

MEMORANDUM

To: Dan Fairbanks, Planning Director, March Joint Powers Authority
From: Nicole Cobleigh, Dudek
Subject: West Campus Upper Plateau Project: Responses to Comments Received - May 3, 2024 through June 11, 2024
Date: June 12, 2024
Attachment(s): 1. Table of Commenters, Comments and Responses
2. Response to Mike McCarthy Letter, dated June 11, 2024
3. Response to Channel Law Group Letter, dated June 11, 2024
4. Comment Letters Received

After release of the Final Environmental Impact Report (EIR) for the West Campus Upper Plateau Project, a total of 96 comment letters were received between May 30, 2024 and June 11, 2024. The following attachments include responses to the comments raised in the comment letters. CEQA Guidelines Section 15088.5 identifies when a lead agency must recirculate an EIR. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before certification of the Final EIR. Information includes changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. As defined in CEQA Guidelines Section 15088.5(a), significant new information requiring recirculation includes the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

As stated in CEQA Guidelines Section 15088.5(b), "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." As demonstrated in the responses to comments included in Attachments 1, 2 and 3, none of the clarifications, modifications, or editorial corrections presented in this Final EIR constitute significant new information warranting recirculation of the EIR as set forth in CEQA Guidelines Section 15088.5.

Additionally, in response to comments received on the Final EIR, mitigation measure MM-HAZ-2, has been revised as follows:

MM-HAZ-2. Materials Storage Near School. Facilities located within one-quarter mile of an existing school, including public or private schools as well as preschools, shall not store, handle, or use ~~toxic or highly toxic gases~~ an extremely hazardous substance or mixture containing extremely hazardous substances that exceed threshold levels established by California Health and Safety Code Section 25532.

Attachment 1

Table of Commenters, Comments and Responses

Comment Letters Received – 05/30/24 through 06/12/24

	Date	Commenter	Comment(s)	Response(s)
1	05/30/24	Soboba	Consulted with Pechanga and agrees with the revisions in the Final EIR	Noted; no new issues raised
2	05/31/24	Riverside County Fire Department	Acknowledging receipt of the Responses to Comments	Noted; no new issues raised
3	06/01/24	Jerry Shearer	General opposition expressed to decision-makers; Alternative 5 is not genuine; concerns about loss of recreational open space; community benefits included as part of the Project are required under the Settlement Agreements	Topical Response 8 discusses alternatives; Topical Response 4 discusses Project consistency with Settlement Agreement terms
4	06/03/24	Jen Larratt-Smith	Request for R-NOW to provide a presentation at the June 12 th hearing; request that all discussions about the Project be conducted in public	Noted; no new issues raised
5	06/04/24	Mike McCarthy	Requests clarification about why responses to comments are included in Chapters 9 and 10 and then also in appendices	Responses to comments are provided in Chapters 9 and 10 of the Final EIR, and the appendices include input from technical experts on specific comments.
6	06/04/24	Rod Deluhery(1)	States that questions weren't responded to in the Final EIR and requests a review of question again.	See RTC I-636. Additional information about the past munitions stored at the Project site and discussed in Section 4.8, Hazards and Hazardous Materials. This answer is provided in RTC I-636 in Chapter 9 of the Final EIR.
7	06/04/24	Rod Deluhery(2)	Questions how long qualifies as intermittent for the storage of unconventional weapons. Days, weeks, months?	In response to comments on the Draft EIR, the Hazards section was revised to include additional information regarding the potential storage of nuclear, chemical and biological weapons in the former Weapons Storage Area (WSA). A detailed investigation was performed that included measurements of alpha and gamma radiation inside 16 structures at the WSA that may have

	Date	Commenter	Comment(s)	Response(s)
				stored non-conventional weapons and confirmed the absence of radioactive contamination at the WSA. In a letter dated August 24, 2000, the Department of Health Services stated that it “is in concurrence that the buildings investigated in [the MARSSIM] meet the State’s release criteria for unrestricted release” (DHS 2000). Further investigations confirmed the absence of any radiologically impacted materials or burial pits and concluded that no further action for surface soils or subsurface investigation of burial sites in the WSA is recommended based on historical information and the results of geophysical, radiological, and subsurface investigations. The Regional Water Quality Control Board concurred with these findings. The EIR therefore concluded there would be a less than significant impact related to potential storage of non-conventional weapons, and the length of time weapon non-conventional weapons may have been stored at the WSA does not change this conclusion.
8	06/07/24	Aaron Bushong	General opposition	Noted; no new issues raised
9	06/07/24	Rita Schneider	General opposition	Noted; no new issues raised
10	06/07/24	Christina Barhorst	General opposition	Noted; no new issues raised
11	06/07/24	Nicolette Rohr	General opposition	Noted; no new issues raised
12	06/07/24	Shaan Saigol	General opposition	Noted; no new issues raised
13	06/07/24	Mike McCarthy	Document is slow to load, especially Chapter 9 and appendices with architectural drawings	Access to the files posted on the MJPA website was tested from several computers with varying internet connection speeds. All files were able to be accessed in less than 1 minute.
14	06/07/24	Deb Whitney	General opposition	Noted; no new issues raised
15	06/07/24	Victoria Belova	General opposition	Noted; no new issues raised
16	06/07/24	Shirley Ng	General opposition	Noted; no new issues raised

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17	06/07/24	Linlin Zhao	General opposition	Noted; no new issues raised
18	06/07/24	Candy Blokland	General opposition	Noted; no new issues raised
19	06/07/24	Mike McCarthy	R-NOW has not received a formal response on whether or not the request to do a presentation can be granted. Also requesting to know whether time-sharing will be allowed.	Noted; no new issues raised
20	06/07/24	Mike McCarthy	Transmittal of City of Riverside Good Neighbor Guideline updates; WCUP not evaluated for consistency with these updates and changes	The updates and changes have not been officially adopted.
21	06/07/24	Lenora Mitchell	General opposition	Noted; no new issues raised
22	06/07/24	Ann & Dolores Marchand	General opposition	Noted; no new issues raised
23	06/07/24	Molly Nazeck	General opposition	Noted; no new issues raised
24	06/07/24	Jessica McDermott	General opposition	Noted; no new issues raised
25	06/07/24	Wendy Wiley	General opposition	Noted; no new issues raised
26	06/07/24	Jerry Shearer	Difficulty getting Final EIR documents to load – it took 10 minutes for the Title Page to load.	Access to the files posted on the MJPA website was tested from several computers with varying internet connection speeds. All files were able to be accessed in less than 1 minute.
27	06/07/24	John Ward	General opposition	Noted; no new issues raised
28	06/07/24	Daniele Gutierrez-Singleton	General opposition	Noted; no new issues raised
29	06/07/24	Michele Muehls	General opposition	Noted; no new issues raised
30	06/07/24	Sara Amend	General opposition	Noted; no new issues raised
31	06/07/24	John Viafora	General opposition	Noted; no new issues raised
32	06/07/24	Peter Pettis	General opposition	Noted; no new issues raised
33	06/07/24	Mary Viafora	General opposition	Noted; no new issues raised
34	06/07/24	Lisa Everson	General opposition	Noted; no new issues raised
35	06/07/24	Joe Aklufi	General opposition	Noted; no new issues raised
36	06/07/24	Steve Huddleston	General opposition	Noted; no new issues raised
37	06/07/24	Jeannine Sabel	General opposition	Noted; no new issues raised
38	06/07/24	Andrea Wood	General opposition	Noted; no new issues raised

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39	06/07/24	Anthony Musumba	General opposition	Noted; no new issues raised
40	06/07/24	Ajay Shah	General opposition	Noted; no new issues raised
41	06/0724	Josie Sosa	General opposition	Noted; no new issues raised
42	06/07/24	John Hagmann	General opposition	Noted; no new issues raised
43	06/07/24	Anthony Scimia Jr.	General opposition	Noted; no new issues raised
44	06/07/24	Kevin Carney	General opposition	Noted; no new issues raised
45	06/07/24	Juan Garcia	General opposition	Noted; no new issues raised
46	06/07/24	Amber Peaslee	General opposition	Noted; no new issues raised
47	06/07/24	Chris Hannon	General opposition	Noted; no new issues raised
48	06/07/24	John Viafora	General opposition	Noted; no new issues raised
49	06/07/24	Betty Hao	General opposition	Noted; no new issues raised
50	06/07/24	Kyle Reed	General opposition	Noted; no new issues raised
51	06/08/24	Kevin	General opposition; past use of the site regarding hazards	Noted; no new issues raised
52	06/08/24	Magie Lacambra	General opposition	Noted; no new issues raised
53	06/08/24	Michael Hampton	General opposition	Noted; no new issues raised
54	06/08/24	Dawn Carter	General opposition	Noted; no new issues raised
55	06/08/24	Suzanne Pearson	General opposition	Noted; no new issues raised
56	06/08/24	Julie Weatherford	General opposition	Noted; no new issues raised
57	06/08/24	Matt Silveous	General opposition	Noted; no new issues raised
58	06/08/24	Bobby Robinette	General opposition	Noted; no new issues raised
59	06/08/24	Linda Tingly	General opposition	Noted; no new issues raised
60	06/08/24	Eunhee Kim	General opposition with 10 distinct bullet points	Noted; no new issues raised
61	06/08/24	Jason Gonsman	General opposition	Noted; no new issues raised
62	06/08/24	Gayle DiCarlantonio	General opposition	Noted; no new issues raised
63	06/08/24	Ira & Rajean Long	General opposition	Noted; no new issues raised
64	06/09/24	Esmeralda Montes	General opposition – loss of open space, loss of habitat for animals, increasing urban heat island effect	Noted; no new issues raised
65	06/09/24	Ronald Peters	1. RTC I-166.2 concerns. Grading data is insufficient, and no retaining walls are shown; need more grading details.	1. Retaining Walls. There are currently three locations where retaining walls are proposed associated with these entitlements:

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			<p>2. RTC I-166.4 concerns. Specific hydrology and drainage concerns.</p> <p>3. RTC I-166.3 concerns. Landfill capacities.</p>	<ul style="list-style-type: none"> • Master Grading – Retaining wall is located at knuckle of Linebacker and Bunker Hill. The face of wall will face the Project site development and not homes. • Building B – Retaining wall is located along southern edge of property. The face of wall will face the Project site development and not homes. • Building C - Retaining wall is located along eastern edge of property. The face of wall will face the existing Meridian developments to the east. <p>In addition, there are storm drain headwalls that are typically not considered retaining walls at locations where storm drain daylights. The remaining areas are currently designed with slopes to accommodate grade differences.</p> <p>2. Erosion due to drainage. The proposed hydrology reports show that the development is meeting Riverside County design requirements for development. The proposed project detains runoff rates to match existing runoff rates for the storm events required by the MJPA. Erosion due to runoff is considered a velocity dependent condition and not a volume dependent condition in drainage design.</p> <p>3. The comment indicates that the FEIR appears to include an error in the Solid Waste subsection of Section 4.17.1, Utilities and Service Systems. The comment indicates that although the Lamb</p>

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				<p>Canyon and Badlands sanitary landfills have similar throughputs and similar remaining capacities, the cease operation date for Lamb Canyon is April 2032, whereas the cease operation date for the Badlands landfill is January 2059. The comment infers therefore that both landfills will likely close in approximately 2032, based on the similarities in the landfill capacities and throughputs.</p> <p>To clarify regarding the cease operation dates in the CalRecycle SWIS Facility database, Dudek contacted the Riverside County Department of Waste Resources, which owns and operates the Lamb Canyon and Badlands landfills. The Riverside County Department of Waste Resources indicated the cease operation dates are the dates the landfill permit expires, the Lamb Canyon landfill will have additional capacity after 2032, and it can reasonably be assumed that the permit will be renewed, based on the additional capacity.¹</p> <p>Riverside County Department of Waste Resources also provided additional detailed information on the El Sobrante, Lamb Canyon, and Badlands landfills. As of January 1, 2024, the Lamb Canyon landfill had a remaining capacity of 6.7 million tons, which is expected to last, at a minimum, until approximately 2032. Landfill expansion potential exists at the Lamb Canyon landfill. As of January 1, 2024, the Badlands landfill had a total remaining</p>

¹ Dudek communication with Ms. Lisa Thompson at the Riverside County Department of Waste Resources, June 11, 2024.

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				<p>capacity of approximately 49.8 million tons, which is expected to last, at a minimum, until 2059. And per a 2023 Annual Report, the El Sobrante landfill had a remaining capacity of approximately 47.2 million tons, which is expected to last until approximately 2059.²</p> <p>Based on the remaining capacity of the Lamb Canyon, Badlands, and El Sobrante landfills, 13 tons per day of solid waste generated during Project operations would represent an incremental increase in solid waste production that would be negligible with respect to remaining landfill capacity in the project region. In addition, the Specific Plan would be required to comply with all applicable federal, state, and local requirements involving solid waste. Therefore, impacts would be less than significant, and no mitigation is required.</p>
66	06/09/24	Alejandra Joseph	General opposition	Noted; no new issues raised.
67	06/09/24	William Landa	General opposition	Noted; no new issues raised.
68	06/09/24	Sue Nipper	General opposition	Noted; no new issues raised.
69	06/10/24	Joe Niehus	Version of Form Letter - general opposition – plenty of jobs; traffic and air quality concerns; not enough open space	Noted; no new issues raised.
70	06/10/24	Dennise Jimenez	Air quality concerns for lung and cardiovascular health; strain on water resources, increased noise, urban heat island effect; Mead Valley project promised a hospital	Air quality analysis in EIR; Mead Valley project is not proposed by this project applicant.
71	06/10/24	Franco Pacheco	General opposition	Noted; no new issues raised.
72	06/10/24	Lisa & Ken Norris	General opposition	Noted; no new issues raised.

² Dudek communication with Ms. Kinika Hesterly, Principal Planner at the Riverside County Department of Waste Resources, June 11, 2024.

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73	06/10/24	Desarea Wilson	General opposition	Noted; no new issues raised.
74	06/10/24	Christine Heinemann	General opposition	Noted; no new issues raised.
75	06/10/24	Rick Lloyd	General opposition	Noted; no new issues raised.
76	06/10/24	Greg Morris	General opposition	Noted; no new issues raised.
77	06/10/24	Josh Rubal, So Cal Gas	New point of contact	Noted; no new issues raised.
78	06/10/24	Jerry Shearer	<p>1. Too many vacant warehouse spaces</p> <p>2. Files are too large to open; too much information to review in such a short period of time</p> <p>3. Inclusion of an article “Price reductions for logistics buildings might hint at further softening.”</p>	<p>1. No new environmental issues raised.</p> <p>2. Access to the files posted on the MJPA website was tested from several computers with varying internet connection speeds. All files were able to be accessed in less than 1 minute.</p> <p>3. Noted.</p>
79	06/10/24	Mike McCarthy	Transmitting article “Price reductions for logistics buildings might hint at further softening.”	Noted.
80	06/10/24	Jen Larratt-Smith	<p>1. SOC leans on heavily flawed assumptions that the project is positive for local jobs and economic viability.</p> <p>2. Inclusion of an article “Price reductions for logistics buildings might hint at further softening.”</p>	<p>1. See responses below for item 86.</p> <p>2. Noted.</p>
81	06/10/24	Robert Redford Conservancy	<p>1. Historical and archaeological value of the Project site. All resources should be considered cumulatively.</p> <p>2. Adaptive reuse of the igloos should be considered.</p> <p>3. Healthy Places Index</p>	<p>1. See Section 4.4, Cultural Resources, of the EIR. Cumulative impacts are also considered therein.</p> <p>2. See Chapter 6, Alternatives, where adaptive reuse of the igloos was discussed and not considered feasible.</p>

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			<p>4. Climate Vulnerability Index</p> <p>5. Cal EnviroScreen index</p> <p>6. Water use and increased impervious surfaces</p> <p>7. Biodiversity</p> <p>8. Heat and the heat severity map</p> <p>9. Robotics/Automation – it’s not speculative and thus not considering in EIR is negligent and incorrect. Data is provided.</p> <p>10. Warehouse bubble/glut in the Inland Empire</p> <p>11. Fire risk, traffic and emergency response times.</p>	<p>3. Consideration of environmental impacts to populations identified in the Healthy Places Index were considered in the EIR.</p> <p>4. Consideration of environmental impacts to populations identified in the Climate Vulnerability Index were considered in the EIR.</p> <p>5. Consideration of environmental impacts to populations identified in the Cal EnviroScreen Index were considered in the EIR.</p> <p>6. Water use is discussed in Section 4.17, Utilities and Service Systems, and is based on the results in the Water Supply Assessment prepared for the Project (Appendix O). Hydrology changes associated with the Project, including the increase in impervious surfaces is discussed in Section 4.9, Hydrology and Water Quality.</p> <p>7. Biodiversity of the site is discussed in Section 4.3, Biological Resources, as well as in Appendix D-1, Biological Technical Report.</p> <p>8. Discussed generally in Section 4.7, Greenhouse Gas Emissions.</p> <p>9. Robotics and automation are not environmental issues; however, see Topical Response 5 – Jobs.</p> <p>10. See Economic Impact Analysis, Appendix U, in the Final EIR.</p>

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				11. See Fire Protection Plan (Appendix Q) and Section 4.18, Wildfire, in the EIR.
82	06/11/24	Channel Law Group, LLP on behalf of R-NOW	See separate response letter	See separate response letter
83	06/11/24	Channel Law Group, LLP on behalf of Community Alliance for Riverside's Economy and Environment (CAREE)	<p>1. March JPA is obligated under Settlement Agreement to provide the Park component of the proposed Project. Don't tie the amenity from the settlement agreement to the project.</p> <p>2. Request for copies of each and every NOD issues in connection with the Project</p>	<p>1. Per the Settlement Agreements, the provision of the park is an obligation of the March JPA. The provision of the park is proposed as a community benefit under the proposed Development Agreement and evaluated in the environmental document for the Project.</p> <p>2. NODs will be posted with the State Clearinghouse and the Riverside County Clerk, as required under CEQA.</p>
84	06/11/24	Jerry Shearer	<p>The following are the major points raised in this letter:</p> <p>1. Alternative 5 was written in a way to discourage your serious consideration.</p> <p>2. The terms of the Settlement Agreements are required to be implemented irrespective of the project.</p> <p>3. EJ Element should be part of this Project.</p> <p>4. Concerns about community engagement and offers to form Community Advisory Board</p>	<p>In response to the major points raised in this letter, please see the following:</p> <p>1. Alternative 5 was created in response to comments raised by the community to consider a Non-Industrial Alternative, as discussed in detail in Topical Response 8 – Alternatives, in the Final EIR.</p> <p>2. See RTC RI-254-38</p> <p>3. See RTC RI-259.52</p> <p>4. See RTC RI-259.9</p>

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			<p>5. Complex and overwhelming nature of the responses to comments and difficulty accessing files. Requests hard copy be retained in the JPA offices and also at the Moreno Valley Library, Orange Terrace Library, Riverside County Law Library and Perris Branch Library.</p> <p>6. Request to postpone hearing to give public time to review all the information.</p> <p>7. JPA didn't email everyone about the Corrections memo posted on 06/05/24</p> <p>8. Concerns about the privatization of public lands.</p> <p>9. Support for Alternative 5</p> <p>10. Community benefits are the terms of the Settlement Agreements</p> <p>11. Specific Plan prohibits construction of buildings that generate smoke or vapor but existing buildings already do.</p> <p>12. Mead & Hunt report identifies landscaping that constitutes bird attractants but nearby neighbors can plant anything.</p>	<p>5. A complete hard copy, including all appendices was made available at the March JPA offices, as noted in the notices sent out. Additionally, access to the files posted on the MJPA website was tested from several computers with varying internet connection speeds. All files were able to be accessed in less than 1 minute.</p> <p>6. Noted. Responses to comments and the Final EIR were available for public review 12 days, which is 2 days longer than mandated under CEQA.</p> <p>7. The corrections memo identified non-substantive corrections, and, as the comment notes, it was posted on the March JPA website on June 5, 2024.</p> <p>8. See RTC RI-259.10</p> <p>9. Noted.</p> <p>10. See RTC RI-259.21</p> <p>11. The proposed Specific Plan applies to the West Campus Upper Plateau buildings. This comment refers to existing conditions outside the Specific Plan Area.</p> <p>12. The proposed Specific Plan identifies what planting materials can be used to minimize bird attractants. This comment refers to existing conditions outside the Specific Plan Area.</p>

	Date	Commenter	Comment(s)	Response(s)
			<p>13. EIR picks and chooses General Plan goals and policies</p> <p>14. No concept plan for Alternative 4</p> <p>15. RTC I-11 – disagreement with conclusions about light and noise pollution.</p> <p>16. RTC I-785 – disagreement with conclusions about aesthetics</p> <p>17. RTC I-787 – the existing landscape plans haven’t worked; can’t guarantee reliance on these to determine less than significant impacts.</p> <p>18. RTC RI-2 – disagreement in how environmental review for the EJ element was handled and they should not have been “two projects”</p>	<p>13. See RTC RI-259.13</p> <p>14. See page 6-43 in Section 6 of the EIR for a discussion of the concept plan for Alternative 4. The overall plan would be the same with the shifting of Barton Street to the east.</p> <p>15. See RTC I-11. These models are the best available technology to evaluate impacts.</p> <p>16. See RTC I-785. Methodology was explained in detail in Section 4.1, Aesthetics, of the EIR. By its very nature, aesthetics is a somewhat subjective measure. Visual simulations were prepared using the guidelines within the proposed Specific Plan to demonstrate visual changes.</p> <p>17. See RTC I-787. Methodology was explained in detail in Section 4.1, Aesthetics, of the EIR. By its very nature, aesthetics is a somewhat subjective measure. Visual simulations were prepared using the guidelines within the proposed Specific Plan to demonstrate visual changes.</p> <p>18. See RTC RI-2.2 and Form Letter RA Response. The EJ Element is part of the March JPA General Plan. It was considered under CEQA and was determined to be categorically exempt.</p> <p>19. The Project’s consistency with the EJ Element is evaluated in Section 4.10, Land Use and Planning,</p>

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			<p>19. RTC RI-232 – disagreement in how environmental review for the EJ element was handled</p> <p>20. Letter RI-259 – a few pages are upside down.</p> <p>21. RTC RI-259 – disagreement about Community Benefits and feels that the use of the term “community benefits” is intended to trick the public.</p> <p>22. Brenda Shearer’s 02/25/24 letter is not included and responded to.</p> <p>23. Park funding</p> <p>24. Fire station funding</p> <p>25. Trucks won’t follow truck routes</p>	<p>of the EIR. That is not the same as the EJ element being a part of the Project.</p> <p>20. Noted; this does not change the material content of the Final EIR.</p> <p>21. The community benefits are included in the proposed Development Agreement and will be part of the Project. See previous Response to Comment Letter RI-259 that address the concerns regarding public involvement and the evaluation of consistency with General Plan goals and policies.</p> <p>22. No record of Brenda Shearer’s 02/25/24 email/letter. On 02/25/24 there were 2 emails/letters submitted from Jerry Shearer (RI-259 and RI-260), 1 email/letter from Christopher Shearer (RI-257), and 1 email/letter from Kevin Shearer (RI-261).</p> <p>23. See RTCs RI-254.46 for a discussion on the funding of the park.</p> <p>24. Not a CEQA issue; however, as discussed in the EIR, the Fire Station will be built as part of the Project.</p> <p>25. See RTC RI-259.116 which discussed truck routes and enforcement mechanisms</p> <p>26. Not under the purview of this Project.</p>

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			26. Requests of payment to repair and clean residential HVAC and heating units, repair and replace windows/stucco/tile, etc. as compensation for the inconveniences caused by living near warehouses.	
85	06/11/24	Jerry Shearer	<p>1. Unable to access Appendix B and the Agenda</p> <p>2. Same comment letter as line 84 above attached.</p>	<p>1. Access to the files posted on the MJPA website was tested from several computers with varying internet connection speeds. All files were able to be accessed in less than 1 minute.</p> <p>2. See responses in item 84 above.</p>
86	06/11/24	Jen Larratt-Smith	<p>1. Disagreement with less than significant aesthetics impacts.</p> <p>2. Questions accuracy and appropriateness of the Biological Tech Report given the month and year it was released (late July/early August in a drought year)</p> <p>3. Haven't property test the site soils for hazardous materials and hazardous wastes.</p> <p>4. Didn't give serious consideration of any of the community's proposed alternatives.</p>	<p>1. See RTC I-785. Methodology was explained in detail in Section 4.1, Aesthetics, of the EIR. By its very nature, aesthetics is a somewhat subjective measure. Visual simulations were prepared using the guidelines within the proposed Specific Plan to demonstrate visual changes.</p> <p>2. As outlined in the Biological Report (Appendix D of the Final EIR), site visits were not only conducted in late July and early August. As discussed in Section 3 of the Biological Report, each separate species for which surveys were conducted outlines the days when the actual surveys were conducted.</p> <p>3. See RTCs RI-290.1 through RI-290.8</p> <p>4. See Topical Response 8 – Alternatives, where discussion is provided of community-suggested alternatives as well as the consideration of a Non-Industrial Alternative is added.</p>

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			<p>5. Disagreement with the Statement of Overriding Considerations – Jobs concerns about the workers, housing and wages.</p> <p>6. Disagreement with the Statement of Overriding Considerations – land use and facility plan for long-term viability</p> <p>7. Disagreement with the Statement of Overriding Considerations – provision of pedestrian and bicycle circulation system</p> <p>8. Disagreement with the Statement of Overriding Considerations – Jobs</p> <p>9. Disagreement with the Statement of Overriding Considerations – balance the jobs/housing balance ratio</p> <p>10. Disagreement with the Statement of Overriding Considerations – employment that will enhance the region</p> <p>11. Disagreement with the Statement of Overriding Considerations – land use and facility plan for long-term viability</p>	<p>5. See Topical Response 5 – Jobs</p> <p>6. See Topical Response 4 – Project Consistency</p> <p>7. See RTC RI-253.14 for a discussion of the pedestrian and bicycle circulation system and connections to the larger pedestrian and bicycle network.</p> <p>8. See Topical Response 5 – Jobs</p> <p>9. See Topical Response 5 – Jobs</p> <p>10. See Topical Response 5 – Jobs</p> <p>11. See Topical Response 4 – Project Consistency</p>
87	06/11/24	Michael Wilson	<p>1. Concerns about the air quality impacts of cut-through traffic with the Barton Street extension. Response was not helpful.</p>	<p>1. As shown in Exhibit 4-A, in Appendix C-1, Revised Air Quality Study, construction and operational air quality impacts for the 9 residences along the Barton Street extension were considered and evaluated as Sensitive Receptors R-11.</p>

	Date	Commenter	Comment(s)	Response(s)
			<p>2. Noise concerns along the Barton Street extension south of Alessandro.</p> <p>3. Concerns about increased traffic along Barton Street between Alessandro and Cactus.</p> <p>4. Concerns about street lights, privacy and safety that could arise from grading unrestricted access to the area.</p>	<p>Operational noise impacts consider traffic traveling along the newly connected Barton Street.</p> <p>2. Existing noise conditions were measured along Barton Street at Camino del Sol, as shown on Exhibit 5-A in Appendix M-1, Revised Noise Study. Receiver locations are shown in Exhibit 8-A in Appendix M-1, where Location R-10 represents the closest residence to the Project site along where the Barton Street extension would be located. Table 9-6 shows the anticipated noise level increases that would be experienced at Location R-10, which would be an increase from 52.7 to 53.0 dBA Leq.</p> <p>3. This comment does not raise environmental questions and expresses concerns about the increase in traffic by 2028.</p> <p>4. Street lighting, privacy walls, and safety requirements will be installed consistent with what is outlined in the proposed Specific Plan, and maintained through the established LLMD.</p>
88	06/11/24	Mike McCarthy (12:52 PM)	See separate response letter	See separate response letter
89	06/11/24	Mike McCarthy (11:55 AM)	<p>1. Questioning park funding.</p> <p>2. Questioning Fire Station credits to developer.</p> <p>3. Questioning Truck Route Enforcement funding and what happens when the funds dry up.</p> <p>4. Modifying the price of the property without an updated appraisal.</p>	These comments relate to funding and community benefits under the proposed Development Agreement and do not raise environmental questions.
90	06/11/24	Noah Estrada	1. What kind of notification has been given about the Project?	1. This comment raises concerns about public engagement on the Project. March JPA and the

	Date	Commenter	Comment(s)	Response(s)
			2. Truck routes questioned.	<p>applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. The comment further requests a non-industrial alternative. As such, in response to this comment, please see Topical Response 8, Alternatives, for the evaluation of Alternative 5, Non-Industrial Alternative. With regard to the October 26, 2022, agreement referenced in the comment, please see Topical Response 10, Development and Disposition Agreement.</p> <p>2. Regarding design considerations, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross street, Meridian Parkway</p>

	Date	Commenter	Comment(s)	Response(s)
91	06/11/24	Steve Walker	General opposition	Noted; no new issues raised.
92	06/11/24	Linda Allen	General opposition	Noted; no new issues raised.
93	06/11/24	Laura Sandidge	General opposition	Noted; no new issues raised.
94	06/11/24	Alyssa De Mint	General opposition	Noted; no new issues raised.
95	06/11/24	Kevin Heinmann	General opposition	Noted; no new issues raised.
96	06/11/24	Zhiyun Qian	General opposition	Noted; no new issues raised.

Attachment 2

Response to Mike McCarthy Letter, dated June 11, 2024

Response to Mike McCarthy, June 11, 2024 email.

March JPA adopted a General Plan and certified the Master EIR at a noticed public meeting in 1999. It has been amended numerous times, all at noticed public hearings. The proposed Project is not tiering off the General Plan EIR – it is amending the General Plan to create a Specific Plan for the Specific Plan Area. As noted by the commenter, all of this is legal. Contrary to the comment, the public has been informed and involved throughout this process.

March JPA is a public agency that holds public meetings that are noticed and open to the public. Regarding this Project, March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three Technical Advisory Committee workshops, and one Zoom virtual presentation with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Please see Section 2.1.3 (Environmental Review Process) for details of the public noticing and review of the environmental analysis for this project.

The Final EIR was published on May 31, 2024. Because this more than 10 days before the hearing date where the Final EIR could be certified, March JPA meets the requirements of CEQA section 21092.5.

Please see below for responses to the topical comments raised by the commenter.

Aesthetics

The photosimulations included in the Final EIR are not intended to provide precise representations of the eventual engineering that will be required for the Project. Rather, as explained in Topical Response 1 – Aesthetics, “[t]o prepare the photosimulations, the five viewpoint photographs were used as a base layer in AutoCAD, and the Project buildout scenario was overlaid, including setbacks, height, materials, color palettes, and landscaping consistent with the plant palette and Design Guidelines in the proposed Specific Plan. For ornamental and screening landscaping within the Development Area, a 10-year growth factor was applied to each plant species. Additionally, the photosimulations accounted for the proposed grades within the Campus Development.” Final EIR p. 9.1-2.

Thus, the photosimulations provide a general picture of how the Project will look from various view points given the information currently available. Detailed grading and engineering plans will be developed at a later date. While retaining walls may be necessary, they would be screened by the same type of vegetation and screening walls that are depicted in the photosimulations. In addition, as noted above and contrary to the comment’s suggestion, the photosimulations accurately represent the elevation of potential Project buildings.

The comment also states that the buildings in the mixed use area depicted in Final EIR Figure 4.1-2 are inconsistent with the conceptual grading plan in Figure 6-9 of the Specific Plan, however the alleged inconsistencies are not specified. The elevations cited in the comment are consistent on both figures and Figure 4.1-2 of the Final EIR does not purport to represent

building elevations, just viewpoint locations. In addition, Specific Plan Figure 6-9 notes that elevations are general and not final.

The comment asserts that the trees are depicted at heights of 45 feet. However, as explained in the Final EIR, the photo simulations demonstrate that trees will partially screen the buildings (about one-half of their height) at full maturity. Final EIR p. 4.1-16, 4.1-17. As explained in Topical Response 1 – Aesthetics, the photo simulations represent a 10-year growth factor. Final EIR p. 9.1-2. Thus, they are not expected to be 45 feet, which is the maximum height allowed by the Specific Plan Design Guidelines for Mixed Use/Business Park buildings. The photo simulations accurately represent the expected tree growth and level of screening it will provide. The Final EIR concludes that with partial screening of the buildings from landscaping and the buffer provided by the Conservation Easement, the project would not degrade the existing visual character of the Project site or its surroundings. In conclusion, impacts to visual character related to the Specific Plan Area are less than significant, and no mitigation is required.

Air Quality

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is known as diesel particulate matter (DPM). More than 90% of DPM is less than 1 µm in diameter (about 1/70th the diameter of a human hair), and thus is a subset of particulate matter less than 2.5 microns in diameter (PM_{2.5}).

DPM is typically composed of carbon particles (“soot”, also called black carbon, or BC) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds and oxides of nitrogen (NO_x). NO_x emissions from diesel engines are important because they can undergo chemical reactions in the atmosphere leading to formation of PM_{2.5} and ozone.

This information and more information can be found on the California Air Resources Board (CARB)’s website here: <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>. See also page 4.2-8 to 4.2-9 of the Final EIR.

The Health Risk Assessment for this Project analyzed cancer risk from DPM, consistent with the South Coast Air Quality Management District’s “Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis” – available online here: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

This analysis took into account all of the over 40 known cancer-causing organic substances that make up DPM. The analysis utilized the OEHHA/CARB Approved Health Risk Assessment Health Values (<https://ww2.arb.ca.gov/resources/documents/consolidated-table-oehha-carb-approved-risk-assessment-health-values>) for DPM, which accounts the cancer causing

substances contained in diesel exhaust. Per the approved health risk assessment values table, the health values for DPM are to be utilized for diesel exhaust.

As explained in Response RI-259.89 and RA-6.3: “Diesel particulate matter (DPM) has been identified as the top contributor to cancer risk-weighted emissions, contributing more than 85% of the total carcinogenic potential of emissions.” Response RI-259.89 stated that “while passenger vehicles do emit some TACs, the inclusion of passenger vehicle emissions in the analysis would not alter the findings.” This response is supported by the fact that even if the Project operational risk estimates from the EIR were increased by 15%, this would result in a risk of 6.05 in one million for the unmitigated scenario and 2.56 in one million for the mitigated scenario, both of which are well below the applicable threshold of 10 in one million. Therefore, the Final EIR responded to the commenter’s concern related to cancer risk from light-duty passenger vehicles and explained that there would be a less than significant health risk impact even if the emissions from these vehicles were included in the health risk analysis.

Furthermore, it is unclear how the reference to CARB and its estimate of diesel PM in 2009 being less accurate is related to the Final EIR’s response to comments or the Final EIR. The commenter appears to erroneously include a reference to CARB when the Final EIR response is not based on this document. The Final EIR and underlying technical reports consistently cite back to the MATES V study that the commenter references.

It should be noted that the benzene and 1,3-butadiene emissions provided in the comment from the commenter are emitted over the entire 6,745 square mile South Coast Air Basin, and are the result of over 10 million gasoline-powered passenger vehicles traveling over 384 million miles per day per EMFAC 2021 vehicle fleet data – on a regional scale – as compared to the Project’s emissions and contributions which occur at a local level. As such, these emissions are spread and diluted over a very large area, compared to stationary sources which by definition are in a fixed location and thus can result in outsized health impacts for the surrounding area. Additionally, this emissions data in MATES V is from 2018, and it is expected that passenger vehicle emissions have since, and will continue to decrease decreased and will continue to decrease as more stringent emission standards take effect and electrification of the passenger vehicle fleet continues.

As explained above, DPM includes benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene and other carcinogenic compounds and the health risk analysis accounted for these compounds in the analysis. All trucks, regardless of class, were assumed to be diesel powered and the DMP emissions from all the trucks were included in the health risk assessment. Gasoline powered passenger vehicles do not emit DPM and were therefore not included in the analysis. This is standard practice and provides a representative estimate of the health risks associated with the proposed project.

The HRA and Final EIR include a cumulative health risk assessment. SCAQMD does not currently have a separate methodology or threshold to evaluate a project’s contribution to cumulative cancer risk. Instead, “[p]rojects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable.” The EPA and other expert air

districts use a cumulative cancer risk threshold of 100 in one million. As explained by Baseline Consulting (Attachment to Letter O-8): “Environmental Protection Agency’s guidance for air toxic analyses at the community-scale level considers a cancer risk of 100 in a million or less to be within the “acceptable” range of cancer risk. This is a common cumulative threshold that is considered by other lead agencies in California.” Urban Crossroads, March JPA’s consultant concurs with this, and the Final EIR uses a cumulative threshold of 100 in one million. The results of this cumulative analysis show that the total cumulative cancer risk is 9.45 in one million. The Final EIR explains that this is “highly conservative, and the actual risk contributions from each project would be less than this combined value. Despite this conservative approach, the total cumulative cancer risk is well below EPA’s standard cumulative cancer risk threshold of 100 in one million.”

Errata on Air Quality

- *Active ground disturbance:* MM-AQ-2 is included in the EIR to ensure construction activities occur within the assumptions utilized in the Revised Air Quality Impact Analysis. It notes that “Active disturbance” does not include moving of equipment from staging area(s) to grading areas, or haul routes between grading areas if the active disturbance areas are not contiguous. Emissions from moving equipment from staging areas is accounted for in CalEEMod as fugitive dust emissions that would occur during site preparation and grading activities, as well as dust emissions that would occur as a result of vendor trips, during which construction equipment and building materials are brought to/from the Project site. Therefore, all emissions associated with active ground disturbance are included in the analysis.
- *Off-site construction activities:* The Health Risk Assessment (Appendix C-2) does not separately model/allocate the emissions associated with installation of an aboveground 0.5-million-gallon prefabricated, bolted steel reclaimed water tank on a poured concrete slab next to an existing water tank on an already disturbed and graded site along with trenching and paving to install a new reclaimed water line along Grove Community Drive to connect with Barton Street. As explained in Response I-827.6, the closest sensitive receptor (Receptor 11) included in the HRA is 32 feet from construction activities, specifically the northern Barton Street extension and the Mixed Use parcels of the Specific Plan Area. Even with analyzed exposure of 4.35 years of construction emissions (including from grading, paving and other construction activities), the mitigated construction health risk at Receptor R11 is 0.56 in one million, well below the SCAQMD significance threshold of 10 in one million. As noted in the Final EIR and Project HRA, TACs generally dissipate with distance from the source. The homes along Grove Community Drive and Barton Drive in the vicinity of the offsite water tank construction and waterline installation would not be exposed to construction source emissions to the extent or duration compared to Receptor R11 – the mitigated construction health risk would be below 0.56 in one million. It will not take 4.35 years to install the water line in Grove Street and the health risk as a result of this construction would be less than 0.56.

DPM emissions related to the tank/water line installation are included in the overall Project DPM emissions. There is no piecemealing of the analysis. The building construction and paving in Table 2-1 of the Project HRA (Appendix C-2) include all of the construction activity for the entire Project. Health risks associated with paving the roadway extensions are included in the HRA and would be less than significant. As noted above, the only off-site construction that was not separately modeled/allocated in the HRA is the construction of the water tank and line installation. Due to the relatively small size of the site at this location and the limited pieces of construction equipment that would fit at this site, and the extremely short-term nature of construction activities at this location relative to overall Project construction, these risks would be less than significant.

Emissions from the 215 Freeway: The health risk assessment evaluated emissions from Project trucks that would occur on surface streets up until vehicles enter the state highway system. Modeling is typically performed up to this point, as it is generally not known what routes Project trucks will take at this point. As Project trucks disperse traveling various routes on the highway system and travel at highway speeds, truck emissions would be increasingly dispersed, occurring at any single location for a very limited period of time. Additionally, as demonstrated in the modeling, DPM concentrations are highest near the Project site, where idling activities are assumed to occur, and trucks would be traveling at relatively slow speeds while maneuvering on-site and traveling on surface streets in the Project vicinity.

For health risk, the Final EIR includes a cumulative analysis of warehouses within 1,000 feet of the project site and its truck routes. This is shown in Exhibit 3-B in the Project HRA (Appendix C-2). Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70-percent drop-off in particulate pollution levels at 500 feet. Based on CARB and SCAQMD emissions and modeling analyses, an 80-percent drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center. To support the 1,000-foot evaluation distance, the Project HRA references traffic-related studies, CARB and SCAQMD emissions and modeling analysis, the Waters Bill, and the 2021 report *Evaluating Siting Distances for New Sensitive Receptors Near Warehouses*, prepared by the Ramboll Group. As noted in comment I-827.9, the I-215 freeway is "0.75 miles from the nearest homes in the neighborhood." This is 3,960 feet and is not within the recommended evaluation distance.

- *Building A.* As discussed in Response RI-254.105, as part of this Project, there are only site plans for Buildings B and C. However, for modeling purposes, the analysis assumed buildings on the remaining parcels and placed dock doors and loading areas in compliance with the development standards in the proposed Specific Plan. The number of idling trucks and TRUs is based on the Project Traffic Analysis and the building square

footage, not the number of loading docks, thus the number of loading docks or dock doors would not affect the analysis.

Alternatives

Alternative Plan #1: The Campus Approach

The commenter questions why the Campus Approach alternative was not evaluated. As explained in Topical Response 8, Alternatives, this alternative was not evaluated because it could be developed under the proposed Specific Plan. The Final EIR discusses the ALUCP's restrictions and recommendations in the C1 and C2 Zones because a campus would have a higher population density than the buildout scenario analyzed in the Final EIR. The Final EIR evaluates the most-intensive uses proposed under the Specific Plan.

Alternative Plan #2: Veterans Village Approach

As discussed above, the fundamental purpose of the Project, and March JPA as a whole, is employment generation. Housing was not contemplated because of land use compatibility issues related to the continued military activities at March ARB. Military operations continue to this day at March ARB and residential land use incompatibility remains the same. Different mix of uses would result in different impacts. The Final EIR conservatively assumed a buildout scenario with the most intensive uses allowed under the proposed Specific Plan to disclose worst case analysis. Any other configuration that is allowed under the Specific Plan would result in fewer impacts.

Alternative Plan #3: State or County Park Approach

This alternative would not be consistent with the fundamental project objective to provide jobs which is the mission of the March JPA and is what Air Force required when the base was transferred for civilian purposes.

The commenter fails to provide any evidence that any of the proposed and rejected alternatives are feasible or that they adequately meet most of the project objectives. As explained in Topical Response 8, Alternatives, with the exception of housing, all of the proposed alternatives could be developed under the currently proposed Specific Plan and would have similar or fewer environmental impacts. The five alternatives that were analyzed in the Final EIR were designed to reduce impacts. Here, the Final EIR evaluates a reasonable range of alternatives and March JPA it is not required to study additional alternatives suggested by members of the public or other agencies. *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 345; *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal.App.4th 214, 256; *City of Maywood v. Los Angeles Unified Sch. Dist.* (2012) 208 Cal.App.4th 362, 420.

Biological

The comment refers to previous letters submitted regarding the San Diego Tarweed, Long-spined spineflower, and the unique vegetation at the Project site. It also shows pictures purportedly from the Project area of the Long-spined spineflower, flat-top buckwheat, and the San Diego Tarweed. Based on the scale of these photos, it is not possible to determine the location at which they were taken. San Diego Tarweed is also known as paniculate tarplant, which is the name used throughout the EIR and in this response.

Please refer to Response I-949.10 regarding the Long-spined spineflower and Responses I-949.12, I-949.14 and FL-C.7 about the paniculate tarplant. Regarding the Long-spined spineflower, as explained in Response I-949.10 (Final EIR pp. 9.5-2046 to -47) as well as Appendix D-2, Bio Responses to Comments, Rocks, March JPA's biological resources expert, did not observe any Long-spined spineflower in the Study Area. The assessments conducted determined that the potential for special-status plant species to occur were conducted using the best available data while taking into account the specific conditions on the Project site and the blooming period of each species. Each of the species listed in comment I-949.10, including the Long-spined spineflower, has a low potential for occurrence on site. Thus, impacts to Long-spined spineflower are not expected. See also, Final EIR p. 4.3-8. The picture of Long-spined spineflower included in the comment does not indicate a specific location, so its relationship to the Study Area cannot be determined.

With respect to the paniculate tarplant, as explained in the Final EIR (p. 4-3.7) and in Responses I-949.12 and I-949.14, this species is not considered special status. Therefore, it was not analyzed further in the EIR. See also, Response FL-C.7.

Finally, the Final EIR acknowledges that several small areas of flat-top buckwheat are present within the Study Area. Final EIR p. 4.3-2. MM-BIO-8 requires impacts on flat-topped buckwheat to be mitigated at a 1:1 ratio. Final EIR p. 4.3-56; see also 4.3-45.

Cumulative Impacts

See Topical Response 7, Cumulative Projects, which discusses the development of the cumulative projects list and its appropriateness. The Topical Response also explains why projects requested to be included by commenters were not added.

Disposition and Development Agreement

Commenter raises issues related to appraisal procedures, methodology, and assumptions, and payment schedule under DDA which do not relate to environmental impacts or CEQA.

Development Agreement

Consistent with the requirements of CEQA, the Final EIR analyzes the proposed Project and evaluates and discloses the potential environmental impacts associated with the Project. March

JPA is obligated to create a park but does not have funding to do so. As explained in the EIR, funding and construction of the Park is a community benefit that the March JPA negotiated to be paid by the Project under the proposed Development Agreement. As explained in responses to the commenter's prior comments, under the proposed Development Agreement, the applicant will be required to retain a consultant to prepare the Park Feasibility Study prior to the issuance of the first grading permit for the Project. The applicant will pay the costs to prepare the Study and grading of the 60-acre site, along with offsite utilities, drainage, and any additional permitting, not to exceed \$6.5 million. Separately, the applicant will contribute \$23.5 million to a March JPA-established Park Fund Account. Within 36 months of completion of the Park Feasibility Study and site grading, the applicant will complete construction of the Park. (See, e.g., Response to Comment RI-254.37 in Chapter 10 of the Final EIR).

With regard to the term of the proposed Development Agreement, as explained in Topical Response 9 – Long-Term Project Implementation and Enforcement, in Chapter 9 of the Final EIR, the land use authority the County held over the March JPA Planning Area as unincorporated County land was given to the March JPA in 1997 and will revert back to the County when the JPA sunsets. As such, the County, as March JPA's successor in interest, will enforce the provisions of the Project's Development Agreement after the March JPA sunsets. As such, the Development Agreement's term is not inconsistent with the March JPA sunset date.

