is implemented.





## OUR COMMITMENT TO THE COMMUNITY

---

The City of Riverside's Community Engagement Policy is built upon a set of commitments that guide the planning, development, implementation, evaluation, and continuous improvement of community engagement processes undertaken for City projects.

When engaging the community, City staff will be open and accountable in the decision-making process. The commitments to the Riverside community are as follows:

1. To ensure that the purpose of community engagement is clear, relevant, and the methods used are well suited to generate highly effective community engagement.
2. To provide information that is clear, easy to understand, and accessible to all people.
3. To proactively engage with our community in an ethical manner using a range of methods and enable everyone to have a voice on matters of importance to them. We will provide engagement opportunities that are mutually respectful, undertaken in reasonable time frames, and with a shared understanding of how the input will inform decision-making processes.
4. To value all participants' knowledge, expertise, and experiences, acknowledging that everyone has different views and needs.
5. To undertake evaluation processes to continually improve our approach to community engagement.
6. To report back to our community in a timely manner about how their input was considered and influenced the outcome.
7. To use information provided by community engagement to advocate on behalf of our community to relevant parties.

These commitments are built upon the core values identified by the International Association for Public Participation (IAP2).

## **PRINCIPLES AND COMMITMENT TO COMMUNITY ENGAGEMENT**

To ensure that community engagement activities are meaningful, the following key principles are critical:

### **1. Careful Planning and Preparation**

Through adequate and inclusive planning, ensure that the design, organization, and convening of the process serves both a clearly defined purpose and needs of the participants.

### **2. Inclusion and Demographic Diversity**

Equitably incorporate diverse people, voices, ideas, and information to lay the groundwork for quality outcomes and democratic legitimacy.

### **3. Collaboration and Shared Purpose**

Support and encourage participants, government, and others to work together to advance the common good.

### **4. Openness and Learning**

Help those involved listen to each other, explore new ideas unconstrained by predetermined outcomes, apply information in ways that generate new options, and evaluate community engagement activities for effectiveness.

### **5. Transparency and Trust**

Be clear and open about the process and provide a public record of the organizers, outcomes, and range of views and ideas expressed.

### **6. Impact and Action**

Ensure each participatory effort has real potential to make a difference, and that participants are aware of that potential.

### **7. Sustained Engagement and Participatory Culture**

Promote a culture of participation with programs and institutions that support ongoing quality community engagement.

Preparation and planning ensure that the design, organization, and convening of the process clearly defines the purpose and the participant's needs.



## WHY WE ENGAGE

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Community engagement is a collaborative process that connects City Staff with the community in a mutually beneficial way by the sharing of new ideas, skills, knowledge, expertise, and experience.

Effective community engagement benefits both the City and community members. Better identifying the priorities, needs, and aspirations of the community will assist City Council and Staff to improve strategic planning and service delivery. A regular, two-way conversation ensures transparency, accountability, and an informed governing body in its decision-making process, which demonstrates integrity and builds trust within the community.

Where appropriate, community engagement should go above and beyond legislative requirements. The information and knowledge gained through hearing a range of community perspectives assist in making informed decisions, develop strong partnerships and creates sustainable outcomes.

The community also benefits from participating in engagement activities. Participating in matters that may have an impact on them can create a sense of belonging and connection, increases community involvement, unites, and empowers individuals and communities, and leads to greater community ownership and resilience.

The knowledge and experience gained also provides the City with a foundation to advocate to other relevant parties, including federal and state government bodies, on issues of community importance that are out of its direct control.

There is a broad range of benefits to effective and authentic community engagement, both to the City and to the community.

Some of the benefits include:

- 1. Increasing community involvement and connections.**
- 2. Developing strong relationships and partnerships with the community, leading to a shared understanding of community needs, aspirations, and priorities.**
- 3. Meeting legislative requirements.**
- 4. Providing a valuable source of evidence-based information that gives a wider perspective on issues and supports future planning and service delivery activities.**
- 5. By supporting transparency and accountability, integrity is demonstrated, and trust is built between all parties.**
- 6. Ensuring the community's right to assist with the democratic process.**
- 7. Ensuring informed decision-making occurs and issues are addressed.**
- 8. Helping inform and assist with advocacy.**
- 9. Leading to more sustainable outcomes.**
- 10. Building community resilience and capacity leads to community empowerment.**





## WHO WE ENGAGE

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The City of Riverside is a diverse community with a mix of people from all walks of life, with unique interest groups. Everyone has a role to play in the community, so it is important that the methods used are accessible and have a broad reach.

For the purpose of this Policy, the Riverside community is defined as individuals or groups who live, work, play, visit, study, invest in, or pass through the City. They could share a geographical location, characteristic, or interest.

The term “stakeholder” defines community groups or individuals who are directly impacted by, involved with, or interested in, the City’s decision-making, relationship-building, or community-strengthening process.

Each person within the community has the potential to be a stakeholder in the City’s community engagement activities. Throughout the engagement process we will focus our efforts to be inclusive of stakeholders and groups that provide insight on how to be more inclusive and diverse in our efforts. A list of potential partners and stakeholders are included on page twenty-six of the Community Engagement Toolkit.



## WHEN WE ENGAGE

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Community engagement will take place at the planning stage of a project or initiative or when a need arises such as a change in service, activities, or infrastructure is considered. Community engagement is likely to be undertaken at multiple stages within a project, program, or development.

### CIRCUMSTANCES THAT TRIGGER COMMUNITY ENGAGEMENT ACTIVITIES

City staff will promote opportunities for the community to actively participate in the following processes:

- Where a proposed change to activities or strategic direction may significantly affect the community in terms of the economy, lifestyle, environment, well-being, or amenity of the municipality
- When developing new or reviewing existing policies, strategies, or plans
- Introducing a new service, discontinuing an existing service, substantially changing, or reviewing a service that may significantly affect how services are provided
- Proposals for changing the way in which public space looks, is used, or enjoyed
- Planning and development of major projects and capital improvement works, including public buildings, centers, or other infrastructure
- Urban development/redevelopment proposals, such as infrastructure plans, that may significantly alter the existing amenity or characteristics of a geographical area
- Any circumstance where more information or evidence was needed to make an informed decision

## **MANDATORY ENGAGEMENT**

While the City of Riverside Administrative Manual and a range of legislation sets out minimum requirements for public involvement, each community engagement process will be considered on an individual basis. In many instances, City staff will go above and beyond the minimum requirements to gain a strong understanding of the community's vision to ensure we are achieving the best possible outcomes for the City of Riverside.

Some of these specific matters may include, but are not limited to:

- Adopting Citywide plans
- Adopting budgets
- Creating local laws
- Declaring special rates or charges
- Selling, exchanging, or leasing land
- Entering into regional agreements
- Deviating or discontinuing a road
- Making amendments to the General Plan

## **CIRCUMSTANCES WHERE COMMUNITY ENGAGEMENT WILL BE LIMITED**

There are times when the City's level of community engagement and key stakeholders will be limited. In certain circumstances, staff may only be able to inform the community and stakeholders of the decisions and actions taken.

Examples include when:

- An immediate resolution is required
- Technical or other expertise is required
- An initiative involves confidential information
- There are clear and defined legislative responsibilities that legally require compliance
- Developing or reviewing internal policies and procedures
- Emergency response is necessary
- There is a risk to public safety

## **INFLUENCING DECISION-MAKING**

Where decision-making is the purpose of a community engagement process, it must be identified that the final decision rests with the City Council.

Good governance is based on the belief that those impacted by a decision may have important contributions to make in the decision-making process. In planning a community engagement process, staff will determine at which levels they will engage and what corresponding commitment they will make to stakeholders and/or the community. This decision is likely to impact the nature and methods of community engagement.



## HOW TO ENGAGE

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There is no one-size-fits-all approach to community engagement activities. A variety of methods will be required to cater for the different purposes of community engagement, as well as a broad range of groups and individuals in the community.

### PLAN

The planning stage is critical to ensuring a successful and authentic community engagement process. During this stage we will understand, outline, and gain agreement on:

- Why we are engaging (purpose)
- What we are trying to achieve through the process (engagement objectives)
- How results will be used (engagement outcomes)
- Whom we want to engage with (stakeholder analysis)
- At what level do we wish to engage
- How we will engage (engagement methods)
- When should we engage (time frame)

During this stage, it is also important to consider the monitoring and evaluation steps that will be embedded into the process.

### DO

Those undertaking the community engagement process will do so in a non-judgmental and respectful way. They will follow the community engagement principles as outlined in the "Our Commitments" section. The following steps will be considered to ensure the activity is successful.

1. Decide on the most appropriate ways of informing the community and stakeholder groups of the planned community engagement activity.



2. Organize resources, including identifying who will conduct the community engagement activities, where meeting locations will be held, event logistics, and the supplies needed for the activity. It is also important to consider specific needs, such as transportation, childcare, and translation services.
3. Invite previously identified stakeholders to participate in the community engagement activity.
4. Provide information to participants in clear and simple terms. Use case studies or examples to assist in explaining the initiative. Provide translation services as needed.
5. Conduct community engagement activities.

## SHARE

Following the community engagement process, we will report the results and outcomes of the community engagement activity back to the community. This will be done in a timely, accessible, and informative manner so that participants understand how their involvement influenced the process, and therefore, the outcomes or decisions.

If the community engagement process is lengthy, it is important that we regularly report on the project's development to ensure that the community remains involved and engaged.

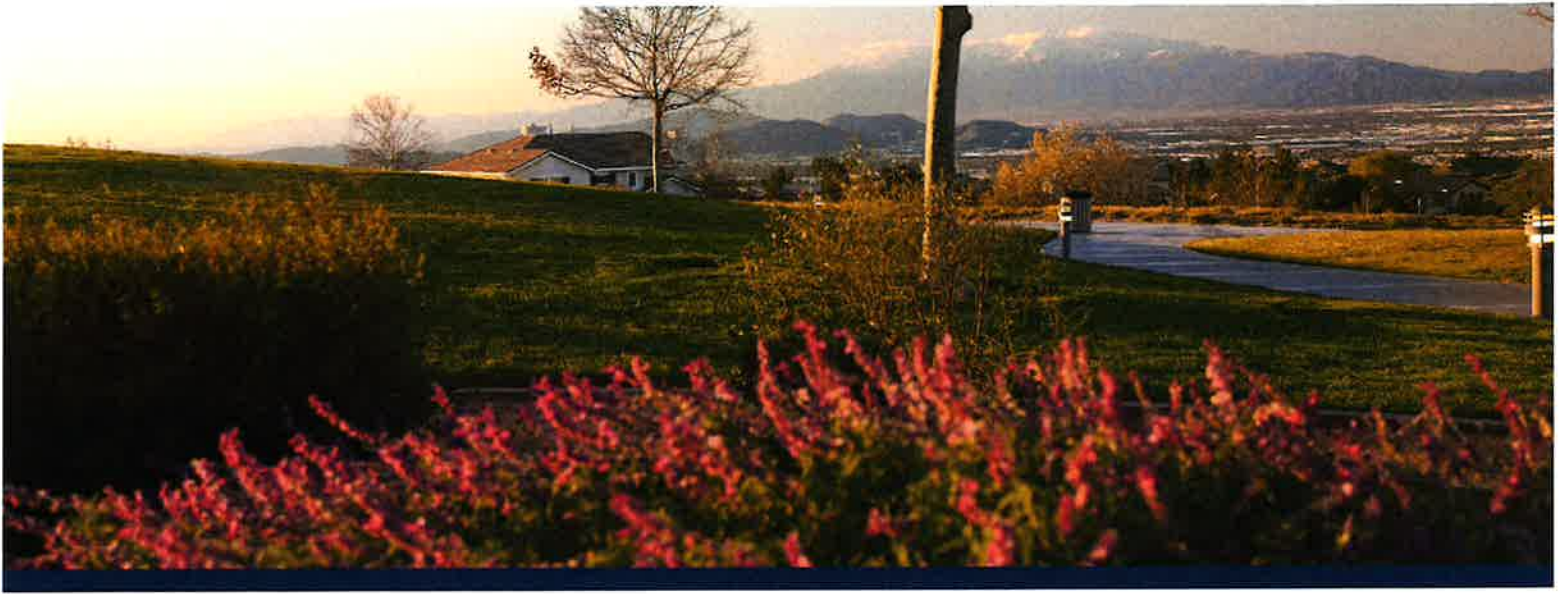
## EVALUATE

An evaluation of the community engagement process will be planned at the beginning of the project to be aware of the outcomes that will be measured. Evaluation will be continuous so that the process can be adjusted should any aspect need refinement. After completion, the community engagement process will be reviewed to ensure we understand what happened and why. We will objectively reflect on what did and didn't work. We will prepare an evaluation report to share observations and recommendations.

## IMPROVE

We will take the lessons learned throughout the project, capturing them in an accessible format. Ideas for improvement of the community engagement process will be shared across the organization and will aid in informing future versions of this policy, as well as the City's broader community engagement framework.





## SUPPORTING INFORMATION

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The International Association for Public Participation (IAP2) is an international organization advancing the practice of public participation. The IAP2 framework is underpinned by seven core values that are aimed at ensuring organizations make better decisions that reflect the interests and concerns of potentially affected people and entities.

These values are:

1. Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.
2. Public participation includes the promise that the public's contribution will influence the decision.
3. Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including the decision-makers.
4. Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
5. Public participation seeks input from participants in designing how they participate.
6. Public participation provides participants with the information they need to participate in a meaningful way.
7. Public participation communicates to participants how their input affected the decision.

## ROLES AND RESPONSIBILITIES

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Community engagement is the responsibility of all City Departments as appropriate to their role and functions. Engaging the community should be a core process considered by staff in the delivery of services, development of projects, or building relationships.

## RELATIONSHIP TO THE ENVISION RIVERSIDE 2025 STRATEGIC PLAN

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Community engagement processes support the delivery of all outcome areas identified in the Envision Riverside 2025 Strategic Plan. The principles and processes of community engagement outlined in this policy are aligned with the Strategic Plan's Vision and Mission.

## VISION

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Riverside is a city where every person is respected and cherished, where equity is essential to community well-being, where residents support one another, and where opportunities exist for all to prosper. In Riverside, everyone comes together to help the community, economy, and environment reach their fullest potential for the public good.

## ENVISION RIVERSIDE 2025 MISSION

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The City of Riverside is committed to providing high-quality municipal services to ensure a safe, inclusive, and livable community.

## RELATED KEY GOALS

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### **Arts, Culture & Recreation:**

1.1: Strengthen Riverside's portfolio of arts, culture, recreation, senior, and lifelong learning programs, and amenities through expanded community partnerships, shared use opportunities, and fund development.

### **Community Well-Being:**

2.2: Collaborate with partner agencies to improve household resiliency and reduce the incidence and duration of homelessness.

2.3: Strengthen neighborhood identities and improve community health and the physical environment through amenities and programs that foster an increased sense of community and enhanced feelings of pride and belonging citywide.

2.4: Support programs and innovations that enhance community safety, encourage neighborhood engagement, and build public trust.

2.5: Foster relationships between community members, partner organizations, and public safety professionals to define, prioritize, and address community safety, and social service needs.

### **Economic Opportunity:**

3.1: Facilitate partnerships and programs to develop, attract and retain innovative business sectors.

3.2 : Work with key partners in implementing workforce development programs and initiatives that connect local talent with high-quality employment opportunities and provide access to education and training in Riverside.

3.4: Collaborate with key partners to implement policies and programs that promote local business growth and ensure equitable opportunities for all.

### **High-Performing Government:**

5.3: Enhance communication and collaboration with community members to improve transparency, build public trust, and encourage shared decision-making.

# POLICY CONTROL SCHEDULE

|   |   |  |   |
|---|---|--|---|
| <b>Policy Title:</b><br>Citywide Community Engagement Policy  |   | <b>Policy Number:</b><br>TBD               | <b>Policy Type:</b><br>City Council Policy<br>and toolkit |
| <b>Policy Creation Date:</b><br>April 2021  | <b>Current Version Adopted by City Council:</b><br>TBD                          | <b>Current Version number:</b><br>03       | <b>Policy Review Date:</b><br>May 16, 2023                |
| <b>Parent Policy:</b><br>None   | <b>Policy responsibility:</b><br>Community & Economic Development<br>Department |  | <b>Resolution Number:</b><br>TBD                          |
| <b>Revised by: Neighborhood Engagement Division</b><br>Agueda Padilla, Division Manager<br>Amaris Gonzalez, Project Coordinator<br>Jesus Noriega, Project Assistant |   | <b>Revised date:</b><br>September 22, 2023 |   |





Community Development  
Department  
Planning Division

*City of Arts & Innovation*

January 30, 2024

Dan Fairbanks  
Planning Director  
Development Services Department – Planning  
14205 Meridian Parkway, Ste. 140  
Riverside, CA 92518

**Subject: City of Riverside's Review of GP 23-02: March JPA Environmental Justice Element**

Dear Mr. Fairbanks:

Thank you for the opportunity to comment on the preparation of March JPA's Environmental Justice Element.

The City of Riverside (City) has reviewed the draft Environmental Justice Element, and would like to provide the following comments:

Community and Economic Development Department – Planning Division:

**Section – Civic Engagement**

**Policies:**

- Environmental Justice Policies HC 15.1 – 15.3:
  - Civic Engagement is interwoven within the Planning process for good reason. Effective engagement benefits both the agency and its constituents and stakeholders, and better identifying the priorities, needs, and aspirations of the community enables the agency to improve strategic planning and service delivery. A regular, two-way conversation ensures transparency, accountability, and an informed governing body in its decision-making process, which demonstrates integrity and builds trust within the community. It is important for community members to feel empowered to share their vision for any given planning area. In general, the civic engagement policies reflect this. Still, there is room to strengthen policies HC 15.1 – 15.3 by consolidating into a singular policy with clear, meaningful, and achievable goals. We encourage the Authority to review the City's [Citywide Community Engagement Policy](#) and associated [Engagement Toolkit](#) as a potential resource.

**Section – Health Risk Reduction**

**Pollution Exposure Policies:**

- Environmental Justice Policy HC 16.5:
  - While the policy does specify that sensitive receptors should be located away from polluting sources, the inverse is not true. The policy states that polluting land uses should evaluate compatibility with surrounding sensitive receptors but does not

stipulate that future polluting land uses be oriented away from sensitive receptors. This language should be revised to promote siting new development that may be harmful away from sensitive receptors.

- Environmental Justice Policy HC 16.6:
  - The policy articulates that new warehousing and distribution, and large logistics projects should address the Good Neighbor Policy for Logistics and Warehouse/Distribution adopted by the Riverside County Board of Supervisors. The City agrees that future warehousing projects should abide by the Good Neighbor Policy guidelines adopted by Riverside County, but the environmental justice policy should expand this requirement to include that future development projects also achieve consistency with Good Neighbor Policies adopted by surrounding jurisdictions which abut March JPA. Since Riverside County's adoption of a Good Neighbor Policy in November 2019, several jurisdictions neighboring March JPA have either adopted or modified Good Neighbor Policies. The City most recently modified the in November 2020 and is in the process of evaluating whether further changes are needed based on community feedback. The City of Perris adopted its in September 2022 which similarly emphasize protecting sensitive receptors from these uses. It is important that the environmental justice policy encompass and plan for continued changes to not only Riverside County's Good Neighbor Policy but also policies of surrounding jurisdictions. Lastly, the policy should be amended to require that new logistics and warehousing development projects not only address the Good Neighbor Policies but require that the project meet the development and design requirements established therein. Modification of project plans should be required as necessary.

The City of Riverside appreciates your consideration of the comments provided in this letter. Should you have any questions regarding this letter, please contact me at (951) 826-5944, or by e-mail at [mtaylor@riversideca.gov](mailto:mtaylor@riversideca.gov).

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

Sincerely,



Matthew Taylor  
Principal Planner

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

Phaedra Norton, City Attorney



## Roxanne Corona

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**From:** Vicki Broach <vbroach55@gmail.com>  
**Sent:** Monday, February 05, 2024 1:43 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,

I am writing for a second time to offer my comments on this project. I am concerned in particular about the EJ elements that were not addressed in the previous DEIR. I am a community member who lives a few miles from the project I attend concerts and events at Westmont Village. I know many of the residents and my mother has considered moving there in the next few years. If the warehouse project is approved, I would certainly discourage her and others from moving to Westmont. Riverside already struggles from a lack of suitable senior housing and this project threatens to cause a significant negative impact to one of the few senior communities of Westmont's caliber.

As a former judicial staff attorney who is familiar with CEQA law, I find it problematic that the EJ considerations were not included originally and therefore have not been scrutinized as part of the full CEQA process. It would be appropriate to implement a warehouse moratorium until the CEQA process is complete. Only after you've completed that process should you evaluate whether the current project plan meets its standard.

As the Riverside community has asked continually for over a year, please consider alternative, non-industrial uses for the West Campus Upper Plateau.

Sincerely,

Vicki Broach, Esq.  
92506



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.

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.

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 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

<https://friendsofriversideshills.org>

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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.

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 in conjunction 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 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.

Sincerely,



Gurumantra Khalsa

President, Friends of Riverside's Hills

<https://friendsofriversideshills.org>

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Riverside, CA 92507-4873

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

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?

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](http://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. 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 14<sup>th</sup> 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.

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.

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

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.

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 sunseting 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

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?

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  
Riverside, CA 92508  
jsydor@yahoo.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.

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.

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.
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 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 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 sunseting 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.

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.

Sincerely,

**Board of Directors  
Riverside Neighborhood Partnership**



## SAN GORGONIO CHAPTER

*Moreno Valley Group*

<https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>

Attorney General (AG) best practices for implementing Environmental Justice (EJ) elements

Mr. Dan Fairbanks,

February 12, 2024

RE: Sierra Club comments March Joint Powers Authority (JPA) Draft Environmental Justice Element(EJE).

The Sierra Club appreciates the opportunity to provide some thoughts and comments on the March Joint Powers Authority's (JPA) own Environmental Justice Element (EJE) to meet the recommendations of Senate Bill (SB) 1000 that went into effect in 2018. During the past six years the JPA should have been putting in the work to craft a very specific plan that is designed to meet the needs of the communities they could impact with their decisions. These needed to be direct, indirect, cumulative and growth inducing impacts. The Sierra Club believes this document is inadequate in addressing all of these impacts to not only those within the JPA's Planning Area Boundaries as shown in Exhibit-7, but also beyond it with the movement and pollution of toxic diesel trucks. Your own map of Senate Bill (SB) 535 Disadvantaged Communities shown in red makes it very evident that not only your entire area, but also much of the adjacent areas meet the criteria of Disadvantage Communities. Therefore this document must also address these adjacent communities whose pollution burdens are increased by actions of the JPA.

This Draft EJE needed to be specifically tailored for not only the lands within your boundaries, but also adjacent communities who suffer because of your actions. It is quite apparent that this was not done, but instead the work by another agencies was copied and passed off as the work of the JPA. This can be seen in the following:

"HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the **Salton Sea** and other bodies of water that impact air quality and water quality and seek and pursue opportunities to address impacts to the maximum extent possible, and make public the data and other information related to the status of the effort."



"HC 16.22 Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum extent possible thereby minimizing contaminated infiltration and runoff, including runoff to the **Salton Sea** and other standing bodies of water."

The Salton Sea mentioned above is at least 100 miles away for the Disadvantaged Communities in which this EJE is supposed to address and serve. It is as if the JPA hired someone who doesn't know our area and they passed off this document as a work product for lands in Exhibit -7. How is the Salton Sea impacting "water quality" for this area and how is this area causing "runoff to the Salton Sea"? The Sierra Club sees this as a major issue that cast doubt on validity of the entire Draft EJE document. We therefore strongly recommend that the entire current Draft Environmental Justice Element (EJE) be rescinded and a new one be developed that closely models the Attorney General's (AG) Best Practices for implementing Senate Bill (SB)1000 which "promotes environmental justice through local land use planning" (Page 2 AG Best Practices SB 1000 found in the first link).

The following four paragraphs come from the Attorney General's (AG) Best Practices for implementing Senate Bill (SB)1000 that the current Draft EJE fails to utilize and implement which makes it inadequate to meet the needs of the Disadvantage Communities it must protect and serve:

"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." (page 13 AG Best Practices SB 1000 first link)

"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." (Page 13 AG Best Practice SB 1000 first link)

"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." ( Page 14 AG Best Practices SB1000 first link)

“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.”** (page 14 AG Best Practices SB 1000)

Your own document reads as follows: "The goal of the Environmental Justice Element is to **ensure the consideration** of environmental justice policies, in order to improve public health and the environment within the March JPA Planning Area." Please note you are to IMPROVE PUBLIC HEALTH AND THE ENVIRONMENT. The document, however, includes the ambiguous words **“ensure the consideration”** which the AG Best Practices states you must avoid because it is vague and requires nothing.

It is with that lens of the AG’s Best Practices that all aspects of the Environmental Justice Element (EJE) needs to be developed, written and evaluated. What is presented in this EJE is ambiguous, vague and doesn’t improve public health or the environment and therefore is inadequate.

We took large portions of the Health Risk Reduction element of the document found below as an example to show how the entire EJE uses ambiguous words which are not "complete, specific, concrete, and targeted". They are also not “binding”, and fail to "use mandatory language" as well as fails to "contain implementation measures".

### **Health Risk Reduction**

'This category includes policies that work towards reducing unique and compounded health risks. The following policies address pollution exposure and access to food and **encourage** safe and sanitary homes and an environment conducive to engaging in physical activity.'

HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the Salton Sea and other bodies of water that impact air quality and water quality and **seek and pursue opportunities** to address impacts to the **maximum extent possible**, and make public the data and other information related to the status of the effort.

HC 16.2 **Pursue funding and other opportunities** from state, federal, and local government and non- government sources and allocate March JPA general funds to improve public health and limit pollution exposure and promote efforts to ameliorate environmental justice constraints in environmental justice communities.

HC 16.3 **Assist communities in seeking funding** for community initiated clean air projects including the installation of on-site air monitoring equipment in areas of high exposure to air contaminants.

HC 16.4 **Pursue funding** to connect low-income residents and communities to municipal water and wastewater services. In the interim, **seek financial assistance** for septic system repair in order to limit groundwater contamination by poorly maintained septic systems or to provide for connections to wastewater systems as a viable alternative if such systems can be made readily available.

HC 16.5\* **Evaluate** the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. 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.

HC 16.6\* When developing and siting large scale logistics, warehouse and distribution projects, **address** the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019 and as may be subsequently amended.