PFAS/PFOS are addressed in the EIR and in responses to the commenter's prior comments. See, for example, Response to Comment RI-254.146 in Chapter 10 of the Final EIR, which explains that no further remediation or removal activities are required.

With regard to CDFW, CDFW has been notified throughout the EIR process and received the Draft EIR, Recirculated Draft EIR sections, and Final EIR from the State Clearinghouse. Section 3, Project Description, of the EIR identifies CDFW as one of the agencies that may be responsible for additional discretionary permits and approvals for the Project. The CDFW is a responsible agency under CEQA and its permitting process is completed after the CEQA review conducted by the March JPA as lead agency. CDFW may or may not issue permits to impact biological resources and may impose additional conditions and mitigation measures.

Environmental Justice

As discussed in Form Letter RA Response in Chapter 10 of the Final EIR, the Environmental Justice Element of the March JPA General Plan applies to the whole of the March JPA Planning Area. The Final EIR includes an analysis of the Project's consistency with the adopted Environmental Justice Element and concludes that the Project is consistent with all applicable policies.

With regard to the CalEnviroScreen rankings for the census tract that includes the Project site, the Project's census tract is large and includes all of the March ARB and the March JPA jurisdiction along with three blocks within the City of Moreno Valley, which appear to have been mapped as part of March JPA. The residential uses within the March ARB census tract are located approximately two miles from the Project site and are all outside of the cumulative

impact area from the Project's truck routes. As such, the proposed Project is not proximate to these residences. The residences immediately adjacent to the north, south, and west of the Project site are in different census tracts that are not identified in CalEnviroScreen as burdened with pollution and the data the comment cites does not apply to these residences. For example, the Orangecrest neighborhood to the south of the Project site is located within two different census tracts, census tracts 6065042013 and 6065042014, with low rates of pollution burden and poverty and high rates of educational attainment. The same is true for the Mission Grove neighborhood which is located to the northwest and west of the Project site within census tract 6065042012. That census tract also includes the residences located in Riverside County to the north of the Project site. As such, the residential areas located proximate to the Project site are not in poor communities overburdened with pollution as identified by CalEnviroScreen. The residential areas that are within the census tract that is cited in the comment are far from the Project site and will not be directly impacted by the development of the Project.

Regarding community engagement, the March JPA and the applicant conducted multiple public outreach efforts including three community meetings, three workshops, and one Zoom virtual meeting with a public notification radius of 1,200 feet around the perimeter of the Project site resulting in 2,172 public notices. Community members submitted comments on the EIR for the Project during the public comment periods, and those comments are provided and responded to in the Final EIR. The public will continue to have the opportunity to provide oral and written comments regarding the Project as part of the noticed public hearings on the Project.

Consistent with the requirements of CEQA, the EIR analyzes the proposed Project and evaluates and discloses the potential environmental impacts associated with the Project. The EIR evaluates a buildout scenario based on the most intensive uses proposed in the Specific Plan to provide the decision makers and public with a full picture of the Project's potential environmental impacts. Section 4.10, Land Use and Planning, and Topical Response 4 – Project Consistency, in the Final EIR address consistency with the March JPA General Plan goals and policies and the Good Neighbor Guidelines for the City of Riverside and County of Riverside. As discussed in the EIR, the purpose of these Good Neighbor Guidelines is to minimize land use conflicts by ensuring air quality and health risks are evaluated when siting new industrial uses, the noise impacts are evaluated and minimized, and that residential uses and neighborhood character are protected. Although the Project is not subject to the City's Guidelines, demonstrating consistency provides additional support for the Project's compatibility with surrounding land uses.

Good Neighbor/Sensitive Receptors

The March JPA is not required to adopt a single definition of "sensitive receptor" in the Final EIR. The commenter accurately quotes and add their own emphasis to the various definitions of sensitive receptors. The proposed active park here is part of the Project. In response to comments on the EIR and for informational purposes, the HRA was revised to include a health risk analysis for the park. The analysis assumed a conservative scenario in which exposure occurs at the park daily over a period of 9 years for 12 hours per day. The maximum potential

cancer risk attributed to operation of the proposed Project was estimated to be 1.18 without mitigation and 0.62 with mitigation, both of which are less than the SCAQMD's threshold of 10 in one million². Non-cancer risks were estimated to be ≤ 0.01 , which would not exceed the applicable significance threshold of 1.0. As such, operation of the proposed Project would not result in a significant impact for users of the proposed active Park.

As discussed in Recirculated Section 4.10, Land Use and Planning, and Topical Response 4, Project Consistency, the Project is consistent with the adopted Good Neighbor Guidelines of the County and City of Riverside. The comment includes the proposed revisions to the City of Riverside's Good Neighbor Guidelines and Industrial Development Standards. These have not yet been adopted.

There are no discrepancies related to the Final EIR's analysis related to sensitive receptors.

1. The Final EIR considers compatibility of the Park with the other uses in the proposed Project as the informational health risk assessment shows there would be a less than significant impact.
2. Open space passive recreational uses, such as those in the conservation easement, are not considered sensitive receptors for the purposes of CEQA.
3. As discussed in Recirculated Section 4.10, Land Use and Planning, and Topical Response 4, Project Consistency, the Project is consistent with the adopted Good Neighbor Guidelines of the County and City of Riverside. The comment includes the proposed revisions to the City of Riverside's Good Neighbor Guidelines and Industrial Development Standards. These have not yet been adopted and consistency with those draft policies is not required.
4. As discussed in Recirculated Section 4.10, Land Use and Planning, and Topical Response 4, Project Consistency, the Project is consistent with the adopted Good Neighbor Guidelines of the County and City of Riverside. The comment includes the proposed revisions to the City of Riverside's Good Neighbor Guidelines and Industrial Development Standards. These have not yet been adopted and consistency with those draft policies is not required.

Hazards

The commenter misrepresents the response to comments with respect to PFOA/PFOS/PFAS. A small section of the Cactus Road extension will be constructed over the Former Landfill No. 5. This is the only part of the Specific Plan Area that the Air Force and Regional Water Quality Control Board had reason to suspect the presence of PFAS compounds. The Final EIR and Appendix J-6 explain that "The Air Force collected groundwater, sediment, and surface water samples at Landfill No. 5 to screen for potential residual PFAS compounds. One groundwater sample was reported to contain 91.9 ng/L of one PFAS compound (PFOA), exceeding the reported 40 ng/L screening level for this compound. Groundwater in this area is 15-25 feet deep

and will not be impacted by construction of Cactus Avenue. The sediment and surface water samples of Landfill No. 5 were reported to contain **no PFAS compounds** exceeding their reported screening levels. (QPP, 2022). Soil samples were collected from three locations within the former Landfill No.5 and there were “[n]o detections of PFOA, PFOS, or PFBS above screening criteria” and, as such, “[n]o additional soil sampling is recommended.” (USAF Final Technical Working Group Meeting Minutes, February 2023). This sampling was done under the oversight of the Regional Water Quality Control Board who approved these results.

As explained in the Final EIR (page 4.8-10 to -11) there are no areas within the Specific Plan Area that require further munitions responses and there is no evidence of any unexploded ordnance within the Specific Plan area. There is therefore no evidence that there are PFAS or any other chemicals of concern related to unexploded ordnance within the Specific Plan Area.

Fireworks have been stored in the concrete bunkers that are within the WSA. As explained in Response FL-D.10 and the Hazards section of the Final EIR: “As part of the Phase I, the concrete bunkers were inspected and the environmental professional noted that the “bunkers are constructed entirely of concrete” and that “[n]o evidence of floor pitting or staining was observed in the bunkers, and the concrete flooring was noted to be in excellent condition.” As such, there is no pathway for perchlorate to the soil. There is no information to indicate that munitions or fireworks were disposed of in the Development Area and no indication that fireworks were manufactured on site and, as such, there is no evidence indicating a release of perchlorate to soil.” Because there is no evidence of a release, there is no reason to test the soil for perchlorate. MM-HAZ-1 requires that all ground disturbing activities shall be conducted by workers trained to look for any suspect contamination, and that if encountered, earthwork activities shall cease until laboratory analysis of soil samples have been conducted and direction given from the Air Force and/or overseeing agency. Therefore, any potential impacts based on the unlikely presence of perchlorate would be mitigated through compliance with MM-HAZ-1.

Topical Response 3 – Hazards, explains that the Air Force and March JPA thoroughly investigated the potential for radiological contamination in the former WSA. In response to comments on the Draft EIR, Section 4.8, Hazards and Hazardous Materials, was revised to include additional information regarding the potential storage of nuclear, chemical and biological weapons in the former Weapons Storage Area (WSA). A detailed investigation was performed that included measurements of alpha and gamma radiation inside 16 structures at the WSA that may have stored non-conventional weapons and confirmed the absence of radioactive contamination at the WSA. In a letter dated August 24, 2000, the Department of Health Services stated that it “is in concurrence that the buildings investigated in [the MARSSIM] meet the State’s release criteria for unrestricted release” (DHS 2000). Further investigations confirmed the absence of any radiologically impacted materials or burial pits and concluded that no further action for surface soils or subsurface investigation of burial sites in the WSA is recommended based on historical information and the results of geophysical, radiological, and subsurface investigations. The Regional Water Quality Control Board concurred with these findings. The EIR therefore concluded there would be a less than significant impact related to potential storage of non-conventional weapons. Contrary to other comment letters received after publication of the

Final EIR (email from Rod Deluhery dated June 4, 2024) the length of time weapon non-conventional weapons may have been stored at the WSA does not change this conclusion. No additional testing is required.

The commenter speculates that there may have been an underground passage 'or railroad' that connects underneath the 215 Freeway to the main portion of the base." There is no evidence that this "passage or railroad" exists and it is therefore not discussed in the Final EIR. If unexpected conditions are encountered during grading, such as an underground railroad, MM-HAZ-1 required that earthwork activities shall cease until laboratory analysis of soil samples have been conducted and direction given from the Air Force and/or overseeing agency.

Finally, the QA/QC procedures used by Vista Environmental Laboratory comply with industry standards and the sample results are valid. As explained in Vista's June 12, 2024 response to this comment:

If one goes to the text of USEPA Method 8000, you will find the following text at the very beginning (Article 1.1):

"Method 8000 is not a determinative method but instead provides guidance on analytical chromatography and describes calibration and quality control requirements that are common to all SW-846 chromatographic methods. However, more specific quality control requirements that are provided in the applicable determinative method will supersede those noted in Method 8000."

USEPA Method 8000 is, in fact, an educational guideline taught as a beginner course to laboratory technicians before they learn the actual methods to be employed. It is not an actual analytical method applicable to analyzing real samples.

The reference to 70% to 130% recovery in quality control comes from Article 9.4.9. This section pertains to the QA/QC requirement when a laboratory is proving competence in the method. As stated therein, "Given that the initial demonstration is performed in a clean matrix, the average recoveries of analyte from the four replicates should generally fall within this range." The process described in Article 9.4.9 of USEPA Method 8000 does not apply to real world samples, such as a sample of transformer oil which is a mix of PCBs and mineral oil, which has been subjected to thousands of heating and cooling cycles, but is applicable to a clean laboratory standard with no interferences.

The actual acceptable recovery parameters for each sample are indicated at the bottom of each sample result. These numbers are not made-up by the laboratory, but are a combination of the actual method employed (USEPA Method 8082 for PCBs), combined with matrix interference, any sample dilution and other factors determined by the laboratory.

Utilizing Samples O-01 and W-01 as examples, since they both pertain to PCBs and are the first two samples in the laboratory report related to PCB and Treated Wood Waste

testing, the acceptable parameters for surrogate recovery are 0% to 87% for the first surrogate (Decachlorobiphenyl) and 0% to 103% for Tetrachloro-m-xylene.

Based on the above, the Vista recoveries cited by the comment as below 50% and sometimes below 25% are acceptable and the sampling data include in their report is reliable. As explained in previous response to comments, the Project is required to comply with MM-HAZ-1, which MM-HAZ-1 requires oversight of all ground disturbing activities by workers trained to identify suspect contamination or other waste debris. In addition, MM-HAZ-1 requires that all wastes be evaluated at the Project site for hazardous waste characterization and disposed of at an appropriately licensed disposal facility. Therefore, any potential impacts related to the unlikely presence of chemical of concern at the Project site would be mitigated to less than significant.

Jobs, Population, Housing

The Project's consistency with the SCAG RTP/SCS 2020-2045 (Connect SoCal) is analyzed in the EIR (see Table 4.7-5 in Section 4.7, Greenhouse Gas Emissions). As discussed in Section 4.7 of the EIR, the proposed Specific Plan Area would increase regional employment by approximately 3,622 jobs (Topical Response 5 – Jobs, of the Final EIR). The ancillary truck driver jobs were included to provide conservative analysis under CEQA. According to SCAG's 2020–2045 RTP/SCS, employment within Riverside County in 2019 is approximately 812,800 jobs with an anticipated increase to approximately 1,102,700 jobs by 2045, a growth of approximately 289,900 jobs (SCAG 2020). The proposed Specific Plan Area represents 1.24% of the anticipated increase in jobs, and therefore, would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or an Air Quality Management Plan, or result in employment growth that would substantially add to traffic congestion. SCAG's Connect SoCal (2020–2045 RTP/SCS) was adopted on September 3, 2020. Additionally, the Project would comply with the policies set forth in the 2020-2045 RTP/SCS by reducing vehicle trips and VMT, increasing the use of alternative fuel vehicles, and improving energy efficiency. The major goals of SCAG's Connect SoCal are outlined in Table 4.7-5 in the EIR, along with the Project's consistency with them. SCAG explicitly found that "For the purpose of determining consistency with Connect SoCal for California Environmental Quality Act (CEQA), grants or other opportunities, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency." (Connect SoCal, p. xiv). March JPA determines consistency with Connect SoCal based on consistency with the long-term employment and growth projections. The SCS also indicates that this is a jobs poor area so providing more jobs will actually reduce GHG emissions and reduce VMT as it will provide local jobs to achieve a more favorable jobs-housing balance.

The comment asserts that SCAG's industrial jobs projections have been exceeded based on approved and proposed warehouses; however, these statements are speculative and not supported by substantial evidence. The analysis conducted by the expert agency Western Riverside Council of Governments is substantial evidence of job generation and commenter is not an expert in this area.

The EIR identifies the regional housing need goals (i.e., RHNA) for the March JPA member agencies (e.g., County of Riverside [unincorporated], City of Riverside, City of Perris, and City of Moreno Valley) in order to capture the planned housing goals within the Project site's vicinity. Describing its Housing Element, the March JPA General Plan states the "land use plan identifies no new housing areas and creates an employment center within the housing rich environment of western Riverside County." Additionally, the March JPA General Plan Housing Profile report states: "No housing opportunities are identified within the March JPA Planning Area due to land use compatibility issues related to the continued military activities of the Air Force Reserves and aviation operations." For additional discussion about why housing is not included in the Project, please see Topical Response 8 – Alternatives, in Chapter 9 of the Final EIR. Topical Response 8 also addresses the Veteran's Village alternative referenced in the comment. The Project is not removing housing opportunities from the region.

Park

As explained in Topical Response 4 – Project Consistency, in Chapter 9 of the Final EIR, under the 2003 Settlement Agreement between the March JPA and the Center for Community Action and Environmental Justice (CCA EJ) and Community Alliance for Riverside's Economy & Environment (CAREE), March JPA is obligated to provide for active recreation in the form of a community park of 48 acres with potential expansion to 60 acres. As discussed above and as explained in the EIR, the Project includes a 60.28-acre parcel for park purposes, and funding and construction of the Park is a community benefit under the proposed Development Agreement. The proposed Development Agreement establishes milestones and the terms of the applicant's obligations to study, fund and build the park. Contrary to the comment's suggestion, the proposed Project and Development Agreement would facilitate the development of the park, which is currently an unfunded obligation of the March JPA under the 2003 Settlement Agreement. The only relationship between the Project and the park is that the Project provides a means to fund the park.

Transportation

Trip rates for the proposed project trip-generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021), the High Cube Warehouse Trip Generation Study (WSP, January 2019), and the San Diego Association of Governments (SANDAG) (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002). As explained in Appendix N-2:

High-Cube Fulfillment Center Warehouse has been used to derive **site specific trip generation estimates** for up to 3,012,710 square feet of the proposed Project. The ITE Trip Generation Manual (2021) has trip generation rates for high-cube fulfillment center use for both non-sort and sort facilities (ITE land use code 155). While there is sufficient data to support use of the trip generation rates for non-sort facilities, the sort-facility rate appears to be unreliable because it is based on limited data (i.e., one to two surveyed sites). The proposed Project is speculative and whether a non-sort or sort facility end-user would occupy the buildings is not known at this time. Lastly, the ITE Trip

Generation Manual recommends the use of local data sources where available. As such, the best available source for high-cube fulfillment center use would be the trip-generation statistics published in the High-Cube Warehouse Trip Generation Study (WSP, January 29, 2019) which was commissioned by the Western Riverside Council of Governments (WRCOG) in support of the Transportation Uniform Mitigation Fee (TUMF) update in the County of Riverside. The WSP trip generation rates were published in January 2019 and are based on data collected at 11 local high-cube fulfillment center sites located throughout Southern California (specifically Riverside County and San Bernardino County). However, the WSP study does not include a split for inbound and outbound vehicles, as such, the inbound and outbound splits per the ITE Trip Generation Manual for Land Use Code 154 (high-cube transload/short-term storage) have been utilized. These rates are consistent with the rates used for other similar projects through Riverside and San Bernardino Counties. The WSP trip generation rates for high-cube fulfillment center use are slightly more conservative than the latest non-sort facility rate provided in the ITE Trip Generation Manual. It should be noted, Saturday peak hour trip generation rates are not readily available in the ITE Trip Generation Manual or the High-Cube Warehouse Trip Generation Study. As such, Saturday weekend peak hour trip generation rates were developed utilizing a ratio of the Saturday and PM peak hour trip generation rates from the Warehousing land use (ITE Land Use Code 150).

Table 4.1 in the Transportation Analysis and Table 4.15-1 in the Final EIR shows that Final EIR used a daily trip rate of 2.129/thousand square feet for the High Cube Fulfillment Center Warehouse.

“WRCOG commissioned a trip generation study in 2018 at local high-cube facilities to verify local trip generation data that was utilized in the previous TUMF Nexus Study Update. Since the completion of that effort, a variety of factors have changed in the logistics industry. The most notable event, the COVID pandemic, increased the frequency and magnitude of on-line shopping; it is therefore appropriate to revisit the high-cube warehousing study as part of the current TUMF update. WRCOG retained Fehr & Peers to update the trip generation study with current trip generation information collected at the same locations as 2018.”

https://wrcog.us/AgendaCenter/ViewFile/Agenda/_12142023-730 One of the conclusions of that study was that “It is recommended that WRCOG utilize the average rate of 1.74 trips / thousand square feet (KSF) for Fulfillment Centers.” “All-in-all, the 2023 data supports very similar conclusions from the 2018 study for both the Fulfillment Centers and the Parcel Hub facilities.” Here, the Final EIR used a higher trip rate of 2.129/thousand square feet. The Fehr & Peers analysis can be found here: https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/2285847/Attachment_1_-_High_Cube_Warehouse_Trip_Generation_Memorandum.pdf

In addition:

- 2,562,561 SF of the proposed Project square footage was evaluated using the High-Cube Fulfillment Center rate. There are other uses such as 500,000 SF of High-Cube Cold

Storage use and 1,234,218 SF of Warehousing uses within the Business Park area. The Business Park areas also include a mixture of office and retail uses which have higher passenger car trip generation associated with these land use categories.

- The ITE Trip Generation Rates for High-Cube Fulfillment Sort Facility is based on data collected at 2-3 site. ITE recommends the use of local data whenever feasible and the prior WSP study prepared for WRCOG is locally sourced trip generation data for 11 High-Cube Fulfillment Center warehouses in the Southern California region. The Fehr & Peers update to the 2019 Study is currently in Draft form but shows that updated surveys of the same 11 facilities indicate a reduction in trip generation from the data collected in 2019. The WSP truck trip generation is higher than the ITE based trip generation which is only 13% daily trucks for High-Cube Fulfillment Non-Sort and 3% daily trucks for High-Cube Fulfillment Sort. The WSP truck percentage of approximately 18% is also greater than the 13% daily truck trips associated with ITE's High-Cube Parcel Hub so there is no understating of truck trips.

The commenter speculates that the trip rates could be increased if the project were instead used as a parcel hub. Parcel Delivery Terminals are a permitted use in the Industrial zone under the proposed Specific Plan but are not proposed for Buildings B or C. MM-AQ-5 requires that all future site plans include documentation that the specific development do not exceed the impacts identified and disclosed in the Final EIR. Without this documentation, additional environmental review would be required.

Unstable Project Description

The Project Description is stable. The description of the proposed Project is consistent throughout the Final EIR.

PDF-TRA-3 is a community benefit required under the proposed Development Agreement (See Exhibit F). It requires the developer to fund truck route enforcement in the amount of \$100,000 for two years, for a total of \$200,000.

The comment suggests the Final EIR should have evaluated the fire station and the timing and funding provisions for the proposed Park. As explained in Chapter 3, Project Description, the construction of Meridian Fire Station would be offsite and its construction and operation were previously environmentally evaluated and subject to mitigation measures (Appendix T). The construction and operation of the Park is evaluated throughout the Final EIR. The timing and funding of the proposed Park would not have environmental impacts.

Although the comment states the Development Agreement was revised between the Final EIR and the agendized motion, none of the revisions would impact the public's review and understanding of the Final EIR's environmental analysis of the Project's impacts.

VMT

The mobile emissions used in the air quality and GHG analysis were estimated based on trip generation and trip distances for all vehicles (heavy duty trucks, and passenger vehicles, including cars and light duty trucks). The transportation impact analysis is based on vehicle miles traveled (VMT) for automobile travel and does not include VMT from heavy duty trucks. This is consistent with CEQA Guidelines Section 15064.3(c) and the 2019 OPR Technical Advisory (available online here: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf) which state: "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks." This is also consistent with the 2020 Caltrans Transportation Analysis Framework (available online here) <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-09-10-1st-edition-taf-fnl-a11y.pdf> which states that "For a CEQA compliant transportation impact analysis, automobile VMT (cars and light trucks) may be evaluated."

In the Project VMT Analysis (Appendix N-1), 2,340 non-retail employees include industrial employees who would drive to and from the warehouse buildings. The 3,622 employee estimate used in the EIR includes ancillary jobs, such as truck drivers. Trucks trips are not included in VMT analysis and that is why the truck drivers are excluded from the non-retail employees. Moreover, the Western Riverside Council of Governments (WRCOG) establishes an efficiency metric that measures efficiency of travel per person generated by the Project. Therefore, any changes (i.e., increases) to the Project employees will not adversely affect the VMT findings and the VMT per non-retail employee presented in the 2022 VMT Analysis applies to all of the warehouse buildings in the Specific Plan Area.

The commenter is correct that the VMT analysis uses home-based VMT and compares it to the regional home-based average VMT for an apples-to-apples comparison. This is consistent with the OPR Technical advisory which states: "Where tour-based information is unavailable for threshold determination, project assessment, or assessment of mitigation, home-based work trip VMT should be used throughout all steps of the analysis to maintain an "apples-to-apples" comparison." The RIVCOM model used in the analysis and recommended by the WCOG does not include tour-based information and therefore a home-based trip VMT is the appropriate method. Consistent with previous projects in the March JPA, the WRCOG Guidelines were used to evaluate impacts on VMT. In addition, the WRCOG Guidelines were utilized as the WRCOG sub-region provides a less expansive area than the entire Riverside County. Utilizing the smaller sub-region provides greater accuracy when analyzing VMT impacts such as data inconsistencies in the travel demand model attributed to model noise (i.e., convergence criteria).

The County of Riverside Transportation Guidelines cited by the commenter (available online here: <https://trans.rctlma.org/sites/g/files/aldnop401/files/migrated/Portals-7-2020-12-15-20--20Transportation-20Analysis-20Guidelines.pdf>) also uses home-based trip ("Commute VMT was computed from the attraction VMT by Home-Based Work trip purposes."

As explained in Appendix N-1, the VMT threshold for this project was developed based on WRCOG's RIVCOM model. For non-retail employees, the WRCOG's sub-regional transportation analysis zone (TAZs) VMT were summed and then divided by the WRCOG's employees resulting in a quotient of the sub-regional VMT per employee average. This is more representative of the employees in the March JPA area than the 14.2 VMT/employee for the entire Riverside County which would include more rural areas of unincorporated eastern Riverside County to the state's eastern boarder of Arizona.

Please see Responses A-9.17 and A-9.18, both of which are related to consistency with the Scoping Plan. Neither comment challenges the adequacy of the VMT analysis. It should be noted, the City of Moreno Valley traffic engineer concurred with the results of the VMT Analysis in a comment letter provided by the City on March 18, 2022.

Finally, there would be no change in the results of the analysis for Alternative 5 if the commenters flawed accounting for VMT were used and the VMT for Alternative 5 would still be greater than that of the proposed project as Alternative 5 would increase retail uses, which introduces a new negative effect to region's total VMT, in addition to any non-retail VMT.

Errata

- *Section 2.3.3:* Incorporation by reference planning documents are not available on the <https://marchjpa.com/mjpa-meridian-west-campus/> site. The locations for the requested references documents are provided below:
 - General Plan: https://marchjpa.com/wp-content/uploads/2023/03/General-Plan_03-07-2023.pdf
 - Master EIR: <https://marchjpa.com/wp-content/uploads/2022/10/Complete-EIR.pdf>
 - Airport Land Use Compatibility Plan: <https://rcaluc.org/sites/g/files/aldnop421/files/2023-06/March.pdf>
- *Section 2.3.4.* Regarding the Project NOP process, March JPA determined that an EIR would be required for the proposed Project and issued a Notice of Preparation (NOP), which was distributed to the State Clearinghouse, interested agencies, and groups on November 19, 2021. Pursuant to Section 15082 of the CEQA Guidelines, recipients of the NOP were requested to provide responses within 30 days after their receipt of the NOP. An in-person scoping meeting was held at the March JPA offices on December 8, 2021. The 30-day NOP public review period ended December 20, 2021. Comments received during the NOP public review period were considered during the preparation of the Draft EIR. The NOP and NOP comments are included in Appendix A of the Final EIR. All comments received on the Project EIR during the public comment periods are responded to in this Final EIR.
- *Appendix C-2 HRA-Table 2-4:* As discussed in Response RI-254.105, as part of this Project, there are only site plans for Buildings B and C. 321 cold storage trucks were assigned to

Building B, and 146 trucks were assigned to Building C. The remaining truck trips were allocated to the remaining industrial parcel, and the impact analysis would not change if more trucks were at a particular building. For modeling purposes, the analysis assumed buildings on the remaining parcels and placed dock doors and loading areas in compliance with the development standards in the proposed Specific Plan. The number of idling trucks and TRUs is based on the Project Traffic Analysis and the building square footage, not the number of loading docks, thus the number of loading docks or dock doors would not affect the analysis.

- *Appendix C-2 HRA: Please see response to the Air Quality comments above.* The only off-site construction that was not separately modeled/allocated in the HRA is the construction of the water tank and line installation. All emissions from construction of the water tank and water line were included in the total construction emissions for the project. Exhibit 2-A shows that the closest modeled receptor to construction of the Barton Street Extension on the north of the Project site is 32 feet. The mitigated construction health risk at this location is 0.56 in one million.
- *Appendix C-2 Exhibit 2-C: Please see response to the Air Quality comments above.* The health risk assessment evaluated emissions from Project trucks that would occur on surface streets up until vehicles enter the state highway system. Modeling is typically performed up to this point, as it is generally not known what routes Project trucks will take at this point. As Project trucks disperse traveling various routes on the highway system and travel at highway speeds, truck emissions would be increasingly dispersed, occurring at any single location for a very limited period of time. Additionally, as demonstrated in the modeling, DPM concentrations are highest near the Project site, where idling activities are assumed to occur, and trucks would be traveling at relatively slow speeds while maneuvering on-site and traveling on surface streets in the Project vicinity.
- RI-254.105. The comment correctly notes the planning assumptions:
 - Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
 - Building C – 587,000 SF of high-cube fulfillment center warehouse use
 - Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
 - Industrial Area – 500,000 SF of high-cube cold storage warehouse use

With the exception of Buildings B and C, the planning assumptions are not separated into buildings. As the location of the cold storage warehouse use is not determined, the analysis conservatively evaluated cold storage use at each of the three industrial parcels. The cold storage warehouse use was a planning assumption to establish a conservative estimate for air quality emissions.

- *Jobs:* As explained in Topical Response 5 – Jobs, A March JPA economic impact ratio was derived based on the above-referenced economic analysis. The March JPA economic ratio is 1,486 square feet per job (see worksheets attached as Final EIR Appendix T). Using this ratio, the Project would be estimated to generate a total of 3,357 jobs. Unlike the March JPA 2023 employment data, the Project on-site employee estimate does not include ancillary jobs. The Project would generate ancillary jobs for truck drivers and Table 4-2 of the West Campus Upper Plateau Traffic Analysis (Appendix N-2) indicates the Project would generate 2,054 truck trips (which is 1,027 trucks coming and going to the site) which equates to approximately 1,027 truck drivers. When the Project’s estimated truck drivers (1,027) are added to the Project’s estimated onsite employees (2,595), the Project has an estimate of 3,622 total jobs generated. The Project’s combined jobs estimate of 3,622 conservatively exceeds the March JPA employment ratio estimate (of 3,357) by only 8%, or 265 jobs. This revised number does not change the conclusions in the EIR.
- *Enforcement:* Section 4.13, Public Services, correctly explains that March JPA contracts with the Riverside County Sheriff’s Department for 40 hours of patrol service per week and truck route enforcement is paid for through an existing truck route mitigation fund. As discussed above, under PDF-TRA-3 and the proposed Settlement Agreement, the applicant will contribute \$100,000 per year for two years to support additional truck route enforcement.
- *Automation:* Topical Response 5 – Jobs, addresses concerns about employment projections and the effects of future automation on the workforce, particularly for warehouses. While existing warehouse automation would be accounted for in the March EIA, at this time, is too speculative to assume future automation and/or incorporate such unknown factors into the EIR. As stated above, the Final EIR assumed the total on-site employment from the proposed Project based on the onsite employment data estimated by March JPA and used in the Water Supply Assessment (Appendix O in the EIR), as well as ancillary jobs derived from truck drivers serving Project operations. The Final EIR’s jobs estimate represents a conservative approach to assess associated environmental impacts if there were a future reduction in jobs. No changes are needed in response to this comment on the Final EIR.

Conclusion

This comment restates comments made in the beginning of the letter about the volume of material included in the Final EIR and the amount of time available for the public to review it prior to the June 12, 2024 public hearing. In response, please refer to the response to comments on the introduction, above.

The comment also raises general objections to the content of the Final EIR and the Project itself. This comment reiterates some of the subject areas discussed earlier in the comment letter and does not raise specific issues, concerns or questions about the analysis in the Final EIR. Please

refer to the response to comments, above, for responses to specific issues raised by the commenter.



June 12, 2024

Brynn McCulloch, PG
EAR Practice Leader (West), Associate VP/Principal Geologist
Verdantas.
2600 Michelson Road, Suite 400
Irvine, CA 92612

**Subject: Lab Testing Parameters – Response to Public Comments
March Air Force Base, Former Ordnance Storage Area / Weapons Storage
Area, Riverside, CA.**

Dear Ms. McCulloch,

In response to your request, the following further clarification is provided.

Response to the following comment, e-mailed to Vista on 11 June 2024:

“Lastly, the MJPA Hazards comments states that the Vista Environmental Laboratory met 'in-house' standards for QA/QC. EPA standards require sample recoveries between 70%-130% for a sample to be considered quantitative. Vista recoveries were often below 50% and sometimes below 25%. That will never stand up to chemical scrutiny for proper environmental testing - all those samples need to be retested for every sample where in-house QA/QC procedure did not meet EPA sampling requirements for USEPA Method 8000. Failure to follow adequate QA/QC procedures invalidates the conclusion that samples were below PQL - it cannot be substantiated without adequate in-house sample recoveries.”

If one goes to the text of USEPA Method 8000, you will find the following text at the very beginning (Article 1.1):

“Method 8000 is not a determinative method but instead provides guidance on analytical chromatography and describes calibration and quality control requirements that are common to all SW-846 chromatographic methods. However, more specific quality control requirements that are provided in the applicable determinative method will supersede those noted in Method 8000.”

USEPA Method 8000 is, in fact, an educational guideline taught as a beginner course to laboratory technicians before they learn the actual methods to be employed. It is not an actual analytical method applicable to analyzing real samples.

The reference to 70% to 130% recovery in quality control comes from Article 9.4.9. This section pertains to the QA/QC requirement when a laboratory is proving competence in the method. As stated therein, “Given that the initial demonstration is performed in a clean matrix, the average recoveries of analyte from the four replicates should generally fall within this range.” The process described in Article 9.4.9 of USEPA Method 8000 does not apply to real world samples, such as a sample of transformer oil which is a mix of PCBs and mineral oil, which has been subjected to

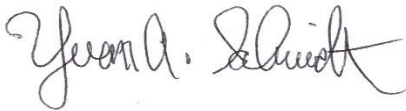
thousands of heating and cooling cycles, but is applicable to a clean laboratory standard with no interferences.

The actual acceptable recovery parameters for each sample are indicated at the bottom of each sample result. These numbers are not made-up by the laboratory, but are a combination of the actual method employed (USEPA Method 8082 for PCBs), combined with matrix interference, any sample dilution and other factors determined by the laboratory.

Utilizing Samples O-01 and W-01 as examples, since they both pertain to PCBs and are the first two samples in the laboratory report related to PCB and Treated Wood Waste testing, the acceptable parameters for surrogate recovery are 0% to 87% for the first surrogate (Decachlorobiphenyl) and 0% to 103% for Tetrachloro-m-xylene.

If you should have any questions regarding this matter, or if I can be of further assistance, please feel free to contact me on my mobile at 714.746.7644.

Respectfully submitted,
Vista Environmental Consulting

A handwritten signature in black ink, appearing to read "Yvan A. Schmidt". The signature is fluid and cursive, with a large, stylized initial "Y".

Yvan A. Schmidt
Senior Project Manager

Attachment 3

Response to Channel Law Group Letter, June 11, 2024

Responses to Channel Law Group Letter (R-NOW) dated June 11, 2024

2. The Final EIR Evaluates the Project as the Whole of the Action

The Final EIR describes and analyzes the whole Project. Contrary to the comment's assertion, March JPA is not required to analyze all development within the Planning Area in one fell swoop. The Final EIR (p. 3-2) lists the previous environmental analyses covering the Project site to provide historical background. The Final EIR does not tier off of the 1999 Master EIR for the March JPA General Plan.

Further, the fact that March ARB is a joint-use airport within the bounds of the March JPA Planning Area does not mean this Project will be accessing or impacting airport operations. Because the March ARB/Inland Port Airport is a joint use airport, civilian flights, including commercial cargo flights, are limited through a Joint Use Agreement between the March JPA and the U.S. Air Force.¹ Additional flights can only be approved after environmental review of an airport operating agreement through CEQA.² No additional flights are proposed as a part of this Project.

The comment suggests that the Meridian D-1 Gateway Aviation Center project should be considered a part of this Project. However, CEQA requires the environmental analysis "examine the impacts of contemplated development...that are reasonably foreseeable consequences of the approval. ... Related activities that are similar in nature and that serve the same purpose are separate projects (as opposed to a single project) if they are independently considered for approval and one activity is not a foreseeable consequence of the other." Practice Under the California Environmental Quality Act (2d ed Cal CEB) § 6.31 B.

This Project and the Meridian D-1 project are being considered independently and neither project is a foreseeable consequence of the other. This Project does not require the Meridian D-1 project to operate, and vice versa. The Meridian D-1 project is located on the March ARB/Inland Port Airport taxiway and will serve aviation freight so it is not a project that is similar in nature or geographically proximate to this Project. March JPA is independently reviewing this separate project in an EIR that may or may not proceed to approval.

The comment further suggests the South Campus project should also be considered as part of this Project. The South Campus project was originally approved in 2003, and amended most recently in 2021, and is not currently being considered. Most of the South Campus project is already operational. The South Campus project was considered independently and reviewed through an EIR and this Project is not a foreseeable consequence of the South Campus approval.

3. The Final EIR Adequately Evaluates Cumulative Impacts.

¹ https://www.marchjpa.com/documents/docs_forms/joint_use_agreement.pdf

² <https://marchjpa.com/wp-content/uploads/2022/05/MIP-Carrier-req-for-Operational-status-instructions-2021.pdf>

The comment suggests the Final EIR should have included the Meridian D-1 project on the list of cumulative projects. As explained in the Urban Crossroads Transportation Responses to Comments (Appendix N-3), March JPA declined to include the Meridian D-1 project because the D-1 project's travel patterns and traffic would not affect the proposed study area intersections. Any nominal traffic contributions would be represented in the 14.87% of background growth that is added to the existing baseline. See also Topical Response 7 – Cumulative Projects, of the Final EIR for further discussion.

4. The Final EIR Is Legally Adequate

A. The Project Description Is Stable.

The comment claims that the EIR lacks an accurate and stable project description and refers to comments submitted by other commenters on the EIR. All comments submitted on the EIR during the public comment periods have been provided and responded to in the Final EIR (see Chapters 9 and 10 of the Final EIR). With regard to the specific EIR comments referenced in the comment, Letter O-8, Comments O-8.10-14, those comments are addressed in Responses O-8.10 through O-8.14 in the Chapter 9 of the Final EIR. The comment also references Comment Letters I-8, I-832, and I-833, which are also provided and responded to in Chapter 9 of the Final EIR. The comment states that defects were corrected in the Final EIR but does not assert any specific defects or new defects and, as the comment acknowledges, the corrections noted in comments on the Draft EIR were addressed in the Final EIR.

B. Project Objectives Comply with CEQA

Contrary to the comment's suggestion, CEQA does not require Project objectives to be the same objectives from the General Plan, nor does it preclude project objectives on the basis of requiring a General Plan amendment, or a zone change, or because they may cause significant impacts. Rather, the CEQA Guidelines simply require that the project description in an EIR include "[a] statement of the objectives sought by the proposed project." (CEQA Guidelines, Section 15124(b)). As stated in CEQA Guidelines Section 15124(b), the project objectives help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings and/or a statement of overriding considerations. The CEQA Guidelines provisions on project objectives further state that "[t]he statement of objectives should include the underlying purpose of the project and may discuss the project benefits." (CEQA Guidelines, Section 15124(b)). Project objectives cannot be artificially narrow to preclude consideration of reasonable alternatives for achieving the project's underlying purpose. Practice Under the California Environmental Quality Act (2d ed Cal CEB) § 15.8 2.

Accordingly, as required by CEQA, the Project objectives are a statement of the objectives sought by the proposed Project, including the underlying purpose of the Project and its benefits. The Project objectives are stated with an appropriate level of specificity to inform the decision-makers and the public, help the lead agency develop a reasonable range of alternatives to evaluate in the EIR, and aid the decision-makers in preparing findings and the statement of overriding considerations, consistent with the requirements of CEQA.

The comment challenges the inclusion of the Project objective to remove and redevelop the Weapons Storage Area (WSA) and its munitions bunkers and claims the conclusion that the WSA igloos are not historic is under challenge. As discussed above, CEQA does not preclude objectives that could have environmental impacts. The comment letter does not assert any authority regarding objectives and only cites that the purpose of CEQA is to protect the environment.

The comment letter asserts that development of the Weapons Storage Area will cause an impact because the bunkers are historic, but as explained in the Final EIR, Section 4.4, Cultural Resources, and the revised WSA report (Appendix E-2) the WSA and its individual buildings were determined not eligible under NRHP, CRHR, or MJPA CEQA Guidelines criteria for historic resources at the national, state, or local level. While the comment indicates this is being challenged, that is apparently a reference to comments disagreeing with that conclusion. None of those comments are expert evidence providing substantial evidence to the contrary of the EIR's conclusion.

With regard to job opportunities, the comment suggests “[i]f the objective were stated as providing high quality, long-term jobs, warehousing would fare poorly in comparison to other job types.” The comment also cites sources regarding employee turnover percentages in the warehouse industry. While the comment criticized the Project objectives as inappropriately narrow, the comments criticism of this objective is that it should be more narrowly tailored to preclude warehouse employment opportunities. We agree objectives cannot be narrow under CEQA, which is why the objective on jobs was not drafted to be overly narrow. The Project objectives are stated with an appropriate level of specificity consistent with the requirements of CEQA. Further, as also noted above, CEQA does not require Project-specific objectives to match the objectives of an agency's General Plan.

C. The March JPA Appropriately Relied on Project Design Features When Making Impact Determinations.

Contrary to the comment's assertion, it was appropriate for the Final EIR to include Project Design Features (PDFs) to describe aspects of the Project that would be specifically relevant to the impact analysis. The PDFs identified in the Final EIR are drawn from the proposed Specific Plan, Development Agreement, and requirements from regulatory agencies and/or other legal requirements for the Project. As explained by the Association of Environmental Professionals (relied upon by the commenter in section 2 of its letter):

<https://ceqportal.org/tp/ceqa%20mitigation%202020.pdf>

Some project proponents incorporate “avoidance and minimization measures” or “environmental commitments” into the project design as part of the project description, and the CEQA Guidelines also reference these features in Section 15064(f)(2) and 15126.4(a)(1)(A). Examples of project design features that may address environmental impacts include construction traffic management plans, **use of energy efficient lighting**, solar panels, **construction lighting that will be shielded and directed away from neighboring properties**, and building standards in excess of the requirements of Title 24 Building Code. **These are not considered mitigation measures because they are part of the project that is undergoing environmental review.** Nonetheless, in order to address

an environmental impact, project design features that include impact avoidance and/or minimization measures must be described, and their effectiveness in reducing or avoiding potential impacts specifically analyzed, in the environmental document.

Failure to evaluate the effect of these measures in the impact analysis violates the legal requirement to provide a logical argument, supported by substantial evidence, for each impact conclusion in an environmental document (*Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645). Therefore, concluding that an impact is less than significant without describing how avoidance and minimization measures of the project design prevent or minimize the impact, is not legally adequate.

While not “mitigation”, a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact.

CEQA Guidelines section 15126.4(a)(1)(A) requires an EIR to describe “feasible measures which could minimize significant adverse impacts,” and explains that “the discussion of mitigation measures shall **distinguish between the measures which are proposed by project proponents to be included in the project** and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project.”

Here, the PDFs describe aspects of the Project that would be specifically relevant to the impact analysis. The PDFs identified in the Final EIR are drawn from the proposed Specific Plan, Development Agreement, and requirements from regulatory agencies and/or other legal requirements for the Project. They are clearly distinguished from the mitigation measures that are imposed by March JPA. They are discussed throughout the EIR and, where appropriate, there is an explanation of how they will help reduce impacts. Moreover, they will be made enforceable through conditions of approval and the MMRP.

The comment claims that including a project design features as part of the Project violates the holding in *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656. In *Lotus*, the court notes:

“The distinction between elements of a project and measures designed to mitigate impacts of the project may not always be clear. For example, in the present case the use of “Cement Treated Permeable Base (CTPB) to minimize the thickness of the structural section, provide greater porosity, minimize compaction of roots, and minimize thermal exposure to roots from Hot Mix Asphalt paving” might well be considered to define the project itself.” *Lotus*, 223 Cal.App.4th at 657, n8.

In the seminal case on GHG thresholds, the California Supreme Court noted that “efficiency and conservation features” can be incorporated into the project design. *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 231. The Court stated that to reduce GHG emissions the agency could “adopt whatever feasible alternatives and mitigation measures exist beyond the efficiency and conservation features **already incorporated in the project design.**” (emphasis added). See also *Save the Plastic Bag Coalition v. City and County of San Francisco* (2013) 222 Cal.App.4th 863, 882 (rejecting contention that a bag fee to protect the environment was a mitigation measure rather than a project feature).

Here, the PDFs are already incorporated in the project design, and “they will also be included as separate conditions of approval and included in the Mitigation Monitoring and Reporting Program (MMRP). March JPA will monitor compliance through the MMRP.” FEIR p. 3.12.

As to the specific PDFs the commenter takes issue with:

Aesthetics, Light and Glare – PDF-AES-2, PDF-AES-3, and PDF-AES-13.

- **PDF-AES-2:** All exterior lighting shall minimize glare and “spill over” light onto public streets, adjacent properties, and Conservation Easement by using downward- directed lights and/or cutoff devices on outdoor lighting fixtures, including spotlights, floodlights, electrical reflectors, and other means of illumination for signs, structures, parking, loading, unloading, and similar areas. Where desired, illuminate trees and other landscape features by concealed uplight fixtures (on- and off-site).

PDF-AES-2 is Section 4.4.6(a) of the proposed Specific Plan and incorporates ALUC conditions and requirements of the CBD Settlement Agreement. The design of project lighting is properly a project design feature because it the type of lighting the project is proposing to construct. Compliance with this project design feature will be confirmed and enforced by March JPA through MM AES-2.

- **PDF-AES-3:** Limit light spillover or trespass to one-half foot-candle or less, measured at the property line for development adjacent to the Conservation Easement (off-site). This shall be confirmed through point-by-point photometric study.

PDF-AES-3 is Section 4.4.6(b) of the proposed Specific Plan and incorporates requirements of the CBD Settlement Agreement. As with PDF-AES-2, the design of project lighting is properly a project design feature because it is again the lighting the project is proposing as part of the project. Compliance with this project design feature will be confirmed and enforced by March JPA through MM AES-2.

- **PDF-AES-13.** Lighting is prohibited that could be mistaken for airport lighting or that would create glare in the eyes of pilots of aircraft using the nearby March Air Reserve Base (on-site).