HC 16.9 **Explore the feasibility** of creating a partnership with the South Coast Air Quality Management District (SCAQMD) to establish a mitigation program to reduce the impact of air pollution as well as assist with the implementation of air quality programs.

HC 16.11 Implement development of bicycle and pedestrian facilities to reduce dependency on fossil fuel-based transportation and **pursue funding** to implement mobility plans and projects.

HC 16.14\* Assure that sensitive receptors are separated and protected from polluting point sources, **as feasible**, including agricultural businesses that produce or use pesticides and chemical fertilizers.

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 through the use of barriers, distance, or similar solutions or measures from emission sources **when possible**.

HC 16.19 **Promote** reduction of vehicle miles traveled (VMT) by **encouraging** expanded multi-modal facilities, linkages between such facilities, and services that provide transportation alternatives, such as transit, bicycle and pedestrian modes.

HC 16.20 Facilitate an increase in transit options. In particular, coordinate with adjacent municipalities, transit providers and regional transportation planning agencies in the

development of mutual policies and funding mechanisms to increase the use of alternative transportation modes. All new development **should** contribute and invest in increasing access to public transit and multimodal active transportation infrastructure.

HC 16.22\* **Discourage** industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and **encourage** agricultural businesses to limit and **reduce the production and use of pesticides and chemical fertilizers to the maximum extent possible thereby minimizing contaminated infiltration and runoff, including runoff to the Salton Sea and other standing bodies of water.**

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.

HC 16.24\* Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria **addressing** noise, land, traffic and greenhouse gas emissions to avoid or **minimize** creating adverse conditions for adjacent communities.

The **bold oblique** words found above are examples of the problem with ambiguous wording throughout the entire Draft Environmental Justice Element (EJE) and shows another reason the entire document is inadequate to "improve public health and the environment".

The Sierra Club again strongly recommends the March Joint Powers Authority (JPA) rescind the current Draft Environmental Justice Element (EJE) for all the reasons listed above. The new version must closely model and adhere to the Attorney General's (AG) Best Practices for implementing Senate Bill (SB)1000 that "promotes environmental justice through local land use planning" (Page 2 AG Best Practices SB 1000 found in the first link). It must also be specifically tailored for not only the lands within your boundaries, but also adjacent communities who suffer additional pollution burdens because of your actions. It is quite apparent this was not done in this Draft EJE, but instead large portions of the work by another agencies was copied and passed off as the work of the March JPA. If we had more time, we could probably find where Policies HC 16.1 and HC 16.22 concerning the Salton Sea were originally used.

We also find it difficult to understand how the March JPA can justify approving one warehouse after another since the implementation of SB 1000 in 2018 without having an approved Environmental Justice Element. This is especially troubling since your entire area is designated a Disadvantaged Community as is much of the adjacent lands. Any proposals for more warehousing must be paused until there is an approved EJE which meets the recommendations we shared above.

Please keep the Sierra Club as well as myself informed of any documents and meetings related to the March Joint Powers Authority (JPA) Draft Environmental Justice Element (EJE).

Sincerely,

George Hague

Sierra Club

Moreno Valley Group

Conservation Chair

P.O. Box 1325

Moreno Valley, CA 92556-1325



Jennifer Larratt-Smith, Chair  
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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.

#### **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

—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



Justice (DOJ)?<sup>1</sup> 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,<sup>2</sup> 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:

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<sup>1</sup> California Department of Justice's Best Practices for EJ policies:

<https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>

<sup>2</sup> 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.

### **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.”<sup>3</sup>

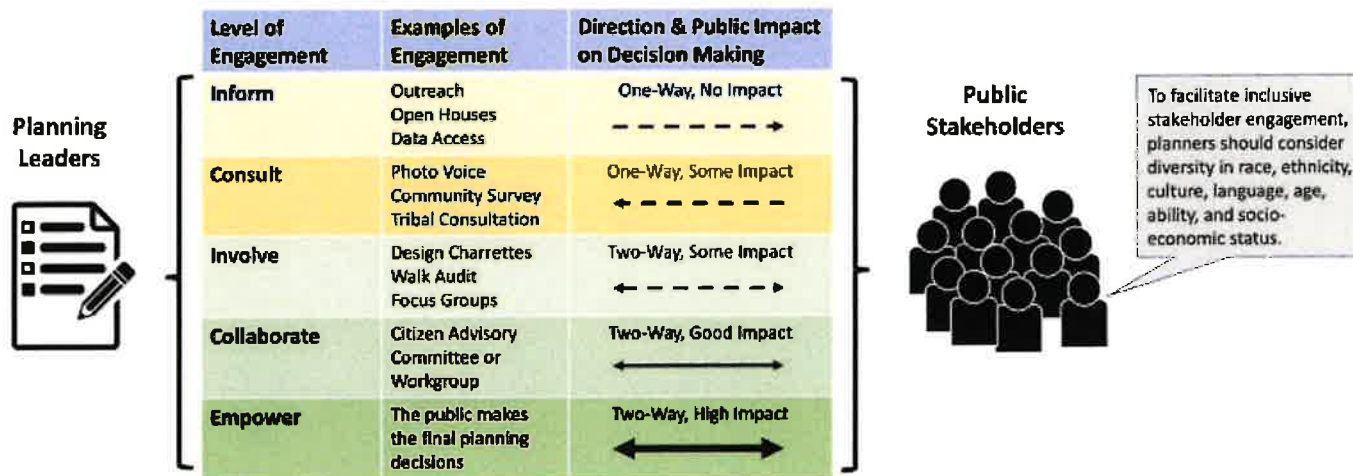
In the document they also provide a figure showing a spectrum of levels of community engagement:<sup>4</sup>

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<sup>3</sup> 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](https://opr.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf)

<sup>4</sup>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

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

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?

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.

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.<sup>5</sup> 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.

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

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<sup>5</sup> 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.<sup>6</sup> 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.<sup>7</sup> 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.<sup>8</sup> The Committee incorporated community feedback obtained at these meetings to prioritize next steps.

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<sup>6</sup> 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)

<sup>7</sup> Report:

<https://riversideca.legistar.com/View.ashx?M=F&ID=11482653&GUID=4CEADEDCEB30-4EDB-9AF1-490A80BC14DA>

<sup>8</sup> 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.<sup>9</sup>

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.<sup>10</sup> 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.

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<sup>9</sup> Report:

<https://riversideca.legistar.com/View.ashx?M=F&ID=12081908&GUID=30A6D156-5E9C-4CC4-8F24-5600ADF90DEE>

<sup>10</sup> 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.

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.

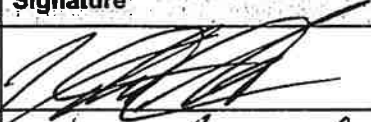

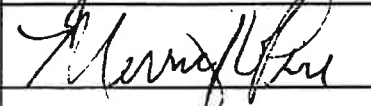
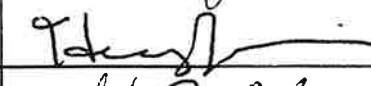


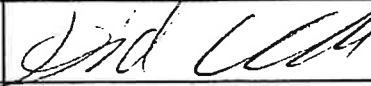
Thank you for the opportunity to provide comments on this General Plan amendment. Please feel free to contact me with any questions.

Sincerely,

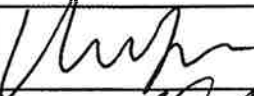
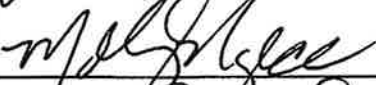
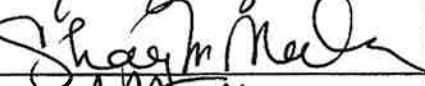

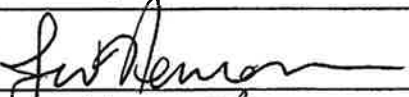






A handwritten signature in black ink that reads "Jennifer Larratt-Smith". The signature is written in a cursive, flowing style with a long horizontal flourish extending to the right.

Jennifer Larratt-Smith





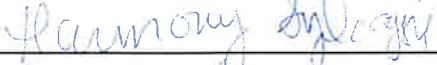





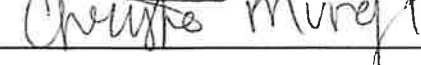
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| First and Last Name | Signature   | Community (WV, GA, VV) |
|---------------------|---|------------------------|
| Victor Capacate     |    | GA                     |
| ERNIE ROUY          |    | VV Veterans Village    |
| Wayne Jones         | Wayne Jones   | VV                     |
| William Bell        | Wm. Bell  | GA / VV                |
| John Collins        | John Collins  | GA / VV                |
| Merrick Price       |  | MVV                    |
| HENRY MARIN         |  | MVV                    |
| ROBERT ELKINS       | Robert B. Elkins  | MVV                    |
| ARTHUR BEAUREGARD   |  | MVV                    |
| ARTHUR JENSEN       |  | MVV                    |
| Carroll Turner      | Carroll Turner  | V.V.                   |
| David Cleveland     |  | MVV                    |
| Alvin Jones         | al Jones  | MVV                    |
|                     |   |                        |




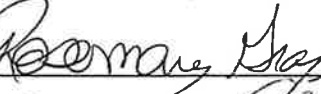
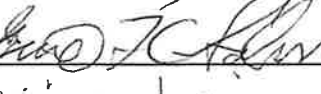
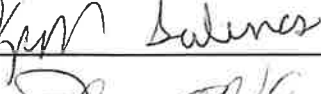


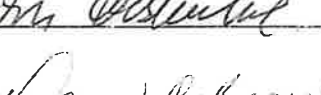
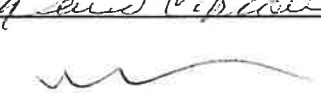


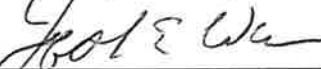

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| First and Last Name | Signature  | Community (WV, GA, VV) |
|---------------------|--|------------------------|
| WILLIAM LANDA       |     | Green Acres            |
| Molly Nix           |    | Green Acres            |
| Shayne Meder        |    | Green Acres            |
| SCOTT F. DONNELL    |    | GREEN ACRES            |
| JERRY W. NEWMAN     |   | GREEN ACRES            |
| ROTHMANE NEWMAN     |  | GREEN ACRES            |
| Stan Gray           | STAN GRAY  | Green                  |
| Harold Anderson     |   | Green Acres            |
| RUBEN MESTIA        |   | GREEN ACRES            |
| Stephanie Bates     |   | Green Acres            |
| Brian Ratt          |  | Green Acres            |
| Sam Baird           |  | Green Acres            |
|                     |  |                        |
|                     |  |                        |

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| First and Last Name | Signature  | Community (WV, GA, VV) |
|---------------------|--|------------------------|
| Brandi Anthony      |     | Green Acres            |
| Jacob Anthony       |     | GA                     |
| Jennifer Jordan     |    | Green Acres            |
| Lernie Shaw         |     | G.A.                   |
| Harmony Szilagyi    |  | Green Acres            |
| Sean Szilagyi       |   | Green Acres            |
| Serena Correa       |   | Green Acres            |
| María I. CORREA     |  | Green Acres            |
| Tyler Spriet        |  | Green Acres            |
| Anthony Hughes      |  | Green Acres            |
| Christie Mureyt     |  | Green Acres            |
|                     |  |                        |
|                     |  |                        |
|                     |  |                        |

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| First and Last Name | Signature  | Community (WV, GA, VV) |
|---------------------|--|------------------------|
| Kickey Fant         |             | MW                     |
| <del>Forrest</del>  | <del></del> | <del>MW</del>          |
| Michael Nesbitt     |             | VV                     |
| Rosemary Grafton    |             | MVV                    |
| Gino SALINAS        |            | MVV                    |
| Kim Salinas         |           | MVV                    |
| PETER Wilson        |           | MW                     |
| JUAN FIGUEROA       |           | MW                     |
| Joni Constantine    |           | VV                     |
| DAVID C. BROWN      |           | VV                     |
| Pete Russo          |           | VV                     |
| Sim Cannizzaro      |           | VV                     |
| David Schenk        |           | MVV                    |
| Joseph Ewings       |           | MVV                    |



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| First and Last Name | Signature | Community (WV, GA, VV) |
|---------------------|-----------|------------------------|
| CHRIS STOCK         |           | ORANGECREST            |
| John Seth           |           | VV                     |
| Russell Thornton    |           | VV                     |
| Jean O'Brien        |           | MVV                    |
| JAMES ANDREW        |           | MU                     |
| STEVEN NEUBAUER     |           | MUV                    |
| JOSEPH CANINO       |           | MUV                    |
| JEFF ALEXANDER      |           | MVV                    |
| Wendy Myers         |           | mo Val resident        |
| Louis Edgeron       |           | MVV                    |
| David Cleveland     |           | MUV                    |
| William A. Hardesty |           | MVV                    |
| ROBERT THORNTON     |           | MVV                    |
| Jean O'Brien        |           | MVV                    |




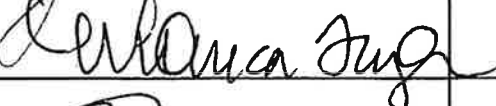




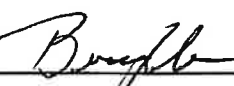
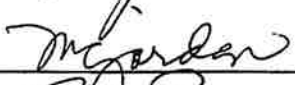
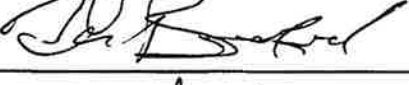