PDF-AES-13 is Section 4.4.6(p) of the proposed Specific Plan and incorporates ALUC conditions. The project is designed to use specific types of lighting fixtures because of the proximity to March ARB and is therefore properly a project design feature. This is confirmed and enforceable through MM-AES-2. To illustrate why PDF-AES-13 is a PDF, if one compares this mitigation measure to MM-HAZ-3, which is also designed to avoid impacts to safe air operations but is an operational measure (and not a project design feature):

MM-HAZ-3 Airport Compatibility. Prior to issuance of building permits, the Project applicant shall ensure the following:

- All development shall be designed in a manner which does not encroach into civilian and military airspace, as determined through a Federal Aviation Administration 7460-1 airspace analysis, that shall be completed prior to review by the Riverside County Airport Land Use Commission and the March Joint Powers Authority (JPA) granting individual plot plan approval.
- The Project engineer for any development shall submit information confirming that open detention basins, when incorporated into the Project, shall completely drain within 48 hours of a rain event.
- Within Airport Compatibility Zone C1, aboveground storage of more than 6,000 gallons of flammable or hazardous materials shall be reviewed by the Riverside County Airport Land Use Commission, prior to consideration of these facilities by the March JPA.
- Irrespective of above bullet, use/storage of acutely hazardous materials within Airport Compatibility Zone C1, in excess of threshold levels as identified in Title 8 of the Code of Regulations Appendix A to Section 5189 - List of Acutely Hazardous Chemicals, Toxics and Reactive, shall file for approval by the Riverside County Airport Land Use Commission prior to review and approval of the use by the March JPA.
- All development shall be consistent with the conditional approvals by the Riverside County Airport Land Use Commission made in their May 16, 2022, Development Review File No. ZAP1515MA22 as well as the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.

As the commenter notes, the Final EIR includes: **MM-AES-2. Lighting Point-by-point Photometric Study Approval.** "Prior to the issuance of a building permit for Campus Development or Infrastructure Improvements, an exterior point-by-point photometric study shall be submitted to March JPA for review and approval demonstrating compliance with PDF-AES-1 through PDF-AES-16, the March JPA Development Code, and the Specific Plan. The photometric study shall document the location, quantity, type, and luminance of all fixtures proposed on the Project site."

Therefore, in addition to being included in the proposed Specific Plan, ALUC conditions, CBD Settlement Agreement requirements, individually as conditions of approval and listed in the MMRP, MM-AES-2 will ensure the Project complies with each of these PDFs and are enforceable by March JPA. Moreover, detailed designs have not been prepared, and it would not be possible to analyze the effectiveness of the PDFs at this time. It is therefore appropriate and in compliance with CEQA to list them as required as part of the Project and then effectiveness evaluated at the time of a building permit application pursuant to MM MM-AES-2. MM-AES-2 would ensure Specific Plan Area-generated lighting would not result in the introduction of a new source of substantial light which would adversely affect nighttime views in the area.

MM-AES-2 is not deficient because no building permit can be issued by March JPA unless the photometric study demonstrates compliance with all the PDFs. This means that light spillover or trespass will be limited to one-half foot-candle or less and that there will be no lighting that could be mistaken for airport lighting or that would create glare in the eyes of pilots of aircraft.

Air Quality – PDF-AQ-1

- **PDF-AQ-1 No Natural Gas Use.** Specific Plan Area development shall not utilize natural gas. In the event a future structure requires access to any available natural gas infrastructure, additional environmental review shall be required.

The applicant does not want to include natural gas in the proposed development – this is a choice to not include this as a feature of the project as provided in Section 6.6 of the proposed Specific Plan. Thus, no natural gas piping will be constructed to the buildings. The Specific Plan would have to be amended, with additional environmental review before March JPA would approve any building that uses natural gas.

Cultural Resources – PDF-CUL-1

- **PDF-CUL-1 Two Weapons Storage Area igloos will be retained on the Project site.** These igloos will remain visually accessible to the public and signage will be incorporated to share the and former use of these facilities as part of the former March Air Force Base.

It is part of the Project to retain two weapon storage igloos. As discussed in Section 4.4, Cultural Resources, the WSA and its individual buildings were determined to not be eligible for listing under the NRHP, CHPR, or March JPA criteria and the Project's impacts would be less than significant. The preservation of two non-historic structures is not mitigation.

Hazards and Hazardous Materials – PDF-HAZ-1 (ALUC), PDF-HAZ-2 (wildlife), PDF-HAZ-4 (wildlife).

- **PDF-HAZ-1** As required by the Riverside County Airport Land Use Compatibility Plan (ALUCP), as detailed plans become available, they will be reviewed for consistency with the Riverside County ALUCP. In addition, the following conditions as a result of ALUC Development Review ...

PDF-HAZ-1 was already imposed on the project by the Riverside County Airport Land Use Commission (ALUC). Since it is already required, it is not a mitigation measure because the Project was designed to comply with each of the conditions that are already imposed for the purpose of consistency with Federal Aviation Administration Advisory Circular 150/5200-33B. As such, the condition is also already enforceable by the ALUC.

- **PDF-HAZ-2** Stormwater management facilities will be designed such that any modifications to open channels or native flow lines do not support potentially hazardous wildlife through the incorporation of vegetation that could provide food, shelter, or nesting habitat for wildlife. Stormwater management facilities will also be consistent with Riverside County ALUCP Condition 4 related to stormwater management facilities and detention basins (see also PDF-HAZ-1).

PDF-HAZ-2 is included in Section 6.5 of the proposed Specific Plan and addresses how the stormwater management facilities are designed as part of the project. The facilities are designed in compliance with ALUCP requirements to not attract wildlife because of the proximity to the aircraft operations of the March ARB. This incorporates ALUC conditions and guidance.

- **PDF-HAZ-4** Grading plan standards related to potential ditches, terrace drains, or other minor swales will require that seed mixes used for soil stabilizations are reviewed by a QAWB and revised as necessary to exclude the use of grains or other constituents that may attract potentially hazardous wildlife.

PDF-HAZ-4 is included in Section 6.8.1, Grading Plan Development Standards, of the proposed Specific Plan. This is part of how the grading is designed and what materials are proposed as part of the project's drainage. This is also required to not create wildlife attractants (e.g., food sources and habitat or nesting opportunities) that could create potential wildlife hazards to the aircraft operations of the March ARB. This is also required by the 2018 March ARB AICUZ, and the Riverside County ALUCP with regard to potentially hazardous wildlife and as compliance with existing requirement, it is not a mitigation measure.

Noise (blasting and drilling) – PDF-NOI-2, PDF-NOI-3, PDF-NOI-4

As explained in the Project Noise Study (Appendix M-1), the Project would have less than significant construction noise impacts and the applicant would implement PDF-NOI-1 through PDF-NOI-4 to further reduce construction noise impacts. Although not required for CEQA purposes, these PDFs represent the applicant's commitment to be a good neighbor to the local community and minimize noise and vibration as much as feasible.

Transportation and Traffic – PDF-TRA-3.

- **PDF-TRA-3. Truck Route Enforcement Program.** To address trucks turning left from Cactus Avenue onto Brown Street or otherwise violating the established truck routes, the Project applicant shall provide the March Joint Powers Authority compensation of

\$100,000 to fund a truck route enforcement program for a period of two years commencing with the issuance of the first certificate of occupancy.

PDF-TRA-3 is a community benefit required under the proposed Development Agreement (See Exhibit F). It is not a mitigation measure because the designated truck routes are a regulatory requirement of each city's municipal code. PDF-TRA-3 provides designated funds for targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. As the Project builds out, drivers will become accustomed to the approved truck routes and the need for targeted enforcement will lessen. After the Project-funded targeted enforcement program winds down, enforcement activities will still occur consistent with all agencies' police power authority to impose vehicular codes, with each jurisdiction addressing any violations of their approved truck routes including leveling fines and penalties on drivers who do not obey truck routes. PDF-TRA-3 is intended to support local enforcement efforts only in the initial phase in case violations are occurring, which is not expected but is included in the Development Agreement as a precautionary measure.

Wildfire – PDF-FIRE-2.

- PDF-FIRE-2. The Project's Fire Protection Plan (FPP) evaluates and identifies the potential fire risk associated with the Project's land uses. The Project shall implement the FPP's recommendations for water supply, fuel modification and defensible space, access, building ignition and fire resistance, and fire protection systems, among other pertinent fire protection criteria, which complies with or exceeds existing code requirements for building in a fire hazard severity zone. The Project shall also comply with the fire safety requirements and standards of the Riverside County Fire Department along with Project-specific measures based on the Project site, its intended use, and its fire environment, as defined and memorialized in the FPP.

PDF-FIRE-2 outlines the provisions of the Project's Fire Protection Plan (Appendix Q), which is a part of the Project and identified in the proposed Specific Plan (see Section 4.5.1). As with all of the PDFs, PDF-FIRE-2 is incorporated into the MMRP and will be enforced by March JPA.

D. The Final EIR Mitigation Measures Are Feasible and Adequate

The comment claims that there are mitigation measures that have either not been demonstrated to be feasible or are inadequate as written and therefore the potential for impacts remains. The comment refers to two specific mitigation measures it claims are inadequate: MM-GHG-11 and MM-HAZ-2, each of which is addressed below.

With regard to MM-GHG-11, the comment claims it is inadequate because it does not ensure that the bus shelter will be installed and anticipates that it will not be installed because the measure provides that the in-lieu payment for the bus shelter would be refunded if the bus shelter is not installed within seven years of Project approval. As explained in Section 4.7.6, Mitigation Measures, in Section 4.7, Greenhouse Gas Emissions, of the Final EIR, CEQA Guidelines Section 15126.4 requires EIRs to describe feasible measures that can minimize

significant adverse impacts. The operational mitigation measures, including MM-GHG-11, presented in the EIR were evaluated for feasibility and incorporated to reduce impacts related to GHG emissions. Consistent with the requirements of CEQA, MM-GHG-11 is adequate and enforceable. As set forth in CEQA Guidelines Section 15151, Standards for Adequacy of an EIR, “[a]n EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.” Contrary to the commenter’s suggestion, the mitigation measure is not inadequate because it provides for a refund of the in-lieu payment if the bus shelter is not installed within seven years of Project approval. MM-GHG-11 requires funding for a specific transit facility improvement and a reasonable amount of time for the funds to be used for the intended purpose. In-lieu fee payments are consistent with the constitutional requirements, as detailed in CEQA Guidelines Section 15126.4(a)(4), including an essential nexus between the mitigation and a legitimate government interest (*Nollan v. California Coastal Commission*, 483 U.S. 825 (1987)). Installation of the bus shelter would improve the local public transit network and further encourage the use of alternative forms of transportation, and increased public transit usage along Alessandro Boulevard would result in reduced GHG emissions in the Project vicinity. However, the reduced GHG emissions associated with this measure have not been quantified, and the analysis and impact conclusions in the EIR will remain the same whether the bus shelter is installed or not. Consistent with CEQA’s requirements for a good faith effort at full disclosure, the mitigation measure simply acknowledges the possibility that the installation may not occur and provides for a refund only if the bus shelter has not been installed within seven years of Project approval.

The comment claims that MM-HAZ-2 is inadequate because it only addresses the potential for storage, handling and use of toxic gases in close proximity to a school and not off-site toxic emissions due to transport, or the use, storage or handling of other hazardous materials or substances within one-quarter mile of a school. The comment cites a portion of MM-HAZ-3, which requires Riverside County Airport Land Use Commission review of above ground storage of more than 6,000 gallons of flammable or hazardous materials and use/storage of acutely hazardous materials in excess of certain threshold levels prior to review and approval of the use by the March JPA, as an indication that the use, transport and storage of non-gaseous toxic materials is contemplated. MM-HAZ-3 simply sets forth adherence to the March ARB/Inland Port ALUCP and the conditions identified from the required ALUC review and approval of proposed plans, requiring ALUC review prior to March JPA review in the event certain hazardous materials storage is proposed.

As explained in Section 4.8, Hazardous Materials, of the Final EIR, the Project’s proposed mixed-use developments would be required to prepare and submit a Hazardous Materials Management Plan and Hazardous Materials Business Plan (HMBP) to the Riverside County

Department of Environmental Health (DEH), as well as comply with any applicable fire code requirements as enforced by the County fire department to minimize the potential for any emissions or releases of hazardous materials. A HMBP would include safety protocols for all hazardous materials that could be included in operations including storage requirements, employee safety training, and handling requirements. The Riverside County DEH, as the CUPA, requires all entities that handle hazardous materials to follow applicable regulations and guidelines regarding storage and handling of hazardous waste as well as response to any inadvertent releases. Additionally, no traffic, including trucks, from the Campus Development will have access to Barton Street. All truck routes lead east and north from the Campus Development, in the opposite direction of the Grove Community Church.

AB 3777 (Cal. Health & Safety Code 25531et.seq. was enacted in 1986 to minimize potential emergencies involving acutely hazardous materials by requiring facilities which handle these materials to submit Risk Management Prevention Plans (RMP). Facilities subject to the AB 3777 are defined in Cal. Health & Safety Code 25532 and are regulated by the local CUPA, here the Riverside County DEH. In order to provide protection for school consistent with CEQA Guidelines section 15186(b), MM-HAZ-2 prohibits any facilities that are subject to AB3777 within one-quarter miles of the existing school. If any other facilities further away from the school are subject to AB 3777, they would be required to submit a RMP to the Riverside County DEH. <https://rivcoeh.org/california-accidental-release-prevention-calarp>.

Under Cal. Health & Safety Code 25532, "Accidental release means an unanticipated emission of a regulated substance or other extremely hazardous substance into the ambient air from a stationary source." As such, as drafted in the FEIR, As explained in MM-HAZ-2 prohibits facilities located within one-quarter miles of the existing school from storing, handling, or using toxic or highly toxic gases at quantities that exceed threshold levels established by California Health and Safety Code 25532. For clarity and in response to this comment, MM-HAZ-2 has been revised as follows:

MM-HAZ-2 Materials Storage Near School. Facilities located within one-quarter mile of an existing school, including public or private schools as well as preschools, shall not store, handle, or use ~~toxic or highly toxic gases~~ an extremely hazardous substance or mixture containing extremely hazardous substances that exceed threshold levels established by California Health and Safety Code Section 25532.

These thresholds can be found here: <https://www.aqmd.gov/docs/default-source/permitting/ceqa-2017/table1-march2017.pdf?sfvrsn=8>

E. The Final EIR Analyzed the Project's Growth-Inducing Impacts.

The comment documents the history of the March Inland Port Airport and cites only the March JPA General Plan's broad policies about joint use of the air field but omits that the Joint Use Agreement between the March JPA and the U.S. Air Force³ limits annual civilian flight

³ https://www.marchjpa.com/documents/docs_forms/joint_use_agreement.pdf

operations⁴ to 21,000 but additional flights within this cap can only be approved after environmental review of an airport operating agreement through CEQA.⁵ No additional flights are proposed as a part of this Project. New development in the March JPA Planning Area including, but not limited to warehouse uses, do not drive demand for air cargo operations and the proposed Project will not increase the number of flights. As responded to in Section 3, the flights proposed by the Meridian D-1 project are analyzed in the EIR prepared for that project. Those flights are limited by the allowed flights under the Joint Use Agreement. This Project in no way causes, or is caused by, the D-1 project as both are independent and will not have any relationship to one another. The D-1 project is an aviation warehouse that will transload goods arriving by air. This Project includes warehouse and other commercial uses that are unrelated to that aviation operation. The D-1 project is not a reasonably foreseeable indirect physical change in the environment caused by this Project.

The comment claims that the EIR is erroneously states the Project does not propose any air cargo operations but cites no substantial evidence as to why that statement is incorrect.

F. The EIR's Cumulative Impacts Analysis Is Adequate.

Commenter references his comments in Section 3 of his letter. The comments are addressed in Section 3 of this Response. Because no project that was required to be a cumulative project was left off, no recirculation is required.

G. The Final EIR Analyzes a Reasonable Range of Alternatives.

As explained in Topical Response 8 – Alternatives, pursuant to CEQA, an EIR is required to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project” CEQA Guidelines Section 15126.6(a). The lead agency has the discretion to reject a suggested alternative – even if it has less of an impact. *Ocean Street Extension Neighborhood Association v. City of Santa Cruz* (2021) 73 Cal.App.5th 985, 1016 (decisionmakers may “reject or approve any of the alternatives” and “may reject alternatives that are undesirable from a policy standpoint.” (internal citations omitted)).

Topical Response 8 provides adequate and accurate reasons why the other four alternatives suggested by commenters were rejected.

All Residential Alternative.

Commenter suggests that the March JPA adopt an all-residential alternative. This is explained in the Topical Response – Alternatives and in Chapter 6.0, Alternatives, of the EIR. This is also

⁴ A flight includes two operations: an arrival and a departure.

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

inconsistent with the March JPA General Plan which has designated this area as Business Park since the inception. Commenter presents no evidence that it is possible.

This would not be compatible with the ALUCP. While it is true that some residential uses are allowed in zones C1 and C2, the C1 Zone is subject to high to moderate noise and moderate accident potential risk and both C1 and C2 Compatibility Zones include safety requirements and restrictions within the policies of the ALUCP.

The March JPA does not include any land zoned for new residential uses because the purpose of the jurisdiction is to increase employment opportunities within the region through the construction of employment-based land uses. Residential use is not consistent with the purpose and mission of the March JPA. Further, the fundamental purpose of the Project, and March JPA as a whole, is job generation, which an all-residential alternative would not fulfill. Practice Under the California Environmental Quality Act (2d ed Cal CEB) § 15.8 2.

Alternative Plan #1: The Campus Approach

The commenter questions why the Campus Approach alternative was not evaluated. As explained in Topical Response 8, Alternatives, this alternative was not evaluated because it could be developed under the proposed Specific Plan. The Final EIR discusses the ALUCP's restrictions and recommendations in the C1 and C2 Zones because a campus would have a higher population density than the buildout scenario analyzed in the Final EIR. The Final EIR evaluates the most-intensive uses proposed under the Specific Plan.

Alternative Plan #2: Veterans Village Approach

As discussed above, the fundamental purpose of the Project, and March JPA as a whole, is employment generation. Housing was not contemplated because of land use compatibility issues related to the continued military activities at March ARB. Military operations continue to this day at March ARB and residential land use incompatibility remains the same. Different mix of uses would result in different impacts. The Final EIR conservatively assumed a buildout scenario with the most intensive uses allowed under the proposed Specific Plan to disclose worst case analysis. Any other configuration that is allowed under the Specific Plan would result in fewer impacts.

Alternative Plan #3: State or County Park Approach

This alternative would not be consistent with the fundamental project objective to provide jobs which is the mission of the March JPA and is what Air Force required when the base was transferred for civilian purposes.

The commenter fails to provide any evidence that any of the proposed and rejected alternatives are feasible or that they adequately meet most of the project objectives. As explained in Topical Response 8, Alternatives, with the exception of housing, all of the proposed alternatives could be developed under the currently proposed Specific Plan and would have similar or fewer

environmental impacts. The five alternatives that were analyzed in the Final EIR were designed to reduce impacts. Here, the Final EIR evaluates a reasonable range of alternatives and March JPA it is not required to study additional alternatives suggested by members of the public or other agencies. *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 345; *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal.App.4th 214, 256; *City of Maywood v. Los Angeles Unified Sch. Dist.* (2012) 208 Cal.App.4th 362, 420.

5. Responses to Comments Are Adequate.

The response to comments for the Project set forth in Chapters 9 and 10 of the Final EIR comply with all of CEQA's requirements and are supported by the case law cited in the comment. In *People v. Kern County*, a case decided 50 years ago, the County prepared a mere 9-page EIR that received multiple substantive comments. 39 Cal.App.3d at 835. Rather than responding to the specific comments, the only additional information the County provided in the Final EIR was a 5-page addendum summarizing significant and unavoidable impacts, and a 2-page summary of the project's impacts. *Id.* at 835-36. The court stated that "in preparing the final EIR, the County must describe the disposition of each of the significant environmental issues raised and must particularly set forth in detail the reasons why the particular comments and objections were rejected and why the County considered the development of the project to be of overriding importance. *Id.* at 841. The court further noted that "[t]here must be good faith, reasoned analysis in response." *Id.* at 842.

In contrast to the non-responses at issue in *Kern County*, here, the Final EIR contains thousands of pages of responses to all comments received. Detailed responses were provided even for comments that did not raise significant environmental issues and the Final EIR includes a detailed analysis of the Project's benefits and why suggestions made in comments were rejected. The response to comments in the Final EIR is clearly distinguishable from the absence of responses in the *Kern County* EIR.

In *Cleary v. County of Stanislaus*, the County was very dismissive of comments received from the California Air Resources Board that asserted that the project's air quality analysis and discussion of growth inducing impacts were inadequate. 118 Cal.App.3d at 358 (1981). In that case, an expert agency raised substantive questions about the adequacy of the environmental analysis in its area of expertise and the County's response, which was "peremptory at best" simply stated that air quality "was not one of the concerns of the Environmental Review Committee and as such was not discussed thoroughly." *Id.* Similarly, with respect to the Air Resources Board's comments about growth inducing impacts, the County summarily responded that "[o]n a regional basis the increase in traffic generated by the proposed use is insignificant." *Id.* The County provided similarly inadequate responses to substantive issues raised by the Department of Food and Agriculture. *Id.* at 358-59.

Unlike the cursory responses at issue in *Cleary*, here the Final EIR included detailed responses to all comments, including all comments submitted by expert agencies. Notably, no expert agencies have suggested that these responses were inadequate. The response to comments did

not dismiss any environmental issues raised in comments; rather, the Final EIR includes a “good faith, reasoned analysis in response” to all comments raised about significant environmental issues, particularly any raised by expert agencies. *Kern County*, 39 Cal.App.3d at 842.

The adequacy of the response to comments included in the Final EIR is supported by the analysis in the third case cited in the comment: *City of Irvine v. County of Orange* (2015) 238 Cal.App.4th 526. In that case – the only one cited in the comment that was decided relatively recently – the court discusses *Kern County* and *Cleary*, as well as a few other cases, and draws some general conclusions about the requirements for response to comments: “When a comment raises a ‘significant’ environmental issue, there must be some genuine confrontation with the issue; it can’t be swept under the rug (*Kern County*). Responses that leave big gaps in the analysis of environmental impacts (such as missing entirely the existence of adjacent wetlands) are obviously inadequate [citation omitted]. By the same token, comments that bring some new issue to the table need genuine confrontation (*Cleary*). And comments that are only objections to the merits of the project itself may be addressed with cursory responses [citation omitted].” 238 Cal.App.4th 526, 553. Notably, the court states that “we see nothing in CEQA Guidelines Section 15088 that allows project opponents to use the comment-and-response process to wear down a lead agency, or delay a project, by the simple expedient of filing an onerous series of demands for information and setting up a series of hoops for the agency to jump through.” *Id.* at 549. Thus, the response to comment process is meant to provide an opportunity for the public to provide meaningful comments about potential environmental impacts of a project to which the lead agency must provide thoughtful responses; it is not meant to serve as a vehicle for delays and project obstruction.

The responses included in the Final EIR satisfy the standards identified by the *City of Irvine* court. In the thousands of pages of responses, March JPA genuinely confronted issues raised and did not sweep any comments under the rug. The caselaw cited in the comment all demonstrate the adequacy of the response to comments in the Final EIR.

The comment specifically identifies four examples of responses that the commenter believes are inadequate. First, the comment states that Topical Response 7 – Cumulative Projects, fails to adequately address comments regarding the EIR’s failure to consider other warehouse projects in the vicinity in the cumulative analysis. Specifically, the comment asserts that the cumulative analysis in the EIR should have included discussion of March JPA’s own Meridian D-1 Gateway Aviation Center, for which a Notice of Preparation was issued on April 1, 2021. See response to Section 3 above.

The comment also asserts that the responses failed to adequately consider alternatives raised by commenters, and refers to Section 4.F of the comment letter for further description. In response to this comment, see responses to Section 4.F, above. The Final EIR includes detailed discussion about alternatives raised during the comment period, in particular in Topical Response 8 – Alternatives.

The comment further questions the adequacy of responses to comment letter I-757 and lists the credentials of the author of this letter, Dr. David Reznick. The comment does not raise any

specific inadequacies of the response to this letter. The referenced comment letter was two pages, which was separated into 15 comments that received a 5-page response drawn from March JPA's expert (Appendix D-2). The comment does not describe any particular deficiencies in the response to these comments.

Finally, the comment alleges that the responses to comment letter I-813.5 and other comments regarding the lack of inclusion of the 215 Freeway were inadequate with respect to air quality and traffic impacts. It is assumed the comment is referencing Comment I-831.5, as there is no I-813.5. Comments were submitted alleging that the EIR did not include analysis of the I-215 Freeway. Response FL-G.4 includes a detailed response regarding the EIR's analysis of I-215 with respect to traffic. With respect to air quality, in response to comments on the Draft EIR, Section 4.2, Air Quality, was recirculated for review. Many of the comments related to cumulative impact and analysis of the I-215 freeway. As explained in the Final EIR, project-level thresholds of significance for criteria pollutants are used by the SCAQMD to determine whether a project's individual emissions would have a cumulatively significant impact on air quality. The potential for the Project to result in a cumulatively considerable impact, specifically a cumulatively considerable new increase of any criteria pollutant for which the Project region is nonattainment under an applicable NAAQS and/or CAAQS, is addressed in Section 4.2.5, Impacts Analysis. As set forth therein, because the Project would exceed the project-level thresholds for regional VOC, NO_x, CO, PM₁₀, and PM_{2.5} emissions during operation, the Project's cumulative impacts with respect to such emissions would be considerable and significant.

For health risk, the Final EIR includes a cumulative analysis of warehouses within 1,000 feet of the project site and its truck routes. This is shown in Exhibit 3-B in the Project HRA (Appendix C-2). Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70-percent drop-off in particulate pollution levels at 500 feet. Based on CARB and SCAQMD emissions and modeling analyses, an 80-percent drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center. To support the 1,000-foot evaluation distance, the Project HRA references traffic-related studies, CARB and SCAQMD emissions and modeling analysis, the Waters Bill, and the 2021 report Evaluating Siting Distances for New Sensitive Receptors Near Warehouses, prepared by the Ramboll Group. As noted in Comment I-827.9, the I-215 freeway is "0.75 miles from the nearest homes in the neighborhood." This is 3,960 feet and is not within the recommended evaluation distance.

As shown in Exhibits 4-1 and 4-2 of the Project Traffic Analysis (Appendix N-2), the Project's truck and passenger vehicle contribution to I-215 are included in the analysis.

The comment does not raise specific concerns about the responses in the Final EIR to the comments about the I-215 Freeway.

6. The MJPA is Not Required to Adopt Alternative 2.

CEQA caselaw is clear that even an environmentally superior alternative, need not be adopted if the agency makes findings rejecting the alternative. *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th at 1000-1 (upholding rejection of potentially environmentally superior alternative for policy considerations). As explained by the court *Ocean Street Extension Neighborhood Assn. v. City of Santa Cruz* (2021) 73 Cal.App.5th 985, 1016:

But whether to reject or approve any of the alternatives is a decision only for the decisionmakers. (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 980-981, 99 Cal.Rptr.3d 572.) They may reject alternatives that are undesirable from a policy standpoint (*id.* at p. 1001, 99 Cal.Rptr.3d 572; *Los Angeles Conservancy v. City of West Hollywood* (2017) 18 Cal.App.5th 1031, 1041-1042, 226 Cal.Rptr.3d 666; *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417, 183 Cal.Rptr. 898 [feasibility includes a consideration of desirability based on “reasonable balancing of relevant economic, environmental, social, and technological factors”]) as well as alternatives that fail to meet project objectives (*Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949, 146 Cal.Rptr.3d 12 (Rialto)).

While it is true that Alternative 2 would meet all of the project objectives, it would achieve the objective to provide increased job opportunities for residents to a much lesser extent than the Project because hundreds fewer jobs would be generated by Alternative 2. Moreover, even though impacts are somewhat reduced, none of the significant and unavoidable impacts are avoided because none of the significant impacts are reduced to less than significant. Therefore, the March JPA is not required to adopt Alternative 2.

7. Conclusion

The language in Mitigation Measure HAZ-2 will be corrected to include nongaseous compounds as proposed above. None of the other comments require revisions to the EIR. This revision merely clarifies the statutory requirement that the mitigation measure already cited to and thus recirculation is not required.

It is noted that the commenter asked to be included on all notices for the project. The March JPA has included the commenter on the Project notice list.

It is noted that commenter incorporates all comments. All comments have been responded to. It is also noted that commenter requests all hyperlinks to be included in the record. The March JPA confirms that links that are functional will be included in the administrative record.

Attachment 4

Comment Letters Received

From: Joseph Ontiveros <jontiveros@soboba-nsn.gov>
Sent: Thursday, May 30, 2024 5:00 PM
To: 'Dan Fairbanks'; Jessica Valdez
Subject: RE: West Campus Upper Plateau (March JPA)

Thank you Dan. We have had discussions with Pechanga regarding the EIR. We also concur with the language within. Thank you again for contacting us.

JOSEPH ONTIVEROS

TRIBAL HISTORIC PRESERVATION OFFICER
(951) 654-5544 Ext. 4137
(951) 663-5279 Cell
jontiveros@soboba-nsn.gov



CULTURAL RESOURCE
23906 Soboba Rd. San Jacinto, CA 92583
P.O. Box 487 San Jacinto, CA 92581
www.soboba-nsn.gov

NOTICE: This communication may contain information that is proprietary, privileged, confidential, or otherwise legally exempt from disclosure. It is intended exclusively for the use of the individual or entity to which it is addressed. If you are not the intended recipient, you are not authorized to read, print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.

From: Dan Fairbanks <fairbanks@marchjpa.com>
Sent: Thursday, May 30, 2024 8:00 AM
To: Joseph Ontiveros <jontiveros@soboba-nsn.gov>; Jessica Valdez <JValdez@soboba-nsn.gov>
Subject: West Campus Upper Plateau (March JPA)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good Morning Joe,

Pechanga requested to review the Final EIR section for Traditional Cultural Resources for the West Campus Upper Plateau. After several reviews, Pechanga approved the attached Final EIR section for Traditional Cultural Resources, inclusive of the mitigation measures. Please let me know if you have comments or concerns.



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

From: Owens, Olivia@CALFIRE <Olivia.Owens@fire.ca.gov>
Sent: Friday, May 31, 2024 3:50 PM
To: Dan Fairbanks
Cc: CALFIRE RVC Planning Submittals
Subject: RE: Response to Comments for the West Campus Upper Plateau Final Environmental Impact Report

Good afternoon, Dan,

Thank you for sending this over, received. Have a wonderful weekend!

Respectfully,



Olivia Owens

Administrative Services Assistant

Office of the Fire Marshal/Fire Planning Division

CAL FIRE/Riverside County Fire Department

Desk: 951-955-0694 | Main: 951-955-4777

4080 Lemon St, 10th Floor, Riverside, CA 92501

olivia.owens@fire.ca.gov | www.rvcfire.org

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

From: Dan Fairbanks <fairbanks@marchjpa.com>
Sent: Friday, May 31, 2024 3:22 PM
To: Dan Fairbanks <fairbanks@marchjpa.com>
Subject: Response to Comments for the West Campus Upper Plateau Final Environmental Impact Report

Warning: this message is from an external user and should be treated with caution.

This email is being sent to you because you provided comments during the public comment periods to the March Joint Powers Authority regarding the draft EIR and/or the recirculated draft EIR for the proposed West Campus Upper Plateau Project. The list of comments is attached for your information. All comments are numbered and organized chronologically based on the date the comment was received. The response to your comments is available at:

Response to comments on the Draft EIR: https://marchjpa.com/wp-content/uploads/2024/05/9.0_Response-to-Comments.pdf

Response to comments on the recirculated portions of the Draft EIR: https://marchjpa.com/wp-content/uploads/2024/05/10_Recirculated-Response-to-Comments.pdf

The proposed West Campus Upper Plateau Project has been scheduled for a public hearing before the March Joint Powers Commission on June 12, 2024 @ 6:30 PM, at the Moreno Valley Conference Center, located at

14075 Frederick St, Moreno Valley, CA 92553. This public hearing is scheduled to discuss and take action on the Final Environmental Impact Report, as well as multiple requests by Meridian Park West, LLC, for the proposed West Campus Upper Plateau Project. The Final EIR, Response to Comments, Specific Plan, Notice of Public Hearing, and Application materials are available at: <https://marchjpa.com/mjpa-meridian-west-campus/>.



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

From: Cindy Camargo <camargo@marchjpa.com>
Sent: Tuesday, June 4, 2024 2:56 PM
To: Dr. Grace Martin; Dan Fairbanks; Thomas.rice
Subject: FW: Community Benefits: A Public Trust

Please see below.

Cindy Camargo, CAP, CPMC

Executive Assistant & Notary Public

14205 Meridian Parkway, Suite 140

Riverside, CA 92518

951-656-7000 [Office]

951-288-3548 [Cell]

March JPA – FTZ 244 Grantee

camargo@marchjpa.com

www.marchjpa.com

Office Hours: Mon-Thu 7:00am to 5:30pm

Office Closed: Friday, Saturday and Sunday



From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Saturday, June 1, 2024 7:53 PM
To: district5@rivco.org; Conder, Chuck <cconder@riversideca.gov>; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org
Cc: Cindy Camargo <camargo@marchjpa.com>
Subject: Community Benefits: A Public Trust

Dear JPA Commission Members,

On behalf of my family and neighbors, I am writing you today because the March JPA is ready for you to discuss and vote on the West Campus Upper Plateau Project, Environmental Impact Report, State Clearinghouse No. 2021110304.

Since the public became aware of this project February 24, 2022, we have struggled to understand why this was the right project, in the right location, at the right time. More than two years later, we are still unclear as to why the JPA and its applicant have ONLY proposed industrial (mixed use and business) and warehouses on the Upper Plateau (did Alternate Plan #5 change anything for you?). When the JPA (and some of you) refer to this as a "good project", they are projecting the "good" of the sweet land deal they are about to pull off onto the public by saying it is "good" for our community (it's not).

The public (your constituents) have attended many meetings and provided hours of public comment, written 1000s of pages of emails and letters to you and the JPA staff, and in response to the original draft EIR and recirculated draft EIR, provided thousands of petition signatures, and spoken directly with many of you regarding our unanimous opposition to this project in OUR neighborhood and community. Yet here we are; you are now to consider "the project."

For more than two years, the public (your constituents) has made it clear that the West Campus Upper Plateau is special to us. We have attempted to explain that not only is it a unique natural area in western Riverside County, it is significant to the region historically and culturally as well. Our requests to have the County of Riverside and the March JPA evaluate the “bunkers” for its uniqueness in California and status as a County or State Park have been either ignored, thwarted, or denied not because the Upper Plateau doesn’t qualify for preservation, but because the applicant needs to finalize this decidedly one-sided land deal with the JPA and build mega-warehouses to satisfy its investors as part of the payment schedule you approved in a closed meeting in October 2022 (and may well modify again in 11 days). As you consider this project, will you work on behalf of the public that loves this land or the private business intent on capitalizing on this land? Who do you want this excess federal land to benefit?

It is clear that this little speck of the earth is important to me, and I write you today because, as I have written in my comment letters to the March JPA, I and every person living near the March JPA development (especially your EJ communities) area are tired of the JPA and the applicant telling us what we need and what is good for us.

It is quite clear that the public despises this project and is outraged that the JPA and the applicant did not consider genuine alternate land use plans for the Upper Plateau in its EIR (Alternate Plan #5 is not written to be approved by you, thus not genuine). From bike riders to hikers, birders like my wife, families, runners, amateur botanists like my neighbor, or just people who appreciate quiet and air to breathe, we expect our elected officials to serve and protect us, not govern on behalf of a private business and its investors. I also know we do not believe the excuse that you have “no option” but to vote to approve this project because (fill in the blank with your carefully Lewis Group-dictated or JPA attorney-crafted justification, frankly none of these reasons matter to your constituents).

I write to appeal to your sense of reason in opposition to this project. For example, and I have many, many examples to share with you if you are interested, the Public Hearing announcement describes Development Agreement 21-01 and includes the words “Community Benefit” as a point of discussion. This wording is carefully crafted to avoid using the term “Agreement” in the announcement. Why is this? Well, a community benefits agreement involves three parties: the public, the government, and private business and the benefit typically occurs outside of any related project. A community benefit agreement is a public trust and a legal contract, yet the “Community Benefits” mentioned in the EIR are JPA and applicant-determined “benefits,” commitments that the applicant determined the public wants and needs. There is no agreement on these “benefits.”

There are many problems with this part of the EIR, but as you consider your vote “for” or “against” the project as proposed in the EIR, please understand that these “benefits” are actually part of the 2003 and 2012 settlement agreements already in place that require the applicant and the JPA to provide the “benefits” as described under previous settlement agreement. Conflating these “benefits” with the West Campus Upper Plateau project is piecemealing, a pattern of sloppiness or illegality within the JPA.

As I presented to you, correctly I might add, during the Environmental Justice hearing in April, the applicant and the JPA are trying to piece together previous failures in management and oversight by the JPA (see the County Civil Grand Jury report for how the JPA fails to adhere to legal obligations unless forced to do so by a court or State/County organization) into the West Campus Upper Plateau project because they want to buy public land cheaply, ONLY build mega-warehouses on it, and then, and only if they are occupied, pay for their obligations or as they call them “Community Benefits.” As I said, there are many more concerns about DA 21-01, but I will leave that for another email.

Please understand that the Park and Conservation Easement are required by the applicant and the JPA even if the Upper Plateau remains undeveloped. Inserting them into this EIR is an intentional act by the applicant as a way of avoiding extra cost and obligations and potentially passing these extra costs on to the member agencies and the County of Riverside. If you vote to “approve” this project, you are voting to add significantly to your annual budgets in the future, while still not guaranteeing the terms of these settlements are honored.

If you have made it to the end of this message, thank you. It takes me hours to plan and write these messages and I don't do it to waste your time. I do it because I do not expect you to read over 7,000 pages of EIR documentation and comments or research CEQA or case precedent, nor do I expect you to single-mindedly focus on this project as I have for more than two years in an effort to protect my community from living with warehouses on their back doorstep like I do now.

I am not writing to tell you how to vote, I am writing today to ensure the public trust and I encourage you to do the same. Good day and I look forward to speaking at you for 3 more minutes on June 12th.

Jerry Shearer
92508

From: Jen L <jlarrattsmith@gmail.com>
Sent: Monday, June 3, 2024 6:45 PM
To: Dan Fairbanks; Cindy Camargo
Cc: Jerry Shearer Jr.; Michael McCarthy
Subject: Public Hearing Requests/Questions

Dear Dan,

We are reaching out ahead of the public hearing on Wednesday, June 12 with a couple requests/questions.

1. Will R-NOW be given 15-20 minutes to make a presentation as an organization as members have requested at public meetings for two years? It is very difficult to present our concerns in a cohesive and coherent manner when only given three minute sound bites. Please let us know as soon as possible so we can prepare.
2. We request that you not have private closed door meetings or "breaks" between public comment and the Commission vote as you did during the Environmental Justice hearing. It is important that you avoid the appearance of impropriety and that the Brown Act be honored. In other words, we request that any discussions you have at the public hearing on the project be **public**.

Thank you in advance for your response to these questions/requests.

Sincerely,

Jen Larratt-Smith
Chair, R-NOW

From: Mike McCarthy <uber.snotling@gmail.com>
Sent: Tuesday, June 4, 2024 4:01 PM
To: Dan Fairbanks
Cc: Clerk; Jennifer Larratt-Smith; Dr. Grace Martin
Subject: Re: Response to Comments for West Campus Upper Plateau EIR

Dan,

That does not make sense to me. The Final EIR chapters 9 and 10 are clearly responses to comments. However, there are also responses to comments in appendices. And if they aren't the same, I am not sure how they aren't both 'official' since the appendices are the technical basis for the FEIR.

Am I to understand that the technical appendices provided are not official pieces of the FEIR?

For example - <https://marchjpa.com/wp-content/uploads/2024/05/E-3.-BFSA-Responses-to-Comments.pdf>

This specific appendix literally addresses comments, letter-by-letter. Maybe I am just misunderstanding what you are saying because it is clearly a response to comments.

Mike

On Tue, Jun 4, 2024 at 3:13 PM Dan Fairbanks <fairbanks@marchjpa.com> wrote:
Good Afternoon Mike,

The official responses to comments are located in the Final EIR.

The items you mention are occasions where a technician is noting in the appendices where the response came from. In a few cases, there could even be a subtle change to the language in the technical appendices. But those notations are not responses to comments.

Please let me know if this makes sense.

Dan Fairbanks
Planning Director
951 656-7000

From: Mike McCarthy <uber.snotling@gmail.com>
Sent: Saturday, June 1, 2024 12:41 PM
To: Dan Fairbanks <fairbanks@marchjpa.com>; Clerk <clerk@marchjpa.com>; Jennifer Larratt-Smith

<jlarrattsmith@gmail.com>

Subject: Re: Response to Comments for West Campus Upper Plateau EIR

Mr. Fairbanks,

Thank you for this notification.

The appendices now include multiple new or updated sections that include titles that say 'response to comments' as well, for example, BFSAs response to comments.

Are those replicates of the Response To Comments for the EIR or REIR? In other words, are all comments incorporated in new appendices or revised appendices also in the other links presented in your email?

Mike McCarthy

On Fri, May 31, 2024 at 2:55 PM Dan Fairbanks <fairbanks@marchjpa.com> wrote:

This email is being sent to you because you provided comments during the public comment periods to the March Joint Powers Authority regarding the draft EIR and/or the recirculated draft EIR for the proposed West Campus Upper Plateau Project. The list of comments is attached for your information. All comments are numbered and organized chronologically based on the date the comment was received. The response to your comments is available at:

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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

From: Mike McCarthy <uber.snotling@gmail.com>
Sent: Tuesday, June 4, 2024 4:01 PM
To: Dan Fairbanks
Cc: Clerk; Jennifer Larratt-Smith; Dr. Grace Martin
Subject: Re: Response to Comments for West Campus Upper Plateau EIR

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Dan Fairbanks
Planning Director
951 656-7000

From: Mike McCarthy <uber.snotling@gmail.com>
Sent: Saturday, June 1, 2024 12:41 PM
To: Dan Fairbanks <fairbanks@marchjpa.com>; Clerk <clerk@marchjpa.com>; Jennifer Larratt-Smith

<jlarrattsmith@gmail.com>

Subject: Re: Response to Comments for West Campus Upper Plateau EIR

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Mike McCarthy

On Fri, May 31, 2024 at 2:55 PM Dan Fairbanks <fairbanks@marchjpa.com> wrote:

This email is being sent to you because you provided comments during the public comment periods to the March Joint Powers Authority regarding the draft EIR and/or the recirculated draft EIR for the proposed West Campus Upper Plateau Project. The list of comments is attached for your information. All comments are numbered and organized chronologically based on the date the comment was received. The response to your comments is available at:

Response to comments on the Draft EIR: https://marchjpa.com/wp-content/uploads/2024/05/9.0_Response-to-Comments.pdf

Response to comments on the recirculated portions of the Draft EIR: https://marchjpa.com/wp-content/uploads/2024/05/10_Recirculated-Response-to-Comments.pdf

The proposed West Campus Upper Plateau Project has been scheduled for a public hearing before the March Joint Powers Commission on June 12, 2024 @ 6:30 PM, at the Moreno Valley Conference Center, located at 14075 Frederick St, Moreno Valley, CA 92553. This public hearing is scheduled to discuss and take action on the Final Environmental Impact Report, as well as multiple requests by Meridian Park West, LLC, for the proposed West Campus Upper Plateau Project. The Final EIR, Response to Comments, Specific Plan, Notice of Public Hearing, and Application materials are available at: <https://marchjpa.com/mjpa-meridian-west-campus/>.



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

From: Rod Deluhery <rod.deluhery@gmail.com>
Sent: Tuesday, June 4, 2024 12:30 PM
To: Dan Fairbanks
Subject: Re: Response to Comments for the West Campus Upper Plateau Final Environmental Impact Report
Attachments: Outlook-2hxydyvo.png

Hi good afternoon

I looked at the response. My question was not answered. Can someone review my question again?

Thank you

Rod

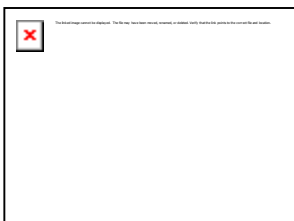
On Fri, May 31, 2024, 3:27 PM Dan Fairbanks <fairbanks@marchjpa.com> wrote:

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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

From: Rod Deluhery <rod.deluhery@gmail.com>
Sent: Tuesday, June 4, 2024 12:38 PM
To: Dan Fairbanks
Subject: Re: Response to Comments for the West Campus Upper Plateau Final Environmental Impact Report
Attachments: Outlook-2hxydyvo.png

question for you. In the response, it said unconventional weapons were only stored intermittently at that location, but not time frames or number of days., Did you see a number of days listed? What do they interpret as intermittent storage? They take six months as intermittent?

Thank you
Rod

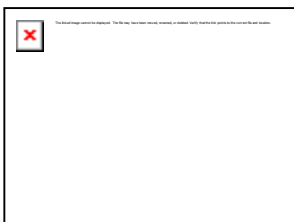
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Dan Fairbanks

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

Cindy Camargo

From: Joe Niehus <jpniehus@yahoo.com>
Sent: Monday, June 10, 2024 3:58 PM
To: Dan Fairbanks
Cc: Adam.Collier@lewismc.com; district5@rivco.org; district1@rivco.org; Conder, Chuck; jperry@riversideca.gov; rrogers@cityofperris.org; mvargas@cityofperris.org; edd@moval.org; mayor@moval.org; Cindy Camargo
Subject: Riverside Neighbors Opposing Warehouses

Dear Members of the March Joint Powers Authority,

I live just off Barton Rd in Orange Terrace, and am writing to plead with you to please vote against the building of more warehouses in this area!

The mandate to replace lost jobs from the closing of March Air Force Base has been met so there is no reason to continue building more warehouses.

The quality of our roads is getting worse with the overload of semi-trucks and traffic. The roads and freeways are at a standstill way too often, the 60/215 interchange north bound is gridlocked almost all the time. The air quality is only going to get worse if these warehouses are built.

There is already too little open area for the residences of this neighborhood to enjoy, and too much of our area is going to corporations. I think we have borne more than our share and deserve some relief

Please leave us some open spaces to enjoy, places to walk and see nature instead of 18 wheelers and warehouses.

Respectfully,

Joseph Niehus

PS: Please include me in updates on public meetings.

Cindy Camargo

From: Jimenez, Dennise <Dennise.Jimenez@molinahealthcare.com>
Sent: Monday, June 10, 2024 3:42 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
edd@moval.org; mayor@moval.org; Dan Fairbanks; Cindy Camargo
Cc: Dennise Jimenez
Subject: Comment for the West Campus Upper Plateau Public Hearing 6/12

Good afternoon, I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

As a resident of this community, I have witnessed firsthand the significant environmental and health impacts that the proliferation of warehouses and the associated increase in trucking activities have had on our area. I live in an unincorporated area of District 5. When I moved to Moreno Valley 20 years ago, the driver of that move was the low-density housing, the quiet roads, and the dark nights. Currently, we are seeing in the Inland Empire already suffers from severe air quality issues, and the continuous expansion of warehouse operations exacerbates these problems. The emissions from diesel trucks, coupled with the heavy traffic congestion they create, contribute to elevated levels of air pollution, which has been linked to a variety of serious health problems, including respiratory and cardiovascular diseases.

As a nurse who has studied the environmental impact in our community, I see that the continued growth of these projects will only continue to worsen the health of our constituents. We are facing an increase in lung and cardiovascular issues, which prevents us from focusing on preventative health measures. Moreover, the environmental degradation caused by these developments is not limited to air quality. The construction and operation of large-scale warehouses also strain our water resources, increase noise pollution, and contribute to the urban heat island effect, further diminishing the quality of life for our residents. The long-term health and environmental sustainability of our community should be a priority. While economic development is important, it is crucial that we pursue avenues that do not come at such a high cost to our environmental and public health. There are alternative paths to economic growth that do not rely on the warehouse and logistics industry, and I urge the County and planning commissioners to explore and invest in these options.

Recently, constituents in Mead Valley – at one of their meetings regarding warehouses, a constituent, in Spanish, stated developers promised the community a local hospital in turn for their vote in favor of building a warehouse, which is something I wanted to follow up on because if this is indeed true, we are facing disinformation both planned and perceived. Many of our constituents do not have the understanding or education regarding warehousing jobs and the hard facts that those jobs are low waged jobs, they do not provide job security rather job insecurity due to fluctuations in demand and automation, adding health & safety concerns with warehouses not having adequate A/C as was mentioned in a recent Perris warehousing meeting and the never ending environmental impact such as

the increase of traffic we have seen, and habitat destruction. It is our job to speak up for those who do not have the tools to be properly informed.

Thank you for your attention to this critical issue. I look forward to your response and hope to see decisive action taken to protect the health and future of our communities. Please review the UCR study, I have others I can share but it is important to review.

“Focusing on the impacts of the 3,321 warehouses larger than 100,000 square feet in the South Coast Air Basin, which includes the counties of Los Angeles, Orange, Riverside, and San Bernardino, researchers found that warehouses generate over 200 million diesel truck trips, which in turn produce over 300,000 pounds of diesel particulate matter, 30 million pounds of nitrogen oxide, and 15 billion pounds of carbon dioxide per year.”

<https://news.ucr.edu/articles/2024/02/28/warehouse-and-trucking-industries-inland-empire-have-provided-more-jobs-also#:~:text=Focusing%20on%20the%20impacts%20of,produce%20over%20300%2C000%20pounds%20of>

Dennise Jimenez | MPH, LVN, CCM, Lean 6σ (Black Belt)

SSBCI Phone Queue Team Lead, Healthcare Services

MCS EMU Care Management

Genesys Phone: 562-317-2132 & Cell # 951-478-1216

SSBCI Phone Queue Number - 866-472-4582

Dennise.Jimenez@MolinaHealthcare.com



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Cindy Camargo

From: dankofoo93@gmail.com
Sent: Monday, June 10, 2024 1:22 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

We have been saturated by Warehouse developments and our area cannot support anymore. They harm our area more than benefits. I was at the last JPA meeting where the board expected ceqa from projects despite 100s of emails from residents and environmental groups. The commander at March Air Force himself said they have a decline in recruitments due to the fact military families don't want to live near the base due to the lack of housing and excessive warehouses in the area. So why wouldn't these lands be developed for family support not corporate greed. Multiple members of the board have received thousands in campaign donations from developers including Vargas , Rita and the mayor of Moreno Valley.

Thank you for considering my comments before you vote on this project.

Sincerely,

Franco Pacheco
Perris parents for clean air

Sent from my iPhone

Cindy Camargo

From: klzbnorris@aol.com
Sent: Monday, June 10, 2024 10:11 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission:

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024.

Our family moved to Orangecrest in 2001. We raised our children here and have enjoyed the open space of the West Campus Upper Plateau for many years. It is some of the only open space left in our community. While the project allows for some open space, it will not be as scenic, useful or peaceful as it is now.

Our community has been heavily impacted by the number of warehouses in our area. Traffic has drastically increased, especially Van Buren and 215/60 freeway. These are the main entry points to Orangecrest. These warehouses have changed the look and feel of our area from a lovely residential community to a more industrial area.

The location of this project will have an even larger impact due to the close proximity to homes. Our roads are congested now, this project will have a heavy impact on traffic and air quality.

It is time for each of you to support the City of Riverside and the Orangecrest Community and stop the overrun of warehouses.

We urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes. Thank you for considering my comments before you vote on this project.

Sincerely,

Lisa and Ken Norris
8445 Lindenhurst St
Riverside, CA 92508

Cindy Camargo

From: Desarea Wilson <dswilson345@gmail.com>
Sent: Monday, June 10, 2024 9:49 AM
To: Cindy Camargo
Subject: No more warehouses please...

Hello,

I have been living in Mission Grove for 29 years and have watched the areas around me change in that span of time. While some of those changes were necessary for this area, it is disheartening that natural landscape is being converted to large warehouses. Some of the buildings even look vacant. Please stop this. Traffic is already worse and this area is more crowded. Please save whatever natural landscape is left for the residents and animals. Enough is enough.

Kind regards,

Cindy Camargo

From: Christine Heinemann <caheinemann@gmail.com>
Sent: Monday, June 10, 2024 9:46 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

I am against this project. The traffic, air, and noise pollution will impact our neighborhood. We live only a half mile away. Many children walk, attend school and church next to this proposed project and will be negatively impacted. Our community's health and quality of life are not worth it! I am not against developing the land, but not for more warehouses! We are already surrounded by them and this one will be in the middle of our neighborhood! Please seek a more neighborhood/family friendly development that will benefit our community life, not destroy it.

Thank you for considering my comments before you vote on this project.

Sincerely,

Christine Heinemann
Orangecrest 92508

Cindy Camargo

From: Rick Lloyd <r.lloyd@gte.net>
Sent: Monday, June 10, 2024 8:39 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Our Community deserves more open spaces and less warehouses. There are many that remain unoccupied. Please consider turning this into a wilderness area or park. Or consider a solar facility and use the bunkers for battery storage. Our roads and freeways are quite congested with truck traffic, I don't want to see big rigs driving up and down Orange Terrace parkway. Meridian avenue is already a truck and car filled raceway due to all the activity.

Thank you for considering my comments before you vote on this project.

Sincerely,

Rick Lloyd
Orangecrest, 92508

Cindy Camargo

From: Greg Morris <greg.morris49@yahoo.com>
Sent: Monday, June 10, 2024 8:01 AM
To: district5@rivco.org; Conder, Chuck; rogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission, I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes. Thank you for considering my comments before you vote on this project. Sincerely,

Signed,
Greg Morris

6/10/FW: Response to Comments for the West Campus Upper Plateau Final Environmental Impact Report

SCG SE Region Redlands Utility Request

<SCGSERegionRedlandsUtilityRequest@semprautilities.com>

Mon 6/10/2024 7:26 AM

To: Dan Fairbanks <fairbanks@marchjpa.com>

Cc: SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>

📎 2 attachments (108 KB)

Draft EIR List of Commenters.docx; Recirculated Draft EIR List of Commenters.docx;

Good morning Dan,

I was forwarded this email from David Castellanos. I replaced David as Franchise Lead Planning Associate. Please use our Utility request inbox at:

SCGSERegionRedlandsUtilityRequest@semprautilities.com for future requests and notifications. Please see below for a list of the Redlands SoCalGas Planning office contacts.

SoCalGas Redlands Planning Office Contacts:

Will Liao - Franchise Planning Supervisor. WLiao@socalgas.com

Joe Chavez - Planning Supervisor. JChavez3@socalgas.com

Anthony Castellanos - Planning Supervisor. ACastellanos3@socalgas.com

Josh Rubal - Franchise Lead Planning Associate. JRubal@socalgas.com

Utility Request Inbox for Franchise requests & notifications.

SCGSERegionRedlandsUtilityRequest@semprautilities.com

Thank you,

Josh Rubal

Lead Planning Associate

Distribution Planning & Project Management

Redlands HQ - Southeast Region

(213) 231-7978 Office

SCGSERegionRedlandsUtilityRequest@semprautilities.com



From: Rubal, Joshua <JRubal@socalgas.com>

Sent: Monday, June 10, 2024 6:36 AM

To: SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>

Subject: 6/10/FW: Response to Comments for the West Campus Upper Plateau Final Environmental Impact Report

Thank you,

Josh Rubal

Lead Planning Associate

Distribution Planning & Project Management

Redlands HQ - Southeast Region

1981 W. Lugonia Ave, Redlands, CA 92374

(213) 231-7978 Office

JRubal@SoCalGas.com



From: Castellanos, David <DCastellanos@socalgas.com>
Sent: Monday, June 10, 2024 6:29 AM
To: Rubal, Joshua <JRubal@socalgas.com>
Subject: FW: Response to Comments for the West Campus Upper Plateau Final Environmental Impact Report

From: Dan Fairbanks <fairbanks@marchjpa.com>
Sent: Friday, May 31, 2024 3:19 PM
To: 'Dan Fairbanks' <danfairbanks9@gmail.com>
Subject: [EXTERNAL] Response to Comments for the West Campus Upper Plateau Final Environmental Impact Report

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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

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

Response to Southern California Gas Comment

Dan Fairbanks <fairbanks@marchjpa.com>

Mon 6/10/2024 1:46 PM

To:SCGSERegionRedlandsUtilityRequest@semprautilities.com <SCGSERegionRedlandsUtilityRequest@semprautilities.com>;
WLiao@socalgas.com <WLiao@socalgas.com>;JChavez3@socalgas.com <JChavez3@socalgas.com>;
ACastellanos3@socalgas.com <ACastellanos3@socalgas.com>;JRubal@socalgas.com <JRubal@socalgas.com>;
JRubal@socalgas.com <JRubal@socalgas.com>
Cc:Dan Fairbanks <fairbanks@marchjpa.com>

Josh,

Thank you for providing supplemental contacts for Southern California Gas. I am resending this information to provide Southern California Gas an opportunity to provide comments, if desired, as it was unclear if the intent of your email was anything beyond providing new contacts at Southern California Gas. So I have provided the specific comment below from David Castellanos dated 3/7/23, as well as March JPA's response, from May 31, 2024. Please call me if you would like to discuss further.

The following information is from my 5/31/24 email:

This email is being sent to you because you provided comments during the public comment periods to the March Joint Powers Authority regarding the draft EIR and/or the recirculated draft EIR for the proposed West Campus Upper Plateau Project.

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The comment from Southern California Edison and the response from March JPA is listed below. Please see the aforementioned March JPA website links above if you require more information.

Comment from David Castellanos 3/7/23 (See comment A-5, from Southern California Edison dated 3/7/2)

Good morning Dan, There is 30" High Pressure Transmission gas line that runs in that area. Thanks,

Response From March JPA:

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

to proceed with the adjustment of the grade of the gas line to the proposed finished grading surface.” It is March JPA’s understanding that the developer has contacted SoCalGas about relocating the existing gas as part of the proposed development. Based on information provided to March JPA by the developer’s project surveyor, the project title company has found that SoCalGas has partial easements over the property for the existing gas line. See attached Figure A-5.1 showing locations of the currently known easements. The Draft EIR analyzed the environmental impacts of the SoCal Gas line relocation as part of the Infrastructure Improvements of the Specific Plan Area. No changes or revisions to the Draft EIR are required in response to this comment.

Please contact me if I may provide further information.



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

Cindy Camargo

From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Monday, June 10, 2024 6:58 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; Kevin Jefferies Riv Co Dist 1; Perry, Jim;
mayor@moval.org; edd@moval.org
Cc: Michael McCarthy; Jen L; Cindy Camargo
Subject: Re: Price reductions for logistics buildings might hint at further softening

Hello Commissioners,

The article below raises two concerns I have with your upcoming discussion and vote on the West Campus Upper Plateau project.

1. From the article referenced below, "Increased supply: The recent building boom has resulted in an oversupply of large logistics spaces. These buildings, once in high demand, are now struggling to find tenants. This surplus is driving down rental rates as owners compete for a shrinking pool of occupants." As someone who has JPA warehouses directly behind my house, I know that they are not occupied on a consistent basis. I have written to you about this before. Seasonal use in most of them, empty most of the rest of the year. No jobs. No benefit to the community. Please say no to the "Project."
2. The final EIR is a difficult document to review in such a short period of time. You likely have not been able to review it completely, I have not been able to open a few of the documents due to file size and server speed on the JPA's side. Some of these critical documents have been inaccessible to me (the public) for review. Thus, I have been unable to fully review the Development Agreement at this point, but I have read enough to know the applicant is (a) getting a hell of a deal on the land, the price is unreasonably low for this space, and (b) they want another 25 years to "develop" it. How much longer will the JPA allow the Lewis Group and its investors to dictate development in the area and harm our communities? You have had several chances to find a new development partner and you have declined. Please don't make this mistake again.

Jerry Shearer
92058

<https://www.ocregister.com/2024/06/08/price-reductions-for-logistics-buildings-might-hint-at-further-softening/>

Price reductions for logistics buildings might hint at further softening

ocregister.com · by Allen Buchanan



Our industrial market in Southern California is rapidly morphing into a buyer's/tenant's market. By that I mean, a supply of available buildings which exceeds demand and a softening of prices.

This is happening in the large logistics spaces constructed in the last building craze. At their peak, rents topped \$2.10 per square foot (triple net) for these concrete caverns. On a 100,000-square-foot building, that's \$210,000 per month plus an additional \$40,000 for operating expenses.

In context, these industrial rents for a seemingly lower and lesser use than, say, an office building, eclipsed the price paid for a suite of office space.

Before June 2022, these boxes were devoured by hungry occupants even before construction was completed. Now they sit. In some cases, for months. Those deals that have transacted are much less than the halcyon days of two years ago. Now a creditworthy tenant can expect to pay \$1.75-\$1.85 triple net for the same address that not too long ago commanded a 17% higher rent.

What about the sale market?

In north Orange County (Anaheim, Placentia, Brea, Orange, Yorba Linda, Fullerton and La Habra), we've also seen softening. However, not to the extent rents have decreased. The inland areas tell a different story.

What's with the shift?

1. Increased supply: The recent building boom has resulted in an oversupply of large logistics spaces. These buildings, once in high demand, are now struggling to find

tenants. This surplus is driving down rental rates as owners compete for a shrinking pool of occupants.

2. Economic uncertainty: Economic factors, including inflation and rising operational costs, have made businesses more cautious about expanding their industrial footprints. Companies are reevaluating their space needs and, in many cases, opting for smaller or more flexible leasing arrangements.

3. Changes in consumer behavior: The rapid shift toward e-commerce during the pandemic has now stabilized. As consumer behavior normalizes, the frantic demand for massive warehouse spaces to accommodate inventory surges has waned.

4. Financing challenges: Higher interest rates and tighter lending conditions have made financing new acquisitions and developments more challenging. This has tempered the pace of new investments and developments in the industrial sector.

Tenant and buyer opportunities

1. Bargaining power: With a glut of available spaces, tenants have greater bargaining power. They can negotiate more favorable lease terms, including lower rents, longer rent-free periods, and tenant improvement allowances.

2. Strategic acquisitions: For buyers, especially those with readily available capital, this market presents opportunities to acquire properties at more reasonable prices. Investors can capitalize on distressed assets or properties that have been sitting vacant.

3. Long-term planning: Businesses can take advantage of the current market conditions to secure space for future growth at attractive rates. Locking in long-term leases now can provide stability and cost savings in the years to come.

Challenges ahead

1. **Vacancy rates:** High vacancy rates can strain property owners who rely on rental income to meet their financial obligations. This could lead to increased property turnover and potential distress sales.
2. **Maintenance costs:** Maintaining large, vacant industrial properties can be costly. Owners must continue to invest in upkeep to attract potential tenants, even as rental income declines.
3. **Market uncertainty:** Continued economic uncertainty and potential regulatory changes could further impact the industrial real estate market. Stakeholders need to stay informed and adaptable to navigate these challenges.

Southern California's industrial real estate market is undergoing a significant transition into a buyer's/tenant's market. While this shift presents challenges for property owners, it also offers opportunities for tenants and buyers to secure favorable terms and strategic investments. By understanding the factors driving this change and staying adaptable, stakeholders can navigate the evolving landscape and capitalize on new opportunities.

Allen C. Buchanan, SIOR, is a principal with Lee & Associates Commercial Real Estate Services in Orange. He can be reached at abuchanan@lee-associates.com or 714.564.7104. His website is allencbuchanan.blogspot.com.

Cindy Camargo

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Monday, June 10, 2024 6:43 AM
To: Clerk; Dan Fairbanks
Subject: FW: Price reductions for logistics buildings might hint at further softening

Dear Mr. Fairbanks,

Please see attached news article on softening demand for warehouses – ‘a glut of available spaces’ from the OC Register.

Mike McCarthy

From: Mission Grove Neighborhood Association <missiongrovena@gmail.com>
Sent: Monday, June 10, 2024 12:09 AM
Subject: Price reductions for logistics buildings might hint at further softening

Price reductions for logistics buildings might hint at further softening

[ocregister.com](https://www.ocregister.com) · by Allen Buchanan



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Allen C. Buchanan, SIOR, is a principal with Lee & Associates Commercial Real Estate Services in Orange. He can be reached at abuchanan@lee-associates.com or 714.564.7104. His website is allencbuchanan.blogspot.com.

Mission Grove Neighborhood Alliance
missiongrovena@gmail.com
<https://www.missiongrovena.org/>
951-394-2526



Cindy Camargo

From: Jen L <jlarrattsmith@gmail.com>
Sent: Monday, June 10, 2024 6:10 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; Kevin Jefferies Riv Co Dist 1; Perry, Jim; mayor@moval.org; edd@moval.org; Dan Fairbanks; Dr. Grace Martin; Cindy Camargo; Jerry Shearer Jr.; Michael McCarthy; Mission Grove Neighborhood Association
Subject: Fwd: Price reductions for logistics buildings might hint at further softening

Dear March JPA Commission,

Please read the article recently sent out by the Mission Grove Neighborhood Alliance (MGNA). This article in the OC Register is telling you what residents have been saying for over a year now. Your statement of overriding considerations leans heavily on flawed assumptions that the project is positive for local jobs and economic viability. Both are untrue. Logistics is a shrinking economy, and we have already approved too many warehouses in this region, enough to double the square footage in ten years.

<https://www.ocregister.com/2024/06/08/price-reductions-for-logistics-buildings-might-hint-at-further-softening/>

The Final EIR is trying to explain away what common sense as well as thousands of local residents have been telling you for two years now. The West Campus Upper Plateau industrial complex is the wrong project at the wrong time in the wrong place. I urge you to vote no. There are other uses for the land that will actually benefit the community and not put it in harm's way.

Sincerely,

Jennifer Larratt-Smith
Chair, R-NOW

----- Forwarded message -----

From: Mission Grove Neighborhood Association <missiongrovena@gmail.com>
Date: Mon, Jun 10, 2024 at 12:09 AM
Subject: Price reductions for logistics buildings might hint at further softening
To:

Price reductions for logistics buildings might hint at further softening

[ocregister.com](https://www.ocregister.com) - by Allen Buchanan



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Mission Grove Neighborhood Alliance
missiongrovena@gmail.com
<https://www.missiongrovena.org/>
951-394-2526



Cindy Camargo

From: Esmeralda Montes <emts.deo@gmail.com>
Sent: Sunday, June 9, 2024 7:47 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

First, the West Campus Upper Plateau is one of the last public lands in Riverside that provides an expansive area for people to walk in nature, and it's one of the very few that are directly next to houses, which gives people easy access to green space. Placing concrete in the middle of this land would be destroying acres of hike-able trails. Thus creating a greater divide between the local community and its connection to nature.

Second, building in the West Campus Upper Plateau would destroy an essential part of the habitat of the local animals. For example, larger animals like bunnies hide themselves in the tall grasses near the bunkers to protect themselves from predators. Also, birds of all species use the tops of the fences and bunkers as places to rest or create nests. Other areas around the proposed project area are mostly flat and barely have trees, which means they do not provide a decent place for the birds to perch. Therefore, the birds would likely have to migrate out of that entire space if the fences and bunkers were removed.

Third, Orangecrest is surrounded by concrete roads, sidewalks, and buildings. Due to the heat island effect, this makes it extremely hot during the summers — which only gets worse every year due to global warming. This would only increase once the West Campus Upper Plateau is turned into industrial/commercial space with more concrete that would retain that heat. According to the US Environmental Protection Agency, the urban heat island effect "increases energy costs (e.g., for air conditioning, air pollution levels, and heat-related illness and mortality)". The acres of green space behind the Grove Church provides a necessary — and free — cooling zone for Orangecrest. **Destroying a huge portion of these precious acres would consequently destroy this ecosystem service, which means people would have to pay the cost financially (e.g., paying more for air conditioning) and physically (e.g., experiencing more heat- and air pollution-related illnesses).**

There is a way to bring economic prosperity to the local community without destroying green space. The first step in this path involves listening and coordinating with the local citizens.

Thank you for considering my comments before you vote on this project.

Sincerely,

Esmeralda M, 92553

Cindy Camargo

From: Ronald Peters <rjpeters13@yahoo.com>
Sent: Sunday, June 9, 2024 7:18 PM
To: Clerk; Dan Fairbanks
Cc: Michael McCarthy
Subject: MJPA, West Campus Upper Plateau, Final EIR Reply to Responses
Attachments: Reply to Response FEIR_Ronald Peters_2024-06-09.pdf

Mr. Fairbanks:

Please find the attached PDF containing three letters replying to responses. The letters contain the identifying information to the replies.

June 7, 2024

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

Re: West Campus Upper Plateau, Environmental Impact Report

Dear Mr. Fairbanks:

On behalf of R-Now.org and a concerned resident of 7762 Northrop Dr., *Riverside*, I am writing to submit a reply to response I-166.12 of the Final Environmental Impact Report for the proposed West Campus Upper Plateau. R-Now was formed to fight warehouse development impacting our residential community, and over development of warehouses in the southern California area. I'm a registered civil engineer with over 37 years of experience and have worked on design of warehouse projects throughout my career.

Response to comment I-166.12 indicates retaining walls will be used against the stated policy. Grading exhibit Figure 6-9 is deficient in data to define basic grading design and see retaining walls and road relationship to lots. No cross section views are showing retaining walls in the FEIR. Wall exhibit Figure 4-1 does not show any retaining wall, and there are no retaining wall heights provided on this exhibit. Discussion regarding walls heights for Building B and C do not reflect retaining wall information.

My original comment is as follows: I have serious concerns regarding the development's use of retaining walls and grading design. There's no information provided on exterior perimeter of the surrounding development, as to how usable development grades will match into the existing grades in the conservation and park areas. Are retaining walls and large slopes going to be used? The community has been here for years, and has concerns about the visual appearance they will see from their homes. Please provide cross section of the grading design to show slopes and retaining walls at the perimeter of the development.

My additional concerns specifically related to the DEIR are as follows:

- Section 4.6.2., Goal/Policy 3.2 (page 393), Encourages contour grading. How is Goal 3.2 achieved with the limited grading design provided (Plot Plan B & C) and overall lack of site grading information? The use of retaining walls would not be an agreement with this goal, since there is no contour grading with retaining walls.
- Section 4.6.2, Goal 2 (page 394), Under hillside management. Minimize grading and otherwise changing the natural topography. The concern here is limited information from the Plot Plan B & C and overall development provide no grading

design of the outside the perimeter of the development. The information does indicate cuts of negative 30-feet and fills of positive 26-feet. There is no cross-sectional information to show relationships with existing topography to show how goal 2 is achieved.

How does a development like large warehouse, that require planer topography work well with a site that's a hilltop and underlined with granite rock. It's hard to believe a development such as this would be undertaken. Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial warehouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,



Ronald J. Peters, P.E.

Rjpeters13@yahoo.com
7762 Northrop Dr., Riverside, Ca. 92508

Feb 15, 2023

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

Re: West Campus Upper Plateau, Environmental Impact Report

Dear Mr. Fairbanks:

On behalf of R-Now.org and a concerned resident of 7762 Northrop Dr., Riverside, I am writing to submit a reply to response I-166.4 on the Final Environmental Impact Report for the proposed West Campus Upper Plateau. R-Now was formed to fight warehouse development impacting our residential community, and over development of warehouses in the southern California area. I'm a registered civil engineer with over 37 years of experience and have worked on design of warehouse projects throughout my career.

Response to comment I-166.4 indicates flow will be extended over 4 days from per-development to post development conditions per hydrology report for Building B & C. This calculation would indicate erosion above and beyond per-development conditions. The calculation has not been changed, and is an environmental deficiency.

My original comment is as follows: I have serious concerns regarding drainage as described in the DEIR and related hydrology reports. The documents indicate project drainage will surface flow across the Camino Del Sol neighborhood from four project tributary locations to existing drainage systems at the north end of the community (Appendix K-1, Preliminary Hydrology Study, Section III, Table, Watershed, 3, 4, 5, 6, 7, 7a, 18a, 18b, and 18c). The hydrology reports for Building B & C detention basins data indicates various storm events will continue to flow over an extended period of 4 days (Appendix 5 & 6, Hydro Building B & C, Hydrograph Report, Time period indicated, last page of each report). The Preliminary Hydrology Report K-1 indicated slow release over two 2 days. Four days seems excessive since the existing condition lacks detention basins. In addition, flow at the four outlets shown in Section IV table (page 12 & 13) of the Preliminary Hydrology Report K-1 with velocities of 16 to 36 feet/second. This surface flow passes between homes and down streets that have excessive slopes. There are two sump conditions on Avenida Hacienda where it appears overflow will pass between homes without any type of drainage facility.

The drainage exhibits also indicate the project will manage flow by out letting drainage 300-feet from the Camino Del Sol neighborhood with no information shown to reduce the velocity. Has any analysis been completed on the proximity of the outlets, extend duration, high velocities, and erosion the community will experience? Can the existing

drainage system in Camino Del Sol neighborhood manage these project flows without providing improvements to the neighborhood? Will a storm drain system be needed for the Camino Del Sol neighborhood to pass flow from south to north? Has the City and County of Riverside been contacted to help provide drainage guidance, since drainage system may become owned by one of these governing bodies and also impact downstream facilities (Preliminary Hydrology Report K-1, page 6)?

My specific concerns related the DEIR sections listed below:

- Section 1.9, Table 1-2, 4.8, Hydrology and Water Quality, HYD-3 (page 81). Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: underlying topics as provided in DEIR.
- Section 4.17.2, Goal 17 (page 787). Adequate flood control facilities shall be provided prior to, or concurrent with, development in order to protect the lives and property within the March JPA Planning Area.
- Section 4.17.2, Policy 17.3 (page 787): Require new development to construct new or upgrade existing drainage facilities to accommodate the additional storm runoff caused by the development.
- Section 4.17.3, Thresholds of Significance, UTL-1 (page 788). Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any industrial warehouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,  Ronald J. Peters, P.E.

Ronald J. Peters, P.E.

Rjpeters13@yahoo.com
7762 Northrop Dr., Riverside, Ca. 92508

June 08, 2024

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

Re: West Campus Upper Plateau, Environmental Impact Report

Dear Mr. Fairbanks:

On behalf of R-Now.org and a concerned resident of 7762 Northrop Dr., *Riverside*, I am writing to submit a reply to response I-166.3 of the Final Environmental Impact Report for the proposed West Campus Upper Plateau. R-Now was formed to fight warehouse development impacting our residential community, and over development of warehouses in the southern California area. I'm a registered civil engineer with over 37 years of experience and have worked on design of warehouse projects throughout my career.

Response to comment I-166.3 narrative discussing landfill capacity appears to be an error. Two landfills, Lamb Canyon and Badlands have roughly the same total capacity and estimated daily throughput, yet the latest edit to the EIR indicates one will be remain open for an additional 17 years.

My original comment is as follows: I have serious concerns regarding the area landfills supporting the project. Based on information provided in the DEIR (page 780) two of the three area landfills will cease to operate in or around 2029. The landfills are 15 to 27 miles for the project area. Assembly Bills 939 & 341 (page 782) were sighted in the DEIR to have been in place since 1989 and 2011, related to waste management. Even with these bills in place the DEIR indicates two landfills will close. With one or two landfill remaining in operation, how can the project justify the less than significant impact? The remaining landfills obviously will have a reduction in operation abilities resulting in extended wait times and increase truck traffic. How can the project justify a less than significant impact (Section 4.17.5, page 804)?

Section 4.17.1, (page 780), describes the existing conditions related to solid waste conditions. Section 4.17.4, Threshold UTL-4 (page 801) discusses the capacity of local infrastructure. Section 4.17.6, (page 804), provides the less than significant impact after mitigation.

Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed warehouses, I urge the March Joint Powers Authority to reject the proposal for the West Campus Upper Plateau. It is clear that any

industrial warehouses developed at the West Campus Upper Plateau would cause irrevocable harm to this community and to the concerned public.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,  Ronald J. Peters, P.E.

Ronald J. Peters, P.E.

Rjpeters13@yahoo.com
7762 Northrop Dr., Riverside, Ca. 92508

Cindy Camargo

From: Alejandra Dubcovsky <adubcovskyj@gmail.com>
Sent: Sunday, June 9, 2024 11:48 AM
To: district5@rivco.org; district1@rivco.org; Conder, Chuck; jperry@riversideca.gov; rrogers@cityofperris.org; mvargas@cityofperris.org; edd@moval.org; mayor@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Warehouses

Dear member of the March Joint Powers commission,

As a Riverside resident and voter, who lives in the beautiful neighborhood of mission Grove, I am writing to express my extreme displeasure at the west campus upper plateau project. This completely unnecessary project will bring thousands more truck trips per day through our neighborhood. It will also be unsettled over a million square feet to create warehouses within 300 ft from surrounding homes.

These warehouses show only a very short-sighted and short-term view of our neighborhood. Think of all the abandoned malls that now litter our Urban landscape. These warehouses are doomed to repeat that fate.

I know you're thinking only about dollars here, but think about the community and actual people you represent.

Alejandra Joseph

Cindy Camargo

From: William Landa <wisaiahlanda@gmail.com>
Sent: Sunday, June 9, 2024 10:04 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Our area is full of warehouses, trucks, smog, and worn down roads. The health and wellness of myself and my three pre school aged daughters is threatened by the reckless development of these projects. Please consider the future of our communities and vote NO.

Thank you for considering my comments before you vote on this project.

Sincerely,

William Landa
Green Acres Neighborhood 92518

Cindy Camargo

From: Sue Nipper <markel221@gmail.com>
Sent: Sunday, June 9, 2024 9:47 AM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

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Building and operating these warehouses will inundate our area with harmful air pollution. Besides the families in the area, the closest neighbor to the site is The Grove Community Church where I attend. Every week, there are thousands of children playing sports on our fields. If warehouses are allowed to be built, those helpless children will be breathing debilitating air pollution causing asthma or worse. There is also a preschool onsite where even younger children will be harmed. Warehouses are a bad idea for our neighborhood. Please vote NO on the current plan for the West Campus Upper Plateau.

Thank you for considering my comments before you vote on this project.

Sincerely,

Susan Nipper
92508

Cindy Camargo

From: Kevin <kevinkrebsa@msn.com>
Sent: Saturday, June 8, 2024 9:17 PM
To: Cindy Camargo
Subject: NO on West Campus Upper Plateau project

As an honest and hard working citizen/veteran I oppose this project in my neighborhood. As my elected official I urge you to speak on our behalf and oppose March Joint Powers plan to disrupt that property. The history of that area shows hazards being stored and the lack of regulations from those times is what created OSHA. So why would you want to entertain having to dig into that territory.

This project is the easiest bad decision that the simplest person can see that digging into munitions bunkers is a bad idea.

I believe the government is great at fighting for democracy at home and abroad but keeping records on items as sensitive as munitions storage is not their strong suit. So don't open that can of worms because you will not like what you find.

I have accepted that risk as the current state and untouched. I will not accept any offer to open that can.

Again, for the citizens around that area, DO NOT approve this project.

Very respectfully,
Kevin

Cindy Camargo

From: Magie Lacambra <mags0128@gmail.com>
Sent: Saturday, June 8, 2024 5:44 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Orangecrest was the perfect location when I purchased my home 20 years ago. It was outside the city limits, lots of open land around, with blue skies and clean air. I've enjoyed riding my bike and walking my dog in the open area behind our homes for many years. I understood that over time, natural growth would bring more homes, along with restaurants and shopping to meet our neighborhood needs.

What I did not imagine was that a concrete jungle of monstrous, unnecessary warehouses would overtake this open land. I did not imagine that I would lose the beautiful area for bike rides and walks. I did not imagine that I would lose the view of the beautiful mountains in the distance. I did not imagine that I would have to be concerned about my health due to air pollution caused by the many trucks that will come and go from the warehouses a stone's throw from my yard.

I trusted that our city manager and voted council members would plan and vote for our neighborhood to remain the gem that I bought into and it continues to be.

Please think of us residents, those of us that live in this area and will be directly impacted by the noise and air pollution created by mega warehouses, and use your power accordingly.

Thank you for considering my comments before you vote on this project.

Sincerely,

Magie Lacambra
Orangecrest - 92508

Cindy Camargo

From: Michael Hampton <hampton2005@gmail.com>
Sent: Saturday, June 8, 2024 2:25 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

I am part of the mountain biking community and many of us ride the trails there almost every weekend. Please do not take away these trails.

Thank you for considering my comments before you vote on this project.

Sincerely,

<NAME>

<NEIGHBORHOOD or ZIP CODE>

Cindy Camargo

From: Dawn Carter <dawncarter1882@gmail.com>
Sent: Saturday, June 8, 2024 2:04 PM
To: Cindy Camargo
Subject: Opposed to March JPA West Campus Upper Plateau Project

Dear Ms. Carmargo:

I'm writing to let you know about my concern and strong opposition to the proposed development of the West Campus Upper Plateau Project, a.k.a. Grove Warehouses in Riverside. As a resident of the Orangecrest neighborhood for over a decade, the undeveloped land attracted us to this community. It provides a place for running, wildlife, and walking our dogs. I love our neighborhood and would hate to see it ruined by overdevelopment.

The proposition of warehouses and office buildings in this area is of most concern. Increased truck traffic, pollution, and noise will adversely affect our neighborhood, thus imperiling our children's health, quality of life, and home values. Please situate these warehouses elsewhere.

Respectfully,



Dawn E. Carter
19867 Rotterdam St, Riverside, CA 92508

Cindy Camargo

From: Suzanne Pearson <suzsir@yahoo.com>
Sent: Saturday, June 8, 2024 1:06 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Question and Public Comment for the West Campus Upper Plateau Project

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

I truly want to know if we can leave this area open. Do we need to build on this land? We are losing open land at an alarming rate, and there is very little open ground left.. It seems everyone talks about global warming and how it is a big issue. The one thing that cleans the air, nature and open space, we are destroying with more buildings and stuff. I understand the city needs income, which we will make money to fund our city so that is a positive. But I really worry about our open space and loss of land, nature, and rare species of animals. We have some amazing vernal pools on this land with Fairy Shrimp and Western Spadefoot Toads as well as long term pools that will be destroyed. Please consider leaving this land alone and leave for recreation of nature lovers. We don't need any more parks, we have plenty in Riverside and in our neighborhoods. We need more open space for native plants and creatures.

Thank you for considering my comments before you vote on this project.

Sincerely,
Suzanne Pearson

Cindy Camargo

From: julie weatherford <julieweatherford@gmail.com>
Sent: Saturday, June 8, 2024 12:51 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission members,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote NO on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

As a retired public health professional and life-long Riverside resident, I'm well aware that we already have the worst air pollution in the country, and our streets and freeways are already congested with trucks spewing pollution and endangering our health and our lives. As an environmental activist, I urge you to protect this plateau, one of our few and dwindling local nature preserves, free from warehouse sprawl and open for the long term environmental sustainability of our area. If it's the local economy that you imagine would benefit by more warehouses, please know that, with exorbitant warehouse job losses in the Inland Empire, the highest warehouse vacancy rate in the past decade, and more local warehouse projects in the works, there is no economic reason to build more warehouses on the Upper Plateau.

Having voiced strong and consistent opposition to the project for the past two years, the community looks to you to listen to its concerns and to protect its interests. I urge you to vote NO on the West Campus Upper Plateau project on June 12.

Thank you for considering my comments before you vote on this project.

Sincerely,

Julie Weatherford
Hawarden Hills neighborhood, 92506

Cindy Camargo

From: matt silveous <mattsilveous1812@gmail.com>
Sent: Saturday, June 8, 2024 11:01 AM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

We are a few short days away from finding out if the elected politicians, stand with the community, or take the side of developers. Before making a decision that will change the life of thousands of orange crest households for years to come, with pollution, congestions, the contestant sounds of semi truck, backup alarms waking you at night. I ask that you go stand over one of local overpass and watch the thousands of trucks that come into our neighborhoods. Im not sure how you could say more warehouse and semi trucks are better for the community.

Maybe I will be pleasantly surprised,
Doing the right thing is not always the easy thing, but **doing the right thing changes everything."**

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Thank you for considering my comments before you vote on this project.

Sincerely,

Matt
92508

Cindy Camargo

From: Bobby Robinette <bobbyelden@yahoo.com>
Sent: Saturday, June 8, 2024 9:41 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

I am the Director of Environmental, Health, & Safety and a Certified Safety Professional for the Supply Chain of a large retailer that includes currently occupying one of the large newer buildings on Meridian. I can tell you from personal experience more warehouses in the area would cause way more damage than good. The land behind my house and this warehouse has already shrunk several times over in the 7 years I have lived in my home. The amount of semi truck traffic has made the freeways and roads barely drivable and unsafe already. The air pollution is already unpalatable, the noise/light pollution worse, and the roads more damaged than ever. The warehouses in the area already struggle to get employees to fill these low paying wages where fast food workers now make as much or more. Where will the workers come from, what happens when these building age, or become empty...suburban blight! Lower property values, lower income, more infrastructure repair, and less taxes and revenue for government. This is when enough is enough.

Thank you for considering my comments before you vote on this project.

Sincerely,
Bobby Robinette
92508

Cindy Camargo

From: Linda Tingly <linda.tingly@yahoo.com>
Sent: Saturday, June 8, 2024 9:39 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential.

I am most concerned about the increase in poor air quality which compromises every residents health and well being. The increased truck traffic resulting in destruction to city streets, driving on non permitted streets and red light violations, all occurs on a daily basis in our communities. It is not safe for resident taxpayers to drive, bike or use walk ways in any of these areas. What is being stored in these warehouse is not disclosed to the residence in this area. The potential for an environmental hazard as a result of an incident such as a fire, explosion or flood would place residents in the surrounding area at extreme risk.

Thank you for considering my comments before you vote on this project.

Sincerely,

Linda Tingley Rivera
92508

Sent from my iPhone

Cindy Camargo

From: Eunhee Kim <eunster@yahoo.com>
Sent: Saturday, June 8, 2024 8:52 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned R-NOW member who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote **no** on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes

I oppose the West Campus Upper Plateau project for the following reasons:

1. Traffic and Congestion:

Increased traffic from trucks and employees commuting to and from the warehouses would lead to significant congestion on local roads, resulting in longer commute times, increased noise, and higher risk of accidents, negatively impacting the quality of life for residents.

2. Noise Pollution:

Warehouses operate around the clock, which leads to constant noise from trucks, loading and unloading activities, and other operational sounds. This would be particularly disruptive for nearby residents, especially during night hours.

3. Air Quality and Pollution:

Increased vehicular traffic, especially from heavy-duty trucks, would lead to higher levels of air pollution. This would affect the health of local residents, particularly children, the elderly, and those with respiratory issues.

4. Property Values:

The presence of large warehouses would decrease the property values of nearby homes. Potential buyers will find the area less attractive due to the associated noise, traffic, and industrial nature of the development.

5. Environmental Impact:

The construction and operation of such a large-scale project would have significant environmental impacts, including the land on which this project would be built is one of the few open areas remaining in Riverside, potential harm to local wildlife, and increased runoff and pollution.

6. Community Character:

Introducing a major industrial development into a residential area would fundamentally alter the character and sense of community. Residents will feel that their neighborhood is being transformed into an industrial zone.

7. Infrastructure Strain:

Local infrastructure, including roads, sewage systems, and public services, might not be equipped to handle the increased demand resulting from the warehouse project. This could lead to further issues and require costly upgrades funded by taxpayers.

8. Safety Concerns:

The increased presence of large trucks and industrial activities raises safety concerns, especially for children and pedestrians in the area.

9. Precedent for Future Development:

Approving such a project would set a precedent for future industrial developments in residential areas, making it difficult to oppose similar projects in the future. Residents opposed to the project are concerned that these issues could significantly impact their daily lives, health, and the overall quality of their community.

10. Warehouses create mostly low-wage jobs – packing and shipping and truck-driving, according to the Southern California Association of Governments recently noted. And many of those who work in the new warehouses live outside the area. No one making minimum wage could afford to buy a home in the Riverside community.

Thank you for considering my comments before you vote on this project.

Sincerely,
Eunhee Kim, R-NOW member
Raleigh, NC 27615

Cindy Camargo

From: J Gonsman <teamgonsman@yahoo.com>
Sent: Saturday, June 8, 2024 8:48 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Our community is a family community the area is used for hiking and biking. Road congestion is already increased due to semi trucks. We must say no to all the warehouses . Why would anyone think warehouse sandwiched between residential homes is good for the environment or public.

Thank you for considering my comments before you vote on this project.

Sincerely

Jason Gonsman
Orange Crest community 92508

Cindy Camargo

From: Gayle Dicarlantonio <gayledmail@gmail.com>
Sent: Saturday, June 8, 2024 8:19 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

<ADD YOUR PERSONAL REASONS FOR OPPOSING HERE>

Thank you for considering my comments before you vote on this project.

Sincerely
G. DiCarlantonio
92507

Cindy Camargo

From: Ira and Rajean Long <longfam6@att.net>
Sent: Saturday, June 8, 2024 8:17 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes. Our families deserve to live in areas that support their well being, not areas that are over run with diesels, air pollution, poor road conditions due to truck traffic, and EMPTY warehouses.

We am saddened to drive through our community these days seeing all of these concrete buildings in open areas where there used to be wild animals and beautiful wild flowers. This area of Riverside has become a concrete jungle. Please consider placing something beautiful and family focused in this area. You have the opportunity to leave a legacy that embraces family values instead of corporate greed. Please rise to the challenge and be remembered as someone who used their voice and vote to do good.

Thank you for considering our comments before you vote on this project.

Sincerely,

Ira and Rajean Long
Mission Grove 92506

Cindy Camargo

From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Friday, June 7, 2024 9:36 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission:

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Since February, 2022, you have each heard hundreds of public comments in opposition to the West Campus Upper Plateau project at city council meetings in Perris, Moreno Valley, and Riverside; at County Board of Supervisors meetings; and at March JPA meetings. You have each received hundreds of e-mails from your constituents in opposition to the West Campus Upper Plateau project, and you have all read thousands of signatures on petitions and thousands of comments on the draft EIR, all in opposition to the West Campus Upper Plateau project.

You have ignored us by refusing to meet with us after the January, 2024, March JPA meeting because you claimed to have heard our points so well; by refusing to reply to our e-mails, thereby failing to fulfill your responsibilities as publicly elected officials; and by hiding from your constituents by refusing to create a community advisory board and by continuing to hold March JPA public meetings at 3:00 in the afternoons, when most people are not available to attend.

For the past two years, our focus has been on how building warehouses on the West Campus Upper Plateau will affect us. It is now time to focus on how it will affect you.

For the past two years, you have accused Riverside Neighbors Opposing Warehouses of being NIMBYs; however, during that time, the City of Moreno Valley defeated a proposed warehouse project, and the City of Perris sued the City of Menifee to prevent warehouse development. It appears that the NIMBYs are not the member of Riverside Neighbors Opposing Warehouses, but all of you.

There has not been a single public comment or a single signature on a single petition in support of the West Campus Upper Plateau project. So, for those of you who decide to vote "yes" on the West Campus Upper Plateau project, you will not only be voting "yes" on the project, you will be answering the following questions, as well:

Are you unwilling to consider the opinions and preferences of your constituents? Your "yes" vote will answer that question.

Are you more beholden to the March JPA than you are to your constituents? Your "yes" vote will answer that question.

Are you unwilling and unable to read, comprehend, and act on the volumes of research and statistics in opposition to future warehouse development? Your “yes” vote will answer that question.

In the presence of overwhelming public opinion, research, and statistics in opposition of the West Campus Upper Plateau project, are you supporting the project because you are being bribed by the developer? We already know Commissioner Vargas’s answer. For the rest of you, your “yes” vote will answer that question.

For those of you who vote “yes” on the West Campus Upper Plateau project and, therefore, answer “yes” to the questions I just asked, I have a wish for you:

I wish for you, your spouses, your parents, and especially your children and your grandchildren to develop debilitating respiratory disease that causes great pain and premature death; to experience sleepless nights from ambient noise that result in chronic illness and lack of productivity and success; and to encounter crippling traffic that prevents timely arrivals to important obligations and events and that may result in injury or death.

Before you accuse me of being mean-spirited, cruel, or vindictive, consider that that your “yes” vote on the West Campus Upper Plateau project is wishing all of those things for all of your constituents.

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

Cindy Camargo

From: Rita Schneider <rita.m.schneider@gmail.com>
Sent: Friday, June 7, 2024 8:15 PM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Just this week marked the 10th anniversary of my husband and I purchasing a home in Orangecrest. We've since had 3 kids here, will be sending our oldest 2 boys to the neighborhood public school. We are also active members at The Grove Church, regularly attending services and events there. We play sports there and at the local parks. It has been crushing to see the rapid influx of warehouses on our daily commutes on Van Buren, stressing over the increased truck traffic on the local roads and freeways, staying inside when the air pollution is too high to go outside. Please be a voice to fight this harm! Our family wants beauty and inspiration and clean air when we go about our lives in our neighborhood. Building more warehouses is foolishly short-sighted, and not in the best interest of the people who are forced to live next to them. Our family will probably be moving in the next few years, and I'll certainly be targeting areas without warehouses in the backyards, somewhere the voices of residents are listened to and long-term solutions more carefully pursued. This warehouse project doesn't need to happen, and shouldn't be happening.