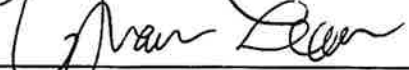
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duplicate

| First and Last Name      | Signature              | Community (WV, GA, VV) |
|--------------------------|------------------------|------------------------|
| <del>WILLIAM LANGA</del> | <del>[Signature]</del> | <del>Green Acres</del> |
| Shirley Raiford          | [Signature]            | Green Acres            |
| Anne Smith               | [Signature]            | Green Acres            |
| Chris Smith              | [Signature]            | GREEN ACRES            |
| Kristin Martin           | [Signature]            | Green Acres            |
| Aubrey Martin            | [Signature]            | Green Acres            |
| CORNELIA DAVIS           | Cornelia Davis         | GREEN ACRES            |
| Sharon Zamora            | [Signature]            | Green Acres            |
| Ana Azmitia              | [Signature]            | Green Acres            |
| Victor Dominguez         | [Signature]            | Green Acres            |
| GARY RYSSO               | [Signature]            | GREEN ACRES            |
| Linda Kocian             | [Signature]            | Green Acres            |
| Jon Kocian               | Jon Kocian             | Green Acres            |
| Marvin Miller            | [Signature]            | Green Acres            |



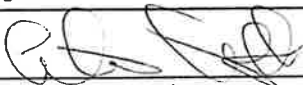
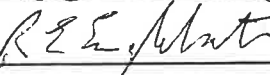

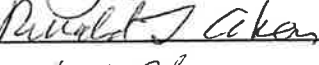
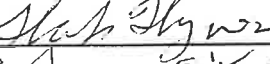
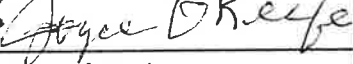



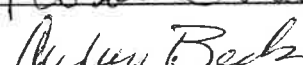
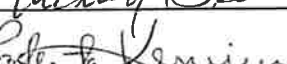


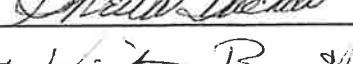
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|---------------------|--|------------------------|
| Lafayette Jones     |    | GA                     |
| Carol Aguirre       |     | WV                     |
| Jennifer Reynolds   |    |                        |
| Monica Taylor       |   |                        |
| FABRIZIA ABOU       |   |                        |
| Nancy Kirchmann     |   |                        |
| TERRY ALCOCK        |   |                        |
| Noemi DeLeon        |  |                        |
| Bruce Jordan        |   |                        |
| Marietta Jordan     |   |                        |
| Alex Bradford       |  |                        |
| Diana Martinez      |  |                        |
| Castro Richard A    |  |                        |
| Leon, Juan          |  |                        |

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| First and Last Name | Signature         | Community (WV, GA, VV) |
|---------------------|-------------------|------------------------|
| RITA SOLANCA        | Rita Solanca      | Westmont Village       |
| CAROL WICKER        | Carol Wicker      | W.V.                   |
| RUTH BLATTNER       | Ruth Blattner     | W.V.                   |
| Janette Agostini    | Janette Agostini  | WV                     |
| BEVERLY SHORT       | Beverly Short     | WV                     |
| NORM GIBBS          | Norman Gibbs      | WV                     |
| SHARON BIVINS       | Sharon L Bivins   | WESTMONT VLG           |
| John March          | John March        | WV                     |
| E.D. Bartel         | E. D. Bartel      | WV                     |
| Edwin Peterse       | Edwin Peterse     | WV                     |
| SONNIE BUCKMAN      | Sonnice Buckman   |                        |
| CHUCK SENNEWOLD     | Chuck Sennewold   | WV                     |
| ROBERT CURROW       | Robert Currow     | W.V.                   |
| JENNIFER FREYBURG   | Jennifer Freyburg | W.V.                   |

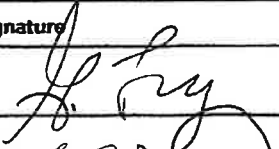
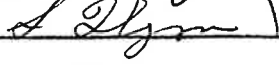
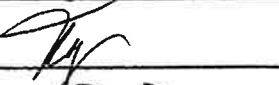
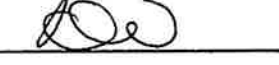


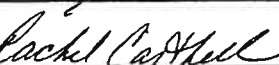
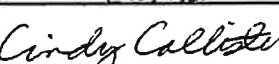
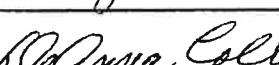
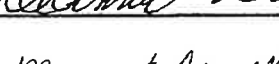
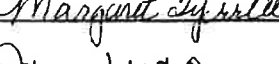
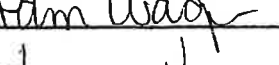

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|---------------------|--|------------------------|
| ESTER GILBON        |     | WV                     |
| Ron Englebrats      |     | WV                     |
| Kay Younger         |    | W.V.                   |
| RON AKERS           |     | WV                     |
| Shahin Ikezawa      |     | WV                     |
| Joyce O'Keeffe      |    | 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                     |

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| First and Last Name          | Signature                           | Community (WV, GA, VV) |
|------------------------------|-------------------------------------|------------------------|
| Christina Miller             | <i>Christina Miller</i>             | Westmont Village       |
| Diane West                   | <i>Diane West</i>                   | WV                     |
| DAN WALDO                    | <i>Dan Waldo</i>                    | WV                     |
| Martina Waldo                | <i>Martina Waldo</i>                | WV                     |
| Adlene Louino                | <i>Adlene Louino</i>                | WV                     |
| Charles Hale                 | <i>Charles Hale</i>                 | WV                     |
| Marica Tennell               | <i>Marica Tennell</i>               | WV                     |
| Bill Salazar                 | <i>Bill Salazar</i>                 | WV                     |
| TED GOERKES                  | <i>Ted Goerkes</i>                  | WV                     |
| MARGARET TYRRELL             | <i>Margaret Tyrrell</i>             | WV                     |
| RICHARD SHORT                | <i>Richard Short</i>                | WV                     |
| SUSAN E. VOLASCO             | <i>Susan E. Volasco</i>             | WV                     |
| Deborah McManigal            | <i>Deborah McManigal</i>            | WV                     |
| <del>ROBERT CARMICHAEL</del> | <del><i>Robert Carmichael</i></del> | <del>WV</del>          |

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| First and Last Name       | Signature   | Community (WV, GA, VV) |
|---------------------------|---|------------------------|
| GAYLYNN TRAY              |    | WESTMONT VILLAGE       |
| Sherry Ikezawa<br>Ikezawa |    | Westmont               |
| Cornelia                  | 318 E   |                        |
| Kilda Ginz                |    | Westmont               |
| Dan WALDE                 |    | WESTMONT               |
| PAM Shea                  |    | Westmont               |
| MARY LOU GREEN            |   | Westmont               |
| RACHEL CARHELL            |  | Westmont (WV)          |
| Cindy Callister           |  | Westmont               |
| DEANNA COLLINS            |  | Westmont               |
| MARGARET TYRREU           |  | Westmont               |
| PAM WAGNER                |  | Westmont               |
| Doris Higa                |  | Westmont               |
| Albert DeLore             |  | WESTMONT               |

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| First and Last Name | Signature   | Community (WV, GA, VV) |
|---------------------|-------------|------------------------|
| Sylvia Briskin      | [Signature] | Westmont               |
| Nancy Tourville     | [Signature] | Westmont               |
| Amy Hanigan         | [Signature] | ✓                      |
| Doris Weinger       | [Signature] | ✓                      |
| Grace Sylvestre     | [Signature] | WV                     |
| Eleanor Magi        | [Signature] | ✓                      |
| Lea Sachsel         | [Signature] | WHRV                   |
| RICHARD CALLISTER   | [Signature] | WESTMONT               |
| VERA MADISON        | [Signature] | WESTMONT               |
| MARY JONES          | [Signature] | W.V                    |
| Kay Stump           | [Signature] | Westmont               |
| SUSAN HILL          | [Signature] | Westmont               |
| Glenda Willison     | [Signature] | Westmont               |
| Carolyn DeCourse    | [Signature] | Westmont               |







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<sup>1</sup>. A paid consultant drafted the EJ element with no input from community members (or even notification that an EJ element was under consideration), no agendaized review by the MJPA Technical Advisory Committee, and no agendaized 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.

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<sup>2</sup>, assumed 1999 date – last updated 3/07/2023 (General Plan, 1999)

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<sup>1</sup> [https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification\\_.pdf](https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification_.pdf)

<sup>2</sup> [https://www.marchjpa.com/documents/docs\\_forms/general\\_plan\\_update\\_02172022.pdf](https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf)

- County of Riverside General Plan, Healthy Communities Element (Revised September 2021)<sup>3</sup>
- SB 1000 Implementation Toolkit: Planning for Healthy Communities (2018) – California Environmental Justice Alliance and PlaceWorks<sup>4</sup>
- Best Practices for Implementing SB 1000 (2023)– California Department of Justice<sup>5</sup>
- CalEnviroScreen4.0<sup>6</sup> 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-5, December 27, 2023 (REIR)
- City of Riverside EJ policies<sup>7</sup>
- City of Moreno Valley EJ policies<sup>8</sup>
- City of Perris EJ policies<sup>9</sup>

## 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 98<sup>th</sup> percentile impact census tract and being adjacent to a 99<sup>th</sup> 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** – 98<sup>th</sup> 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 80<sup>th</sup> percentile rank are shown in **Table 1**.

**Table 1.** CalEnviroScreen4.0 scores for individual pollution and population characteristics above the 80<sup>th</sup> percentile in the March JPA census tract. Data from CalEnviroScreen4.0 (released 2021).

| Tract      | variable  | Percentile rank (0-100) | Description                                    |
|------------|-----------|-------------------------|--|
| 6065046700 | ClScoreP  | 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           |

<sup>3</sup> <https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-Ch10-HCE-092121.pdf>

<sup>4</sup> <https://caleja.org/2017/09/sb-1000-toolkit-release/>

<sup>5</sup> <https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>

<sup>6</sup> <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

<sup>7</sup> [https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/2021/Housing\\_Element/2021-09%20EJ%20-%20City%20Council%20Draft.pdf](https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/2021/Housing_Element/2021-09%20EJ%20-%20City%20Council%20Draft.pdf)

<sup>8</sup> <https://moval.gov/cdd/documents/general-plan-update/draft-docs/GP-Elements/08.pdf>

<sup>9</sup> <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 98<sup>th</sup> percentile high ozone pollution and groundwater pollution (PFAS spills, see hazards letter). Communities are exposed to 80<sup>th</sup>+ 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 8<sup>th</sup> 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 **99.8<sup>th</sup>** 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 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.

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<sup>10</sup>. 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

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<sup>10</sup> [https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification\\_.pdf](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<sup>11</sup>. 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)

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<sup>11</sup> <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. ‘14<sup>th</sup> 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.

*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 policies 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.

- 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 MIPA 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 MIPA 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 MIPA 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 MIPA fund and build the 48-60 acre park that the MIPA agreed to build 21 years ago. That is achievable, targeted, specific to the agency, and concrete.

### Promote Food Access

I ask that the MIPA establish at least one grocery store or health food option within its planning area. To date 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 MIPA 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 MIPA communities. The warehouse moratorium would achieve that goal.

## Summary

Warehouse land use in the MIPA planning area disproportionately added to the burden of MIPA communities. MIPA staff continue to pursue an industrial land-use policy with minimal mitigation measures. MIPA 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

Mr. CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE  
"Bringing People Together to Improve Our Social and Natural Environment"

February 15, 2024

March Joint Powers Authority  
14205 Meridian Parkway, Suite 140  
Riverside, CA 92518  
Submitted via email to [fairbanks@marchjpa.com](mailto:fairbanks@marchjpa.com).

Re: March JPA Draft Environmental Justice Element

Dear Mr. Fairbanks,

This letter is in response to the Draft Environmental Justice Element which has been made available for review and comment. Please see Table 1 for our comments on the proposal.

Sincerely,



Marven E. Norman  
Policy Coordinator

*CCA EJ* is a long-standing community based organization with over 40 years of experience advocating for stronger regulations through strategic campaigns and building a base of community power. Most notably, *CCA EJ*'s founder Penny Newman won a landmark federal case against Stringfellow Construction which resulted in the 'Stringfellow Acid Pits' being declared one of the first Superfund sites in the nation. *CCA EJ* prioritizes community voices as we continue our grassroots efforts to bring lasting environmental justice to the Inland Valley Region.