Thank you for considering my comments before you vote on this project.

Sincerely,

Rita Schneider
92508

Cindy Camargo

From: Christina Barhorst <tbar9191@hotmail.com>
Sent: Friday, June 7, 2024 7:07 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; Supervisor Jeffries - 1st District;
jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks;
Cindy Camargo
Subject: Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

As a lifelong resident of Riverside, I am disheartened to see that this committee is even considering bringing more warehouses and low pay/low skill jobs to our community. Our community will quickly turn towards the mess that the city of San Bernardino is in. Zero jobs, surging homelessness and crime, with no industry even looking to grow in the city. Riverside has long been a place for educated white collar workers to live and spend their hard earning money. We have huge numbers of Orange County and San Diego county employees who live here and work there. This was prompted by the opportunities to own homes in thriving communities like Orangecrest. I hope that this push for more warehouses isn't in some attempt to build out the personal pockets of a few leaders. I urge you to vote no on this monstrosity.

Thank you for considering my comments before you vote on this project.

Sincerely,

Christina Barhorst, M.A. Educational Administration
Kelly Barhorst, B.A. Business Administration

Orangecrest, 92508

Cindy Camargo

From: Nicolette Rohr <nicolette.rohr@gmail.com>
Sent: Friday, June 7, 2024 6:35 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; Supervisor Jeffries - 1st District; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am somewhat sad to be writing to you yet again, because I am disappointed that you have continually ignored the input of the community as well as the well being of the community. Nevertheless, I join my community in calling on you yet again to prioritize our health, the sustainability of this land and air, the strength of our local economy, and our future and VOTE NO on the proposed warehouses that are part of the West Campus Upper Plateau project.

Perhaps the proposed warehouses will benefit a small group of developers, but for the community at large, this project would cause far more harm than good. I have heard the argument that the project will bring jobs, but let's be clear, it won't bring good jobs that will pay people enough to live nearby, and it won't bring sustainable jobs. This is not the "growth" we want or need for our region. Moreover, warehouse development comes at the expense of the land, plant life, and air in this place we call home. One of the things that I value about living in Riverside is access to open spaces, and this project would undermine that benefit to our quality of life. The project would also contribute to the poor air quality in this region. We know now that air pollution is not just a "nuisance" for a few but a crisis with long term health impacts. This project will contribute to adverse health outcomes, especially for the children who live and play in this community and especially those in the residential neighborhood that is far too close to this proposed project. All of us, and especially these children, deserve leaders and representatives who care about their health and future and look to the long term health of the community at large rather than the very short term benefit of a very few.

As a teacher who works with young people and helps them look to their future, as a Christian who is called to care about stewarding the earth and the health of my neighbors, and as a lifelong resident of Riverside who is grateful to call this place home, I urge you to carefully consider my concerns and those of my neighbors before you vote on the West Campus Upper Plateau project on Wednesday, June 12, 2024. I urge you to VOTE NO.

Sincerely,

Nicolette Rohr
Riverside (92506)

Cindy Camargo

From: Shaan Saigol <shaansaigol@gmail.com>
Sent: Friday, June 7, 2024 6:31 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

There is zero reason why industrial warehouses should be built next to residential homes. They attract low paying jobs, they increase traffic and many of the current warehouses drivers already illegally drive on local streets they shouldn't, they pollute the air our children breathe in the nearby public parks, they reduce the ability to build more housing which would help the current housing crisis in the state, and it's a shame our elected officials would rather side with warehouses than its citizens. At the very least you could support building commercial office or retail spaces to attract businesses and entrepreneurs, warehouses should be placed in the middle of nowhere, not near where we live. Amazon and its ilk can afford to be pushed out an extra few miles into a low population zone.

Thank you for considering my comments before you vote on this project.

Sincerely,

Shaan Saigol
Orangecrest Neighborhood, 92508



Cindy Camargo

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Friday, June 7, 2024 4:44 PM
To: Dan Fairbanks; Clerk
Subject: accessibility of documents - SCH 2021110304

Mr. Fairbanks, Ms. Camargo,

I just wanted to note that the document loading from the MIPA FEIR website has been extremely slow and unresponsive. I am working on a workstation with high-speed internet and loading these documents is a slog.

It is not at all clear that this document is fully accessible to slower internet and lower RAM devices, especially for huge documents like Chapter 9 or appendices with architectural drawings.

Mike

Cindy Camargo

From: Deb Whitney <surfjade@yahoo.com>
Sent: Friday, June 7, 2024 4:29 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Cc: Jen L.
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

It is beyond my reasoning that the commission would allow this action to that will so negatively impact the people and the environment.

Thank you for considering my comments before you vote on this project. Sincerely,

Deb Whitney
6790 Mission Grove Pkwy N
Riverside, CA 92506

Cindy Camargo

From: nora jones <jnora893@gmail.com>
Sent: Friday, June 7, 2024 3:40 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jerry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote **NO** on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Please see below my reasons why warehouses would negatively affect our lives:

1. Quality of Life: I enjoy the peaceful and serene environment of the Orange Grove area and fear that a warehouse would bring noise, pollution, and traffic, diminishing my quality of life.
2. Safety Concerns: I worry about the increased risk of accidents and potential hazards that come with warehouse operations, putting my family and neighbors at risk.
3. Community Character: The area's charm and character would be lost with the introduction of a large warehouse, altering the fabric of our community.
4. Environmental Impact: Warehouses can generate significant air pollution, contributing to poor air quality and negative health effects for nearby residents.
5. Traffic Congestion: The increased truck traffic would lead to congestion on local roads, causing frustration for commuters and potentially damaging local infrastructure.
6. Property Values: The presence of a warehouse could decrease property values, making it harder for residents to sell their homes and negatively impacting the local economy.
7. Lack of Jobs: Warehouses often employ few local residents, and the jobs created may not offset the negative impacts on the community.
8. Alternative Uses: The land could be better utilized for community-enhancing projects, such as parks, community centers, or local businesses that promote economic growth and improve residents' lives.

Thank you for considering my comments before you vote on this project.

Sincerely,

Victoria Belova
Orange Grove, 92508

Cindy Camargo

From: Shirley <fungyinandjoseph@gmail.com>
Sent: Friday, June 7, 2024 2:34 PM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

<ADD YOUR PERSONAL REASONS FOR OPPOSING HERE>

Thank you for considering my comments before you vote on this project.

Sincerely,

Shirley Ng
CA 92508

Cindy Camargo

From: Linlin Zhao <fredzhaolin@gmail.com>
Sent: Friday, June 7, 2024 2:24 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

The project has a significantly negative health and safety impacts with limited economic impact on the local community.

Thank you for considering my comments before you vote on this project.

Sincerely,

Lin Zhao
Riverside, CA
92508

Cindy Camargo

From: Candy Blokland <blokland@yahoo.com>
Sent: Friday, June 7, 2024 1:49 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

<ADD YOUR PERSONAL REASONS FOR OPPOSING HERE>

Thank you for considering my comments before you vote on this project.

Sincerely,

Candy Blokland
Creekside. 92508

Sent from my iPhone

Cindy Camargo

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Friday, June 7, 2024 1:09 PM
To: Clerk; Dan Fairbanks; edd@moval.org
Cc: Jennifer Larratt-Smith
Subject: public comment on record regarding lack of civic engagement on SCH 2021110304

Dear Mr. Fairbanks, Ms. Camargo, Chair Delgado,

As of 1 PM Friday June 7, 2024, R-NOW has received only a legalese clarification from MJPA staff regarding our long-standing request for an opportunity to present an agendized presentation on the West Campus Upper Plateau. Our group has been asking for this for over a year in verbal and written comment. We have reached out to Chair Delgado via multiple emails and also reached out via phone and he has not responded. MJPA CEO Dr. Martin stated that allowing us to present would require a rule change to allow all speakers more than 3 minutes, but we believe it can also be added as a separate agendized item should the commission propose it. Given our hundreds of requests on this issue, we think it is a policy decision by the MJPA to keep feedback from community-based organizations to the minimum legally allowable standard.

We believe that this is inconsistent with the recently adopted EJ element civic engagement policies HC15.1-15.7 that require proactive outreach, partnerships, and communication. We also believe that this is consistent with the Riverside County Civil Grand Jury assessment that the MJPA is 'marginally transparent'.

Secondly, we would like to know ahead of time whether time-sharing (designating ones time to another speaker) will be allowed.

Please let us know how the meeting will be run and do not hide behind legalese when doing so.

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

Cindy Camargo

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Friday, June 7, 2024 12:57 PM
To: Dan Fairbanks; Clerk
Subject: FW: Available Now: Draft Industrial Development Regulation Zoning Code Amendments - public comment on SCH 2021110304
Attachments: Summary of Changes - Industrial Development Amendments (1).pdf; Chapter 19.130 Industrial Zones.pdf; Chapter 19.150 Permitted Land Uses.pdf; Chapter 19.435 - Warehousing and Distribution Facilities.pdf; Chapter 19.670 Public Hearings.pdf; Chapter 19.910 Definitions.pdf

Mr. Fairbanks, Ms. Camargo,

Attached please find proposed City of Riverside Good Neighbor Guideline updates and changes to Industrial Development Standards. Please include these as a public comment that these have not been reviewed for consistency with the West Campus Upper Plateau project. We hope that the March JPA does, in fact, meet or exceed these proposed new standards.

Please note the changes to definitions of sensitive receptors, the FAR change for cumulative building footprint, and the proposed 1,500 foot buffer for mega-warehouses over 400,000 sq ft in size.

Thank you for your attention to this matter.

Mike McCarthy

Riverside Neighbors Opposing Warehouses
92508

From: Palafox, Daniel <DPalafox@riversideca.gov>
Sent: Wednesday, March 13, 2024 10:09 AM
Cc: Tinio, Maribeth <MTinio@riversideca.gov>; Taylor, Matthew <MTaylor@riversideca.gov>; Montojo, Paige <PMontojo@riversideca.gov>; Palafox, Daniel <DPalafox@riversideca.gov>
Subject: Available Now: Draft Industrial Development Regulation Zoning Code Amendments

Good morning everyone,

Staff has had the opportunity to work closely with community stakeholders and the City Council Land Use, Sustainability, & Resilience Committee to address concerns related to continued growth of industrial development in the region and to build upon and improve the City's standard-setting Good Neighbor Guidelines.

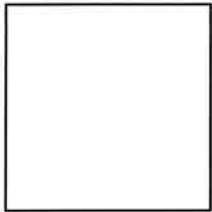
In June 2023, staff held a workshop with the Planning Commission to obtain feedback on potential Zoning Code changes consistent with the Committee's policy direction. You may view the [agenda packet here](#) and [watch the meeting here](#).

Attached is a draft of the update to the industrial development regulations; we would like to share them for review and feedback. The draft amendments affect several provisions of the Zoning Code as it relates to industrial projects, including but not limited to changes to calculating Floor Area Ratio; definitions for Sensitive Receptors and enhanced protections; landscaping requirements; renewable energy and sustainable construction practice requirements; and new project noticing requirements. Attached you will find:

1. A plain-English summary of the proposed changes and their potential effects; and
2. The full redlined Zoning Code text amendments, as proposed.

The proposed amendments will be presented at the [April 8th Land Use, Sustainability, & Resilience Committee meeting](#). Your feedback is welcomed and encouraged.

Please let us know if you have any questions or feedback. We'd be happy to schedule a meeting to discuss any of the proposed amendments; kindly let us know by replying to this email with your availability.



Daniel Palafox | Associate Planner
City of Riverside | [Planning Division](#)
3900 Main Street, Riverside, CA 92522
E: 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).

**PR-2023-001523 (AMD): Proposed Amendments Related to
Industrial Development Standards**

CHAPTER 19.910 – DEFINITIONS

Summary of Changes

- A new definition for sensitive receptor is incorporated throughout the Zoning Code. Land uses that constitute sensitive receptors will include:
 - A residential zone or use;
 - K-12 public, private and charter school;
 - Designated parks and open space;
 - Adult and child day care facilities;
 - Assisted living facilities; and
 - Hospitals.
- The Zoning Code does not currently define sensitive receptors, but the 2020 Good Neighbor Guidelines provides policy guidelines for warehousing and distribution facilities adjacent to specifically defined sensitive receptors. This amendment would fix this inconsistency by creating a sensitive receptor definition Title 19 that is aligned with the existing Good Neighbor Guidelines policy.

Effects

- The proposed sensitive receptor definition will have the effect of expanding protections to additional land uses beyond current requirements which currently only apply to development within proximity of a residential zone or use, as described in the following section. As a result, more restrictive development requirements will affect a greater quantity of industrially zoned land.

CHAPTER 19.130 – INDUSTRIAL ZONES (BMP, I, AI AND AIR)

Summary of Changes

- Sensitive receptor protections are extended to other land uses covered under the updated Sensitive Receptor definitions and will apply tiered development regulations based on proximity to a sensitive receptor (maximum building height, building size, setbacks etc.)
- A New Floor Area Ratio (FAR) table replaces the existing FAR values and provides development limits for industrial development based on 1) lot size and 2) distance from sensitive receptor.
 - The intent is that industrial development closer to a sensitive receptor would have a smaller cumulative building footprint. As the distance from a sensitive receptor increases, the cumulative building floor area increases.
- A new landscaping section dedicated to buffering between industrial development and sensitive receptors outlines the buffer dimensions and plant material requirements for industrially zoned parcels which share a property line with a sensitive receptor.

Effects

- Development standards including maximum building height, maximum building size, floor area ratio (FAR), and building & landscape setbacks based on distance to sensitive receptors will apply to more industrially zoned land. The preparation of a Health Risk Assessment (HRA) will also be required for new

PR-2023-001523 (AMD): Proposed Amendments Related to Industrial Development Standards

industrial development within 1,000 feet of any sensitive receptor where the current code only requires an HRA when 1,000 feet of a residential zone or use.

- The additional 1,500-foot buffer requirement for buildings over 400,000 square feet and the new FAR table will reduce the overall development intensity and achievable gross floor area of industrial land within the city. This may result in smaller buildings and less intense development for industrial land within 1,500 feet of any sensitive receptor, as defined.
- The additional landscaping buffer will create a natural gradient between the industrial use and adjacent sensitive receptors and improve compatibility.

CHAPTER 19.150 BASE ZONES PERMITTED LAND USES

Summary of Changes

- The permitted land uses table is revised to prohibit warehouse and distribution facilities greater than 400,000 square feet in all industrial zones except the General Industrial (I) Zone subject to a Conditional Use Permit (CUP).

Effects

- Very large warehouses and logistics facilities over 400,000 square feet will no longer be permitted in the Business & Manufacturing Park, Air Industrial (AI) and Airport (AIR) Zones.

CHAPTER 19.435 – WAREHOUSING AND DISTRIBUTION FACILITIES

Summary of Changes

- Update "sensitive receptor" language to be consistent with the new proposed definition.
- A new section has been added which incorporates renewable energy and sustainable construction requirements which will apply to all warehousing and distribution facilities.

Effects

- Creates new operational standards for renewable energy generation and low- or no-emissions equipment for warehousing and distribution facilities, including CARB Tier IV standards, rooftop solar photovoltaics and other requirements. Additional staff review time will be required in order to ensure compliance with the proposed operational and alternative energy requirements.

CHAPTER 19.670 – PUBLIC HEARINGS AND NOTICE REQUIREMENTS

Summary of Changes

- Project notification radius is extended from 330 feet to 1,000 feet for any new industrial development requiring a Minor Conditional Use Permit (MCUP) or Conditional Use Permit (CUP) within the Business Manufacturing Park (BMP) and General Industrial (I) Zone.
- Project notification will include tenants/occupants of multi-tenant properties in addition to property owners.

**PR-2023-001523 (AMD): Proposed Amendments Related to
Industrial Development Standards**

- A new requirement to post a physical notice of filing sign on-site for any new development requiring a MCUP or CUP within the BMP and I Zone is added.

Effects

- Expands the type and extent of public noticing required for new industrial development beyond what is required for other land use entitlements. The additional notification requirements for tenants and the Notice of Filing sign will provide residents with greater opportunities to provide feedback during the initial stages of a project.

PART II - CODE OF ORDINANCES
 Title 19 - ZONING
 ARTICLE V - BASE ZONES AND RELATED USE AND DEVELOPMENT PROVISIONS
 Chapter 19.130 INDUSTRIAL ZONES (BMP, I, AI AND AIR)

Chapter 19.130 INDUSTRIAL ZONES (BMP, I, AI AND AIR)

19.130.030 Development standards for Industrial Zones.

- A. Table 19.130.030.A (BMP, I and AIR Industrial Zones Development Standards) sets forth the minimum development standards for all development in the BMP, I, and AIR Zones.
- B. Table 19.130.030.B (AI Industrial Zones Development Standards) sets forth the minimum development standards for all development in the AI Zones.

(Ord. 7609 § 1, 2022; Ord. 7331 §7, 2016; Ord. 6966 §1, 2007)

Table 19.130.030.A
 BMP, I and AIR Industrial Zones Development Standards

Development Standards	BMP	I	AIR	Notes, Exceptions & Special Provisions
Floor Area Ratio (FAR) - Maximum^{1,3}	1.50	0.60	0.60	See Chapter 19.149 - Airport Land Use Compatibility
Lot Area - Minimum	40,000 sq. ft. ²	10,000 sq. ft.	8,000 sq. ft.	
Lot Width - Minimum	140 ft.	60 ft.	60 ft.	
Lot Depth - Minimum	100 ft.	100 ft.	100 ft.	
Building Height - Maximum ³	—	—	—	See Chapter 19.149 - Airport Land Use Compatibility
a. Within 200 feet of a sensitive receptor Residential Zone or use ^{6,7,8}	35 ft.	35 ft.	35 ft.	
b. All other locations	45 ft.	45 ft.	45 ft.	
Building Size - Maximum	—	—	—	Gross floor area, exclusive of mezzanine. Multiple buildings allowed provided the buildings meet the FAR established in Table 19.130.030.B. maximum FAR is not exceeded.
a. Within 200 feet of a Residential Zone or use sensitive receptor ^{6,7}	10,000 sq. ft.	10,000 sq. ft.	10,000 sq. ft.	

-b. 200-800 feet of a Residential Zone or use sensitive receptor ^{6,7}	100,000 sq. ft.	100,000 sq. ft.	100,000 sq. ft.	
c. 800-1,500 feet of a sensitive receptor	400,000 sq. ft.	400,000 sq. ft.	400,000 sq. ft.	
d. 1,500 feet or more ^{6,7} € All other locations	Per FAR	Per FAR	Per FAR	
Front Yard Setback - Minimum ⁵	—	20 ft.	15 ft.	In the BMP Zone, 20-foot of the required 50-foot front yard setback shall be landscaped.
a. Buildings over 30 ft. in height or on an arterial street	50 or 40 ft. ⁴ (See Notes)	—	—	However, a 40-foot front yard setback shall be permitted if it is landscaped in its entirety.
b. Buildings 30 ft. or less in height and not on an arterial street	20 ft. (See Notes)	—	—	In the BMP zone, the 20-foot front yard setback required for buildings 30-foot or less in height shall be landscaped in its entirety.
Side Yard setbacks - Minimum	—	—	—	
a. Interior Side	0 ft.	0 ft.	0 ft.	
b. Adjacent to a sensitive receptor Residential Zone or use ^{6,7}	60	60	60	Not less than At least 15-20 feet of the minimum side yard setback area directly adjacent to a Residential Zone or use sensitive receptor shall be fully landscaped.
c. Street side	Same as Front Yard	20 ft.	15 ft.	Minimum 10 feet fully landscaped.
Rear Yard Setback - Minimum	—	—	—	
a. Rear yard	0 ft.	0 ft.	15 ft.	
b. Adjacent to a sensitive receptor Residential Zone or use ^{6,7}	60 ft.	60 ft.	60 ft.	Not less than At least 15-20 feet of the minimum rear yard setback area directly adjacent to a Residential Zone a sensitive receptor or use shall be fully landscaped.
c. Adjacent to Streets	Same as Front Yard	20 ft.	20 ft.	Minimum 10 feet fully landscaped.

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Table 19.130.030.B
BMP, I and AIR Industrial Zones Floor Area Ratio

Distance from Sensitive Receptor	Lot Size								
	< 2 acres			2-4 Acres			> 4 Acres		
	BMP	I	AIR	BMP	I	AIR	BMP	I	AIR
< 200 feet	<u>.50</u>	<u>.50</u>	<u>.60</u>	<u>.35</u>	<u>.35</u>	<u>.60</u>	<u>.25</u>	<u>.25</u>	<u>.60</u>
< 800 feet	<u>.75</u>	<u>.60</u>	<u>.60</u>	<u>.50</u>	<u>.50</u>	<u>.60</u>	<u>.35</u>	<u>.35</u>	<u>.60</u>
< 1,500 feet	<u>1.5</u>	<u>.60</u>	<u>.60</u>	<u>1.0</u>	<u>.60</u>	<u>.60</u>	<u>.75</u>	<u>.60</u>	<u>.60</u>
> 1,500 feet	<u>1.5</u>	<u>.60</u>	<u>.60</u>	<u>1.5</u>	<u>.60</u>	<u>.60</u>	<u>1.5</u>	<u>.60</u>	<u>.60</u>

Notes:

1. The Approving or Appeal Authority may allow a development project to exceed a maximum FAR when findings can be made that such project (a) will not have a detrimental effect on infrastructure and municipal services, (b) will not adversely impact the surrounding neighborhood, and (c) will not likely set a precedent for additional development that would adversely affect infrastructure, service or surrounding land uses.
2. Smaller minimum lot areas may be established by a specific plan or master plan in the BMP Zone. A master plan must include provisions for common access, parking and maintenance. A total master plan area of five acres is required. Site plan review approval by the Community & Economic Development Director or his/her designee is required for any master plan.
3. See Chapter 19.149 - Airport Land Use Compatibility to determine if a project site is subject to Airport Land Use Compatibility Plan requirements.
4. In the BMP Zone, off-street parking, gate or guard houses, roofs or canopies covering unenclosed pedestrian walks and walls or fences not more than six feet in height shall be permitted in the rear 30 feet of the required 50-foot front yard setback.
5. A minimum front yard setback of 50 feet shall be required and maintained wherever a lot or parcel in any industrial zone abuts or is adjacent to a lot or parcel in any residential zone or use.
6. Except where the site is separated from such residential zone or use by a freeway.
7. Measured from the residential zone or property line to the industrial building.
8. ~~A sensitive receptor includes a residential zone or use; K-12 public, private and charter school; designated parks and open space; adult and child day care facilities; assisted living facilities and hospitals shall be defined as defined by Article X - Chapter 19.910 - Definitions a residential zone or use; K-12 public, private and charter schools; designated parks and open space; adult and child day care centers; assisted living facilities, hospitals.~~

19.130.040 Additional standards, regulations and requirements for the BMP, I, AIR and AI Zones.

- A. *Health Risk Assessment.* A Health Risk Assessment (HRA) shall be prepared in accordance with South Coast Air Quality Management District (SCAQMD) Guideline for the new development or substantial enlargement of industrial uses within 1,000 feet of a ~~Residential Zone or use~~ sensitive receptor.

-
- B. *Specific Plan District Consistency.* For new development within 1,500 feet of sensitive receptor in a specific plan district requiring a Minor Conditional Use Permit or Conditional Use Permit, the development standards of Table 19.130.030.A and Table 19.130.030.B shall prevail unless the specific plan district standards are more restrictive.
- BC. *Walls.* Wherever a lot or parcel in any industrial zone abuts a ~~sensitive receptor~~ Residential Zone or use, or abuts an alley that separates the industrial zone from a Residential Zone or use sensitive receptor, a minimum eight-foot high solid masonry wall shall be constructed along the property line or alley right-of-way line separating the industrial zone from the Residential Zone or use. Wall height shall be measured from the finished grade of the adjacent Residential Zone or use.
1. Such wall shall be limited in height to three feet in any required front yard or street side yard setback area.
 2. Such wall shall not be required until the industrial lot or parcel is developed with a permitted use.
- CD. *Outdoor display and storage.* Except for the outdoor storage and display of aircraft, outdoor display and storage shall not be permitted except as specified in 19.285 (Outdoor Storage Yard), 19.500 (Outdoor Display of Incidental Plant Materials), 19.505 (Outdoor Display and Sales — Incidental) and 19.510 (Outdoor Storage—Incidental).
- DE. *Use of interior rear and side yards for off-street parking and loading.* Except for required landscape areas, required interior rear yards and side yards may be used for off-street parking, off-street loading, outdoor storage incidental to a permitted use, and any use permitted in the required front yard area; provided such loading, parking and storage areas are acoustically shielded and screened from adjacent Residential Zones or uses and the public right-of-way, to the satisfaction of the Community & Economic Development Director or his/her designee.
- EF. *Lighting.* Lighting for signs, structures, landscaping, parking areas, loading areas and the like, shall comply with the regulations set forth in Section 19.590.070 (Light and Glare) and the provisions of Chapter 19.556 (Outdoor Lighting).
- EG. *Screening of mechanical equipment.* All roof-supported or ground-supported mechanical equipment and utility equipment shall comply with the regulations set forth in Chapter 19.555 (Outdoor Equipment Screening).
- GH. *Landscaping.*
1. Front and side yard ~~areas adjacent~~ areas.
 - a. Landscaping adjacent to streets and sensitive receptors ~~interior perimeter landscape planters adjacent to Residential Zones or uses~~ shall be suitably landscaped and continuously maintained as set forth in Chapter 19.570 (Water Efficient Landscaping and Irrigation).
 - b. Such setbacks landscape areas shall not be used for off-street parking, loading, storage or accessory buildings.
 2. Buffering between uses. In addition to any required perimeter walls, a landscape-planter strip shall be provided when adjacent to a sensitive receptor along the shared property line.
 - a. Dimensions: The landscape planter strip shall have a minimum width of twenty feet.

b. Plant Materials: The planter strip shall have a layered composition of deciduous and/or evergreen trees.

i. A minimum of two rows of trees is required.

1. Each row shall be placed at intervals of one for every 30 linear feet and shall be staggered such that the distance between trees in each row is not less than 15 feet.

ii. All trees shall be mature at the time of planting.

iii. The remainder of the planter strip shall be permanently stabilized by ground cover plantings, mulch, or similar methods.

iv. Alternative planting materials may be considered subject to the approval of the approving authority.

Ⓜ. *Performance standards.* All uses shall comply with the performance standards set forth in Chapter 19.590 (Performance Standards) for industrial uses, except that the noise associated with aircraft operations shall be exempt from noise standards but shall comply with any applicable Federal Aviation Administration regulations regarding noise.

Ⓝ. *Parking and loading requirements.* Parking areas shall be provided as set forth in Chapter 19.580 (Parking and Loading).

Ⓞ. *Trash receptacles and enclosures.*

1. All trash storage areas shall be located so as to be convenient to the users and where associated odors and noise will not adversely impact the users.

2. The provisions of Chapter 19.554 (Trash/Recyclable Materials Collection Area Enclosures) regarding requirements for the screening of trash receptacles shall apply.

(Ord. 7541 , § 4, 2020; Ord. 7331 §7, 2016; Ord. 6966 §1, 2007)

Chapter 19.150 BASE ZONES PERMITTED LAND USES

19.150.010 Purpose.

This section establishes land use regulations for all base zones listed in this article consistent with the stated intent and purpose of each zone.

(Ord. 7573 § 1(Exh. A), 2021; Ord. 7331 §12, 2016; Ord. 6966 §1, 2007)

² Legal, existing duplexes built prior to the adoption of this Zoning Code are permitted in the R 1-7000 Zone see 19 100.060 D.

³ Allowed with a Planned Residential Development (PRD) Permit, Chapter 19 780.

⁴ One single-family detached dwelling allowed on one legal lot 0.25 acres in size or less in existence prior to January 1, 2018 subject to the development standards of the R 1-7000 Zone.

⁵ Permitted or conditionally permitted on sites that do not include a residential use.

⁶ For Clean Energy Uses and associated Outdoor Storage (Chapter 19 510) and/or Indoor Vehicle Repair (Chapter 19 420), permitted with a Minor Conditional Use Permit.

⁷ Allowed for Two-Unit Developments pursuant to Chapter 19 443.

(Ord. 7630 § 4(Exh. A), 2023; Ord. 7592 § 4(Exh. D), 2022; Ord. 7587 , § 2(Exh. A), 2022; Ord. 7573 § 1(Exh. A), 2021; Ord. 7552 § 7(Exh. C), 2021; Ord. 7541 , § 6(Exh. C), 2020; Ord. 7528 § 1(Exh. A), 2020; Ord. 7520 § 1(Exh. A); Ord. 7505 § 1(Exh. A), 2020; Ord. 7487 § 13(Exh. D), 11-5-2019; Ord. 7462 , § 2(Exh. A), 2019; Ord. 7431 § 3(Exh. A), 2018)

19.150.030 Special or unusual uses.

At the discretion of the Community & Economic Development Department Director, or his/her designee, a conditional use permit may be considered for a unique or unusual combination of uses or special facilities similar to and not more detrimental than other uses in a particular zone.

(Ord. 7552 §9, 2021;Ord. 7331 §12, 2016; Ord. 7235 §6, 2013; Ord. 6966 §1, 2007)

Chapter 19.435 WAREHOUSING AND DISTRIBUTION FACILITIES

19.435.030 Site location, operation and development standards.

The standards set forth in Article V, Base Zones and Related Use and Development Provisions, shall apply to warehousing and distribution facilities, unless otherwise specified here.

A. Warehousing and distribution facilities 10,000 square feet or less.

1. Driveways, loading areas, docks, truck wells and internal circulation routes shall be oriented away from ~~residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals or other public places~~ sensitive receptors to the maximum extent feasible.
2. Loading areas, docks, truck wells and outdoor storage areas shall be fully screened from view of ~~residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals or other public places~~ sensitive receptors and from public rights-of-way with buildings, freestanding walls and fences, landscaping or other means to the satisfaction of the Approving Authority.

Where loading areas, docks, truck wells and outdoor storage areas are located adjacent to a ~~Residential Zone or use~~ sensitive receptor, they shall be fully screened from view of the adjacent ~~Residential Zone or use~~ sensitive receptor by means of a solid wall with a minimum height of eight feet as measured from the finished grade of the ~~adjacent Residential Zone or use~~ sensitive receptor.

3. Operations, including loading, unloading, staging and storage of trucks and trailers, shall comply with Title 7 (Noise) of this Code.

B. Warehousing and distribution facilities larger than 10,000 square feet and less than 100,000 square feet.

1. Driveways, loading areas, docks, truck wells and internal circulation routes shall be oriented away from ~~residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals or other public places~~ sensitive receptors the maximum extent feasible.
2. Loading areas, docks, truck wells and outdoor storage areas shall be fully screened from view of sensitive receptors ~~residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals or other public places~~ and from public rights-of-way with buildings, freestanding walls and fences, landscaping or other means to the satisfaction of the Approving Authority.

Where loading areas, docks, truck wells and outdoor storage areas are located adjacent to a sensitive receptor ~~Residential Zone or use~~, they shall be screened from view of the adjacent sensitive receptor ~~Residential Zone or use~~ by means of a solid wall with a minimum height of

eight feet as measured from the finished grade of the adjacent sensitive receptors~~Residential Zone or use.~~

3. Operations, including loading, unloading, staging and storage of trucks and trailers, shall comply with Title 7 (Noise) of this Code.
4. Idling of trucks queued or operated on site shall not exceed five minutes.
5. Where transport by temperature-controlled trucks or trailers is proposed, on-site electrical hookups shall be provided at loading docks. Idling or use of auxiliary truck engine power to power climate-control equipment shall be prohibited.

C. Warehousing and distribution facilities 100,000 square feet and larger.

1. Driveways, loading areas, docks, truck wells and internal circulation routes shall be oriented away from sensitive receptors~~residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals or other public places.~~
2. Loading areas, docks, truck wells and outdoor storage areas shall be screened from view of sensitive receptors~~residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals or other public places~~ and from public rights-of-way with buildings, freestanding walls and fences, landscaping or other means to the satisfaction of the Approving Authority.

Where loading areas, docks, truck wells and outdoor storage areas are located adjacent to a sensitive receptor~~Residential Zone or use~~, they shall be screened from view of the adjacent sensitive receptor~~Residential Zone or use~~ by means of a solid wall with a minimum height of eight feet as measured from the finished grade of the adjacent sensitive receptor~~Residential Zone or use.~~

3. Sufficient aisle space shall be provided on-site to accommodate the on-site queuing of trucks as determined by a Traffic Impact Analysis, if required. Queuing lanes or aisles shall not obstruct regular vehicular or pedestrian circulation or emergency equipment access.
4. Operations, including loading, unloading, staging and storage of trucks and trailers, shall comply with Title 7 (Noise) of this Code.
5. Idling of trucks queued or operated on site shall not exceed five minutes.
6. On-site electrical hookups shall be provided at loading docks. Idling or use of auxiliary truck engine power to power climate-control equipment shall be prohibited.
7. Warehousing and distribution facilities generating 150 or more truck trips per day, as determined by the most recent Institute of Transportation Engineers (ITE) Trip Generation Rate for the specific proposed land use, shall prepare a Health Risk Assessment in accordance with South Coast Air Quality Management District (SCAQMD) Guidelines.

D. All Warehousing & Distribution Facilities

1. On-site renewable requirements.

- a. All building roofs shall be constructed with light colored roofing material with a solar reflective index ("SRI") of not less than 78. This material shall be the minimum solar reflective rating of the roof material for the life of the building.

-
- b. All building roofs shall be designed to be solar-ready.
 - c. For buildings over 100,000 square feet, solar rooftop panels shall be installed prior to issuance of a business license.
 - i. The solar panels shall supply 100 percent of the power needed to operate all non-refrigerated portions of the facility including the parking areas.

2. Operation and construction.

- a. Cool surface treatments shall be added to all drive aisles and parking areas. Such areas shall be constructed with a solar-reflective cool pavement such as concrete.
- b. The following environmentally responsible practices shall be required during construction:
 - i. The applicant shall commit to using CARB Tier 4 or greater off-road equipment, where available at the time of construction.
 - ii. Use of electric-powered hand tools, forklifts, and pressure washers.
 - iii. Designation of an area in any construction site where electric-powered construction vehicles and equipment can charge.
 - iv. Diesel-powered generators shall be prohibited except in case of emergency or to establish temporary power during construction.

(Ord. 7541 , § 8(Exh. D), 2020)

DIVISION II. SPECIFIC INCIDENTAL LAND USES

Chapter 19.670 PUBLIC HEARINGS AND NOTICE REQUIREMENTS

19.670.020 Notice requirements for administrative discretionary permits with no public hearing.

A. *Minor Conditional Use Permit and Variance.*

1. Public notice of the consideration of a proposed minor conditional use permit in all zones shall be provided by the Community & Economic Development Department Director, or his/her designee, by mailing such notice to the property owners within 300 feet of the exterior boundaries of the property under consideration.
 - a. For new development requiring a minor conditional use permit within the Business Manufacturing Park (BMP) & General Industrial (I) Zones, the notification radius shall be extended to 1,000 feet.
2. Public notice of the consideration of a proposed variance in any zone shall be provided by the Community & Economic Development Department Director, or his/her designee, by mailing such notice to the property owners adjacent to the boundaries of the property under consideration. When the variance request is regarding a corner lot and will pertain to a rear or side yard setback, such notice shall be given to the owners of property directly across each street from the proposed side or rear yard encroachment as well as to the owners of abutting property.
3. For mailing purposes, the last known name and address of such owners and occupants as ~~are~~ shown on the latest available equalized assessment roll of the County Assessor shall be used. Such notices shall identify the property under consideration and indicate the nature of the proposed permit.
4. The public notice shall:
 - a. Be sent no later than 14 days after acceptance of a complete and accurate application;
 - b. Invite interested persons to notify, in writing, the Planning Division of any concerns, comments or to make a request to be further notified of actions relating to the proposed variance or minor conditional use permit during a 15-day comment and review period commencing with the date of the notice;
 - c. Specify that only those specifically requesting to be further notified of actions relating to the application will be so notified of decisions, appeals or requests for City Council review; and

-
- d. Specify that, at the end of the 15-day comment and review period, the Community & Economic Development Department Director's or Development Review Committee's final report and recommendations will be issued, initiating a ten-day appeal period during which time any interested person may appeal to the decision the appropriate Appeal Authority.
 5. For variances in any residential zone where the applicant has obtained the written approval of the adjacent property owners, no public notices, comment period or appeal period is required.
 6. The Community & Economic Development Department Director's decision is final, except that the applicant may appeal the decision within ten days of the mailing of written notice of decision.
 7. Noticing distance requirements for individual uses may vary. Refer to Article VII, Specific Land Use Provisions.
- B. *All other administrative, discretionary permits.*
- No notice is required for other administrative, discretionary actions without a public hearing, unless specified.
- (Ord. 7552 §33, 2021; Ord. 7487 §3, 11-5-2019; Ord. 7331 §103, 2016; Ord. 6966 §1, 2007)

19.670.030 Notice of hearing for discretionary actions requiring a public hearing.

Notice of the hearing shall be given in all of the following ways:

- A. Notice of the hearing shall be mailed or delivered, at least ten days prior to the hearing, to:
 1. The owner of the subject real property or the owner's duly authorized agent, and the project applicant.
 2. Each local agency expected to provide water, sewage, streets, roads, schools or other essential facilities or services to the project.
 3. All owners of the subject real property on the latest County Assessor records of the County Assessor and occupants within 300 feet of the real property. For new development requiring a Conditional Use Permit within the Business Manufacturing Park (BMP) & General Industrial (I) Zones, the notification radius shall be extended to 1,000 feet.
 4. If the number of owners to whom notice would be mailed or delivered is greater than 1,000, the City may, in lieu of mailing or delivering the notice, provide notice by placing an advertisement of at least one-eighth page in at least one newspaper of general circulation within the City at least ten days prior to the hearing.
- B. The notice shall be published in at least one newspaper of general circulation within the City at least ten days prior to the hearing.
- C. Noticing distance requirements for individual uses may vary. Refer to Article VII, Specific Land Use Provisions.

(Ord. 7552 §34, 2021; Ord. 7331 §103, 2016; Ord. 6966 §1, 2007)

19.670.130. On-site notification signage for projects in the Industrial Zones

Notice of filing for new development projects within the Business Manufacturing Park (BMP) & General Industrial (I) Zone shall also be made by posting of physical signage on the site by the applicant when a Minor Conditional Use Permit or Conditional Use Permit is being considered.

1. Purpose: The on-site notification signage requirement is intended to notify neighbors of the affected project area and the community at large early in the review process, allowing the applicant and the City to consider citizens' comments throughout all stages of project review.
2. Specific Plan requirements:
 - a. In any specific plan district where specified industrial uses require a Minor Conditional Use Permit or Conditional Use Permit by the current industrial zoning designation, a Notice of Filing sign shall be required.
2. Sign criteria/maintenance: Posting of required on-site notification signage shall comply with the following:
 - a. Sign size and specifications.
 - i. Sign(s) shall be four feet high by eight feet wide.
 - ii. Sign(s) shall be attached by ground-mounted stake(s) or post(s) not less than 6 feet in height from ground surface.
 - iii. Signs shall not be affixed to buildings or other structures.
 - iv. Signs shall contain the following information:
 1. City of Riverside Logo;
 2. "Notice of Filing" lettering;
 3. Planning project case number;
 4. Brief project description;
 5. Project location including Accessor Parcel Number(s) (APNs);
 6. Project applicant name and contact information;
 7. Contact information for the City Planning Division; and
 8. Other information as determined to be necessary by the Community & Economic Development Director or designee, including but not limited to a standardized design template published by the Planning Division.
 - b. Location and installation standards. All sign(s) shall be installed according to the specifications determined by the Planning Division.
 - i. Signs shall be posted on each public street frontage.

ii. A minimum of one sign shall be posted for every 300 lineal feet of public street frontage.

iii. Corner Lots.

1. Where two street frontages intersect, one sign posted at the corner facing the intersection shall satisfy the posting requirement for the first 300 lineal feet of frontage for both streets facing the interchange.

iv. Signs shall be located no more than three feet behind the property line closest to, parallel to, and clearly visible from the street.

v. Signs shall not be located within the public right of way.

+vi. Additional signs may be required as determined by the Planning Division.

c. Timing.

i. All notification sign(s) shall be installed within 60 days of application submittal.

ii. Signs shall remain in place throughout the entire project review period and shall not be removed prior to the expiration of the appeal period of the final action taken on the project.

iii. Signs shall be removed no later than 14 days following the expiration of the final appeal period or withdrawal of the application.

d. Sign removal and maintenance.

i. All sign(s) must be kept adequately maintained in a legible state and remain in place until the final decision on the application has been made or the application is withdrawn.

ii. Changes to the nature of the project or the requested entitlements shall necessitate updates to the posted notification signage to the satisfaction of the Planning Division.

iii. Failure to remove the sign within the prescribed time period will result in the withholding of any post-entitlement permits.

3. The project application shall not be deemed complete until the required notification signage is installed.

4. A Notification Signage Exhibit may be required to identify the proposed location of signage and verify compliance with these requirements.

ARTICLE X: DEFINITIONS

Chapter 19.910 DEFINITIONS

19.910.010 Purpose and applicability.

For the purposes of the Zoning Code, certain words, phrases and terms used herein shall have the meaning assigned to them by this article, except that definitions derived from State and Federal regulations that are referenced herein shall have the meaning contained in the referenced regulations.

For general terminology used throughout the Zoning Code, refer to Section 19.060.030.A (Rules and Interpretations - Terminology). For terminology used in the Zoning Code but not defined in this title, the definitions used elsewhere in the Riverside Municipal Code, the Uniform Building Code or accepted dictionaries of the English language shall govern.

(Ord. 6966 §1, 2007)

19.910.200 "S" Definitions.

Saloon. See "bar."

Salvage yard means any area, lot, parcel, building, or part thereof used for the storage, collection, processing, purchase, sale, or abandonment or wastepaper, rags, scrap metal, or other scrap or discarded materials, machinery, or other types of junk. Such uses include baling of cardboard and other paper materials.

Scale means proportionate size judged in relation to an external point of reference. See definition in the Downtown Specific Plan.

School means any institution of learning for minors, whether public or private, offering instruction in those courses of study required by the California Education Code and maintained pursuant to standards set by the State Board of Education. This definition includes a kindergarten, elementary school, middle or junior high school, senior high school, or any special institution of education, but it does not include a vocational or professional institution of higher education, including a community or junior college, or university. This definition does not include any day care center or family day care home, regardless of size (see separate definitions for all day care facilities).

School, professional institution of higher education means a post-secondary institution for higher learning that grants associate or bachelor degrees and may also have research facilities and/or professional schools that grant master and doctoral degrees. This may also include community colleges that grant associate or bachelor degrees or certificates of completion in business or technical fields.

School, vocational means a specialized instructional establishment that provides on-site training of business, commercial and/or trade skills such as accounting, data processing and computer repair. This classification excludes establishments providing training in an activity that is not otherwise permitted in the zone. Incidental instructional services in conjunction with another primary use shall not be considered a business and trade school.

Secondary street frontage. See "frontage, secondary street."

Secondhand store means a retail or wholesale business in which the largest portion of merchandise is used. This classification does not include secondhand motor vehicle parts or accessories.

Semi-public means a use owned or operated by a private non-profit, religious or charitable institution that provides educational, cultural, recreational, religious or similar types of programs to the general public.

Senior housing means a housing facility or development the occupancy of which is limited to persons 55 years of age or older pursuant to Section 51.3 of the California Civil Code.

Sensitive receptor means a residential zone or use; K-12 public, private and charter school; designated parks and open space; adult and child day care facilities; assisted living facilities and hospitals.

Separate interest. Has the following meanings:

1. In a community apartment project, "separate interest" means the exclusive right to occupy an apartment, as specified in 19.790 subdivision (d).
2. In a condominium project, "separate interest" means an individual unit, as specified in 19.790 subdivision (f).
3. In a planned development, "separate interest" means a separately owned lot, parcel, area or space.
4. In a stock cooperative, "separate interest" means the exclusive right to occupy a portion of the real property, as specified in 19.790 subdivision (m).

Unless the declaration or condominium plan, if any exists, otherwise provides, if walls, floors, or ceilings are designated as boundaries of a separate interest, the interior surfaces of the perimeter walls, floors, ceilings, windows, doors and outlets located within the separate interest are part of the separate interest and any other portions of the walls, floors or ceilings are part of the common areas.

The estate in a separate interest may be a fee, a life estate, an estate for years, or any combination of the foregoing.

Service station. See "vehicle fuel station."

Setback means the distance from a defined point or line governing the placement of buildings, structures, parking or uses on a lot. See definition in the General Plan.

Setback building line, front means a line parallel with the front lot line or planned street line and located at the required front yard setback for regular lots and a line parallel with the street measured one third the lot depth back for cul-de-sac lots and knuckle lots.

Setback building line, rear means a line parallel with the front lot line or planned street line and located at the required rear yard setback.

Setback, building line, side means a line parallel with the front lot line or planned street line and located at the required side yard setback.

Shared parking means the provision that two or more uses that are within close proximity may share parking facilities to fulfill their individual parking requirements because their prime operational hours do not overlap.

Shelters, emergency. Has the same meaning as defined in subdivision C of Section 50801 of the Health and Safety Code except as allowed with a Temporary Use Permit with assemblies of people—non-entertainment.

Shopping center. Same as "complex, commercial."

Short-term rental, as regulated in Title 5 of the Riverside Municipal Code, means the rental of a dwelling, or a portion thereof, by the owner to another person or group of persons for occupancy, dwelling, lodging or sleeping purposes for a period of less than 30 consecutive calendar days. The rental of units within city-approved hotels, motels, and bed-and-breakfast inns shall not be considered to be a short-term rental.

Showroom means an area for the display of goods/merchandise in conjunction with a permitted use on the site.

Side lot line. See "lot line, side."