**Mailing Address**  
PO Box 33124  
Jurupa Valley, CA 92519  
[www.ccaej.org](http://www.ccaej.org)

MCENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

"Bringing People Together to Improve Our Social and Natural Environment"

Table 1: CCAEJ comments on select proposed EJ policies.

| Policy   | Current  | Notes or suggestion  |
|----------|--|--|
| HC 16.11 | Implement development of bicycle and pedestrian facilities to reduce dependency on fossil fuel-based transportation and pursue funding to implement mobility plans and projects.   | Implement development of <b>low-stress</b> bicycle and pedestrian facilities to reduce dependency on fossil fuel-based transportation and pursue funding to implement mobility plans and projects.   |
| HC 16.12 | Plan and implement complete streets which include sidewalks, greenbelts, and trails to facilitate use by pedestrians and bicyclists where such facilities are well separated from parallel or cross through traffic to ensure pedestrian and cyclist safety and rehabilitate/expand existing to achieve same of similar design features. | Plan and implement complete streets which include sidewalks, greenbelts, <b>separated bikeways</b> , and trails to facilitate use by pedestrians and bicyclists where such facilities are well separated from parallel or cross through traffic to ensure pedestrian and cyclist safety and rehabilitate/expand existing to achieve same of similar design features.   |
| 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 through the use of barriers, distance, or similar solutions or measures from emissions sources when possible.       | 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 through the use of barriers, <b>adequate</b> distance, or similar solutions or measures from emissions sources when possible. <b>Larger projects may require larger separation distances.</b> |
| HC 16.19 | Promote reduction of vehicle miles traveled (VMT) by encouraging expanded multi-modal facilities, linkages between such facilities, and services that provide transportation alternatives, such as transit, bicycle and pedestrian modes.  | Promote reduction of vehicle miles traveled (VMT) by encouraging expanded multi-modal facilities, linkages between such facilities, and services that provide transportation alternatives, such as transit, bicycle and pedestrian modes. <b>Include the expected VMT reductions as inputs in traffic modeling for projects and ensure that multi-modal transportation is eligible for the same funding</b>        |

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MR. CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

“Bringing People Together to Improve Our Social and Natural Environment”

| Policy  | Current  | Notes or suggestion  |
|---------|--|--|
| HC 22.5 | New specific plans or existing specific plans that includes a substantial revision that are within “disadvantaged communities,” as identified by CalEPA should address Environmental Justice goals and include appropriate policies similarly to this section. | sources as roads.<br><br>New specific plans or existing specific plans that includes a substantial revision that are within or directly adjacent “disadvantaged communities,” as identified by CalEPA should address Environmental Justice goals and include appropriate policies similarly to this section. |



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February 14, 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 a professor of environmental analysis, I have a long history in working for and teaching about environmental justice. For over two decades, I have worked in community engaged settings within the Inland Empire. Since 2020, I have also been the director of the Robert Redford Conservancy at Pitzer College, where we support “community-first, climate-first” pathways toward local decision making.

The draft EJ element is unfit for adoption for several reasons, which I outline below. But first I would like to flag that the pending West Campus Upper Plateau project directly conflicts with most if not all of the listed aspects of the EJ element. Attempting to both comply with the principles of this document while at the same paving the way for warehouses in an already disproportionately burdened community is incongruent with EJ principles. Warehouses are the most significant environmental justice issue in the Inland Empire currently. Warehouse development runs counter to community voice, divides the working class against itself, and exacerbates existing environmental justice inequities including air quality, noise, light and traffic concerns, as well as contributing to greenhouse gas emissions and a host of additional environmental, infrastructural, economic, and climate-based harms.

Second, in relation to the West Campus Upper Plateau project, this EJ element is being adopted and considered well into a planning process, which has moved forward without the benefit of an EJ element, which has long been required by law for the purposes of local land use planning such as this.

Additionally, it is an omission to fail to consider cumulative impacts and the way these bypass the formal boundaries of the March JPA land to impact others through truck routes, pollution and GHG generation, and light, noise, and heat. The EJ element seems to excuse the March JPA of this responsibility by outlining boundaries, but that is not a true accounting of impacts upon adjacent EJ communities. This recognition should be included in the EJ Element.

In terms of the EJ Element itself, the document does have clear topic areas, including health risks, civic engagement, and prioritization of needs of disadvantaged communities. However, the language remains vague because it includes recommendations to “consider and evaluate” issues, but little or no commitment to actually act in accordance with those considerations.

Perhaps most important, the production of the environmental justice element without abiding by the fundamental point of such an element—meaningful community involvement—immediately sets the principles in the EJ element in contrast to the practices used to create that self-same document. The use of an environmental consulting firm without any direct community engagement is an inappropriate way to develop an EJ element per SB 1000 and the Attorney General’s DOJ recommended best practices.

This runs counter to the statement that: “In order to fully address environmental justice, the general plans must include new or existing policies intended to: (1) reduce unique or compounded health risks in disadvantaged communities; (2) promote civic engagement in public decision-making process; and (3) prioritize improvements and programs that address the needs of disadvantaged communities. (Gov. Code, § 65302(h)).” The current project slated for the March JPA violates the principles of each of these three policies.

Perhaps the vaguest part of the document is that statement about levels of compliance being along a continuum: “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.”

Given the text of the draft EJ element, your consultants have missed the mark of “appropriate determinations.” They have clearly utilized the CA DOJ’s [Best Practices for SB 1000](#). But unfortunately they have created a cafeteria-style copy/paste of that document by incorporating select aspects of the best practices and not others. The most obvious omission is the very first recommendation within the Best Practices document: that “community engagement is necessary to create compliant policies [...] Community engagement is also necessary in order to understand the ‘unique or compounded health risks’ of disadvantaged communities. (Gov. Code, § 65302, subd. (h)(1)(A).)” I am unaware of a meaningful community engagement process associated with the March JPA EJ element.

At the Redford Conservancy, we have developed several tools to measure land use decision-making on the part of local authorities through an environmental justice lens. These tools are based upon the academic literature as well as on SB 1000. Most specifically, the provision of SB 1000 Best Practices that calls for “meaningful” engagement of community members in the planning process. Neither the outreach around the EJ element or the draft document come close to meeting these standards.

Standards for EJ can indeed be clearly articulated along a continuum as you suggest. But that does not mean that the document need be vague: indeed, in the best practices are recommendations that language be complete, specific, targeted, and binding. The March JPA EJ element is incomplete, lacking in specificity, vague, and non-binding. It is thus out of compliance with the spirit and letter of SB 1000.

My recommendation is to take your consultants to task, ask them to actually engage with local communities in the production of this EJ element, or simply ask the community groups to lead the process themselves. The Redford Conservancy would also be happy to engage with this process as well. It is inappropriate as it stands and needs remedy.

Sincerely,

A handwritten signature in black ink, appearing to read 'SAP', with a stylized flourish at the end.

Susan A. Phillips  
Director, Robert Redford Conservancy  
Associate Dean, Pitzer College  
Professor of Environmental Analysis  
susan\_phillips@pitzer.edu



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.

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<sup>1</sup>. A paid consultant drafted the EJ element with no input from community members (or even notification that an EJ element was under consideration), no agenda review by the MJPA Technical Advisory Committee, and no agenda 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.

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<sup>2</sup>, assumed 1999 date – last updated 3/07/2023 (General Plan, 1999)

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<sup>1</sup> [https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification\\_.pdf](https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification_.pdf)

<sup>2</sup> [https://www.marchjpa.com/documents/docs\\_forms/general\\_plan\\_update\\_02172022.pdf](https://www.marchjpa.com/documents/docs_forms/general_plan_update_02172022.pdf)

- County of Riverside General Plan, Healthy Communities Element (Revised September 2021)<sup>3</sup>
- SB 1000 Implementation Toolkit: Planning for Healthy Communities (2018) – California Environmental Justice Alliance and PlaceWorks<sup>4</sup>
- Best Practices for Implementing SB 1000 (2023)– California Department of Justice<sup>5</sup>
- CalEnviroScreen4.0<sup>6</sup> 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<sup>7</sup>
- City of Moreno Valley EJ policies<sup>8</sup>
- City of Perris EJ policies<sup>9</sup>
- Governor’s Office of Planning and Research documents on Environmental Justice<sup>10</sup>, Community Engagement<sup>11</sup>, and General Plan amendments<sup>12</sup>

## 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 98<sup>th</sup> percentile impact census tract and being adjacent to a 99<sup>th</sup> percentile census tract (6065042505). 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** – 98<sup>th</sup> 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 80<sup>th</sup> percentile rank are shown in **Table 1**.

**Table 1.** CalEnviroScreen4.0 scores for individual pollution and population characteristics above the 80<sup>th</sup> percentile in the March JPA census tract. Data from CalEnviroScreen4.0 (released 2021).

| Tract      | variable | Percentile rank (0-100) | Description                                    |
|------------|----------|-------------------------|--|
| 6065046700 | ClScoreP | 98                      | CalEnviroScreen Impact Score                   |
| 6065046700 | PolBurdP | 95                      | Pollution Burden Score                         |
| 6065046700 | PopCharP | 95                      | Population vulnerability characteristics Score |

<sup>3</sup> <https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-Ch10-HCE-092121.pdf>

<sup>4</sup> <https://caleja.org/2017/09/sb-1000-toolkit-release/>

<sup>5</sup> <https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>

<sup>6</sup> <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

<sup>7</sup> [https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/2021/Housing\\_Element/2021-09%20EJ%20-%20City%20Council%20Draft.pdf](https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/2021/Housing_Element/2021-09%20EJ%20-%20City%20Council%20Draft.pdf)

<sup>8</sup> <https://moval.gov/cdd/documents/general-plan-update/draft-docs/GP-Elements/08.pdf>

<sup>9</sup> <https://www.cityofperris.org/home/showpublisheddocument/15026/637807115505230000>

<sup>10</sup> [https://opr.ca.gov/docs/20200706-GPG\\_Chapter\\_4\\_EJ.pdf](https://opr.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf)

<sup>11</sup> [https://opr.ca.gov/docs/OPR\\_C3\\_final.pdf](https://opr.ca.gov/docs/OPR_C3_final.pdf)

<sup>12</sup> [https://opr.ca.gov/docs/OPR\\_C10\\_final.pdf](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 98<sup>th</sup> percentile high ozone pollution and groundwater pollution (PFAS spills, see hazards letter). Communities are exposed to 80<sup>th</sup>+ 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 8<sup>th</sup> 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 **99.8<sup>th</sup>** 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).

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<sup>13</sup>. 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

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<sup>13</sup> [https://marchjpa.com/wp-content/uploads/2023/11/Environmental-Justice-Notification\\_.pdf](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

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**”)).’

### [EJ Workshops Railroad 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.

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.

## 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<sup>14</sup>. 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.

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

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<sup>14</sup> <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. '14<sup>th</sup> 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.

*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 policies 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.

- 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 MIPA 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 MIPA 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 MIPA fund and build the 48-60 acre park that the MIPA agreed to build 21 years ago. That is achievable, targeted, specific to the agency, and concrete.

#### Promote Food Access

I ask that the MIPA establish at least one grocery store or health food option within its planning area. To date 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 MIPA 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 MIPA communities. The warehouse moratorium would achieve that goal.

#### Summary

Warehouse land use in the MIPA planning area disproportionately added to the burden of MIPA communities. MIPA staff continue to pursue an industrial land-use policy with minimal mitigation measures. MIPA 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 MIPA 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 MIPA 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

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.

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)

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.

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.

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 sunseting 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.

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.

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.

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.

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 suits 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

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.

### **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?

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

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.

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

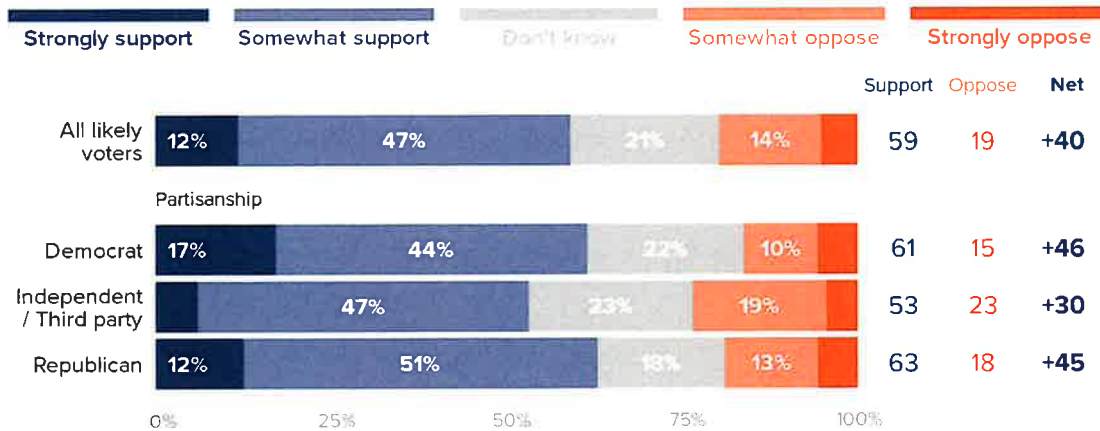
warehouse project because the City felt it fell beyond the City’s legal authority to approve as CEQA-related Mitigation Measures or as the Conditions of Approval related to the requested entitlements. This applicant was motivated to work with the government to win a project, but they did not engage with 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.

## Across Partisan Lines, Voters Support CBAs for Development Projects

A Community Benefits Agreement (CBA) is a legally binding agreement between a project developer and a community where a project will be built. The CBA describes the benefits a project developer promises to give to a community in exchange for the community's support for the project.

Do you support or oppose the use of CBAs on development projects?



June 10–13, 2022 survey of 1,268 likely voters

DATA FOR PROGRESS

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

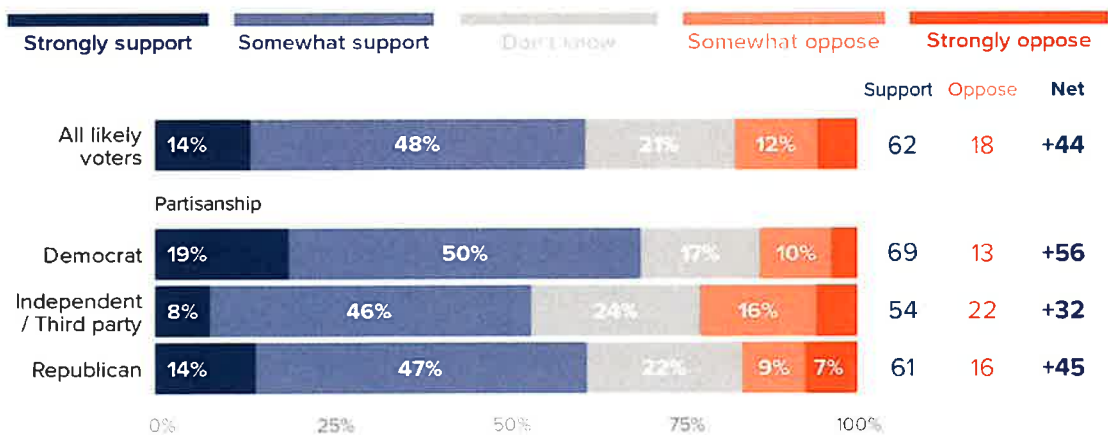


projects (like the many of the warehouses within the March JPA development area) in communities of color, this finding is indicative of the need and support for CBAs that center on equity and prioritize local benefit and restorative justice.

## Voters Support CBAs in Their Own Communities

A Community Benefits Agreement (CBA) is a legally binding agreement between a project developer and a community where a project will be built. The CBA describes the benefits a project developer promises to give to a community in exchange for the community's support for the project.

If there was a proposed development project in **your community**, would you support or oppose the use of a CBA?



June 10–13, 2022 survey of 1,268 likely voters

DATA FOR PROGRESS

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.

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

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.

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.

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.

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 CNDDDB.
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

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.

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.

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

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.

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.

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?

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.

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

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 intend to adhere to the settlement requirements and guidelines. How do you justify not considering the main truck traffic routes of the March JPA and the primary freeways in the area? Why did you exclude known construction projects that have already been permitted to be built? Why don't you consider the cumulative impacts for traffic within a five-mile radius of this project? Ignoring it is irresponsible.

Please redo your traffic section to include the 215 and the 215/60 corridor, other known construction projects in the 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.

Your revised plan also does not account for the noise pollution associated 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.

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.

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.



## **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.

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.

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

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.

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.

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.

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

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,

without oversight, they will do so and their predatory nature will continue without government protection of residents like me and my neighbors.

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 sunset 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 form a community advisory board 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 sunset 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.

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.

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)

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.

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.

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 it 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 contracts 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.

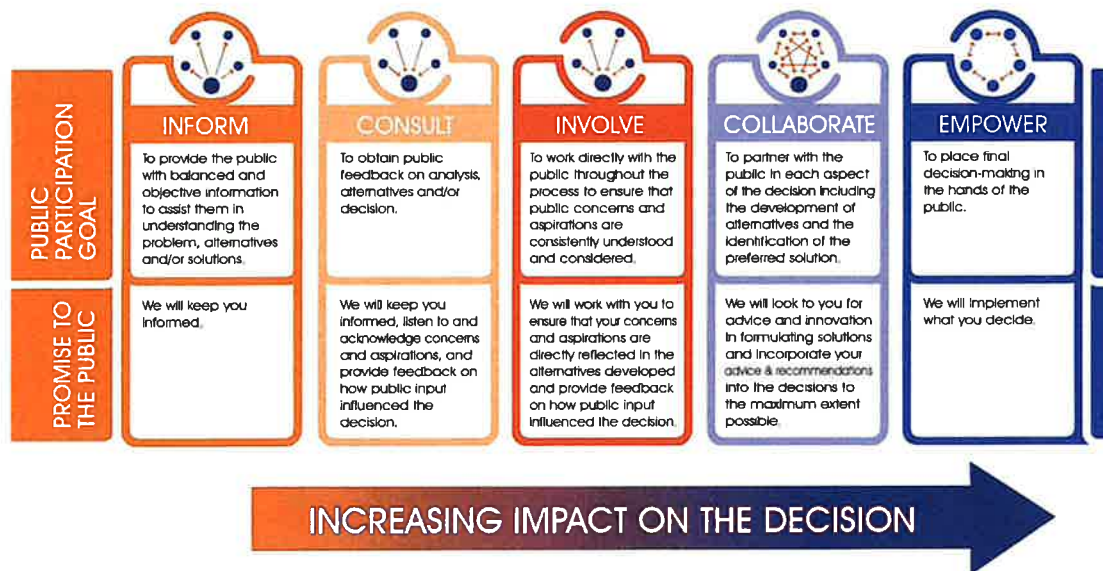
Another example of a one-way community engagement event was on August 18, 2022 when you hosted a presentation of the proposed plan at an open house at the March Air Museum. This event was open to the public and the public believed we were going to be able to discuss the plans with you, provide meaningful 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 false 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 inclined 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 sunseting 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. FAR 1.102 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 statute 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 statute," 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 muddled, 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 statute, 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 statute. 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.

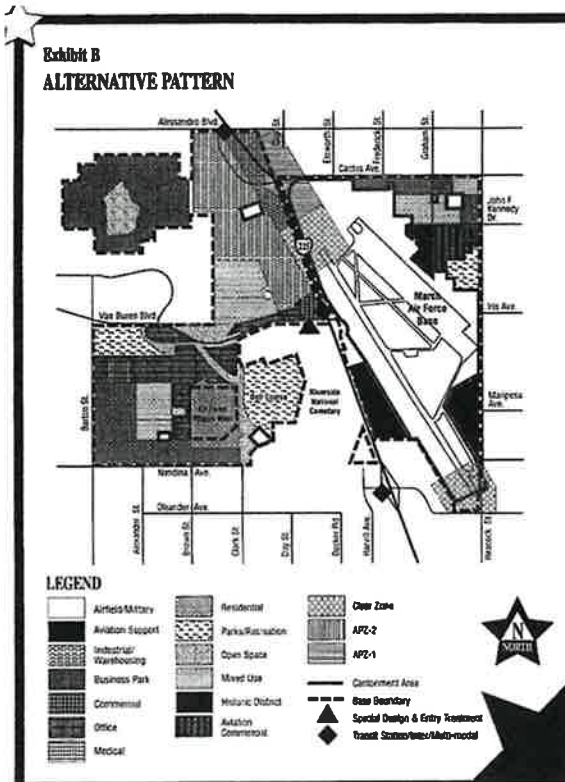
In the last two years, community members have presented a clear and consistent pattern of opposition to the proposal to ‘upzone’ the land use as specified in the General Plan from Business Park to Industrial. Community members have submitted petitions with thousands of signatures opposing the Project, 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 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.

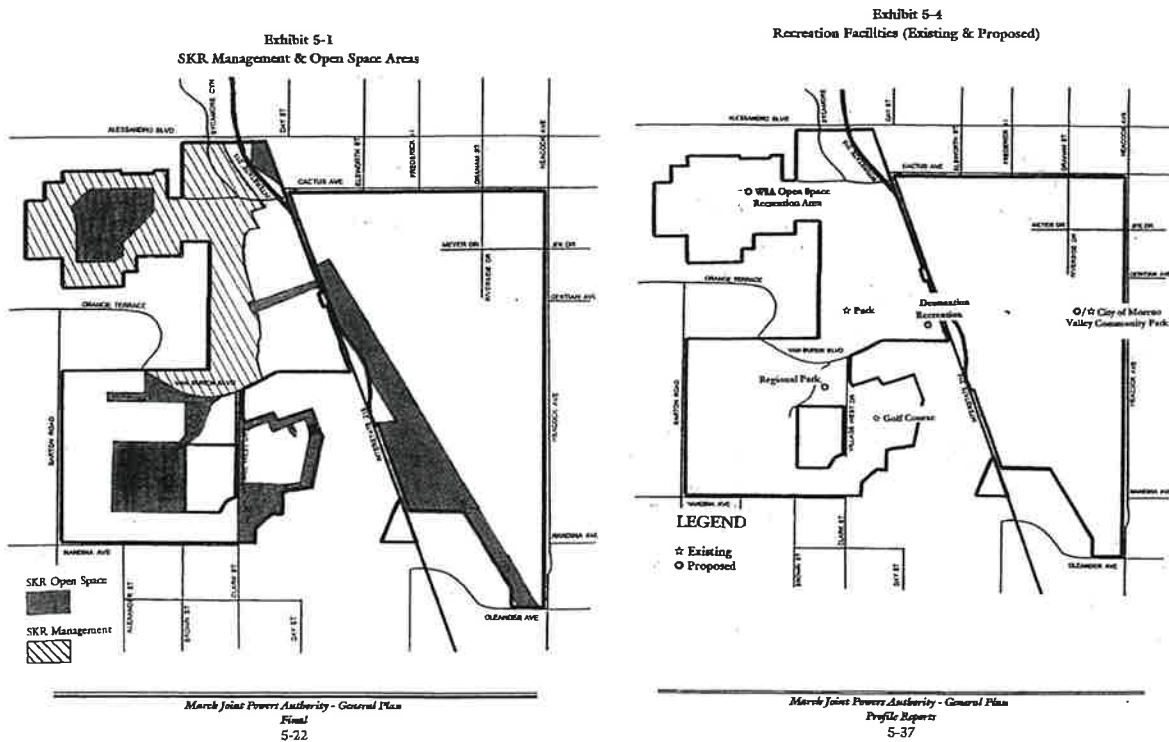


**TABLE 1-1  
BUDDOUL/MARCH JPA PLANNING AREA**

| Land Use Designation           | Acres<br>gross | Density |        | Buildout<br>Capacity* |
|--------------------------------|----------------|---------|--------|-----------------------|
|                                |                | MAX.    | AVG.   |                       |
| <b>INDUSTRY</b>                |                |         |        |                       |
| Business Park                  | 1278           | .75     | .20    | 7,793,755 sf          |
| Industrial                     | 433            | .60     | .15    | 1,980,455 sf          |
| <b>SUBTOTAL</b>                |                |         |        | <b>9,774,210 sf</b>   |
| <b>COMMERCE</b>                |                |         |        |                       |
| 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          |
| <b>SUBTOTAL</b>                |                |         |        | <b>4,136,377 sf</b>   |
| <b>PUBLIC</b>                  |                |         |        |                       |
| Park/Recreation/<br>Open Space | 777            | .25     | .025   | 592,307 sf            |
| Public Facility                | 449            | .50     | .10    | 1,369,091 sf          |
| <b>SUBTOTAL</b>                |                |         |        | <b>1,961,398 sf</b>   |
| <b>SPECIAL</b>                 |                |         |        |                       |
| 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             |
| AFWV Expansion                 | 75             | .60     | .30    | 686,070 sf            |
| Cemetery Expansion             | 160            | .10     | .005   | 24,394 sf             |
| <b>SUBTOTAL</b>                |                |         |        | <b>4,657,784 sf</b>   |
| <b>TOTAL</b>                   |                |         |        | <b>13,127,769 sf</b>  |

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).”

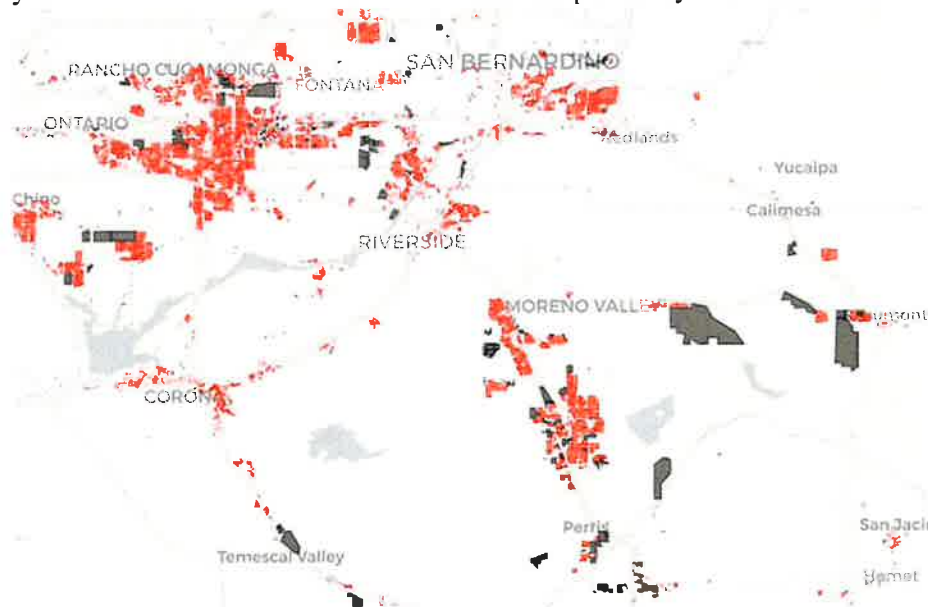
The historical precedent of the Final Reuse Plan (1996), General Plan (1999) and Draft General Plan (2010-never adopted) are clear. The West Campus Upper Plateau was never considered for intensive Industrial/Warehousing uses and all discussion of warehouse uses focused on appropriate setbacks to protect 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.”