Cindy Camargo

From: Lenora Mitchell <rageturner@gmail.com>
Sent: Friday, June 7, 2024 12:18 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

In April 2023, Congressman Mark Takano released his "State of Air Quality in California's 39th Congressional District". In this report, Congressman Takano notes the rapid increase in warehouse development around the March Air Reserve Base along Interstate 215. This report also contains numerous charts and statistics supporting the worsening traffic conditions and air pollution. Many examples and images demonstrate how this air pollution is currently damaging the health of residents in this area, right now - as in today!

To knowingly cause further damage to our health is certainly immoral.

It is willful poor governance and advances the reputation of the Inland Empire as a noxious environment to live in and raise a family.

Thank you for considering my comments before you vote on this project.

Sincerely,

Lenora Mitchell
92508

Cindy Camargo

From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Friday, June 7, 2024 12:09 PM
To: district5@rivco.org; Conder, Chuck; rogers@cityofperris.org;
mvargas@cityofperris.org; Kevin Jeffries; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. **I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.**

The Inland Empire has been invaded by warehouses in every direction, totally surrounding the cities. There are empty warehouses sitting there, we don't need more blyth, big rig traffic that ruins our streets, clogs our freeways, emits pollution, and the mere fact that it harms all of us. Currently all of the warehouses will one day be automated, and there won't be a need for but a few individuals who are capable of working on the mechanics that will have a job. The Inland Empire will turn into the highest unemployment region in Southern California. The cities are being destroyed by greed, useless warehouses with very low income wages. The only winners are the worthless unions and the builders, the rest of the county and the residents are the losers. Our lives are slowly but surely being destroyed, the quality of my life has been forever changed because of the bad decisions, the bad direction our government, city council and mayors have chosen for their residents.

I again ask you to **vote NO!!**

Thank you for considering my comments before you vote on this project.

Sincerely,

Ann & Dolores Marchand
Ward 2 Riverside CA 92506

Cindy Camargo

From: Molly Nazeck <mnazeck@gmail.com>
Sent: Friday, June 7, 2024 12:01 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

I have three young daughters and I am concerned about the impacts to their health from being surrounded by warehouses. Additionally, our quality of life is significantly decreased by the traffic and pollution from these warehouses. Please consider alternative developments that will add to the quality of life of the residents who live here and the future residents of the area. Parks, pools and public spaces where people can come together and build community are sorely needed, not more concrete and trucks.

Thank you for considering my comments before you vote on this project.

Sincerely,

Molly Nazeck
Green Acres resident, 92518

Cindy Camargo

From: Jessica McDermott <jess.colleen.mcd@gmail.com>
Sent: Friday, June 7, 2024 11:28 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am a concerned Riverside resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

As a resident who has walked this land identifying native and rare plants and, like many other residents, is concerned about the pollution, contaminants in the soil, and environmental havok this planned project will wreak on our already crowded roads and polluted air, I urge you to listen to our voices and protect this beloved open space.

We don't need more low paying jobs that will disappear as AI grows. This isn't a solution to boost our economy; it is a project that will line the pockets of a few while us, the people and our environment, will have to carry the costs.

Thank you for considering my comments before you vote on this project.

Sincerely,

Jessica McDermott
92506

Cindy Camargo

From: Wendy Wiley <wendylwiley@gmail.com>
Sent: Friday, June 7, 2024 11:00 AM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Please no more warehouses! Traffic is horrible, too many trucks!! Put them somewhere else, not close to our neighborhood!

Thank you for considering my comments before you vote on this project.

Sincerely,

Wendy Wiley
Mission Grove
Juniperhill Ln

Cindy Camargo

From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Friday, June 7, 2024 10:45 AM
To: Dan Fairbanks; Cindy Camargo
Cc: Jen L.; Michael McCarthy
Subject: Re: Response to Comments for West Campus Upper Plateau EIR

Hello Dan,

I cannot get the Final EIR documents to load for me. Any idea if this is an issue on your end? I don't have trouble loading anything else on my computer, so its not a technical issue on my end.

I do have limited time to review this document and the short notice of the public hearing, the volume of paperwork and linked documents needing review, and now what appears to be a slow server on the JPA end is making it difficult for the public (me) to evaluate the JPA's project. Please include this comment in the record for the final draft, making sure the JPA and Commission understand that the FEIR documents have not always been accessible. It took me upward of 10 minutes to load the Title Page.

Thank you.

On another note, the motorcycles have been on the trails every night this week. Now that school is out, the cycles are out nightly.

Jerry Shearer

On Friday, May 31, 2024 at 02:55:44 PM PDT, Dan Fairbanks <fairbanks@marchjpa.com> wrote:

This email is being sent to you because you provided comments during the public comment periods to the March Joint Powers Authority regarding the draft EIR and/or the recirculated draft EIR for the proposed West Campus Upper Plateau Project. The list of comments is attached for your information. All comments are numbered and organized chronologically based on the date the comment was received. The response to your comments is available at:

Response to comments on the Draft EIR: https://marchjpa.com/wp-content/uploads/2024/05/9.0_Response-to-Comments.pdf

Response to comments on the recirculated portions of the Draft EIR: https://marchjpa.com/wp-content/uploads/2024/05/10_Recirculated-Response-to-Comments.pdf

The proposed West Campus Upper Plateau Project has been scheduled for a public hearing before the March Joint Powers Commission on June 12, 2024 @ 6:30 PM, at the Moreno Valley Conference Center, located at 14075 Frederick St, Moreno Valley, CA 92553. This public hearing is scheduled

to discuss and take action on the Final Environmental Impact Report, as well as multiple requests by Meridian Park West, LLC, for the proposed West Campus Upper Plateau Project. The Final EIR, Response to Comments, Specific Plan, Notice of Public Hearing, and Application materials are available at: <https://marchjpa.com/mjpa-meridian-west-campus/>.



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

Cindy Camargo

From: John Ward <john.ward8275@gmail.com>
Sent: Friday, June 7, 2024 10:27 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

We are seeing our area turned into a commercial / warehouse industrial zone. The current construction of the distribution center off of Alessandro and Barton is only about 300 yards from the cull-d-sac we have resided in for over 30 years. The noise from this project will have trucks coming and going 24 – 7 and disturb our quiet neighborhood plus added truck traffic will degrade and clog our roadways. Enough is enough lets not turn the inland empire into the industrial storage space for southern California.

Thank you for considering my comments before you vote on this project.

Sincerely,

John Ward
Mission Grove neighborhood Peachwood Place 92506
Sent from Mail for Windows

Cindy Camargo

From: Daniele Singleton <msgsingleton@gmail.com>
Sent: Friday, June 7, 2024 10:10 AM
To: district5@rivco.org; Conder, Chuck; rogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

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I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

We purchased our home to give our children a quiet community setting environment that we work very hard to maintain. With warehouses being built in our backyard is opposite of why we chose this particular house. Please find another location for your plans.

Thank you for considering my comments before you vote on this project.

Sincerely,

Daniele Gutierrez-Singleton
Mission Grove 92508

Cindy Camargo

From: Michele Muehls <michelebello@hotmail.com>
Sent: Friday, June 7, 2024 9:28 AM
To: district5@rivco.org; Conder, Chuck; rogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,
Thank you for taking the time to read this!

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

I feel that there is way too much pollution, truck, traffic, and congestion on our local roads. Please, no more warehouses.

Thank you for considering my comments before you vote on this project.

Sincerely,

Michele Muehls
Hawarden 92506

Sent from my iPhone

Cindy Camargo

From: Sara Amend <jnsamend@gmail.com>
Sent: Friday, June 7, 2024 9:13 AM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Our family has lived in the Orangecrest area for over 20 years. We have taken countless walks out in the area behind the Grove church for many years. It is a beautiful place to get away from the hustle of city life. The building of these warehouses will compromise the aesthetic qualities of the entire area.

When we bought our house, we signed an agreement with the HOA acknowledging the flight pattern from March AFB (now ARB). So I don't buy the argument that more houses can't be built because of the concern of these jets. There has to be a better use for this property than warehouses.

I understand that you can't stop progress, especially in a city environment. But putting in warehouses in this area would be a detriment for many reasons. This community is comprised of many families, churches, parks, schools... It is not a place for another cluster of warehouses. There are too many already built and more to come. Our local roads and the 215 freeway are already gutted with potholes from the multitude of large semi trucks. The traffic and the air quality are another area of great concern. Please don't accept plans that were created by the JPA years ago. Do the right thing and do not vote for this project to continue.

Thank you for considering my comments before you vote on this project.

Sincerely,

Sara Amend
Orangecrest 92508

Cindy Camargo

From: John Viafora <jrviafora@gmail.com>
Sent: Friday, June 7, 2024 9:10 AM
To: district5@rivco.org; Conder, Chuck; rogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Long after the developers of the upper plateau have retired to their South Coast mansions, the residents Orange Crest and the Inland Empire will have to deal with the congestion and health issues brought on by unchecked greed and corruption.

Council men the short term economic gains are simply not worth bankrupting are children's future.

Thank you for considering my comments before you vote on this project.

Sincerely,

John Viafora
Indigo point, Orange crest, 92508

Sent from my iPhone

Cindy Camargo

From: Peter Pettis <pettis.peter@gmail.com>
Sent: Friday, June 7, 2024 9:06 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

These warehouses have continued to degrade the quality of life for we residents of Riverside over the years. The trucks, the traffic, the pollution, the takeover of lands used and treasured by residents—all of the things that accompany the warehouses' existence negatively impact our lives in increasingly apparent ways. We don't want more warehouses in our city, especially in or near our residential neighborhoods. The benefits they may bring in the form of jobs are not worth the expense and degradation to our quality of life.

Please vote no on building more warehouses. We do not want more of them.

Thank you for considering my comments before you vote on this project.

Sincerely,

Peter Pettis
92508

Cindy Camargo

From: Mary Viafora <mlviafora@gmail.com>
Sent: Friday, June 7, 2024 9:04 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

The air quality in Riverside is already listed as one of the worst in the nation and will only continue to get worse with all the increased truck traffic. It is sad that none of you value the health and quality of life of Riverside resident's. Maybe dig a little deeper in your heart and for once look past the greed of these wealthy developers and show some compassion towards all of us that are begging you to not pass this West Campus Upper Plateau project.

Thank you for considering my comments before you vote on this project.

Sincerely,

Mary Viafora
92508

Sent from my iPhone

Cindy Camargo

From: Lisa Everson <leverson@earthlink.net>
Sent: Friday, June 7, 2024 8:42 AM
To: To:; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: March JPA Public Hearing June 12

Dear March JPA-

I am a resident of the neighborhood near the planned development of the March Upper Plateau. My family has lived here for more than 20 years, I have lived in Riverside for more than 50 years, and we are now considering moving because of this construction. We have experienced worsening air quality, increased truck traffic to the point we avoid using the nearby freeways or going anywhere during congested times, and a decrease in nature and wildlife that is disheartening. I am really worried about what will be disturbed in the soil when this construction begins-my father was stationed at March during the 1960s and knew what was there-the generation that set this land aside prevented from development is now gone so we have no idea why they felt it was important to leave it undisturbed.

I sincerely wonder what the motivation is to push so strongly for a development that as far as I can tell brings nothing to our community except a decreased quality of life. We are already constantly inconvenienced by the construction along Alessandro associated with the Sycamore Canyon warehouses. Yesterday I saw an ambulance in that traffic and was thinking about who was waiting for it. Every time I get stuck in that traffic I sit there infuriated about the fact it is only associated with more blight. Logistics is not the wave of the future, it doesn't produce good quality jobs, only traffic and smog.

Please, please reconsider this project. Please consider the health and well being of our community above money.

Thank you,

Lisa Everson

7642 Ayr Court

Riverside, CA 92508

Cindy Camargo

From: Joe Aklufi <jaklufi@gmail.com>
Sent: Friday, June 7, 2024 8:41 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes. Truck traffic is unbearable as things now stand; we absolutely do not need more!

Thank you for considering my comments before you vote on this project.

Sincerely,
Joe Aklufi
Riverside, 92506

Cindy Camargo

From: Steve Huddleston <shudd1217@charter.net>
Sent: Friday, June 7, 2024 8:36 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

My wife and I have been living in the neighborhood for decades. We have seen all the warehouses go up and the traffic congestion on the freeways increase. We also hike and bike in the upper plateau area and would hate to see more warehouses built in this pristine and natural area.

All of us opposing this irrational plan will remember those who decide to go against the voters wishes at the next election.

Thank you for considering my comments before you vote on this project.

Sincerely,

Steve Huddleston

Mission Grove North, Riverside CA

Cindy Camargo

From: Jeannine Sabel <j9sabel@gmail.com>
Sent: Friday, June 7, 2024 8:30 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Warehouses do not belong in our community. Please save this open space so that it is free of truck traffic, air pollution and general congestion. Open space needs to be preserved for our community and generations to come.

Thank you for considering my comments before you vote on this project.

Sincerely,

Jeannine Sabel
Canyon Crest

Cindy Camargo

From: Andrea Wood <andrea.wood@ucr.edu>
Sent: Friday, June 7, 2024 8:26 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

As you have heard from countless members of the community, we do not agree with the need to build additional warehouse structures in Riverside, in particular so close to houses, churches and schools. This would most certainly add more air and noise pollution and traffic congestion and lower the value of all homes adjacent. In addition, available wild outdoor recreation spaces are in short supply. Some of you may not see the value in this small oasis, but if you could just take the time to take a walk through the area and look and listen, you will appreciate the plant and wildlife that have sprung up that we all have derived so much enjoyment from. I cannot imagine paving over such a valuable asset. As you make this decision, please treat this as if it were happening in your own neighborhoods.

Thank you for considering my comments before you vote on this project.

Sincerely,

ANDREA WOOD
Riverside, CA 92521

Cindy Camargo

From: Tony Musumba <tonymusumba@gmail.com>
Sent: Friday, June 7, 2024 8:16 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential.

I have lived in this area for a little close to three years and this the only space available for residents around here for biking. This is also very historic land that needs to be preserved the way it is.

Thank you for considering my comments before you vote on this project.

Sincerely,

Anthony Musumba
19798 Allenhurst st
Riverside
CA 92508

Cindy Camargo

From: Ajay Shah <ajayatssc@yahoo.com>
Sent: Friday, June 7, 2024 8:16 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Riverside is a wonderful place and we love where we live. By building warehouses in the middle of residential area, you are increasing the noise, pollution, and it looks terrible to have warehouses sounded by homes. If you were in our shoes, would you want to see warehouse in your backyard? Would you be okay with warehouse next to a school and church?

Please help us in preserving the beauty of riverside. Please vote no on warehouses.

Thank you for considering my comments before you vote on this project.

Sincerely,

Ajay Shah
Orangecrest 92508

Cindy Camargo

From: Josie Sosa <josie.sosa@gmail.com>
Sent: Friday, June 7, 2024 8:14 AM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

The pollution in our air has significantly increased with the current warehouses close to us. If these are built, it's closer to our community, which I know will cause more air pollution related illnesses. We have a pretty wide range of demographics and hoping you can understand where our concerns are coming from.

Thank you for considering my comments before you vote on this project.

Sincerely,

Josie Sosa
92508

Cindy Camargo

From: mkymsecltr <mkymsecltr@aol.com>
Sent: Friday, June 7, 2024 8:13 AM
To: district5@rivco.org; Conder, Chuck; rogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

The infrastructure to reasonably handle the commercial truck traffic these warehouses will create does not exist. Quality of life greatly declines as commute times go up.

Street maintenance already seems to be on a very limited budget. The heavier traffic and significantly heavier vehicles these warehouses will create will exponentially multiply this problem.

Thank you for considering my comments before you vote on this project.

Sincerely,

John W. Hagmann
Mission Grove 92506

Sent from my Verizon, Samsung Galaxy smartphone

Cindy Camargo

From: ANTHONY SCIMIA JR <tscimia@sbcglobal.net>
Sent: Friday, June 7, 2024 8:02 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

Our quality of life has suffered tremendously since warehouses have appeared in close proximity to our home. I continually hear beeping from either trucks backing up or lift equipment warning signals. This keeps waking up our entire family.

Traveling our freeways is almost impossible as gridlock is almost 24 hours a day. Semi trucks stuck on freeways pollute the air With toxins. Our once beautiful area has turned into a low quality area that appeals to very few people.

This parcel is not suitable for industrial designation as residential homes surround this parcel. Visually these buildings are not appealing as we loose our calming rolling hills and spring flowers and natural habitat. Vote no as that is the right thing to do regarding this parcel. Industrial May be important but not for this parcel.

Thank you for considering my comments before you vote on this project.

Sincerely,

Anthony Scimia Jr
20829 Indigo Point,
Riverside, Ca, 92508
Orangecrest

Sent from my iPhone

Cindy Camargo

From: Carney, Kevin P. <KCarney@socalgas.com>
Sent: Friday, June 7, 2024 8:07 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

This is not making our community better. The initial reason for your oversight of the March properties was to repurpose the land no longer needed by the March Air Force Base as it downsized to the March Air Reserve Base. Much of what you have done has been helpful to the community. This is not. This only benefits outside developers who like carpetbaggers will take their profits and leave us to live with the destruction they have left in their wake. We have entrusted you to protect our community. Please honor that trust.

Thank you for considering my comments before you vote on this project.

Sincerely,

Kevin Carney
8268 Laurel Ridge Rd
Riverside, CA 92508

Cindy Camargo

From: Juan Garcia <garciajuan08@gmail.com>
Sent: Friday, June 7, 2024 8:01 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a deeply concerned resident and a parent who opposes the West Campus Upper Plateau project, on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on the proposal to develop up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

The studies against warehouse developments and the dangers they bring to communities are insurmountable and cannot be ignored. As a parent, I am particularly alarmed by the potential health risks that the emissions from such projects pose to my children and other families in the area. The thought of exposing my kids to harmful pollutants is frightening and unacceptable.

You were put in this position of power not only to protect the interests of the JVPA but also, as elected representatives for surrounding cities and the county, to safeguard the best interests of your constituents. Councilman Condor is my city councilman, and I voted for him. For the life of me, I can't understand why he has supported this project from day one; Councilman Condor please listen to your constituents that elected you to your position.

The safety and well-being of our community must be the top priority. Please consider the long-term impacts and vote no on this project.

Sincerely,

Juan Garcia
Syracuse St, 92508

Cindy Camargo

From: peasleeamber <peasleeamber@gmail.com>
Sent: Friday, June 7, 2024 7:50 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

As a proud homeowner of this community, my desire is to raise my family in an area away from the harmful effects of unstable warehouses and the negative impact they have on the economy. As a working, professional Registered Nurse, I know the effects of these warehouses will have negative impacts on the physical, social, and mental health of those in my neighborhood. Do NOT allow this to occur here in my backyard!

Thank you for considering my comments before you vote on this project.

Sincerely,

Amber Peaslee
92508

Cindy Camargo

From: Chris Hannon <chrishannon25@gmail.com>
Sent: Friday, June 7, 2024 7:45 AM
To: Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jperry@riversideca.gov; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

There is an old saying in building construction that was oft repeated when I was in home construction back in the 70's and 80's. It states, "You can't see it from my house". It still rings true today and is even more appropriate given the circumstances you, the Commission, find yourselves in.

I have to believe that, were it in your backyard, your roles would be reversed. Given the proximity to the surrounding homes, and, the fact that this natural environment is so much more valuable to us and future generations, in it's natural state, it is literally an environmental crime to develop this. There's not much left of this plateau. Take a walk through it, see the vistas, wildlife, fauna, rock formations, and historical structures. These all could be part of an incredible parkland, a companion to the Sycamore Canyon Park. Think of your legacy should you decide on a park verses warehousing construction. You would be the ones who made a difference.

Thank you for considering my comments before you vote on this project.

Sincerely,

Chris Hannon
Victoria Park 92506

Cindy Camargo

From: John Viafora <jrviafora@gmail.com>
Sent: Friday, June 7, 2024 6:59 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

<ADD YOUR PERSONAL REASONS FOR OPPOSING HERE>

Thank you for considering my comments before you vote on this project.

Sincerely
John Viafora
Indigo point, orange crest, 92508

Sent from my iPhone

Cindy Camargo

From: bettysbag@charter.net
Sent: Friday, June 7, 2024 7:03 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

I do not want to lose the wildfire and vegetation is that unique to this area. It is a great and necessary open space for the residents. If you have never walked it, I encourage you to do so. There is an abundance of flowers that only grow in this area.

Thank you for considering my comments before you vote on this project.

Sincerely,

Betty Hao
92508

Cindy Camargo

From: Kyle Reed <brewngold23@yahoo.com>
Sent: Friday, June 7, 2024 6:51 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

As a life long Riverside resident it pains me to watch our open spaces get swallowed up by these eyesore warehouses. Their negative impact on our air quality, road conditions and traffic need to stop.

Thank you for considering my comments before you vote on this project.

Sincerely,

Kyle Reed
Canyon Crest
92506

Cindy Camargo

From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Tuesday, June 11, 2024 3:49 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org
Cc: Cindy Camargo; Dan Fairbanks
Subject: Comment for the West Campus Upper Plateau Public Hearing 6/12
Attachments: Final EIR Letter Template-JS1.pdf

Dear March JPA Commission,

I am writing to oppose the West Campus Upper Plateau Specific Plan (the Project) on which the Commission will hold a hearing and vote on Wednesday, June 12, 2024. I urge you to vote no on more than 4 million square feet of warehouses on land surrounded almost entirely by residential homes (something the developer has never done before).

I realize the overwhelming nature of the enormous EIR documents and process makes evaluating this project challenging, but I hope you have had sufficient time to come to conclude that this is the wrong project, in the wrong place, at the wrong time. While Alternate Plan #5 excludes industrial development, the project was written in a way to discourage your serious consideration of it. For 26 months, residents of Riverside, Moreno Valley, and Perris have asked you to demand a non-industrial plan for this land, and while we really wanted the JPA to consider the community recommended Alternate Plans, we request that you support democracy and advocate for the public and for a land use designation that excludes industrial on the West Campus Upper Plateau.

I request you approve either JPA Alternate Project #1 or another non-industrial alternative if you will not consider the community preferred alternatives.

If you are interested in reading my final comment letter, I have attached it here. Thank you for considering my comments before you vote on this project.

Sincerely,

Jerry Shearer
92508

11 June 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, Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The 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.

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:

- Final West Campus Upper Plateau Project Environmental Impact Report (Correction) State Clearinghouse No. 2021110304 and plus Appendices A-U, June 5, 2024
- 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 Final Environmental Justice Element, April 2024
- 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 also a part of the region's heritage with March Air Force Base and the U.S. Military. 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 due to its proximity to so many neighborhoods. 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 this EIR process, I and many members of the community wrote to you detailing alternate land use plans that benefit the community, meet the JPA's goals for this project, and preserve large portions of the landscape for both passive and active recreation. Your Alternate Plan 5 does address what the public has requested by excluding industrial land uses. Thank you for this plan, but it is a flawed plan that you have no intention of actually following through with. This alternate project comes with more intensive VMT and more dense human population than the plans I provided you with in my original comment letters. Additionally, I am disappointed that you exaggerated so greatly the concepts of the three alternate plans I suggested, but I should not be surprised as it appears the JPA is working only on behalf of the applicant.

As much as the applicant via this EIRs tries, this industrial development plan and land use zoning do not preserve the landscape even with the inclusion of the 2003 and 2012 agreements that set aside open space and a conservation easement, a fire department (which was always a requirement of settlements against the JPA), and a park which you insist on describing as "community benefits." Viewing this land from a project map or a parking lot doesn't do justice to the human value of this land. After 28 months, the public still does not understand your thoughts on taking this special part of our community away from residents of western Riverside County and turning it over for private development (we do understand you have the "right" or "obligation" to do something with it). 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 the public why the JPA continues to push forward this specific plan and project (and your attempt to greenwash the fact that you are working on behalf of the applicant instead of with both the applicant and public), especially after more than two years of widespread and uniform community opposition to it. Your efforts in the end are scandalous or even illegal.

After reviewing all three versions of the environmental report for the West Campus Upper Plateau, it is 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 messy timelines of

construction, negative public relations, project mitigations, budgeting pitfalls, and oversight of the development agreement for this historically unpopular project. There are still many errors, omissions, misrepresentations, and discrepancies in the final EIR despite the JPA claiming this is a stable and acceptable document. I write this letter to call attention to as many of these issues as I can, especially those that are the most egregious to my family and my community. Changes to the Specific Plan since I first learned of it are negligible. Specifically, I submit the following list of instabilities, concerns, exaggerations, mistakes, and examples of high-end shenanigans in the final EIR and its appendices for the record.

1. Despite your claims otherwise, you are purposefully claiming or have claimed that the whole of the action must include the fulfillment of 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), and the August 2003 agreement with Center for Community Action and Environmental Justice. These settlements against the March JPA and applicant exist independent of any project and are not only legally mandated JPA obligations, but also significant financial obligations for the JPA and the applicant. I ask for the March JPA to comply with the terms of these settlements outside of the West Campus Upper Plateau Specific Plan. The March JPA has made (or not made) decisions over the last twenty years that have put the organization in the position it finds itself today and the public and the County of Riverside should not be left to pick up the pieces of your poor management decisions for the next two decades. I request the March JPA remove the 2003 and 2012 settlement agreements as benefits of any project approved for the West Campus Upper Plateau.
2. The omission of an Environmental Justice policy from the original draft EIR, its inclusion in the recirculated draft EIR, and then its perfunctory inclusion in the final draft EIR is piecemealing the benefits of one project with another, and that is illegal according to CEQA. The March JPA's findings that the Specific Project complies entirely with the recently approved EJ Policy is convenient. Your findings that the EJ Element was separate from the West Campus Upper Plateau project is also convenient, yet you included the two together for public review in 2024 and therefore they are connected. The JPA wants the public to believe that you are only following an appropriate approval process to comply with State law. But the required Environmental Justice Policy was delinquent by eight years, and to remedy this delay, the EJ Element was piecemealed throughout the recirculated West Campus Upper Plateau EIR review cycle until it was adopted in April 2024; you conditioned the approval of one for the benefit of the other. The approved EJ Policy remains inauthentic and was simply done to push forward an unpopular Specific Project. Pending litigation, I request the March JPA develop and approve an authentic Environmental Justice policy that is CEQA complaint, one that applies to the March JPA development area rather than piecemealing two projects together to gain benefits from one and applying to another.
3. Adopting a General Plan amendment for the Environmental Justice policy in order to pass projects that will cause environmental harm is piecemealing or segmenting which

according to CEQA means “dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document.” This, according to CEQA, is “explicitly forbidden because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact.” To the public, it seems like this is exactly the process that the March JPA followed during this process. Pending litigation, I request the March JPA develop and approve an authentic Environmental Justice policy that applies to the March JPA development area rather than simply adopting the policy from the County of Riverside, and halt any ongoing or upcoming industrial developments until a complaint policy can be adopted.

4. As disappointing as it was to read, the Civil Grand Jury report found that the March JPA involves the community in its decisions, though as a member of the public I am not sure I feel involved. Hearing one-way comments at meetings, and holding one-way public meetings where the community is informed or surveyed is inauthentic community engagement. There is virtually no evidence of the implementation of community feedback in the final EIR for the Upper Plateau. You could have remedied this problem many times over the last two and half years, but you declined for a variety of reasons. I routinely request to be part of an active community advisory committee to help the JPA as it makes important land use decisions. By ignoring requests like mine, you are locking out the public from having meaningful engagement with the March JPA. I request once again to have a community advisory committee to the March JPA consisting of residents living in the March JPA special district and members living in neighborhoods bordering the March JPA development area (you are my neighbor and a bad one at that).
5. In investigation, the Civil Grand Jury were unclear as to why the March JPA does not have a community advisory committee focusing on the development of excess ARB lands. In its response, the March JPA described the Public Advisory Committee of the “Airport Master Plan,” which is financially supported by the Federal Aviation Administration (FAA), comprised of federal, state, and local government representatives as well as residents instead of a formal Community Advisory Board to the JPA. The Grand Jury asked the JPA about the Commission’s perspective on establishing a community advisory committee, given the public frequently requests to form one, and the response given was that JPA management did not know what perspective the Commission had on creating a community advisory committee. This is an excuse and a callous statement by the March JPA to defend staff decisions to not engage authentically with the public. The JPA has repeatedly declined forming a community advisory committee both verbally and in writing. The reasons vary from “there isn’t time” to “there isn’t a need.” These responses demonstrate how the JPA engages with the public. The Civil Grand Jury also noted the California Department of Justice published a document that identifies “best practices” for governmental agencies facing land development projects, especially potential warehouse projects. One of the “best

practices” mentioned in that California Department of Justice document is for local governmental agencies to create a community advisory committee made up of residents. Yet, here we are a few days before a public hearing on a scandalous and unpopular project and the JPA’s policy of public engagement is to keep the public out of decisions that significantly impact our quality of life and health. Thus, I request the March JPA comply with the State of California DOJ recommendations and with the suggestion from the Civil Grand Jury to authentically engage with the public via a permanent public advisory committee to the JPA.

6. In reviewing the final EIR and its appendices, I have struggled to get all document links to open on my computer, especially Appendix B, Responses to Comments for the draft EIR, and the Agenda. Since I have limited time to review these documents, and with the JPA releasing thousands of pages of information and references with only 12 days for public review along with unannounced updates, and since there are technical issues the documents and where they are housed within the JPA servers, a reasonable person could conclude, much as the Civil Grand Jury did when it found the March JPA website difficult find information on, it is impossible to do a full review of the final EIR. Due to the complexity of the final EIR, I have found it difficult to locate important information like responses to specific comment letters and all text regarding the development agreement. Because of the complex and overwhelming nature of these document, how can the public and Commissioners review this document missing important information or making errors while considering your proposed plans? As of writing this comment letter, I have been unable to open and review all EIR document links from the JPA website and am therefore unable to conduct a complete review of the final project plan because the documents are not accessible at this time. I do not believe this is a one-time issue for the March JPA, nor do I believe it is an unavoidable consequence of high-volume traffic to the website. Therefore, I request the March JPA provide and maintain a complete hard-copy of the entirety of the final EIR plus Appendices and the Agenda in your offices accessible to the public, and also have a hard copy of the same documents available for public access at the Moreno Valley Library (Mall Branch and Iris Plaza Branch), the Orange Terrace Library, the Riverside County Law Library, and the Perris Branch Library. I also request the JPA postpone the public hearing allowing the public and the Commission reasonable time to review and process the overwhelming volume of information and associated references prior to holding a vote on this project.
7. On May 30 and May 31, the March JPA Clerk and Planning Director emailed residents notifying the public of a final EIR and of a public hearing on the Specific Plan. On June 5, 2024, the March JPA posted a final EIR document with “corrections” to the EIR posted at 4:30 PM but the March JPA did not notify the public of this update. This practice is consistent with the findings of the Civil Grand Jury and with the standard business practices at the JPA. The Civil Grand Jury found the March JPA website to be difficult to navigate (which the JPA disagreed with in its response to the findings), it is missing key documents related to the organization, and inconsistently communicates documentation of business operations to the public. As mentioned above, I request the

March JPA provide publicly accessible printed copies of all project documents at its offices as well as at the Moreno Valley Library (Mall Branch and Iris Plaza Branch), the Orange Terrace Library, the Riverside County Law Library, and the Perris Branch Library.

8. The continued privatization of public lands surrounding March ARB and throughout southern California, including the highly suspicious request to form a second long-term development agreement with a single contractor appears to be influenced heavily by private interests in order to avoid public, regulatory, or enforcement agency oversight. The Institute for Local Self-Governance published a manual on establishing development agreements which they title “Collaboration in Pursuit of Community Interests.” In it they define development agreements as:

Development agreements are contracts negotiated between project proponents and public agencies that govern the land uses that may be allowed in a particular project. Although subject to negotiation, allowable land uses must be consistent with the local planning policies formulated by the legislative body through its general plan, and consistent with any applicable specific plan. Neither the applicant nor the public agency is required to enter into a development agreement. When they do, the allowable land uses and other terms and conditions of approval are negotiated between the parties, subject to the public agencies’ ultimate approval. While a development agreement must advance the agencies’ local planning policies, it may also contain provisions that vary from otherwise applicable zoning standards and land use requirements. The development agreement is essentially a planning tool that allows public agencies greater latitude to advance local planning policies, sometimes in new and creative ways. While a development agreement may be viewed as an alternative to the traditional development approval process, in practice it is commonly used in conjunction with it. It is not uncommon, for example, to see a project proponent apply for approval of a conditional use permit, zone change and development agreement for the same project. Under a development agreement, both parties to the agreement receive benefits. In addition to the greater latitude afforded by the development agreement to advance local planning policies, the public agency has greater flexibility in imposing conditions and requirements on proposed projects including the applicant is afforded greater assurance that once the project is approved it can be built. There may be disadvantages associated with development agreements as well (bad planning, unrealistic expectations related to feasibility of the project, and fixed rules of engagement.) A development agreement generally allows a project proponent to proceed with a project that meets the “policies, rules and regulations” in effect at the time the development agreement is approved. A development agreement may also supersede an agency’s existing policies, rules and regulations, as long as the project is consistent with the general plan and any applicable specific plan.

In my comment letters for the draft EIR and the recirculated draft EIR, I expressed concern that the Lewis Group has held a 25-year exclusive agreement to develop the land around March ARB. Your response to me was that this was an acceptable and appropriate form of contracting and that the application of Federal Acquisition Regulations (FAR) did not apply on projects under the March JPA. Whereas the FAR was established to protect the public from fraud and misuse of public funds and resources, and would certainly prevent the business model followed by the March JPA, development agreements rely on government to act on behalf of the public in order to get land development projects done in a timely and cost-effective manner. The JPA has, as is its pattern, has either found a way to streamline its operations by allowing one developer access to public resources, or the JPA has been complicit in fraud and misuse of public resources. For example, the manual identifies that development agreements at the County level: "Annual review is required. County development agreements are time-limited if land is annexed or incorporated (Government Code section 65865.3)." Code 65865.1 also states: "Procedures established pursuant to Section 65865 shall include provisions requiring periodic review at least every 12 months, at which time the applicant, or successor in interest thereto, shall be required to demonstrate good faith compliance with the terms of the agreement. If, as a result of such periodic review, the local agency finds and determines, on the basis of substantial evidence, that the applicant or successor in interest thereto has not complied in good faith with terms or conditions of the agreement, the local agency may terminate or modify the agreement." The March JPA does not follow this guideline adequately because if you had you would have ended your agreement with the applicant each time the projects it built with your approval failed to meet the job requirements. This failure impacts payment milestones and rather than amend the development agreement to incorporate occupancy or grading-based payment milestones instead of jobs, you remove the requirement for a minimum number of jobs created under the current development agreement (October 26, 2022). The JPA is able to skirt contractual requirements because development agreements give you the flexibility you desire to maintain your mutually beneficial relationship with the applicant. An uninformed public is prone to conspiracy when discussing concerns about confusing government operations (like the West Campus Upper Plateau project), but it doesn't take long for an informed public to see that the JPA manipulates the structures within the development agreement to benefit private interests which is not aligned with the Institute for Local Self-Government manual. The manual concludes: "Development agreements can be a useful tool in land use planning, creating win-win opportunities for both project proponents and local agencies when dealing with uncertainties associated with the regulatory environment. The goal of this manual is to help local agencies in understanding development agreements and to provide them with practical tools to assist them in using development agreements within their jurisdiction." The end result of a development agreement is to benefit the public, and the JPA's justification fails to adequately do this for the public. The JPA's Specific Plan in the final EIR is not a small project (such as the 2009 Bellevue Draft WR-SRI 120th LLC Development Agreement,

the 2015 Issaquah and Costco Wholesale Corporation Development Agreement, or the 2007 Redmond Development with Microsoft Corporation), and it isn't on the level of a large project (such as the 2018 Jefferson County Pleasant Harbor Marina and Golf Resort Development Agreement, the 2019 Shoreline Aurora Square/Shoreline Place Community Renewal Area Staff Report on Proposed Development Agreement, or the 2019 Clark County Holt/Mill Creek Draft Development Agreement). While these projects utilized development agreements to streamline the project, they also used this process to benefit the public, but the same cannot be said for the JPA's warehouse projects. Comparatively, the March JPA specific project is somewhere in the middle. So why does the applicant require and the JPA advocate for another 15-year Development Agreement with two 5-year extensions? Why 50 years with the same developer? Even if one considers the redevelopment of the land around March ARB as a "project," the time and scope of it would exceed the parameters of a development agreement. In its responses to the comments to the draft and recirculated EIRs, the JPA makes it clear that the Project is consistent with the JPA planning guidelines because you created them and amend them to suit each specific project need. You do so solely in the interest of the JPA and the applicant. As reading my letters can be viewed as a repetitive process, the same can be said for finding the JPA ignoring and excluding the public from its decisions and nowhere is it clearer than in your insistence on maintaining a long-term development agreement with the Lewis Group. While it appears a development agreement does not require public involvement, it does clearly state that the Project is a benefit to the public, and your duplicitous claims that the public will benefit primarily because of jobs and tax revenue is insincere and just plain false and you know it. I request the JPA end the development agreement practices as it sunsets and allow the final parcels to be developed by the County of Riverside in a competitive bid process that encourages community involvement and prioritizes innovative land use planning.

9. The JPA's refusal to discuss or acknowledge why the applicant is proposing an industrial Specific Plan 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 is another example of a disingenuous public agency feigning concern for the public. However, the final EIR provides a non-industrial option and according to Table 6-1, the only difference in impacts of all development project options is Alternative 5 offers less Noise pollution and an increase impact on Transportation. Having lived with warehouses in my backyard for many years now, I would happily trade an increase in traffic or a slight increase in GHG to avoid the significant noise pollution coming from local warehouses. Another benefit of Alternate Plan 5 is the community will gain an additional 17 acres of open space. Yet, consistent with the JPA's pattern of only managing this area on paper, the JPA should be jumping to approve Alternate Plan 5 because it addresses public sentiment to exclude industrial development, it is consistent with nearby and local land uses, and it accomplishes the goals of the Project while allowing the public to benefit from and make use of this popular part of the community instead of turning it over to the predatory profiteering of industrial land investors. It is unclear why you chose

to make the Shopping Center buildings less than 20% of the project with the rest Office Space or Public Facilities, but maybe you did this to ensure the Commission will not be interested in pursuing Alternative 5 due to the fear you created because it will increase vehicle trips and population density in the Office Space area. Ironically, your Alternate Plan 5 is predicted to be more densely populated than any of the Alternative Projects I proposed in my comment letters to the draft EIR. In your responses to my alternate projects, I was helping highlight what local groups (like the VA, youth sports organizations, and local colleges) have asked for combined with what makes sense from a ALUC or Project Objectives standpoint. Your responses to my plans show a lack of imagination, a lack of accountability, and a lack of concern for public sentiment. I request the JPA engage in authentic public engagement as you claim in your Environmental Justice Policy and incorporate actual community feedback as benefits into your project objectives. Once you do this, then you can revise your alternate plans that in-fact do what you claim throughout your EIR and EJ Element.

10. 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. In yet another turn of phrase, your final EIR enumerates “Community Benefits” resulting from this Specific Plan. You list the following as benefits of the project: “Community Park and Site Grading, construct a fire Station, truck route enforcement, compliance with the 2003 and 2012 Settlement Agreements, increase employment opportunities for area residents, extending Barton Road, preserving some existing trails in the open space, generate new tax revenue and traffic improvement fees, and construct a new recycled water storage system.” As written in my response to the recirculated draft EIR, a community benefits agreement is a legal agreement between community benefit groups and developers, stipulating the benefits a developer agrees to fund or furnish, in exchange for community support of a project. Your response to my letter is pandering and purposefully non-responsive. I realize you are not offering an agreement; I wrote as much in my letter. You are piecemealing benefits for the public on the back of an unpopular industrial project. The only word missing in this term is the word “agreement” or the legal contract documenting the stances and obligations of all parties. Minus this legal contract, you still have left the spirit of a CBA in “Community Benefits,” but the JPA, as is your standard business practice and in conflict with the words and spirit of your recently adopted Environmental Justice Policy, is telling the public what benefits it needs in exchange for the right to build warehouses in an area surrounded by neighborhoods, churches, parks, schools, and precious natural landscapes and ecosystem. Much like the political discourse in America today, the final EIR advertises “benefits” to the public, but in the details supporting each “benefit” you built in ways for the benefit to be realized by either the JPA or the applicant at almost every point. For instance, within

the “benefit” of the Park (that the region cannot afford to build or maintain), the JPA has adjusted the payment terms to discount the price of buying the land by \$15 million and forgiving the \$6.5 million grading costs for the applicant by way of credits applied in other areas of the applicant’s business with the JPA. This isn’t a benefit to the public; it is a benefit to the applicant who may only be required to pay \$9 million of the cost of the Park fees despite the 2003 Settlement requiring it be built outside of any specific project. Sticking with the Park, if approved, the Project will cap the CFD at \$4,000 per acre which would not be enough for LLMD and maintenance of the Park in the future. This is not a benefit to the public; it is actually an increase in public cost for the Park.

Employment opportunities for area residents? Are you serious? Houses along the Riverside boundary with this development area are listing for more than \$900,000. Name for me a job within a warehouse that pays area residents enough to buy a \$900,000 house in Riverside near this project site. Jobs are not a benefit for area residents, but telling the public and local municipalities there will be jobs is a benefit to the JPA. And the list goes on, but in the interest in my time, I will end with requesting the JPA participate in authentic public engagement, as you claim in your Environmental Justice Policy, and develop community benefits that include the term “agreement” to ensure that all parties benefit from any approved project on the West Campus Upper Plateau. As written today, the final EIR and development agreement heavily benefit the JPA and more so the applicant while placing future financial burdens on the taxpayers and residents of western Riverside County and the four member municipalities that make up the March JPA.

Additionally, I find the final EIR egregious and deficient in the following locations:

1. Specific Plan No.9, 6/12/24, page 2-5 and 2-6. You prohibit the construction of buildings that generate smoke or water vapor within the Upper Plateau, yet there are already one or two buildings located along Brown St. that currently vent something several times a day. Per Figure 2 of Appendix J-4, you list this building within Zone B-2, more restrictive zoning, while the Specific Plan lies within Zone C-1 and C-2. As is typical of the JPA, you like to tell two stories at the same time and these requirements are inconsistent because the JPA already has buildings that do this in the area today. You know the JPA can over-ride the ALUC with the in-place exemptions available to you, yet you selectively decide when you invoke these requirements and when you don’t.
2. In Appendix J-4, Rick Jones of Mead & Hunt provides Table 2 as a list of plants that may be attractive to wildlife and may increase bird strikes in the flight path. There are many homes located in Zone C-2 like a large portion of the Specific Plan. Residents are permitted to plant anything we like in our homes and the theory is that our landscaping will not be large enough to attract wildlife hazards near the flight path. But I fail to see how this is any different than the actual path airplanes fly except that since this is repurposed federal land, it must comply with your standards and since our homes are private property, we do not. The military planes fly over homes in my neighborhood as much if not more frequently than they will the development area for the Specific Plan. Your inconsistencies in how you apply real world practices versus policy and procedure

is typical of a government entity with a lack of resources to understand risk and mitigation in the real world.

3. Throughout the final EIR, and in past March JPA projects, the March JPA picks-and-chooses where it adheres to the General Plan verbatim, and where it refers to the Plan as a guideline. A good example is in Section 6 of the final EIR. You write, “Describing its Housing Element, the March JPA General Plan states the “land use plan identifies no new housing areas, and creates an employment center within the housing rich environment of western Riverside County.” Additionally, the March JPA General Plan Housing Profile report states: “No housing opportunities are identified within the March JPA Planning Area due to land use compatibility issues related to the continued military activities of the Air Force Reserves and aviation operations.” As you have amended the original General Plan to suit your upzoning desires building more warehouses to support your hopes that March ARB becomes a logistics hub for freight, you also fail to acknowledge where the document is dated in your land use decisions. When originally written, California was not suffering from the affordable housing crisis it is today. Just as you amend the General Plan to suit your logistics addiction, you could amend the Housing Profile to reflect available land and the need for more affordable housing in the region. The JPA isn’t separate from the needs of the region or the State of California. You could easily have adopted a change to your Housing Profile to include housing for local residents who receive the low wages in your warehouses, but you chose not to. Appendix J-4 again show the ALUC zones for the area under consideration and there are many, many densely populate single family homes located in Zone C-2. The public has requested, and the State requires, affordable housing options in western Riverside County, and the land to the west of the development area would be sufficient to help address this regional need. The JPA has the ability to address this need and chooses not to, passing blame on the ALUC and the US Air Force.
4. In Section 6, the March JPA again is choosing to manipulate the 2012 settlement agreement and hold it hostage in exchange for approval of the Specific Project. For Alternate Project 1, you write that, “the Conservation Easement would not be placed under a conservation easement.” This line is a choice the JPA is making to connect the 2012 settlement agreement with the West Campus Upper Plateau warehouses. It is not a requirement to connect these two individual things, you are once again piecemealing one action to realize the benefits from another action. Piecemealing is illegal under CEQA. This this is not a legitimate reason to dismiss Alternate Project 1, and the only reason to connect these two independent things is to capitalize on them financially as a collective action. You are required to place this land under conservation easement by 2027 regardless of whether you approve or build anything on this land. Your statement is intentionally false. I will also add here that the final EIR makes reference to decreasing the open space if needed to accommodate development needs of the Park or other public space associated with the Project. This also seems manipulative of the terms of the settlement at this point of this process.