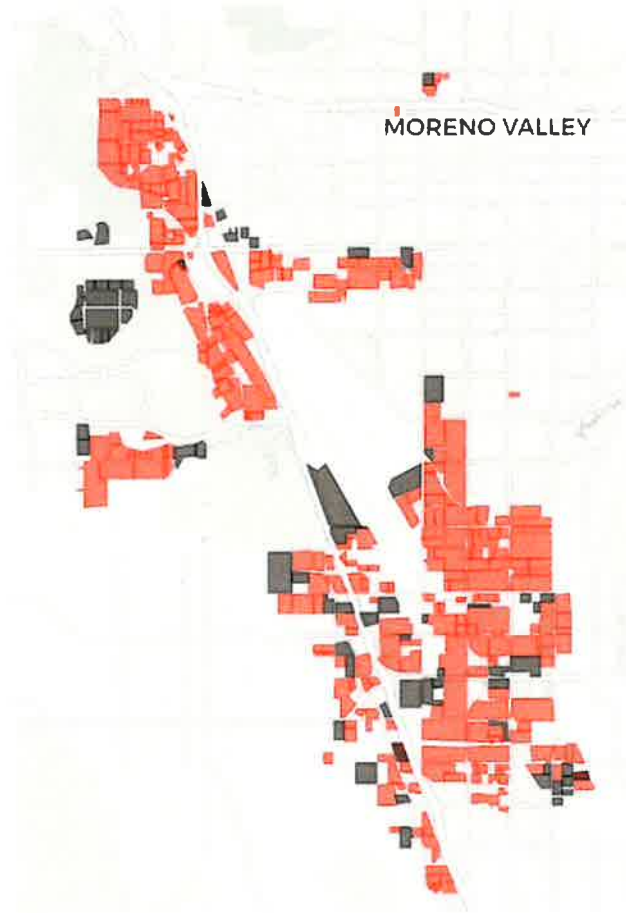
However, in the draft EIR (2023), p. 2-4, mixed-use is now defined as, “Mixed uses include a variety of complementary land uses, including commercial, business park, office, medical, research and development, business enterprise, and services. Industrial, and outdoor storage is prohibited.” Why change 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 disproportionately impacted by these warehouses thanks to the JPA and the predatory nature of the developer.





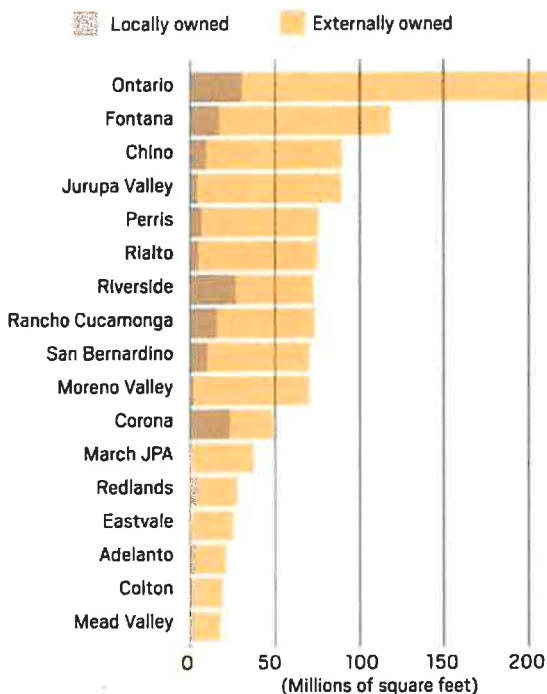


As the updated maps above demonstrate, the 215/60 freeway corridor is disproportionately impacted by the sprawl of warehouses and logistics as is most of the Inland Empire. The JPA has specialized in placing warehouses on a majority of the land it was tasked with repurposing. So, one has to ask why build 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)."

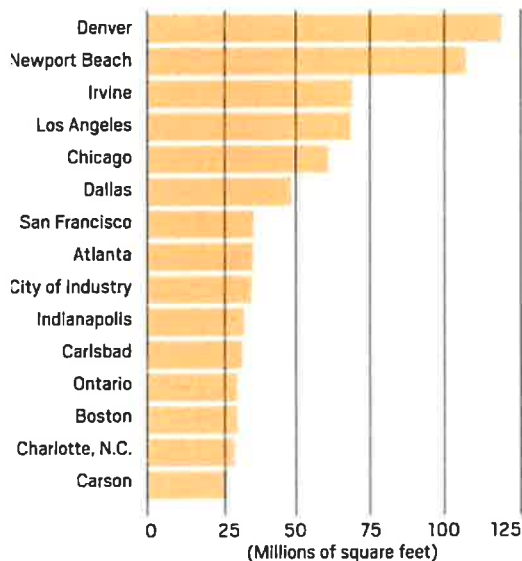
Fortunately, a little work and publicly available information provides me with some insight to avoid the conspiracies about why there are so many warehouses in the JPA's territory. In a meeting with the JPA in April 2022, I was told that most of these warehouses are built as speculative developments, 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.

### Inland warehouses, non-Inland owners

Most of the Inland Empire's logistics footprint is owned by companies with addresses outside the two-county region.



### Top 15 cities with companies that own Inland warehouses



Source: Mike McCarthy, Riverside environmental consultant  
JEFF GOERTZEN, SCNG

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?

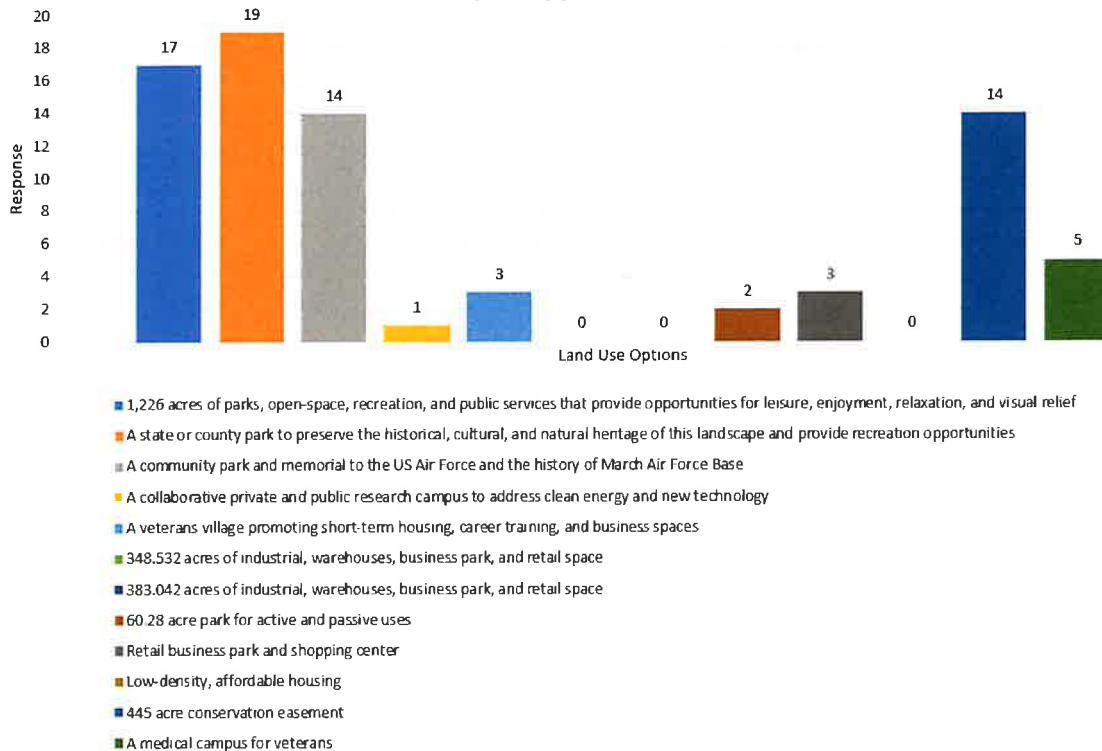
You do not explain this in your recirculated draft EIR. How will you hold them accountable on our behalf (a function of government)? How will you enforce your own mission identified in the General Plan, the one that protects community values, health, and history from narrowly focused and neglectful land 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 sunseting?

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 Medicin 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 such 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 sunseting 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 sunseting 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 here 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?

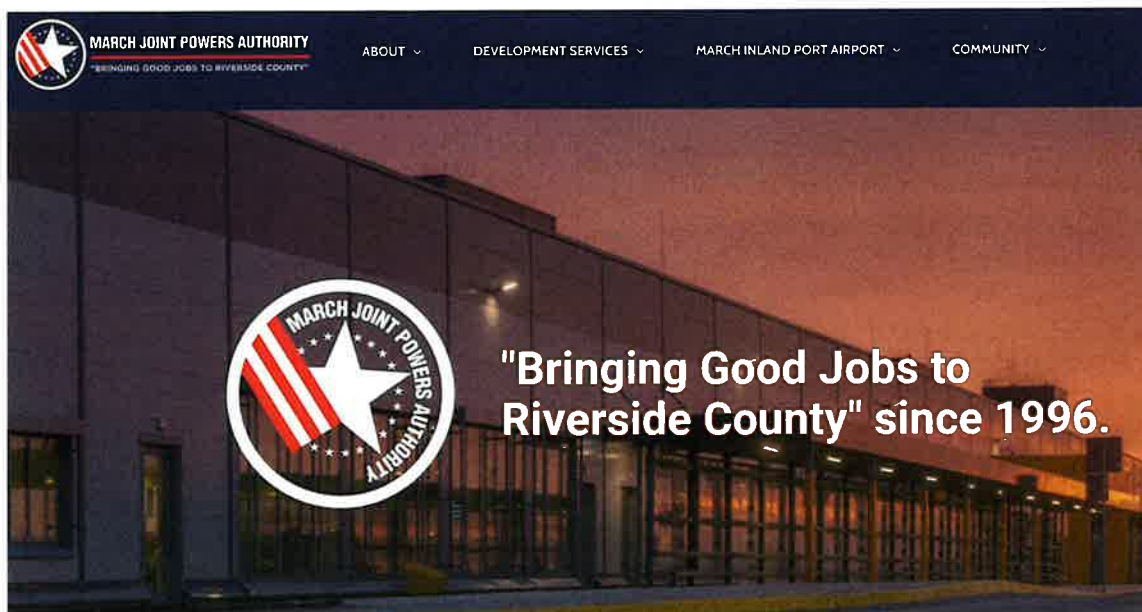
- Pages 4.8-40-41, Section 4.8.6 Mitigation Measures-HAZ1: If this project does not begin demolition prior to the March JPA sunset in July 2025, what assurances and procedures exist that the County of Riverside will be able to adhere to these same findings and mitigations, or that during the time between 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?

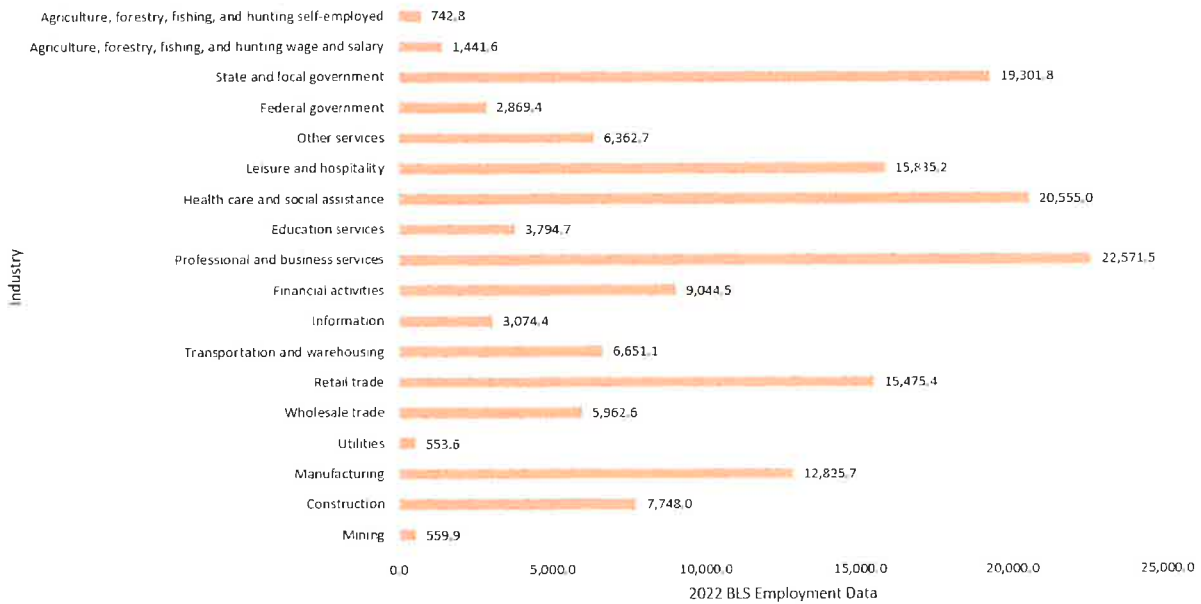
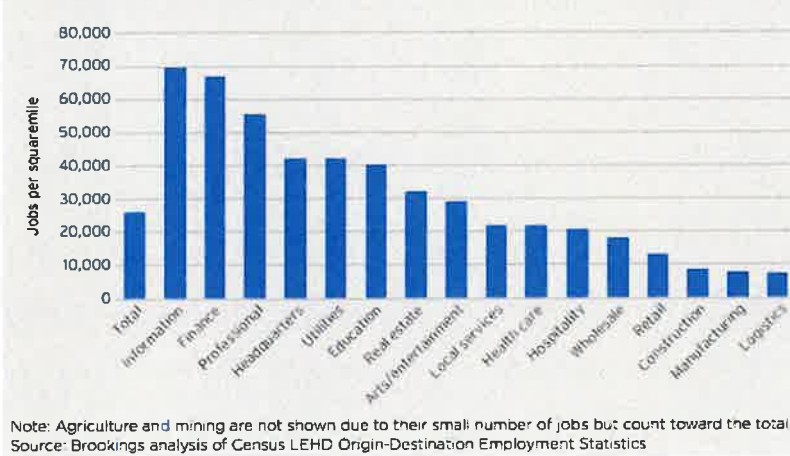
In fact, the logistics industry has actually weakened the economic outlook of our region overall. According to the SCAG December 2022 economic outlook report, “In 2001, GDP per capita in Riverside County and San Bernardino County were 64 percent and 69 percent of U.S. per capita GDP, respectively. When 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.