5. There is no Concept Plan for Alternative Plan 4. The JPA should provide one for public and Commissioner review.
6. The Responses to Comments to the draft EIR, specifically the letters and comments submitted by my family, contain errors omissions, and speculation.
 - a. In Letter I-111 you incorrectly refer to developmental standards to justify real-world conditions as it relates to noise. Your modeling of things like light and noise pollution are speculative and suspect in places and do not actually reflect these levels once a building is completed. The March JPA can conclude that your models make this project safe for residents living nearby, but your models are wrong and you do not get to tell me what an acceptable level of noise pollution is in my life. Your existing mitigations simply do not work and therefore the public should be concerned that any future mitigations for noise and light pollution will create significant impacts in their lives, despite the JPA's biased sales pitch. And monitoring via the MMRP will not matter once the land resides in the County of Riverside.
 - b. In Letter I-785, you write: "the Draft EIR includes extensive analysis of the potential aesthetic impacts of the Project and concludes that its impacts will be less than significant with mitigation incorporated, in compliance with CEQA." This is exactly what the author complained about where you are subjectively justifying your decisions with the aid of a development code (legally) but ignoring that this is a unique development, one that the developer indicated it has never built because of the proximity to homes. Aesthetics, as indicated in the letter, is personal and assigning a niche industry code to justify your preferred view of aesthetics does not respond to the questions or concerns and is consistent with the JPA ignoring community sentiment.
 - c. In Letter I-787 you fail to respond to the nature of the line of questions. Your responses are to copy/paste or parrot responses about your methodology for making photo simulations rather than address how those simulations never really happen for any existing March JPA developments. There is no accountability for the developer to ensure the mitigations for noise, aesthetics, light pollution occur as described in this or past EIR documents and so it never happens for existing JPA buildings. If there was accountability, then maybe the irrigation to the existing landscaping surrounding building along Meridian Pkwy would actually work instead of being capped off. The establishment of a Long-Term Project Implementation and Enforcement policy in order to pass this project is immaterial when there is the enforcement agency responsible to ensure the public is protected or this project is implemented correctly is unable or unwilling to do these things today and will cease to exist in twelve months. You also wrote: "For ornamental and screening landscaping within the Specific Plan Area, the photo simulation applied a 10-year growth factor to each plant species, which is standard practice given the long-term nature of development." Having lived near warehouses built between 5-10 years ago, it is plain to see that the reality of a changing climate has

done the landscape plans of the past not benefits, and along with the inconsistent and unfunctional irrigation and maintenance in the area, the landscaping plans of 10 years ago never materialized, thus no mitigations for light, noise, and aesthetics. Why would the public believe the JPA will remedy this problem in the future when you are not even fixing the problems that exist today? The comments and photo comparisons provided in this letter remain a valid concern for the public and a major deficiency in the final EIR. You also write: "PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of \$100,000 to fund a truck route enforcement for a period of two years." But in other responses and locations in the EIR you indicate there will be \$200,000 for truck route enforcement over two years. Which is it? In either case, this will not prevent or reduce the trucks from idling for extended periods of time near residential areas, thus significantly impacting and increasing noise and air pollution beyond the modeling provided by the JPA in this EIR. I have 5-10 years' experience dealing with this problem rather than relying on your projections and simulations which are fictional, as is your empathy or concern for the public living with the JPA as a neighbor. You wrote: "the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities; impacts would be less than significant, and no mitigation is required." As you say, this response is also speculative. In the last three months, I have had to call Riverside County Sheriff's non-emergency hotline to report idling trucks, vagrants and homeless camping in the conservation easement, fireworks being shot off from within the walls of a warehouse along Meridian Pkwy, vehicles racing and "drifting," and motorcyclists riding along the trails of the conservation easement. To my knowledge, all the Sheriff was able to do at the time was take a report and dispatch officers if available. I was never contacted by officers again and concluded there was no law enforcement available to respond to these problems. And these are my own calls and complaints, my neighbors have also occasionally called to report the same problems. The JPA is unresponsive to resident concerns and local law enforcement is understaffed and unable to deter or prevent lawlessness in the areas around your warehouses. Again, it is speculative for you to say that our real-world experiences will not carry over to any new warehouse projects you develop.

- d. It is disappointing that the JPA marginalized and dismissed a majority of the concerns provided in these comment letters. While I am not qualified to address compliance with CEQA, as your responses expect, it is appropriate to demand the JPA balance CEQA requirements with public preference and experience.
7. The Responses to Comments to the recirculated draft EIR, specifically the letters and comments submitted by my family, contain errors omissions, and speculation.
- a. In Letter RI-2, you wrote: "Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR." This is false

because you included the draft EJ Element in the recirculated draft EIR and conditioned the review of the project to the unapproved General Plan amendment. By requiring the public to provide comment on both documents at the same time, you conditioned the two “projects” with one another.

- b. In Letter RI-232, you wrote: “the March JPA Draft Environmental Justice Element, which is not part of the proposed Project.” But on February 11, 2024, the EJ Element was included in the recirculated draft EIR and therefore very much a part of public review of the project described in the recirculated draft EIR.
 - c. In Letter RI-259, pages 21, 43, 53 of 83 is upside down and difficult to read.
 - d. In Letter RI-259, you wrote: “detail regarding the Community Benefits under the proposed Development Agreement” in multiple locations. As addressed above, Community Benefits prescribed by the JPA or developer are not benefits to the community in so much as JPA or developer obligations or features of the project. The JPA has a history of telling the public what is in their best interest and getting away with it. This has never been authentic community engagement and is not only in violation with CEQA, the JPA’s General Plan, but now your EJ Policy that prioritizes community engagement and benefits. You also wrote: “Consistent with the requirements of CEQA, a lead agency need not evaluate consistency with every single policy in a General Plan. Pursuant to the applicable threshold, the relevant policies are those adopted for the purposes of avoiding or mitigating an environmental effect.” It is my understanding that the General Plan provides the foundation for all specific projects and to read that the JPA is not evaluating the Project for consistency with all General Plan policies is disturbing especially in light of the suspicious relationship between the JPA and the applicant related to your manipulation of the process to push this project through approval despite significant public opposition. You also wrote: “comment questions how the proposed Specific Plan meets the objectives stated in the General Plan and benefits the surrounding community,” and then you do not respond to it. You also wrote: “the Project includes a proposed development agreement between March JPA and the applicant, which is not a community benefits agreement as described by the comment.” When I submitted this comment and discussion, I understood it was not a CBA and that the JPA was not proposing a CBA. My comment reflects the idea that the JPA is using these terms to confuse or trick the public and the Commission into believing the benefits you describe in the EIR are community recognized and supported. They are not benefits the community agrees to and to conflate them as public engagement and benefit only serves to help the JPA and applicant get this project approved and recorded before sunseting in July 2025. Your response to the comment letter is disingenuous and purposefully misleading.
 - e. The inclusion of and response to Brenda Shearer’s comment letter dated February 25, 2024 is not in your final EIR, responses to comments.
8. Development Agreement #21-01 has some flaws. The community park is supposedly getting \$30 million from the developer. The real number is \$9,000,000 from the

Developer, \$15 million from the taxpayer (yes, I read your comments that this is JPA-owned land, but it was originally public land assigned to the U.S. Military) in the form of land credits or a discount on the purchase price of the land offered by the JPA to the developer, and a \$6,000,000 bogus credit for work already agreed to. The fire station required on the North Campus appears to also have financial incentives going back to the developer to help lower the responsibility to pay for it. There is conflicting information for how much money will be contributed to truck route enforcement but whichever number is correct is insufficient to monitor, discourage, and cite violators. Truck drivers will simply figure out how to get around this enforcement to avoid fines while still violating your no truck zones. And finally, it appears you have some serious issues with your appraisal for this land. It appears you did not follow your own requirements identified in the current DA for number and type of appraisals, but you got one that was not comparable for the land in Riverside County and you allow it to expire before releasing the EIR and setting the payment schedules, with discounts, for this Project. As I discussed above in this letter, development agreements are typically put in place with community benefit in mind. The proposed development agreement here is decidedly beneficial for the developer, not the public.

As a concerned citizen, it is not enough to just find problems with the EIR and the process the March JPA has undertaken to get to this final document. Responsible citizens take an interest in their community for the benefit of all people and businesses, working to avoid the economic and social injustices that these warehouse projects present our communities.

For instance, based on the painful experience of living through a March JPA warehouse development project from start to end, I know that you do not mitigate significant impacts to residents and you do not accept responsibility when the project causes damage to local neighborhood houses. Therefore, I request the March JPA, as part of the whole of the action, also establish a fund to pay for repair and cleaning of HVAC and heating units; repair or replacement of real property like windows, stucco, tile, brick, or stone, decorative features affixed to homes like shutters or fascia boards, plumbing, or foundation damage; pest control associated with insects, rodents, wildlife, and reptiles/amphibians displaced by demolition and grading activities; and clean-up or repairs from dust related damage to gutters, paint, pool equipment, and loss of landscaping such as trees, shrubs, fruiting plants and vegetables, and lawns. The wording of such a fund is better left up to experts in this field, but a reasonable value for such repairs caused by activity associated with the project is between anywhere from \$6,000,000 to \$12,000,000. As someone who routinely asked for help with these things from the construction office located on Meridian Pkwy behind my house, I know getting the JPA to respond to requests for help is nearly impossible. Being proactive in this case is a real community benefit.

By submitting this letter as comment on the final EIR for the West Campus Upper Plateau, I am endeavoring to preserve the local trust for my community and neighbors. I submit this response to the JPA in hopes that you consider my thoughts as an educated public review of your project

plan, and a voice of thousands of residents who don't have the time, resources, ability, or desire to hold you accountable to the public interest. I submit this letter as evidence of purposefully deceitful governing, scandalous and possibly illegal land use decisions, and a failure to promote and ensure the community interests are foremost in the repurposing of public lands.

Lastly, I write today to request the JPA honor its responsibility to make our lives better through your oversight and land use decisions. I am not sure you have been able to answer my question from 16 months ago, but it is worth asking again: Has the JPA improved people's lives? It seems the answer to that can be found in your 10,000 plus page final EIR report where you have spared no expense to tell the public that life is better because of the JPA rather than actually developing the repurposed federal land to improve our quality of life. By approving this final mega-industrial project on the Upper Plateau, the March JPA Commission will be dooming the region to significant health, quality of life, and financial burdens for the next 20 years. My final request today is to ask you to reject the Specific Plan or any industrial plan, to investigate community recommended Alternate Plans, especially the County or State Park plan, and give the public what it has been asking you for these last 26 months. Please allow us some peace and sanity while enjoying the Upper Plateau as an escape from life's struggles. There is no benefit for the public in the final EIR, only the misconduct of a few rich men. Don't allow this final grand act of greed and poor land use planning be your lasting legacy.

"We don't read and write poetry because it's cute. We read and write poetry because we are members of the human race. And the human race is filled with passion. So medicine, law, business, engineering... these are noble pursuits and necessary to sustain life. But poetry, beauty, romance, love... these are what we stay alive for."

Jerry Shearer
Riverside, CA 92508
jsydor@yahoo.com

Cindy Camargo

From: Jerry Shearer Jr. <jsydor@yahoo.com>
Sent: Tuesday, June 11, 2024 3:02 PM
To: Clerk; Dan Fairbanks
Cc: Michael McCarthy; Jen L.
Subject: Public comment on record for FEIR for SCH 2021110304
Attachments: Final EIR Letter Template-JS1.pdf

Hello,

Please find my comment letter on the Final EIR for the West Campus Upper Plateau project (SCH 2021110304) included with this email. Thank you for this opportunity to provide a comment letter and I would appreciate confirmation that you received it.

Additionally, since I did not hear back from you last week and this week, I was unable to access Appendix B and the Agenda, and I had difficulty accessing the Responses to Comments on the draft EIR linked to your website. Please note that these documents were difficult to access and insufficient time was granted to fully review this complex project. Thank you.

Jerry Shearer
92508

11 June 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, Environmental Impact Report, State Clearinghouse No. 2021110304

Attention Mr. Fairbanks:

Thank you for considering my comments on the March JPA West Campus Upper Plateau project. The 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.

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:

- Final West Campus Upper Plateau Project Environmental Impact Report (Correction) State Clearinghouse No. 2021110304 and plus Appendices A-U, June 5, 2024
- 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 Final Environmental Justice Element, April 2024
- 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 also a part of the region's heritage with March Air Force Base and the U.S. Military. 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 due to its proximity to so many neighborhoods. 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 this EIR process, I and many members of the community wrote to you detailing alternate land use plans that benefit the community, meet the JPA's goals for this project, and preserve large portions of the landscape for both passive and active recreation. Your Alternate Plan 5 does address what the public has requested by excluding industrial land uses. Thank you for this plan, but it is a flawed plan that you have no intention of actually following through with. This alternate project comes with more intensive VMT and more dense human population than the plans I provided you with in my original comment letters. Additionally, I am disappointed that you exaggerated so greatly the concepts of the three alternate plans I suggested, but I should not be surprised as it appears the JPA is working only on behalf of the applicant.

As much as the applicant via this EIRs tries, this industrial development plan and land use zoning do not preserve the landscape even with the inclusion of the 2003 and 2012 agreements that set aside open space and a conservation easement, a fire department (which was always a requirement of settlements against the JPA), and a park which you insist on describing as "community benefits." Viewing this land from a project map or a parking lot doesn't do justice to the human value of this land. After 28 months, the public still does not understand your thoughts on taking this special part of our community away from residents of western Riverside County and turning it over for private development (we do understand you have the "right" or "obligation" to do something with it). 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 the public why the JPA continues to push forward this specific plan and project (and your attempt to greenwash the fact that you are working on behalf of the applicant instead of with both the applicant and public), especially after more than two years of widespread and uniform community opposition to it. Your efforts in the end are scandalous or even illegal.

After reviewing all three versions of the environmental report for the West Campus Upper Plateau, it is 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 messy timelines of

construction, negative public relations, project mitigations, budgeting pitfalls, and oversight of the development agreement for this historically unpopular project. There are still many errors, omissions, misrepresentations, and discrepancies in the final EIR despite the JPA claiming this is a stable and acceptable document. I write this letter to call attention to as many of these issues as I can, especially those that are the most egregious to my family and my community. Changes to the Specific Plan since I first learned of it are negligible. Specifically, I submit the following list of instabilities, concerns, exaggerations, mistakes, and examples of high-end shenanigans in the final EIR and its appendices for the record.

1. Despite your claims otherwise, you are purposefully claiming or have claimed that the whole of the action must include the fulfillment of 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), and the August 2003 agreement with Center for Community Action and Environmental Justice. These settlements against the March JPA and applicant exist independent of any project and are not only legally mandated JPA obligations, but also significant financial obligations for the JPA and the applicant. I ask for the March JPA to comply with the terms of these settlements outside of the West Campus Upper Plateau Specific Plan. The March JPA has made (or not made) decisions over the last twenty years that have put the organization in the position it finds itself today and the public and the County of Riverside should not be left to pick up the pieces of your poor management decisions for the next two decades. I request the March JPA remove the 2003 and 2012 settlement agreements as benefits of any project approved for the West Campus Upper Plateau.
2. The omission of an Environmental Justice policy from the original draft EIR, its inclusion in the recirculated draft EIR, and then its perfunctory inclusion in the final draft EIR is piecemealing the benefits of one project with another, and that is illegal according to CEQA. The March JPA's findings that the Specific Project complies entirely with the recently approved EJ Policy is convenient. Your findings that the EJ Element was separate from the West Campus Upper Plateau project is also convenient, yet you included the two together for public review in 2024 and therefore they are connected. The JPA wants the public to believe that you are only following an appropriate approval process to comply with State law. But the required Environmental Justice Policy was delinquent by eight years, and to remedy this delay, the EJ Element was piecemealed throughout the recirculated West Campus Upper Plateau EIR review cycle until it was adopted in April 2024; you conditioned the approval of one for the benefit of the other. The approved EJ Policy remains inauthentic and was simply done to push forward an unpopular Specific Project. Pending litigation, I request the March JPA develop and approve an authentic Environmental Justice policy that is CEQA complaint, one that applies to the March JPA development area rather than piecemealing two projects together to gain benefits from one and applying to another.
3. Adopting a General Plan amendment for the Environmental Justice policy in order to pass projects that will cause environmental harm is piecemealing or segmenting which

according to CEQA means “dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document.” This, according to CEQA, is “explicitly forbidden because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact.” To the public, it seems like this is exactly the process that the March JPA followed during this process. Pending litigation, I request the March JPA develop and approve an authentic Environmental Justice policy that applies to the March JPA development area rather than simply adopting the policy from the County of Riverside, and halt any ongoing or upcoming industrial developments until a complaint policy can be adopted.

4. As disappointing as it was to read, the Civil Grand Jury report found that the March JPA involves the community in its decisions, though as a member of the public I am not sure I feel involved. Hearing one-way comments at meetings, and holding one-way public meetings where the community is informed or surveyed is inauthentic community engagement. There is virtually no evidence of the implementation of community feedback in the final EIR for the Upper Plateau. You could have remedied this problem many times over the last two and half years, but you declined for a variety of reasons. I routinely request to be part of an active community advisory committee to help the JPA as it makes important land use decisions. By ignoring requests like mine, you are locking out the public from having meaningful engagement with the March JPA. I request once again to have a community advisory committee to the March JPA consisting of residents living in the March JPA special district and members living in neighborhoods bordering the March JPA development area (you are my neighbor and a bad one at that).
5. In investigation, the Civil Grand Jury were unclear as to why the March JPA does not have a community advisory committee focusing on the development of excess ARB lands. In its response, the March JPA described the Public Advisory Committee of the “Airport Master Plan,” which is financially supported by the Federal Aviation Administration (FAA), comprised of federal, state, and local government representatives as well as residents instead of a formal Community Advisory Board to the JPA. The Grand Jury asked the JPA about the Commission’s perspective on establishing a community advisory committee, given the public frequently requests to form one, and the response given was that JPA management did not know what perspective the Commission had on creating a community advisory committee. This is an excuse and a callous statement by the March JPA to defend staff decisions to not engage authentically with the public. The JPA has repeatedly declined forming a community advisory committee both verbally and in writing. The reasons vary from “there isn’t time” to “there isn’t a need.” These responses demonstrate how the JPA engages with the public. The Civil Grand Jury also noted the California Department of Justice published a document that identifies “best practices” for governmental agencies facing land development projects, especially potential warehouse projects. One of the “best

practices” mentioned in that California Department of Justice document is for local governmental agencies to create a community advisory committee made up of residents. Yet, here we are a few days before a public hearing on a scandalous and unpopular project and the JPA’s policy of public engagement is to keep the public out of decisions that significantly impact our quality of life and health. Thus, I request the March JPA comply with the State of California DOJ recommendations and with the suggestion from the Civil Grand Jury to authentically engage with the public via a permanent public advisory committee to the JPA.

6. In reviewing the final EIR and its appendices, I have struggled to get all document links to open on my computer, especially Appendix B, Responses to Comments for the draft EIR, and the Agenda. Since I have limited time to review these documents, and with the JPA releasing thousands of pages of information and references with only 12 days for public review along with unannounced updates, and since there are technical issues the documents and where they are housed within the JPA servers, a reasonable person could conclude, much as the Civil Grand Jury did when it found the March JPA website difficult find information on, it is impossible to do a full review of the final EIR. Due to the complexity of the final EIR, I have found it difficult to locate important information like responses to specific comment letters and all text regarding the development agreement. Because of the complex and overwhelming nature of these document, how can the public and Commissioners review this document missing important information or making errors while considering your proposed plans? As of writing this comment letter, I have been unable to open and review all EIR document links from the JPA website and am therefore unable to conduct a complete review of the final project plan because the documents are not accessible at this time. I do not believe this is a one-time issue for the March JPA, nor do I believe it is an unavoidable consequence of high-volume traffic to the website. Therefore, I request the March JPA provide and maintain a complete hard-copy of the entirety of the final EIR plus Appendices and the Agenda in your offices accessible to the public, and also have a hard copy of the same documents available for public access at the Moreno Valley Library (Mall Branch and Iris Plaza Branch), the Orange Terrace Library, the Riverside County Law Library, and the Perris Branch Library. I also request the JPA postpone the public hearing allowing the public and the Commission reasonable time to review and process the overwhelming volume of information and associated references prior to holding a vote on this project.
7. On May 30 and May 31, the March JPA Clerk and Planning Director emailed residents notifying the public of a final EIR and of a public hearing on the Specific Plan. On June 5, 2024, the March JPA posted a final EIR document with “corrections” to the EIR posted at 4:30 PM but the March JPA did not notify the public of this update. This practice is consistent with the findings of the Civil Grand Jury and with the standard business practices at the JPA. The Civil Grand Jury found the March JPA website to be difficult to navigate (which the JPA disagreed with in its response to the findings), it is missing key documents related to the organization, and inconsistently communicates documentation of business operations to the public. As mentioned above, I request the

March JPA provide publicly accessible printed copies of all project documents at its offices as well as at the Moreno Valley Library (Mall Branch and Iris Plaza Branch), the Orange Terrace Library, the Riverside County Law Library, and the Perris Branch Library.

8. The continued privatization of public lands surrounding March ARB and throughout southern California, including the highly suspicious request to form a second long-term development agreement with a single contractor appears to be influenced heavily by private interests in order to avoid public, regulatory, or enforcement agency oversight. The Institute for Local Self-Governance published a manual on establishing development agreements which they title “Collaboration in Pursuit of Community Interests.” In it they define development agreements as:

Development agreements are contracts negotiated between project proponents and public agencies that govern the land uses that may be allowed in a particular project. Although subject to negotiation, allowable land uses must be consistent with the local planning policies formulated by the legislative body through its general plan, and consistent with any applicable specific plan. Neither the applicant nor the public agency is required to enter into a development agreement. When they do, the allowable land uses and other terms and conditions of approval are negotiated between the parties, subject to the public agencies’ ultimate approval. While a development agreement must advance the agencies’ local planning policies, it may also contain provisions that vary from otherwise applicable zoning standards and land use requirements. The development agreement is essentially a planning tool that allows public agencies greater latitude to advance local planning policies, sometimes in new and creative ways. While a development agreement may be viewed as an alternative to the traditional development approval process, in practice it is commonly used in conjunction with it. It is not uncommon, for example, to see a project proponent apply for approval of a conditional use permit, zone change and development agreement for the same project. Under a development agreement, both parties to the agreement receive benefits. In addition to the greater latitude afforded by the development agreement to advance local planning policies, the public agency has greater flexibility in imposing conditions and requirements on proposed projects including the applicant is afforded greater assurance that once the project is approved it can be built. There may be disadvantages associated with development agreements as well (bad planning, unrealistic expectations related to feasibility of the project, and fixed rules of engagement.) A development agreement generally allows a project proponent to proceed with a project that meets the “policies, rules and regulations” in effect at the time the development agreement is approved. A development agreement may also supersede an agency’s existing policies, rules and regulations, as long as the project is consistent with the general plan and any applicable specific plan.

In my comment letters for the draft EIR and the recirculated draft EIR, I expressed concern that the Lewis Group has held a 25-year exclusive agreement to develop the land around March ARB. Your response to me was that this was an acceptable and appropriate form of contracting and that the application of Federal Acquisition Regulations (FAR) did not apply on projects under the March JPA. Whereas the FAR was established to protect the public from fraud and misuse of public funds and resources, and would certainly prevent the business model followed by the March JPA, development agreements rely on government to act on behalf of the public in order to get land development projects done in a timely and cost-effective manner. The JPA has, as is its pattern, has either found a way to streamline its operations by allowing one developer access to public resources, or the JPA has been complicit in fraud and misuse of public resources. For example, the manual identifies that development agreements at the County level: "Annual review is required. County development agreements are time-limited if land is annexed or incorporated (Government Code section 65865.3)." Code 65865.1 also states: "Procedures established pursuant to Section 65865 shall include provisions requiring periodic review at least every 12 months, at which time the applicant, or successor in interest thereto, shall be required to demonstrate good faith compliance with the terms of the agreement. If, as a result of such periodic review, the local agency finds and determines, on the basis of substantial evidence, that the applicant or successor in interest thereto has not complied in good faith with terms or conditions of the agreement, the local agency may terminate or modify the agreement." The March JPA does not follow this guideline adequately because if you had you would have ended your agreement with the applicant each time the projects it built with your approval failed to meet the job requirements. This failure impacts payment milestones and rather than amend the development agreement to incorporate occupancy or grading-based payment milestones instead of jobs, you remove the requirement for a minimum number of jobs created under the current development agreement (October 26, 2022). The JPA is able to skirt contractual requirements because development agreements give you the flexibility you desire to maintain your mutually beneficial relationship with the applicant. An uninformed public is prone to conspiracy when discussing concerns about confusing government operations (like the West Campus Upper Plateau project), but it doesn't take long for an informed public to see that the JPA manipulates the structures within the development agreement to benefit private interests which is not aligned with the Institute for Local Self-Government manual. The manual concludes: "Development agreements can be a useful tool in land use planning, creating win-win opportunities for both project proponents and local agencies when dealing with uncertainties associated with the regulatory environment. The goal of this manual is to help local agencies in understanding development agreements and to provide them with practical tools to assist them in using development agreements within their jurisdiction." The end result of a development agreement is to benefit the public, and the JPA's justification fails to adequately do this for the public. The JPA's Specific Plan in the final EIR is not a small project (such as the 2009 Bellevue Draft WR-SRI 120th LLC Development Agreement,

the 2015 Issaquah and Costco Wholesale Corporation Development Agreement, or the 2007 Redmond Development with Microsoft Corporation), and it isn't on the level of a large project (such as the 2018 Jefferson County Pleasant Harbor Marina and Golf Resort Development Agreement, the 2019 Shoreline Aurora Square/Shoreline Place Community Renewal Area Staff Report on Proposed Development Agreement, or the 2019 Clark County Holt/Mill Creek Draft Development Agreement). While these projects utilized development agreements to streamline the project, they also used this process to benefit the public, but the same cannot be said for the JPA's warehouse projects. Comparatively, the March JPA specific project is somewhere in the middle. So why does the applicant require and the JPA advocate for another 15-year Development Agreement with two 5-year extensions? Why 50 years with the same developer? Even if one considers the redevelopment of the land around March ARB as a "project," the time and scope of it would exceed the parameters of a development agreement. In its responses to the comments to the draft and recirculated EIRs, the JPA makes it clear that the Project is consistent with the JPA planning guidelines because you created them and amend them to suit each specific project need. You do so solely in the interest of the JPA and the applicant. As reading my letters can be viewed as a repetitive process, the same can be said for finding the JPA ignoring and excluding the public from its decisions and nowhere is it clearer than in your insistence on maintaining a long-term development agreement with the Lewis Group. While it appears a development agreement does not require public involvement, it does clearly state that the Project is a benefit to the public, and your duplicitous claims that the public will benefit primarily because of jobs and tax revenue is insincere and just plain false and you know it. I request the JPA end the development agreement practices as it sunsets and allow the final parcels to be developed by the County of Riverside in a competitive bid process that encourages community involvement and prioritizes innovative land use planning.

9. The JPA's refusal to discuss or acknowledge why the applicant is proposing an industrial Specific Plan 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 is another example of a disingenuous public agency feigning concern for the public. However, the final EIR provides a non-industrial option and according to Table 6-1, the only difference in impacts of all development project options is Alternative 5 offers less Noise pollution and an increase impact on Transportation. Having lived with warehouses in my backyard for many years now, I would happily trade an increase in traffic or a slight increase in GHG to avoid the significant noise pollution coming from local warehouses. Another benefit of Alternate Plan 5 is the community will gain an additional 17 acres of open space. Yet, consistent with the JPA's pattern of only managing this area on paper, the JPA should be jumping to approve Alternate Plan 5 because it addresses public sentiment to exclude industrial development, it is consistent with nearby and local land uses, and it accomplishes the goals of the Project while allowing the public to benefit from and make use of this popular part of the community instead of turning it over to the predatory profiteering of industrial land investors. It is unclear why you chose

to make the Shopping Center buildings less than 20% of the project with the rest Office Space or Public Facilities, but maybe you did this to ensure the Commission will not be interested in pursuing Alternative 5 due to the fear you created because it will increase vehicle trips and population density in the Office Space area. Ironically, your Alternate Plan 5 is predicted to be more densely populated than any of the Alternative Projects I proposed in my comment letters to the draft EIR. In your responses to my alternate projects, I was helping highlight what local groups (like the VA, youth sports organizations, and local colleges) have asked for combined with what makes sense from a ALUC or Project Objectives standpoint. Your responses to my plans show a lack of imagination, a lack of accountability, and a lack of concern for public sentiment. I request the JPA engage in authentic public engagement as you claim in your Environmental Justice Policy and incorporate actual community feedback as benefits into your project objectives. Once you do this, then you can revise your alternate plans that in-fact do what you claim throughout your EIR and EJ Element.

10. 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. In yet another turn of phrase, your final EIR enumerates “Community Benefits” resulting from this Specific Plan. You list the following as benefits of the project: “Community Park and Site Grading, construct a fire Station, truck route enforcement, compliance with the 2003 and 2012 Settlement Agreements, increase employment opportunities for area residents, extending Barton Road, preserving some existing trails in the open space, generate new tax revenue and traffic improvement fees, and construct a new recycled water storage system.” As written in my response to the recirculated draft EIR, a community benefits agreement is a legal agreement between community benefit groups and developers, stipulating the benefits a developer agrees to fund or furnish, in exchange for community support of a project. Your response to my letter is pandering and purposefully non-responsive. I realize you are not offering an agreement; I wrote as much in my letter. You are piecemealing benefits for the public on the back of an unpopular industrial project. The only word missing in this term is the word “agreement” or the legal contract documenting the stances and obligations of all parties. Minus this legal contract, you still have left the spirit of a CBA in “Community Benefits,” but the JPA, as is your standard business practice and in conflict with the words and spirit of your recently adopted Environmental Justice Policy, is telling the public what benefits it needs in exchange for the right to build warehouses in an area surrounded by neighborhoods, churches, parks, schools, and precious natural landscapes and ecosystem. Much like the political discourse in America today, the final EIR advertises “benefits” to the public, but in the details supporting each “benefit” you built in ways for the benefit to be realized by either the JPA or the applicant at almost every point. For instance, within

the “benefit” of the Park (that the region cannot afford to build or maintain), the JPA has adjusted the payment terms to discount the price of buying the land by \$15 million and forgiving the \$6.5 million grading costs for the applicant by way of credits applied in other areas of the applicant’s business with the JPA. This isn’t a benefit to the public; it is a benefit to the applicant who may only be required to pay \$9 million of the cost of the Park fees despite the 2003 Settlement requiring it be built outside of any specific project. Sticking with the Park, if approved, the Project will cap the CFD at \$4,000 per acre which would not be enough for LLMD and maintenance of the Park in the future. This is not a benefit to the public; it is actually an increase in public cost for the Park.

Employment opportunities for area residents? Are you serious? Houses along the Riverside boundary with this development area are listing for more than \$900,000. Name for me a job within a warehouse that pays area residents enough to buy a \$900,000 house in Riverside near this project site. Jobs are not a benefit for area residents, but telling the public and local municipalities there will be jobs is a benefit to the JPA. And the list goes on, but in the interest in my time, I will end with requesting the JPA participate in authentic public engagement, as you claim in your Environmental Justice Policy, and develop community benefits that include the term “agreement” to ensure that all parties benefit from any approved project on the West Campus Upper Plateau. As written today, the final EIR and development agreement heavily benefit the JPA and more so the applicant while placing future financial burdens on the taxpayers and residents of western Riverside County and the four member municipalities that make up the March JPA.

Additionally, I find the final EIR egregious and deficient in the following locations:

1. Specific Plan No.9, 6/12/24, page 2-5 and 2-6. You prohibit the construction of buildings that generate smoke or water vapor within the Upper Plateau, yet there are already one or two buildings located along Brown St. that currently vent something several times a day. Per Figure 2 of Appendix J-4, you list this building within Zone B-2, more restrictive zoning, while the Specific Plan lies within Zone C-1 and C-2. As is typical of the JPA, you like to tell two stories at the same time and these requirements are inconsistent because the JPA already has buildings that do this in the area today. You know the JPA can over-ride the ALUC with the in-place exemptions available to you, yet you selectively decide when you invoke these requirements and when you don’t.
2. In Appendix J-4, Rick Jones of Mead & Hunt provides Table 2 as a list of plants that may be attractive to wildlife and may increase bird strikes in the flight path. There are many homes located in Zone C-2 like a large portion of the Specific Plan. Residents are permitted to plant anything we like in our homes and the theory is that our landscaping will not be large enough to attract wildlife hazards near the flight path. But I fail to see how this is any different than the actual path airplanes fly except that since this is repurposed federal land, it must comply with your standards and since our homes are private property, we do not. The military planes fly over homes in my neighborhood as much if not more frequently than they will the development area for the Specific Plan. Your inconsistencies in how you apply real world practices versus policy and procedure

is typical of a government entity with a lack of resources to understand risk and mitigation in the real world.

3. Throughout the final EIR, and in past March JPA projects, the March JPA picks-and-chooses where it adheres to the General Plan verbatim, and where it refers to the Plan as a guideline. A good example is in Section 6 of the final EIR. You write, “Describing its Housing Element, the March JPA General Plan states the “land use plan identifies no new housing areas, and creates an employment center within the housing rich environment of western Riverside County.” Additionally, the March JPA General Plan Housing Profile report states: “No housing opportunities are identified within the March JPA Planning Area due to land use compatibility issues related to the continued military activities of the Air Force Reserves and aviation operations.” As you have amended the original General Plan to suit your upzoning desires building more warehouses to support your hopes that March ARB becomes a logistics hub for freight, you also fail to acknowledge where the document is dated in your land use decisions. When originally written, California was not suffering from the affordable housing crisis it is today. Just as you amend the General Plan to suit your logistics addiction, you could amend the Housing Profile to reflect available land and the need for more affordable housing in the region. The JPA isn’t separate from the needs of the region or the State of California. You could easily have adopted a change to your Housing Profile to include housing for local residents who receive the low wages in your warehouses, but you chose not to. Appendix J-4 again show the ALUC zones for the area under consideration and there are many, many densely populate single family homes located in Zone C-2. The public has requested, and the State requires, affordable housing options in western Riverside County, and the land to the west of the development area would be sufficient to help address this regional need. The JPA has the ability to address this need and chooses not to, passing blame on the ALUC and the US Air Force.
4. In Section 6, the March JPA again is choosing to manipulate the 2012 settlement agreement and hold it hostage in exchange for approval of the Specific Project. For Alternate Project 1, you write that, “the Conservation Easement would not be placed under a conservation easement.” This line is a choice the JPA is making to connect the 2012 settlement agreement with the West Campus Upper Plateau warehouses. It is not a requirement to connect these two individual things, you are once again piecemealing one action to realize the benefits from another action. Piecemealing is illegal under CEQA. This this is not a legitimate reason to dismiss Alternate Project 1, and the only reason to connect these two independent things is to capitalize on them financially as a collective action. You are required to place this land under conservation easement by 2027 regardless of whether you approve or build anything on this land. Your statement is intentionally false. I will also add here that the final EIR makes reference to decreasing the open space if needed to accommodate development needs of the Park or other public space associated with the Project. This also seems manipulative of the terms of the settlement at this point of this process.

5. There is no Concept Plan for Alternative Plan 4. The JPA should provide one for public and Commissioner review.
6. The Responses to Comments to the draft EIR, specifically the letters and comments submitted by my family, contain errors omissions, and speculation.
 - a. In Letter I-11 you incorrectly refer to developmental standards to justify real-world conditions as it relates to noise. Your modeling of things like light and noise pollution are speculative and suspect in places and do not actually reflect these levels once a building is completed. The March JPA can conclude that your models make this project safe for residents living nearby, but your models are wrong and you do not get to tell me what an acceptable level of noise pollution is in my life. Your existing mitigations simply do not work and therefore the public should be concerned that any future mitigations for noise and light pollution will create significant impacts in their lives, despite the JPA's biased sales pitch. And monitoring via the MMRP will not matter once the land resides in the County of Riverside.
 - b. In Letter I-785, you write: "the Draft EIR includes extensive analysis of the potential aesthetic impacts of the Project and concludes that its impacts will be less than significant with mitigation incorporated, in compliance with CEQA." This is exactly what the author complained about where you are subjectively justifying your decisions with the aid of a development code (legally) but ignoring that this is a unique development, one that the developer indicated it has never built because of the proximity to homes. Aesthetics, as indicated in the letter, is personal and assigning a niche industry code to justify your preferred view of aesthetics does not respond to the questions or concerns and is consistent with the JPA ignoring community sentiment.
 - c. In Letter I-787 you fail to respond to the nature of the line of questions. Your responses are to copy/paste or parrot responses about your methodology for making photo simulations rather than address how those simulations never really happen for any existing March JPA developments. There is no accountability for the developer to ensure the mitigations for noise, aesthetics, light pollution occur as described in this or past EIR documents and so it never happens for existing JPA buildings. If there was accountability, then maybe the irrigation to the existing landscaping surrounding building along Meridian Pkwy would actually work instead of being capped off. The establishment of a Long-Term Project Implementation and Enforcement policy in order to pass this project is immaterial when there is the enforcement agency responsible to ensure the public is protected or this project is implemented correctly is unable or unwilling to do these things today and will cease to exist in twelve months. You also wrote: "For ornamental and screening landscaping within the Specific Plan Area, the photo simulation applied a 10-year growth factor to each plant species, which is standard practice given the long-term nature of development." Having lived near warehouses built between 5-10 years ago, it is plain to see that the reality of a changing climate has

done the landscape plans of the past not benefits, and along with the inconsistent and unfunctional irrigation and maintenance in the area, the landscaping plans of 10 years ago never materialized, thus no mitigations for light, noise, and aesthetics. Why would the public believe the JPA will remedy this problem in the future when you are not even fixing the problems that exist today? The comments and photo comparisons provided in this letter remain a valid concern for the public and a major deficiency in the final EIR. You also write: “PDF-TRA-3 directs the Project applicant to provide March JPA with compensation of \$100,000 to fund a truck route enforcement for a period of two years.” But in other responses and locations in the EIR you indicate there will be \$200,000 for truck route enforcement over two years. Which is it? In either case, this will not prevent or reduce the trucks from idling for extended periods of time near residential areas, thus significantly impacting and increasing noise and air pollution beyond the modeling provided by the JPA in this EIR. I have 5-10 years’ experience dealing with this problem rather than relying on your projections and simulations which are fictional, as is your empathy or concern for the public living with the JPA as a neighbor. You wrote: “the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities; impacts would be less than significant, and no mitigation is required.” As you say, this response is also speculative. In the last three months, I have had to call Riverside County Sheriff’s non-emergency hotline to report idling trucks, vagrants and homeless camping in the conservation easement, fireworks being shot off from within the walls of a warehouse along Meridian Pkwy, vehicles racing and “drifting,” and motorcyclists riding along the trails of the conservation easement. To my knowledge, all the Sheriff was able to do at the time was take a report and dispatch officers if available. I was never contacted by officers again and concluded there was no law enforcement available to response to these problems. And these are my own calls and complaints, my neighbors have also occasionally called to report the same problems. The JPA is unresponsive to resident concerns and local law enforcement is understaffed and unable to deter or prevent lawlessness in the areas around your warehouses. Again, it is speculative for you to say that our real-world experiences will not carry over to any new warehouse projects you develop.

- d. It is disappointing that the JPA marginalized and dismissed a majority of the concerns provided in these comment letters. While I am not qualified to address compliance with CEQA, as your responses expect, it is appropriate to demand the JPA balance CEQA requirements with public preference and experience.
7. The Responses to Comments to the recirculated draft EIR, specifically the letters and comments submitted by my family, contain errors omissions, and speculation.
- a. In Letter RI-2, you wrote: “Environmental evaluation of the Draft Environmental Justice Element was a separate process from the Project EIR.” This is false

because you included the draft EJ Element in the recirculated draft EIR and conditioned the review of the project to the unapproved General Plan amendment. By requiring the public to provide comment on both documents at the same time, you conditioned the two “projects” with one another.

- b. In Letter RI-232, you wrote: “the March JPA Draft Environmental Justice Element, which is not part of the proposed Project.” But on February 11, 2024, the EJ Element was included in the recirculated draft EIR and therefore very much a part of public review of the project described in the recirculated draft EIR.
 - c. In Letter RI-259, pages 21, 43, 53 of 83 is upside down and difficult to read.
 - d. In Letter RI-259, you wrote: “detail regarding the Community Benefits under the proposed Development Agreement” in multiple locations. As addressed above, Community Benefits prescribed by the JPA or developer are not benefits to the community in so much as JPA or developer obligations or features of the project. The JPA has a history of telling the public what is in their best interest and getting away with it. This has never been authentic community engagement and is not only in violation with CEQA, the JPA’s General Plan, but now your EJ Policy that prioritizes community engagement and benefits. You also wrote: “Consistent with the requirements of CEQA, a lead agency need not evaluate consistency with every single policy in a General Plan. Pursuant to the applicable threshold, the relevant policies are those adopted for the purposes of avoiding or mitigating an environmental effect.” It is my understanding that the General Plan provides the foundation for all specific projects and to read that the JPA is not evaluating the Project for consistency with all General Plan policies is disturbing especially in light of the suspicious relationship between the JPA and the applicant related to your manipulation of the process to push this project through approval despite significant public opposition. You also wrote: “comment questions how the proposed Specific Plan meets the objectives stated in the General Plan and benefits the surrounding community,” and then you do not respond to it. You also wrote: “the Project includes a proposed development agreement between March JPA and the applicant, which is not a community benefits agreement as described by the comment.” When I submitted this comment and discussion, I understood it was not a CBA and that the JPA was not proposing a CBA. My comment reflects the idea that the JPA is using these terms to confuse or trick the public and the Commission into believing the benefits you describe in the EIR are community recognized and supported. They are not benefits the community agrees to and to conflate them as public engagement and benefit only serves to help the JPA and applicant get this project approved and recorded before sunseting in July 2025. Your response to the comment letter is disingenuous and purposefully misleading.
 - e. The inclusion of and response to Brenda Shearer’s comment letter dated February 25, 2024 is not in your final EIR, responses to comments.
8. Development Agreement #21-01 has some flaws. The community park is supposedly getting \$30 million from the developer. The real number is \$9,000,000 from the

Developer, \$15 million from the taxpayer (yes, I read your comments that this is JPA-owned land, but it was originally public land assigned to the U.S. Military) in the form of land credits or a discount on the purchase price of the land offered by the JPA to the developer, and a \$6,000,000 bogus credit for work already agreed to. The fire station required on the North Campus appears to also have financial incentives going back to the developer to help lower the responsibility to pay for it. There is conflicting information for how much money will be contributed to truck route enforcement but whichever number is correct is insufficient to monitor, discourage, and cite violators. Truck drivers will simply figure out how to get around this enforcement to avoid fines while still violating your no truck zones. And finally, it appears you have some serious issues with your appraisal for this land. It appears you did not follow your own requirements identified in the current DA for number and type of appraisals, but you got one that was not comparable for the land in Riverside County and you allow it to expire before releasing the EIR and setting the payment schedules, with discounts, for this Project. As I discussed above in this letter, development agreements are typically put in place with community benefit in mind. The proposed development agreement here is decidedly beneficial for the developer, not the public.

As a concerned citizen, it is not enough to just find problems with the EIR and the process the March JPA has undertaken to get to this final document. Responsible citizens take an interest in their community for the benefit of all people and businesses, working to avoid the economic and social injustices that these warehouse projects present our communities.

For instance, based on the painful experience of living through a March JPA warehouse development project from start to end, I know that you do not mitigate significant impacts to residents and you do not accept responsibility when the project causes damage to local neighborhood houses. Therefore, I request the March JPA, as part of the whole of the action, also establish a fund to pay for repair and cleaning of HVAC and heating units; repair or replacement of real property like windows, stucco, tile, brick, or stone, decorative features affixed to homes like shutters or fascia boards, plumbing, or foundation damage; pest control associated with insects, rodents, wildlife, and reptiles/amphibians displaced by demolition and grading activities; and clean-up or repairs from dust related damage to gutters, paint, pool equipment, and loss of landscaping such as trees, shrubs, fruiting plants and vegetables, and lawns. The wording of such a fund is better left up to experts in this field, but a reasonable value for such repairs caused by activity associated with the project is between anywhere from \$6,000,000 to \$12,000,000. As someone who routinely asked for help with these things from the construction office located on Meridian Pkwy behind my house, I know getting the JPA to respond to requests for help is nearly impossible. Being proactive in this case is a real community benefit.

By submitting this letter as comment on the final EIR for the West Campus Upper Plateau, I am endeavoring to preserve the local trust for my community and neighbors. I submit this response to the JPA in hopes that you consider my thoughts as an educated public review of your project

plan, and a voice of thousands of residents who don't have the time, resources, ability, or desire to hold you accountable to the public interest. I submit this letter as evidence of purposefully deceitful governing, scandalous and possibly illegal land use decisions, and a failure to promote and ensure the community interests are foremost in the repurposing of public lands.

Lastly, I write today to request the JPA honor its responsibility to make our lives better through your oversight and land use decisions. I am not sure you have been able to answer my question from 16 months ago, but it is worth asking again: Has the JPA improved people's lives? It seems the answer to that can be found in your 10,000 plus page final EIR report where you have spared no expense to tell the public that life is better because of the JPA rather than actually developing the repurposed federal land to improve our quality of life. By approving this final mega-industrial project on the Upper Plateau, the March JPA Commission will be dooming the region to significant health, quality of life, and financial burdens for the next 20 years. My final request today is to ask you to reject the Specific Plan or any industrial plan, to investigate community recommended Alternate Plans, especially the County or State Park plan, and give the public what it has been asking you for these last 26 months. Please allow us some peace and sanity while enjoying the Upper Plateau as an escape from life's struggles. There is no benefit for the public in the final EIR, only the misconduct of a few rich men. Don't allow this final grand act of greed and poor land use planning be your lasting legacy.

"We don't read and write poetry because it's cute. We read and write poetry because we are members of the human race. And the human race is filled with passion. So medicine, law, business, engineering... these are noble pursuits and necessary to sustain life. But poetry, beauty, romance, love... these are what we stay alive for."

Jerry Shearer
Riverside, CA 92508
jsydor@yahoo.com

Cindy Camargo

From: Jen L <jlarrattsmith@gmail.com>
Sent: Tuesday, June 11, 2024 1:58 PM
To: Dan Fairbanks; Cindy Camargo; Jerry Shearer Jr.; Michael McCarthy
Subject: Public comment on record for FEIR for SCH 2021110304
Attachments: Jen Final EIR Comment Letter.pdf

Dear Mr. Fairbanks,

Please see attached letter.

Sincerely,

Jen



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

Jun 11, 2024

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

Re: Comment for the West Campus Upper Plateau, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks,

Thank you for the opportunity to comment on the West Campus Upper Plateau, State Clearinghouse No. 2021110304. The 1,700-page agenda for the Public Hearing, released just five days before the vote, clearly defends the project and minimizes the realities of its environmental effects. No regular person, especially with a job and family like myself, could cull through 1,700 pages of analysis as well as the 7,500+ pages you provided of comments to the EIR and REIR and give you coherent and detailed feedback in just a few days. However, I can see very quickly in reading that the adverse effects have been minimized. Your paid consultants have somehow managed to explain away what common sense knows to be true.