**Figure 10. Jobs in advanced services sectors are located in the densest parts of metro areas on average**

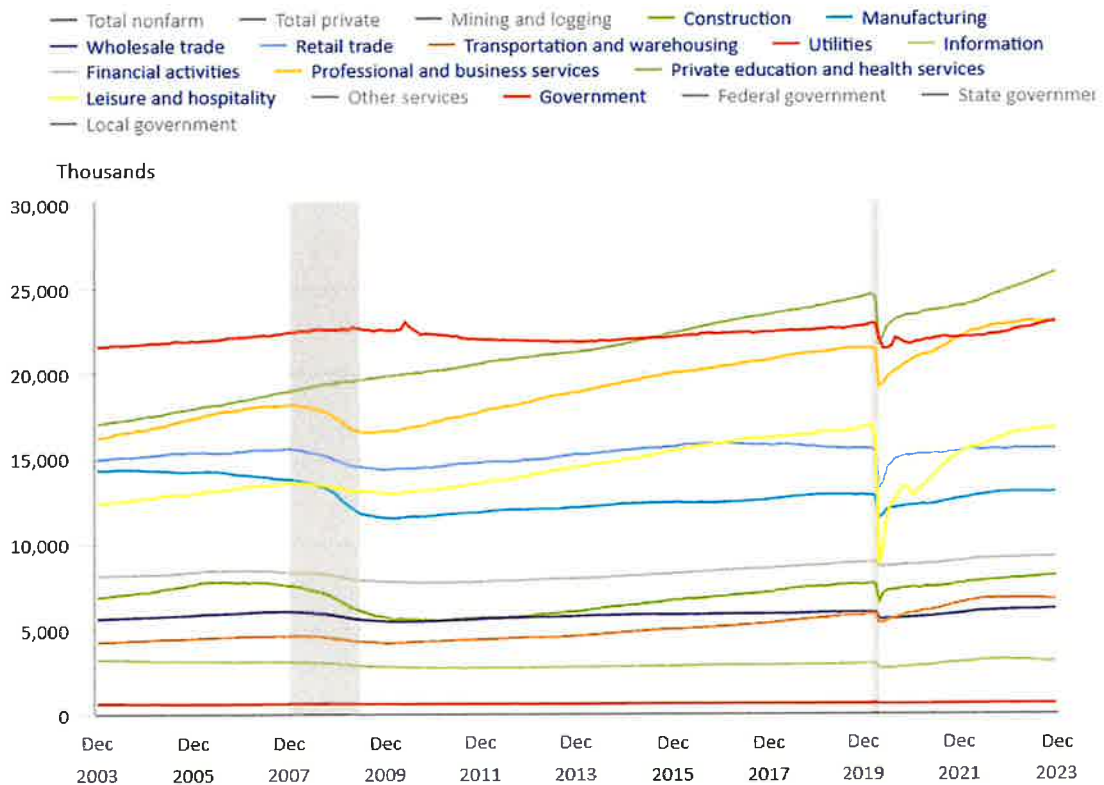
Job density by sector in 2015



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.

### Employment levels by industry, seasonally adjusted

Click and drag inside chart to change dates displayed



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 sunset 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 sunset 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 sunset 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 sunset on 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/CCA EJ 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.

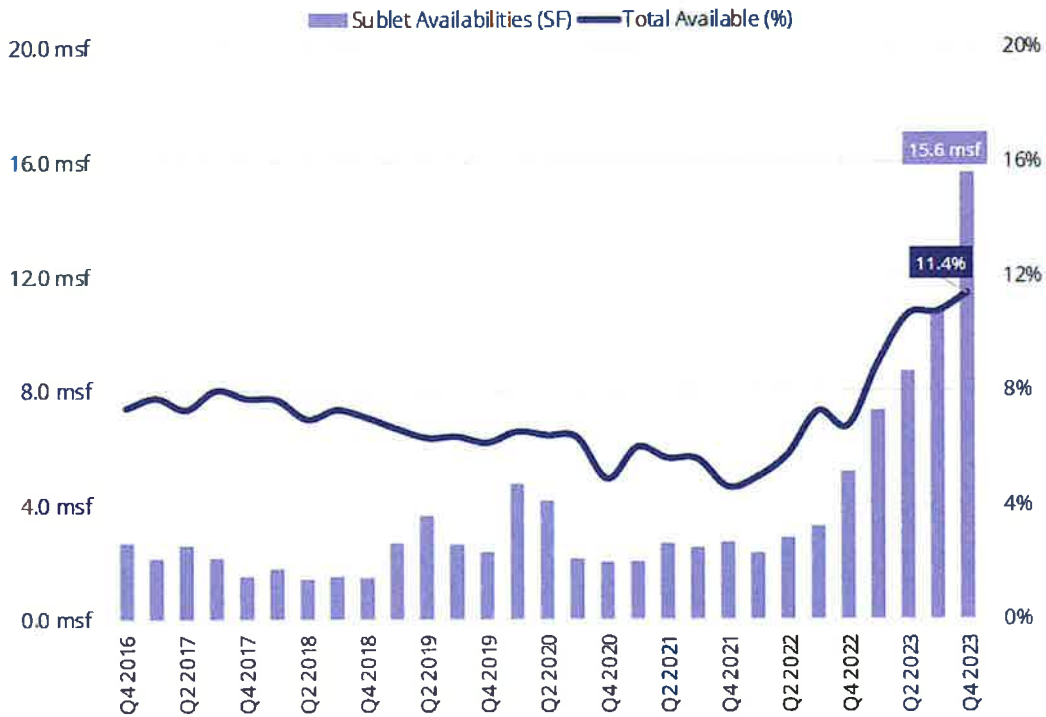
A once-booming U.S. warehousing market is coping with signs of contraction as businesses consolidate warehouses and, in some cases, upgrade existing sites rather than add facilities. The shift comes as retailers have turned the corner on a big drawdown of inventories and are working to align their supply 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

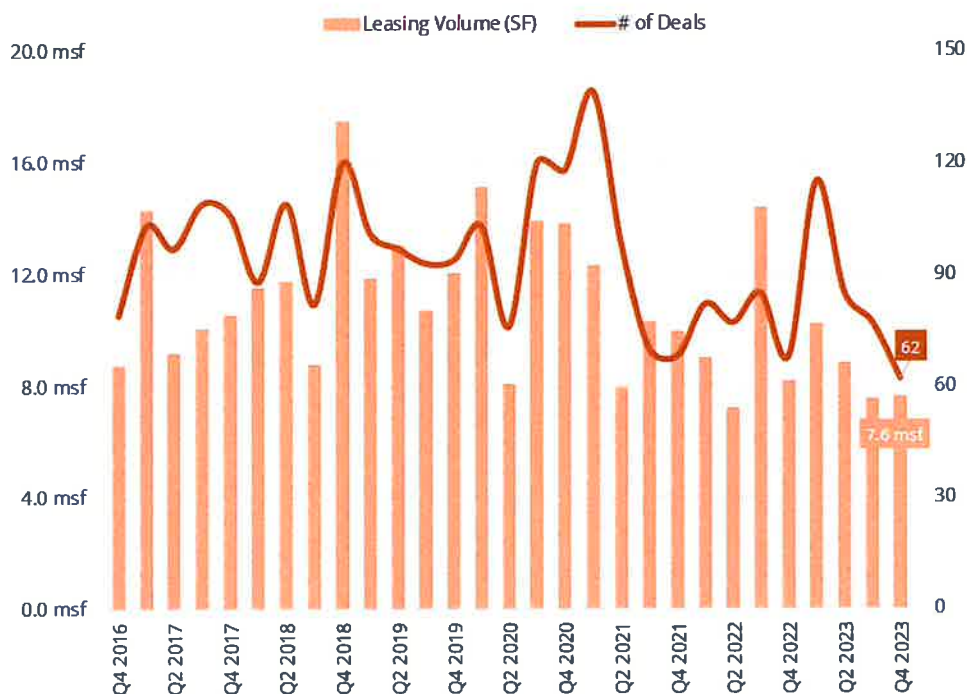
rezoning in not only the Inland Empire, but more specifically gave the March JPA an excuse to upzone land uses from the Final Reuse plan to be more industrial focused. This speculative development practice might have been a safe bet for investors and land use authorities, but today it is a risky proposition. 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.

## Total Availabilities



## Leasing Activity



## Inland Empire Industrial development pipeline

### 272 properties

97 under construction  
175 proposed

### 151.9 million sf

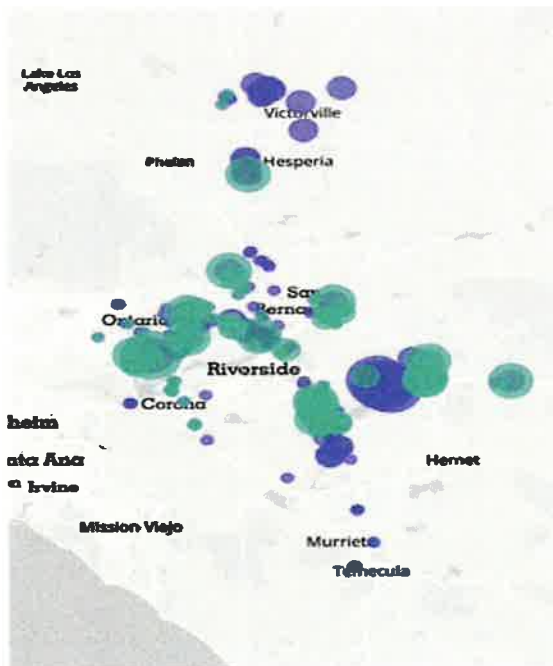
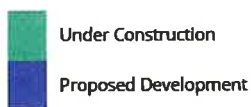
28.4 million sf under construction  
123.5 million sf proposed

### Major developments

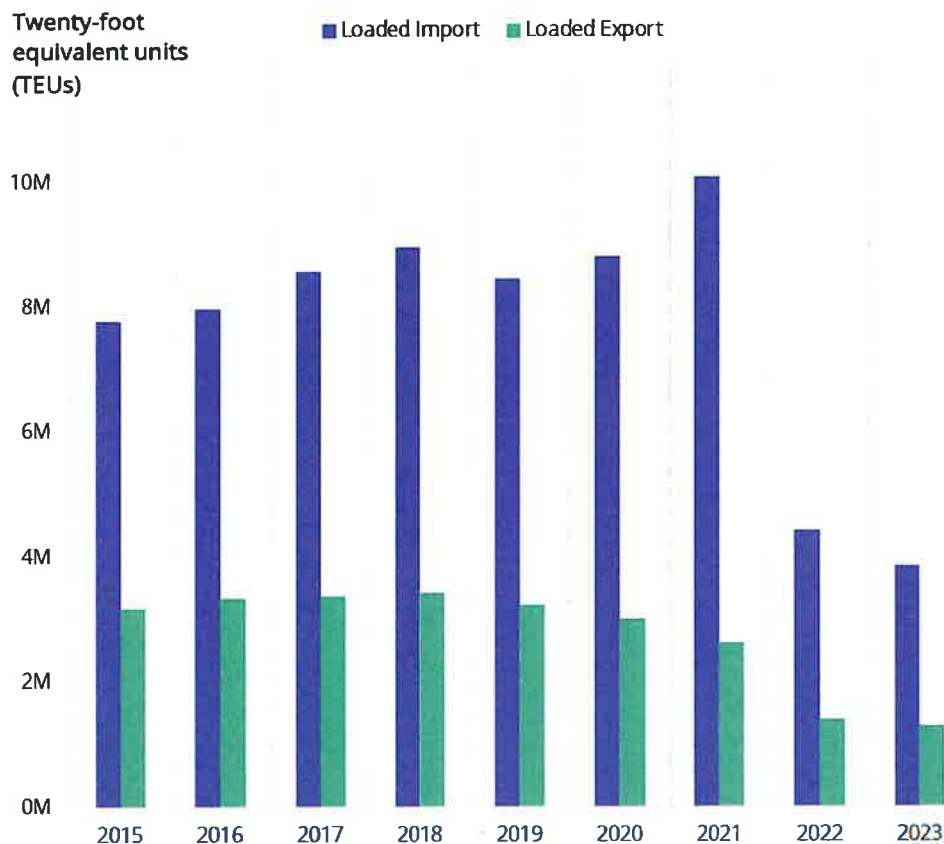
1363 Merrill Ave - 1.5 million sf

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-healthy 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, 1<sup>st</sup> paragraph; p.1-5, 1<sup>st</sup> 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



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.

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.

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 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 sunseting 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

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.



Sincerely,

Ciara Thrower  
Inland Empire Regional Organizer, California Environmental Voters

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

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?

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](http://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. 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 14<sup>th</sup> 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.

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.

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

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.

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 sunseting 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

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?

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  
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