Take for example the Aesthetics section (Section II.3): Does having a view of the mountains somehow negate any other aesthetic blight to our community? Can I therefore dump a mountain of garbage and sewage in your backyard and say it does not impact aesthetics as long as your view of the mountains is not completely obscured? This is the logic of your aesthetics section. On paper, you can pay a consultant to say it will have less than significant impact, but ask anyone in the community, and they will use plain common sense to tell you that it will.

Or, as another example, in the Biological Resources section (Section III.B.1), your document blithely says that construction will have no impact on special status plants like the smooth tarweed. Unfortunately, this is based on a faulty biological report from your EIR done in late July/early August of a drought year that claims the West Campus Upper Plateau is primarily non-native grassland. Residents who have hiked the trails during the spring of rainy years know that special-status plants thrive on this land. How can you draw conclusions about plants in the peak of summer during a year with no rain? Residents know that the findings of your consultants do not match reality.

These are only two examples of many, but it's clear that the CEQA findings are attempting to negate common sense reality and skew the findings in favor of the project. How can we trust these self-serving analyses? How can we take you at your word that there is no significant impact in the area of Hazards and Hazardous Waste when you have not properly tested soil of former military ammunition dumps to the depth that you will be digging - more than 20 feet? Doing the bare minimum and then calling it good may be your modus operandi (as described in the conclusions of the [Civil Grand Jury report](#) released in March 21, 2024), but the bare minimum when testing for the health effects of a project on surrounding communities is unethical. I ask that you do more to safeguard the health of the surrounding community.

Alternatives

Your analysis on alternatives did not include serious consideration of any of the community's proposed alternative plans. It is clear the developer begrudgingly offered a non-industrial alternative in an attempt to placate community members. Unfortunately, the alternate plan proposed, one none of the community members asked for, is immediately negated by March JPA staff who urge you to reject it due its environmental impacts. There was never a serious consideration of a non-industrial alternative in spite of two years of opposition from community members asking you to come up with a feasible option. On January 23, 2023, R-NOW sent an email agreeing to meet with the Lewis Group only if they were willing to discuss non-industrial alternatives. The Lewis Group never responded to that email, which we assumed to mean that they were not interested in engaging the community on what might benefit us.

Overriding Considerations

Ultimately, the March JPA staff urges the Commission to vote in favor of the project due to “overriding considerations.” Unfortunately, your statement of overriding considerations contains flawed justifications.

“The Project will provide increased job opportunities for local residents through the provision of employment-generating businesses. “

How many times have I commented on EIR’s using economic data to show that this assumption is demonstrably false? (See both my comment letters for the Draft EIR and the Recirculated Draft.) I have shown again and again that the local residents would not be able to afford rent or a mortgage on the kinds of salaries that the average warehouse worker is paid. The assumption that local residents will work at these warehouses is false.

“The Project will establish a land use and facility plan that ensures project viability in consideration of existing and anticipated economic conditions.”

The logistics industry has lost over 23,000 jobs since 2021, even as other industries like healthcare or hospitality have grown. Warehouse vacancies are at their highest in a decade, even though square footage will double in Riverside and San Bernardino Counties over the next decade based solely on projects that have already been approved. This is a losing bet for the Inland Empire. Even if the sector were not prone to automation, the economic trend is downsizing rather than increased opportunities. The Project is far from “viable” if we face the reality of “anticipated economic conditions.”

“The Project will encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is both safe and comfortable.”

Once again, this is based on the faulty assumption that local residents will work at the warehouses. No one owning or renting in the immediate area can afford to work seasonal, low-wage jobs without benefits, which is what the majority of warehouse jobs would be. In other words, no one within walking or biking distance can afford to work at the West Campus Upper Plateau. The work force will be driving in from other areas in the region.

“The Project will provide a range of job types for the community’s residents.”

Even the mixed use buildings have truck bays, so the entire complex is being built with industrial warehouses in mind. Logistics warehouses already make up a significant portion of the economy in the Inland Empire, approximately 16% of the workforce. How is this providing a “range” of jobs?

“The Project will help balance the jobs to housing ratio within Riverside County. This would reduce the need for the existing local workforce to commute outside the area for employment.”

This is a bold assertion given that unemployment is near an all-time low, and we are in a housing crisis. Creating more (low-income) jobs will throw the ratio further out of whack. The only land use that would help balance the ratio would provide housing.

“The Project will provide employment opportunities that will enhance the area’s economy.”

As I have demonstrated in previous comment letters, the logistics industry actually harms our region’s economy because it provides relatively low paying work. A recent SCAG report showed that our region’s GDP has decreased in spite of a low unemployment rate, largely because we have overinvested in warehouses. For my references, see my Draft EIR comment letter.

“The Project will enhance the area’s economy by developing a large property with employment-generating land uses with long-term economic viability.”

Repeating the same misinformation based on faulty assumptions does not somehow make this true. As I have shown in previous EIR comment letters, this project does not make sense economically for our region. It will not provide living wage jobs to local residents and is not economically viable.

The statement of overriding considerations is a series of misleading and false statements. The truth is that we do not need another square inch of warehouse in this region. (For more on why, please see the recent [Letter to the Editor](#) that I wrote for the Raincross Gazette.) Passing this project makes no sense. It is in the wrong place and the wrong time. It’s unfortunate that you are willing to make surrounding communities sacrifice zones in order to please a greedy developer. I had hoped for better from an authority that is supposed to serve the community.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Larratt-Smith". The signature is written in a cursive, flowing style.

Jennifer Larratt-Smith

Cindy Camargo

From: Michael Wilson <Bloomington51@outlook.com>
Sent: Tuesday, June 11, 2024 1:24 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org
Cc: Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I'm submitting this email in response to the **Recirculated Responses to Comments**, in particular to statements made by the responding agency to comments I submitted on 26 Feb 2024 regarding the Recirculated EIR. My comment letter is RI-295. The agency's response follows on Page 10.3-231.

The concern I expressed in my comment regarded the multiple effects of opening up the March property to free-flowing public access enabled by the proposed extension of Barton Street south of it's current endpoint past Camino Del Sol. Due to the close proximity of the street to the backyards of private properties along Greenock Way, there will be exposure to vehicle emissions, tire and brake particles, and dust in addition to contaminants generated from the commercial-industrial sites of the project. I also expressed concerns about traffic volume, street lighting, noise, privacy, and safety arising from public use what I expect will be a popular shortcut between Alessandro and the Orange Terrace area. The response I received did not directly address my concerns. Instead, it referred me to unspecified parts of appendices in the recirculated EIR, placing on me the burden of deciphering the technical data, and ferreting out the information relevant to my comments. While some of the information was helpful, overall, I am left with the impression that some of my concerns were never considered in the preparation of the EIR or it's updated version, and that the responding agency was only interested in doing the necessary minimum to cover their obligation rather than address my legitimate concerns in a meaningful and truly helpful way.

Point #1

I made comments specifically about the effects vehicle traffic will have on air quality along the Barton Street extension on properties and residents on Greenock Way, whose back yards, like mine, will be closest to Barton. The response referred me to Recirculated Section 4.2, and what appears to be the impact on air quality from the project as a whole, with a mention of sensitive receptor locations R8, R10, and R11 (none of which are on Barton Street). I was expecting an evaluation of the effects of Barton Street vehicle traffic

on the air and land from the street outward and what effect our block wall will have as a barrier. I was also referred to the technical studies section of Appendix C-1. There was no specific page reference given, and the computer printout in that section consists of raw data, with no key or explanation of abbreviations or values presented to make it comprehensible for a layperson. While the responder's restatement of my comment indicated it was understood, the response given was not presented in a way to be helpful.

Point #2

I had mentioned I saw no evaluation of the effect of public use of the Barton Street extension on noise. I was referred to Appendix M-1 of the REIR. In checking, I see no mention of the Barton Street extension. All the tables regarding noise only take into account Barton Street north of Van Buren Blvd. It appears no studies were performed regarding Barton Street south of Alessandro, and no projections made regarding this stretch of proposed roadway.

Point #3

The responder's reference to Appendix N, Transportation, was somewhat helpful, but anticipated traffic flow was estimated based on Barton Street's designation as a collector road. Apparently there are no plans to install a traffic light, and there were suggestions for speed-limiting measures. Troubling is the projection that the level of service (LOS) on Barton Street between Alessandro and Cactus will be unacceptable in 2028 (Appendix N, Section 1.5.3).

Point #4

My concerns regarding street lights, and regarding privacy and safety that could arise from granting unrestricted access of that area to the public were not acknowledged at all.

Thank you for the opportunity to submit these comments for the record.

Sincerely,

Michael Wilson
Mission Grove, 92508

Cindy Camargo

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Tuesday, June 11, 2024 12:52 PM
To: Clerk; Dan Fairbanks
Subject: Public comment on record for FEIR for SCH 2021110304
Attachments: FEIR_comments.pdf

Mr. Fairbanks, Ms. Camargo,

Attached please find a comment letter on the Final EIR for the SCH 2021110304 project on the West Campus Upper Plateau.

Please confirm receipt at your earliest opportunity.

Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508

June 11th, 2024

Mr. Dan Fairbanks, AICP - Planning Director
Ms. Cindy Camargo, CAP, CPMC – Executive Assistant and Notary Public
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, Environmental Impact Report, State Clearinghouse No. 2021110304

Dear Mr. Fairbanks and Ms. Camargo

Thank you for the opportunity to provide comments on the March Joint Powers Authority (MJPA) Final Environmental Impact Report (FEIR) 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 response to comments on the draft EIR and recirculated draft EIR (REIR) is over 7,000 pages long and was circulated to the public and elected officials on the afternoon of May 30, 2024. The public hearing is scheduled for June 12th, 2024. While this may be legal, it is not civic engagement and is a mockery of the civic engagement component of Environmental Justice policies adopted by the MJPA less than 6 weeks ago. The General Plan of this agency was adopted in 1999 based on a Final Reuse plan involving community focus groups from 1993-1995. CEQA is intended to provide a review process that considers current conditions and changing priorities.

This letter will focus on the sections that I managed to review in the allotted time. It is not complete, because it is not possible for residents or elected officials to review a document with this much new material that has not been previously released in less than 10 business days. Unfortunately, this is the standard approach for the MJPA, an unresponsive and unaccountable agency that acts solely as an extension of a private business trying to maximize profit while failing to engage with community stakeholders.

Broadly, this letter will include comments on the following topics:

- Aesthetics
- Air Quality
- Biological Resources
- Cumulative Impacts
- Development Agreement
- Disposition and Development Agreement
- Environmental Justice
- Good Neighbor Policies
- Hazards and Hazardous Materials
- Jobs, Population, Housing
- Park
- Transportation

- VMT

Aesthetics

The aesthetics section relies on visual photo-simulations of project buildings but fails to accurately represent required engineering to achieve conceptual grading difference. Buildings in mixed-use area shown in Figure 4.1.2 are inconsistent with conceptual grading plan shown in Figure 6-9 in the Specific Plan. The photo-simulation is taken at 1642', and the nearest building on parcel 9 is at 1680' feet, a 38 foot gradient. Parcel 1 is at 1711' elevation, with a more than 60 foot drop across the open space buffer, again requiring retaining walls. The park is at 1660 feet. The photo-simulations do not show retaining walls or accurate representations of buildings that will be perched on a high retaining wall island relative to the surrounding communities of Camino del Sol to the north and Mission Grove to the West. Existing vegetative landscaping on Meridian campus developments do not have 45 foot trees blocking views of the warehouses as these photo-simulations represent. They are barren, tiny trees, interspersed at small intervals with no visual appeal.

Please show retaining walls (if required) for engineering the project and how that blends into the community for the proposed warehouse island fortress, overseeing the neighboring peasant communities.

Air Quality

Health Risk Assessment

The section on Diesel Particulate Matter is unsubstantiated. Citations repeatedly list a citation for CARB 2016 which is a glossary of terms link which provide no definitions for diesel, diesel PM, diesel, or the composition of diesel.

The claim that light-duty passenger cars are not considered a significant source of mobile source TAC emissions is unsubstantiated and incorrect. Definitions of significance typically include contributions as low as 5%, but in this case, the project applicant and their consultant have not done the math to demonstrate that passenger vehicle TAC contributions are insignificant. Emissions inventory data for the SCAQMD MATES V air toxics monitoring study breaks down the contributions of all major source categories. Diesel PM is the largest source of cancer risk in the basin at 50% of the total based on measured values from 10 monitoring sites. The next largest contributors are benzene, 1,3-butadiene, and carbonyls (formaldehyde and acetaldehyde) as shown in **Figure 2-47** from the MATES V report (reproduced below). The source characterization for these pollutants in the emission inventory is provided Appendix VIII of the MATES V final report (SCAQMD, 2021). Onroad vehicle classifications from EMFAC (CARB, 2021) identify multiple categories of 'non-truck vehicles' based on gross vehicle weight rating (GVWR) and equivalent test weight (ETW) including light-duty passenger vehicles (LDA), light-duty trucks 1 (LDT1 – GVWR < 6,000 lbs & ETW < 3,750 lbs), light-duty trucks 2 (LDT2 – GVWR < 6,000 lbs & ETW 3,751-5,750 lbs), medium-duty trucks (MDV – GVWR 5,751-8,500 lbs), motor homes (MH) and motorcycles (MCY). Trucks start at GVWR 8,500 lbs. Light heavy-duty truck LHD1 T4 (GVWR 8,500-10,000 lbs) and LHD2 T5 (GVWR 10,000-14,000 lbs) include most courier vehicles like Amazon delivery trucks and UPS brown trucks. Medium-heavy duty vehicles MHD T6 go from GVWR 14,000-33,000 lbs) and heavy-heavy duties (T7 and T8) are GVWR >= 33,000 lb. Onroad motor vehicles are the largest source of benzene, with light-duty passenger vehicles (1,536 lbs/day), light-duty trucks 2 (854 lbs/day), medium duty trucks T3 (723 lbs/day), and motorcycles (597 lbs/day) as the four largest subcategories in

the SCAB. Heavy duty diesel trucks HDD are a mere 160 lbs/day. Off-road equipment is the next largest source of benzene, with off-road equipment emitting 2,253 lbs/day and recreational boats emitting 1535 lbs/day. No stationary source subcategory emits more than light-duty trucks 2. Onroad passenger vehicles are the largest source of benzene in the SCAB in the MATES V emission inventory at 4,036 lbs/day. Onroad passenger vehicles are the largest source of 1,3-butadiene emissions in the SCAB at 491 lbs/day. Onroad passenger vehicles are significant sources of direct emissions of formaldehyde (1,822 lbs/day) and acetaldehyde (864 lbs/day) and contribute to secondary formation of carbonyls through the breakdown of other hydrocarbons emissions.

CARB’s estimate of the total cancer risk estimate from diesel PM in 2009 is less accurate and reasonable for southern California than the MATES V study published in 2021 that is specific to the project area and run by the local air quality agency (SCAQMD, 2021). The basin average measured cancer risk from diesel PM is 50% in that study (Figure ES-2). **Figure 2-47** from the MATES V report shows that benzene, 1,3-butadiene, formaldehyde, and acetaldehyde contribute 150-in-a-million cancer risk at sites in the basin, including the two inland sites at Rubidoux and Inland VSB. Given that the threshold of significance in the Basin is 10-in-a-million risk, it is certainly not *a priori* obvious that the proposed project passenger vehicles do not need to be analyzed, as the MJPA consultant claims. This is especially true when considered cumulatively with the impacts of other projects and roadways of the MJPA planning areas that contribute to the total excess risk.

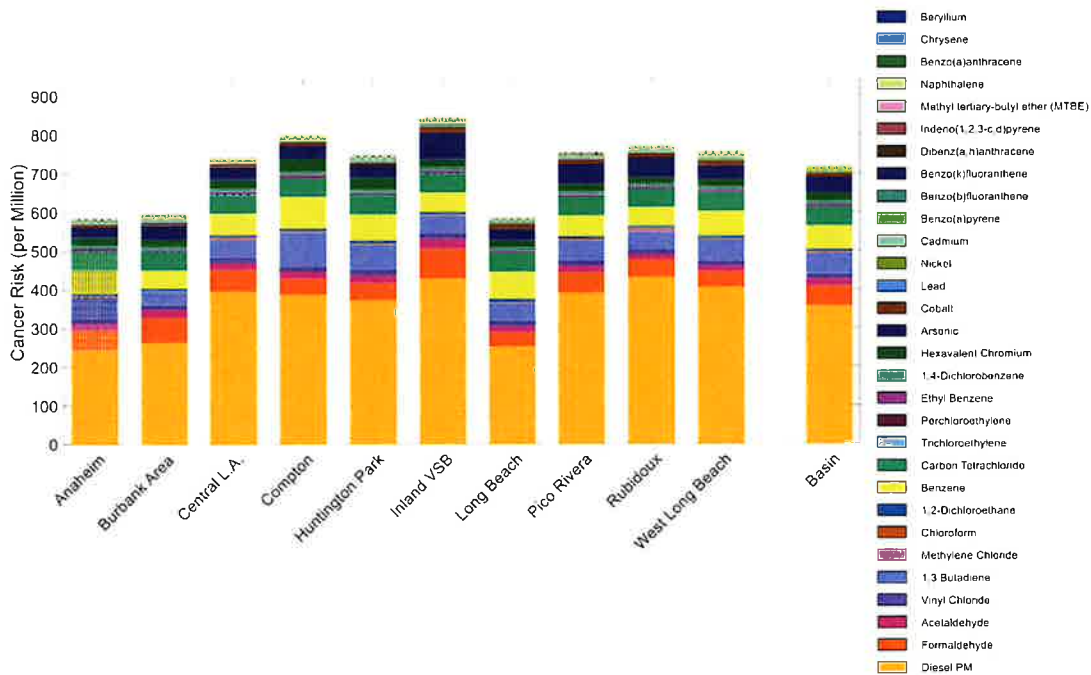


Figure 2-47 Bar charts of the cumulative cancer risks by station for MATES V. 1,2-Dibromoethane is excluded because of high uncertainty due to all measurements being below detection limit for each station. Dots are used to mark bar segments that are more uncertain due to either substitution for data that were unavailable or data for which more than 80% of measurements were below detection limit.

Figure 2-47. Cancer risk at all measurement sites for all measured pollutants in MATES V. Benzene is yellow, 1,3-butadiene is light blue, formaldehyde is dark orange, acetaldehyde is maroon.

In summary, the deliberate omission of passenger vehicle emissions from the health-risk assessment is a failure to follow the basic steps of hazard identification, dose-response assessment, exposure assessment, and risk characterization^{1, 2} as described by CARB and the US EPA. There are 33,000 passenger trips with an average trip length of over 10 miles per day and that is clearly a significant contributor to pollutant emissions of toxic air contaminants of concern. The MJPA has provided no substantive basis for excluding passenger vehicle emissions from its HRA *a priori*. Please demonstrate that the cumulative impacts of warehouse passenger and truck vehicles are below the 10-in-a-million risk level of significance.

Errata on Air Quality –

- Active ground disturbance appears to exclude unloading of rocks and graded material from ‘active disturbance’ – (Appendix C-1). Unloading rock and dirt will emit fugitive dust and is form of air quality emissions. It is ‘active disturbance.’ Given the existing inconsistency with city of Riverside and County of Riverside acre guidelines (10 acres per day) – this is additional emissions that will be generated for the MJPA relative to its member agencies.
- Appendix C-2 omits ‘off-site construction activities’ due to an unsubstantiated claim that they are short-term and intermittent in nature. There is no defined length for ‘short-term’ nor ‘intermittent,’ so it is unclear why the consultant believes that this portion of the project is negligible for exposures of the residential homes along Grove Community Dr. Moreover, it fails to include any residential homes adjacent to this construction activity as receptor locations. It simply is omitted. The cumulative impact fails to include the entirety of the project emissions in the modeling activity and is thus piecemealing this part of the project’s emissions. The Table 2-1 construction activities ‘Building Construction (Including Off-site)’ shows a time of 615 days, which is neither short-term nor intermittent. Paving is another 42 days. In its entirety, the off-site construction could be just under 22 months in duration based on the project schedule.
- Project continues to deliberately omit I-215 freeway from the project modeling domain emissions activity. There is no reason to omit the I-215 freeway as trucks will go onto the freeway. Where do trucks go, if not the freeway? The Truck arterials direct them to the freeway – that’s where they accelerate and emit the most pollution, which is not modeled because it would indicate that the HRA is underestimating the cancer risk by a factor of 100. (Boogaard et al., 2023; Craig et al., 2020; McCarthy et al., 2013, 2021; SCAQMD, 2021)
- Building A still underestimates the number of trucks per day based on the combined square footage of high-cube warehouses.

Alternatives

R-NOW members sent in three alternatives for the March JPA to consider in Form Letter H – #1 research campus, #2 a veteran’s village mixed-use residential/office/business park, and #3 a Great Park.

The March JPA rejected all these alternatives as inconsistent with project objectives.

1. The Research Campus was rejected because they equated a research campus with a ‘Children’s School’ and due to the C2 flight zoning prohibiting large gatherings on public assembly

¹ <https://ww2.arb.ca.gov/resources/documents/health-risk-assessment>

² <https://www.epa.gov/risk/human-health-risk-assessment>

(>500/acre). A research campus would be adults and would not have more than 500 people per acre or high density unless there was a large auditorium which is not mandatory.

2. The Veteran’s Village mixed-use residential/offices/business park was not considered due to
 - a. Imaginary ALUCP incompatibility – even though C1 and C2 zoning, which allows residential at 3 dwelling units/acre and 6 dwelling units/acre, respectively. There’s no incompatibility for residential mixed-use.
 - b. Imaginary General Plan zoning – the area is unzoned – it can be anything
 - c. Selective reading of the General Plan housing profile – the March JPA approved a US Vets Specific Plan amendment (SP-6 A1) in March 2024. That was all residential housing which will apply to the County RHNA deficiency. They can consider whatever they want.
3. The County Park alternative was rejected because of insufficient jobs.

Instead of any of the low-impact projects suggested by the community, the MJPA considered a ham-fisted Alternative #5 which would replace 4.3M SQ FT of warehouses with 4.2M SQ of offices – see p. 69/5,362 on the response to comments.

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

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

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

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

Biological Resources

See letters on biological resources in the area related to San Diego Tarweed (*Deinandra paniculata*), Long-spined spineflower (*Chorizanthe polygonoides var. longispina*), and the unique and undescribed natural alliance of vegetation present at the proposed site of the project. A reduction in the extent of damage to this unique ecosystem is required. **Figure 1** shows the long-spined spineflower.



Figure 1. (left) Long-spined spineflower and flat-top buckwheat at West Campus Upper Plateau. (right) San Diego tarweed at West Campus Upper Plateau.

Cumulative Impacts

As described in the responses to comments, the final list of Cumulative Projects was determined devoid of community input. Table 4-2 contains the same list of projects decided upon by March JPA, the City of Riverside, County of Riverside, and City of Moreno Valley in December, 2021, as described in Topical Response 1. Community members living adjacent to the project were not notified about the project until February 2022, after the IS/NOP comment period had closed and after the scoping agreement had been finalized. Public comment and comment letters asking for a complete list of projects in the area submitted on the Draft EIR and REIR ignored projects that are in the Figure 4-1 domain and within the described geographic scope of Table 4-1 (Regional, South Coast Air Basin) are therefore omitted from the project.

Public participation in CEQA is a 'privileged position' based on the belief that the public can make important contributions to environmental protection and based on notions of democratic decision-making. Deciding on and FINALIZING the scope of a cumulative impacts analysis before the community was notified is not consistent with CEQA. Public feedback must be considered and if the comments are reasonable, the cumulative impacts must be modified to adequately address comments. The March JPA and its consultant is claiming that the scope of projects cannot be changed as result of public feedback – which was initially provided in the form of a publicly accessible open data product in May 2022, followed by a list of projects in the DEIR public comment period submitted March 9, 2023 (I-834). Excluding projects that are beyond an arbitrary 5 mile boundary due to an NOP period that didn't notify residents fails to meet civic engagement requirements and is inconstant with the geographic scope of the air quality energy, geology, GHG, groundwater, land use and planning, population and housing, and transportation resource sections in Table 4-1.

Moreover, this response is inconsistent with the recently adopted Environmental Justice Element GP-02 policies HC 15.1, 15.3, 15.4, 15.7, 16.5, 16.8, 16.10, 16.15, 16.24, 18.7, 18.12, 22.4, and 22.5. The MJPA does not feel the need to be consistent with its brand new EJ element.

Finally, cumulative impacts assessment performed is completely inconsistent with the regional countywide scope of the jobs/population/housing analysis. See the Jobs and Housing section for more details.

Disposition and Development Agreement

- (1) The MJPA failed to follow the required appraisal procedures set out in Section 4.06 of the original Disposition and Development Agreement (DDA).
- (2) The 2022 appraisal relies on a sales comparison approach that uses no properties from Riverside county. All properties were over 58 miles from the project site in the High Desert – this is not comparable.
- (3) The MJPA removed sections requiring a Minimum Jobs Generation Target of 15 jobs/acre that were never met by Meridian West LLC based on the MJPA's own Economic Impact Analysis Report (2023).

- (4) Modifying the DDA to reduce the price for the third amendment should trigger another appraisal process to evaluate changes in the value of the property from June 2022 – appraisals are typically only dependable for 120 days.

Failure to Obtain Two Independent Appraisals to Determine Fair Market Value in 2022

Under the terms and conditions of the DDA in place in June 2022, Article 4 describes the 'Approved Participation Model Matters' and Sections 4.01 through 4.06. Key requirements include 'Compliance with the...Minimum Job Generation Target' in Section 4.03 and the required appraisal process for appraised fair market value of any asset in Section 4.06. Section 4.06 requires two appraisals to be taken for any determination of any asset – one paid for by the agency, the other by the developer. If the two appraisals differ by more than 10%, a third appraisal is required.

Section 4.06. Appraisal Process. Whenever this Agreement provides for the determination of the Appraised Fair Market Value of any asset, the following procedure shall be used (the "Appraisal Process").

- (i) Within fifteen (15) days after the demand for appraisal has been given, the parties shall each appoint one (1) appraiser. Each such appraiser shall determine the Fair Market Value of the parcel in question and complete and submit his or her written appraisal to Agency and Master Developer within sixty (60) days after the appointment of both such appraisers. If the higher appraised fair market value in such two (2) appraisals is not more than one hundred ten percent (110%) of the lower appraised fair market value, then the Appraised Fair Market Value of the Parcel shall be the average of the two (2) appraised values. If it is not, however, then the appraisers so named shall have fifteen (15) days to designate a third appraiser with similar qualifications. If the two appraisers are unable in a timely manner to agree on the third appraiser, then either LNR or Agency,

by giving prior written notice to the other party, shall have thirty (30) days to request and obtain appointment of such a qualified appraiser by applying to the Superior Court of the State of California for the County of Riverside. The third appraiser, however selected, shall be a person who has not acted in any capacity for either party.

- (ii) Neither Agency nor LNR shall advise the third appraiser of the appraised fair market value determinations delivered by the first two appraisers, and Agency and LNR shall instruct the first two appraisers not to advise the third appraiser of such determination. The third appraiser shall conduct an independent appraisal of the parcel to determine the fair market value based upon the above-enumerated factors and complete and submit his or her written appraisal to LNR and Agency within sixty (60) days after his or her appointment. In such case, the Appraised Fair Market Value for the parcel shall be the average of the two (2) of the three (3) appraised fair market values that are closest to each other. Such Appraised Fair Market Value for the parcel shall be conclusive and binding upon LNR and Agency.
- (iii) All appraisers appointed pursuant to this Section shall be licensed MAI Appraisers, or a member of the American Institute of Real Estate Appraisers or any successor thereto, or a member of the Society of Real Estate Appraisers or any successor thereto, in each case with not less than ten (10) years' experience appraising mixed use commercial and retail properties, and shall have performed appraisals of not less than three (3) commercial/industrial projects similar in nature to the Project in the five (5) years preceding the date on which the appraisal under this Agreement is to be made. Each party shall pay the cost of the appraiser selected by such party and one-half of the cost of the third appraiser, if necessary. The results of such appraisal shall be binding on Agency and LNR. LNR's cost of the appraisal shall be a Project Cost.

As a resident, I submitted four separate public records requests to the Clerk of the MJPA through the public records portal on the MJPA website. My timeline of the events in question is below.

- **Aug 3, 2022** – 1st public records request submitted – ‘Most recent appraisal information for parcels that are slotted for development as part of the West Campus Upper Plateau proposal, along with any appraiser text on the highest and best-use of the land. Additionally, if these parcels are currently undergoing appraisal as part of the EIR process or are being updated, please include any draft or information on the ongoing appraisal.’
 - **Aug 8, 2022** – Response from Clerk – ‘The requested information does not exist.’ – *In fact, the appraisal and correspondence records did exist as of June 6, 2022 as revealed in later public requests. (Email re Appraisal 6-27-22 1.pdf)*

- **Nov 15, 2022** – 2nd request – ‘Any and all appraisal information, documents, and correspondence used to determine fair market value for the property described as Option Parcel #17 in the November 9th 2022 JPC agenda, p.22 and 24. <https://marchjpa.com/wp-content/uploads/2022/11/11092022-JPC-Packet-1-1.pdf>’
 - **Nov 21, 2022** – MJPA deny release of the appraisal and associated documents based on ongoing real estate negotiations. See attached.
- **May 4, 2023** – 3rd request – ‘Any and all appraisal information, documents, and correspondence used to determine fair market value for the property described as Option Parcel #17 in the November 9th, 2022, JPC agenda, p.22 and 24.’
 - **May 15th, 2023** – received appraisal
 - **May 16th, 2023** – received three letters of correspondence between Martin and appraiser. Third request complete
- **April 11th, 2024** – 4th request – ‘Real property appraisals of any of the following parcels pertaining to the West Campus Upper Plateau that have occurred on or after July 2022 available to the March JPA. The subject is also known by all or part of the following Riverside County Assessor Parcel Numbers: 294-020-001; 297-080-001, 002, 003, 004, 005; 297-090-001, 002, 003, 008, 009 and 297-170-007. Note, I already have the June 6, 2022 appraisal from Mission Property Advisers. I'm interested in any available appraisals prepared after that.’
 - **April 15th, 2024** – ‘There is nothing new to provide, you have **all current appraisal information.**’

Assuming the public records request is accurate, the MJPA did not follow its Section 4.0.6 requirements for two independent appraisals and thus did not follow the explicit DDA protocol for assessing Fair Market Value. Failure to obtain confirmation of Fair Market Value is an indication that internal audit controls are inadequate and may be an indication of white-collar crime.

Sales Comparison Approach Includes Only Properties from the Mojave Desert

A second issue is the appraisal itself is neither validated, checked, nor a reasonable set of comparable properties. The appraisal provided by Steven Fontes of Mission Property Advisers has several irregularities that should have drawn scrutiny from the MJPA staff.

1. The appraisal only included a ‘Hypothetical Conditions’ and ‘Extraordinary Assumptions’ limited appraisal of the property value.
 - a. The Hypothetical Condition assumed it was already entitled as described in the West Campus proposed Specific Plan
 - b. The Extraordinary Assumption assumed it was not contaminated by hazardous materials
2. The appraisal omitted current and historical use of the property – it is not vacant, has 80 years of history as an Air Force Base, and is currently used for fireworks storage. It assumes ‘as if vacant’ for highest and best-use (p.30)
3. The appraisal uses a ‘Sales Comparison Approach to Value’ but obtains no properties from within Riverside County for comparison. The nearest property used for comparison is 58 miles away across a mountain range in the Mojave Desert. Location matters in real estate. It is hard to envision a case where it would be appropriate to compare solely high-desert properties to Riverside County properties for any appraisal.
4. The appraisal mistakenly states the property is owned by the Southern California Logistics Airport (p. 13) – an inexplicable error that calls into question whether this is derived as a copy of

another appraisal for a separate property at another airport which would also explain why the only comparison sales are from the Mojave Desert.

5. Finally, the comparison sales themselves have multiple irregularities, including properties that did not sell, inaccurate sale price and loan valuations, and at least one sale that was resold for many multiples of value within 1 year of the appraisal.

Minimum Jobs Generation Target Was Never Met

In addition to the deficiencies in obtaining a Fair Market Value for the West Campus Upper Plateau via which to negotiate the terms of the payment with the project application, the MJPA also claimed that the project applicant was 'substantially compliant' with the terms and conditions of the DDA in Section 6.03 which describes a "Minimum Job Generation Target" of 15 jobs per acre of industrially developed property during each 5-year period. As shown in the Economic Impact Analysis (Pan, 2023) published by the MJPA, no planning areas of the MJPA have achieved a density of 15 jobs per acre. Thus, it is not possible for Meridian West, LLC to have been 'substantially compliant' and a recalculation event should have been triggered.

The Third Amendment to the DDA Should Trigger a Reappraisal of the Property

The March JPA commission is considering amending the DDA to lower the payments required by Meridian West LLC to offset costs for developing the proposed active park included as part of the project. Any modifications to the payment schedule should be predicated on the value of the property which is being developed. The March JPA has not acquired no appraisals for the West Campus Upper Plateau since June 2022, according to the public records request.

How can one modify the value of the payment schedule based on an appraisal from 2022? Appraisals are only valid for ~120 days, especially under rapidly changing market conditions. This third amendment should be triggering an appraisal for the property to make sure that the public interest is served in getting the highest-and-best value for the land from the Developer.

Moreover, the proposed schedule of payments reduces the total value of the 250 acre developable property (excluding parks and roads, 378 acres with those components) from \$52M to \$37M. Assuming only the developable 250 acres counts towards the cost, that is a payment reduction from \$208,000/acre to \$148,000/acre. That is an absurdly low price for any property in Riverside County. If we count the entire 378 acres as the property, then Meridian West LLC is getting a sweetheart deal at a mere \$97,884/acre. I think the community would be happy to crowdsource our own funding to buy the land for that price.

It would great to meet community needs such as providing affordable housing with this cheap land rather than bulldoze community interests and gifting public funds to a private developer.

Development Agreement 21-01

The California Development Agreement Manual from the Institute for Local Self Government (2002) has a subtitle of 'Collaboration in Pursuit of Community Interests'. It is a great subtitle, indicating that a development agreement is not merely a contract, but is a means of achieving an end – community improvement.

Development Agreement DA 21-01:

Due to the scale and complexity of the proposed Project, a draft Development Agreement is proposed to vest the Project entitlements and fees, ensure financing of public improvements required by the conditions of approval, and provide certain Community Benefits. The Development Agreement is proposed between March JPA and Meridian Park West, LLC with a 15-year term and two potential 5-year extensions, and includes the following draft terms:

- **Community Park:** The parameters for the development of a Community Park are identified on page 1 of this staff report. As identified elsewhere, the developer's contribution to the Community Park would be \$30 million.
- **Fire Station:** The Developer agrees to commence construction of a three-bay fire station with ancillary accommodations, including sleeping rooms, offices, and kitchen, prior to issuance of a Certificate of Occupancy for any building constructed in the Upper Plateau after the certificates of occupancy have been issued for both Plot Plan PP 21-03 and Plot Plan PP 21-04. Developer shall complete the Fire Station within 18 months, subject to material delays and force majeure. The Riverside County Fire Department shall accept the facility upon issuance of a Notice of Completion, and Developer shall have no ongoing maintenance or liability of the Fire Station. The March JPA shall enter into a Credit and Reimbursement Agreement with the Developer to credit the Developer for any remaining development within the Meridian North and South Campus that is owned by Developer.
- The Development Agreement includes a reimbursement agreement so that future capital fire development impact fees are reimbursed to the developer who constructed the Fire Station (Meridian Park, LLC) rather than being paid to the County.
- **Truck Route Enforcement:** The developer will contribute \$200,000 toward truck route enforcement.

First, the Development Agreement DA 21-01 describes a community park and its 'parameters'. Reading the details, the DA 21-01 (1) conditions the payment of \$23.5M into a park account upon certificates of occupancy for multiple warehouses and (2) allows the MJPA or its successor-in-interest to reject the Parks Feasibility Study and simply put the \$23.5M into a fund and releases the Developer from any future liability or responsibility for completion of the park. Given the 15-25 year length of the Development Agreement, this would delay any active park from being built on the site to benefit the community. Since the FEIR claims the benefits of this park for its consistency analysis, the project FEIR would be invalidated should the feasibility study be rejected and the park not get built. The Development Agreement should be reworded to make approval of any warehouse buildings contingent on approval of the Feasibility Study and full funding/maintenance of the Park – not the other way around.

Secondly, the Development Agreement schedule is for a 15-year term with two potential 5-year extensions. That is absurd. The March JPA will sunset in 12 months and 18 days. Existing California law for cities that inherit development agreements during annexation is addressed in § 65865.3(a), which states that 'any development agreement entered into by the county prior to the effective date of the incorporation or annexation shall remain valid for the duration of the agreement, or eight years from the effective date of incorporation or annexation, whichever is earlier.' There is no established law for a transfer from a JPA to a county, which is why the County of Riverside enlisted Senator Roth and helped co-write SB 994 to transfer all authority directly from the MJPA to the County by state law. Community members opposed this abuse of authority and got the legislation stripped down to just affect LLMDs. The MJPA should not be entering into a Development agreement longer than 8 years post-sunset. It is against the spirit of the law and it is an abuse of its land-use authority, especially given the unanimous community opposition to this project.

Lastly, we note that the discretionary approvals that may be necessary as part of Project approval should consider the areas of controversy for PFAS/PFOS contamination of the site for the State and Regional Water Quality Control Board given the possibility of migration of PFAS/PFOS through the soil or discharge into unrecorded or inappropriate areas of the WSA or project area. Moreover, the California Department of Fish and Wildlife should reject any conditional approvals that do not require mitigations that require project alteration to protect the previously undescribed and rare San Diego Tarweed (*Deinandra paniculata* Herbaceous Alliance). If this is a rare and undescribed vegetation stand, all feasible mitigation measures to protect this unique landscape should be applied.

Environmental Justice

The March JPA fails to adequately implement any of the EJ element policies in this warehouse project.

- **Civic Engagement** - The March JPA has no documented support or approval from community-based organizations, EJ organizations, or environmental organizations for this project. The MJPA has not partnered with or collaborated with any of those organizations and has refused to implement any formal or informal meetings to collaborate with community on this project (HC15.1 through 15.7)
- **Health Risk Reduction** - The March JPA is considering a project that increases health risks, degrades air quality, and is incompatible with Good Neighbor Policies. HC16.1-16.26
- **Food Access Policies** – The project is warehouses – no food here.
- **Safe and Sanitary Home Policies** – The project has no housing component and actively rejected considering housing or mixed-use housing as an alternative.
- **Physical Activity Policies** – The project reduces open space amenities used for walking, hiking, biking, and observing nature, and provides a loophole so that its proposed park can be rejected by the MJPA/successor and be not built at all.
- **Public Facilities** – The project provides a recycled water tank, but omits any transit stops, degrades existing residential neighborhoods, and provides a fire station to provide services for a catchment area of warehouses.
- **Other EJ policies** – The new specific plan specifically fails to address EJ goals and explicitly omits Environmental Justice policies from consideration, ignoring HC 22.5.

Even if we just accept the EJ element at face value, this project neither included any community engagement that involved partnerships or collaboration with community groups in or around the MJPA planning area. Community organizations made hundreds of verbal and written requests for a community-advisory board which were denied. The Riverside Civil Grand Jury recommended a Community Advisory Board – the MJPA has ignored all requests and never considered a community advisory board as an agenda item.

More importantly, this project is inconsistent with reducing and eliminating pollution risks to disproportionately impacted communities. The March JPA census tract is in the 98th percentile in CalEnviroScreen4.0. It is the 99.8th percentile for warehouses in a census tract in Southern California – 7th highest out of over 3,600 census tracts based on data from Warehouse CITY v1.19. Despite this existing disproportionate impact, the MJPA commission refused to consider a warehouse moratorium, restrictions on additional industrial zoning, or any EJ policies suggested by community members when adding its EJ element. This project, with at least 4.2M SQ FT of warehouse uses proposed, is being considered via public hearing exactly 7 weeks after the EJ element was approved by the commission.

An EJ element is merely words on a page in this planning document. Somehow, every single EJ element that discusses community engagement (HC15.1 – 15.7) is consistent with ignoring community groups and members. Note, a public records request in May 2024 to the MJPA asking for a list of the CBOs that the MJPA is partnering and collaborating with has been delayed twice and has not been delivered as of June 8, 2024. There is no independent verification that any EJ group or CBO ‘partners’ with or ‘collaborates’ with the March JPA.

Good Neighbor Policies

Sensitive Receptors

The March JPA has not adopted a definition of sensitive receptors within the Executive Summary or Project Description of the FEIR. The MJPA does not have a definition of sensitive receptor within its General Plan, although it is referenced in the newly adopted EJ element.

The Air Quality section describes an SCAQMD sensitive receptor on p.4.2-3 based on a 1993 CEQA handbook, which is defined as:

*According to the SCAQMD, sensitive receptors include residences, schools, **playgrounds**, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).*

The County of Riverside sensitive receptor definition is defined in its ‘Good Neighbor’ Policy (Riverside County Board of Supervisors, 2020). In theory, this is incorporated by reference into the March JPA General Plan via the adoption of the County EJ element in GP #24-02.

*Sensitive receptors generally include residences, schools, **parks, playgrounds**, community centers, assisted living, day care centers, nursing homes, hospitals, and similar uses.*

The City of Riverside sensitive receptor definition is defined in its Good Neighbor Guidelines (City of Riverside, 2020). The definition of sensitive receptor in the Good Neighbor Guidelines is also being considered for revision in the draft Industrial guidelines circulated by City of Riverside staff on April 2, 2024. (Revised language underlined).

*...protect residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals, and other public places where residents are most likely to spend time (Sensitive Receptors). **[Current]***

*Sensitive receptor means a residential zone or use; K-12 public, private and charter school; **designated parks and open space**; adult and child day care facilities; assisted living facilities and hospitals. **[Proposed]***

Lastly, the Western Riverside Council of Governments provided their own definition of sensitive receptors in their Good Neighbor Guidelines (WRCOG, 2005). MJPA Truck Route ordinance #21-02 incorporated the ‘objectives’ of those guidelines. Sensitive receptors in the WRCOG list include **residential communities**, schools, **parks, playgrounds**, day care centers, nursing homes, hospitals, and **other public places** where residents are most likely to spend time.

Therefore, the question is which of these sensitive receptor definitions, if any, are adopted for the purposes of this FEIR? Given the competing definitions, it certainly includes residences, playgrounds, and includes parks, may include open space, and could include similar uses.

This definition is critically important, yet no consistent definition is defined for use in this FEIR, nor in the MJPA General Plan. If the County definition is most appropriate, as seen in the rationale used to most recently amend the MJPA General Plan, then it includes parks, playgrounds, and similar uses. Passive recreation open space areas are 'similar uses' to parks and playgrounds, as indicated in the County of Riverside land-use planning document on required parking spaces, where passive recreation open space and parks are included on the same line item on Title 17, section 17.188.030 on parking standards. And it is clear from the 2012 CBD Settlement Agreement, and the existing uses of the area, that this is an open space park.

parks and recreational uses:	1 space/8,000 sq. ft. of active recreational area within a park or playground		1 space/acre of passive recreational area within a park or playground
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The County of Riverside includes Parks and is consistent with inclusion of open space passive recreation areas as a sensitive receptor. The City of Riverside is considering modifying their guidelines to include the same guidance. The WRCOG guidelines includes parks and playgrounds, and other public places.

There are three discrepancies that arise from the failure to adequately consider the definition of sensitive receptors.

- 1) The proposed active park IS a sensitive receptor by WRCOG, County, and SCAQMD guidelines. It will be a sensitive receptor under City guidelines if the proposed GNG are adopted. Consistency for the adjacent parcels has not been done to ensure that
 - a. Any buildings within 200 feet of the proposed park are less than 10,000 SQ FT (city guidelines) – currently failing
 - b. Any buildings between 200 feet and 800 feet of the proposed park are less than 100,000 SQ FT – currently failing
 - c. No industrial parcels are within 1000 feet of the proposed park. – currently failing
 - d. No truck routes are within 1000 feet of the proposed park. – currently failing
- 2) The open space passive recreation areas are likely sensitive receptors (County, WRCOG, proposed City).
 - a. Any buildings within 200 feet of the open space passive recreation areas are less than 10,000 SQ FT (city guidelines) – currently failing
 - b. Any buildings between 200 feet and 800 feet of the open space passive recreation areas are less than 100,000 SQ FT – currently failing
 - c. No industrial parcels are within 1000 feet of the open space passive recreation areas. – currently failing
 - d. No truck routes are within 1000 feet of the open space passive recreation areas. – currently failing

- 3) The proposed City Good Neighbor Guidelines will prohibit warehouses larger than 400,000 SQ FT within 1,500 feet of sensitive receptors. All high-cube warehouses currently proposed for this project are inconsistent with this new guidance.
- 4) The proposed City Good Neighbor Guidelines will prohibit clusters of warehouses with FAR guidelines that are more than 2x-3x the total size of the maximum warehouse within the size distance bin. The entirety of the project will have at least 3.0M SQ FT of warehouses beyond the proposed limit.

Please check for consistency with all GNG policies.

Hazards and Hazardous Materials

The March JPA conceded in their responses that (1) PFOA/PFOS/PFAS compounds are known to have been disposed on sites that intersect with the West Campus areas of ground disturbance but does not believe it is necessary to evaluate for that along those areas of intersection or in areas of unexploded munitions; this is negligence.

The March JPA concedes that fireworks have been stored in WSA igloos for years and did not assess any bunkers with wipe sampling or other methods to determine if perchlorate had leached or escaped. Perchlorate is also sometimes used in munitions including rockets, it is unclear if any perchlorate testing has been done at any time in the WSA.

The March JPA concedes that radionuclide sampling was required prior to the transfer of the bunkers due to the storage of nuclear weapons at the site. We have asked for additional testing on the soils that will be disturbed by the grading activities and the MJPA does not believe it is necessary .

The March area is alleged to have an underground passage 'or railroad' that connects underneath the 215 Freeway to the main portion of the base. That passage or railroad is not discussed in any of the grading or hazards maps and if it was used to transport unconventional weapons or will be disturbed by the grading and soil disturbance, we want to know if it has been evaluated for radionuclides and other contaminants.

Lastly, the MJPA Hazards comments states that the Vista Environmental Laboratory met 'in-house' standards for QA/QC. EPA standards require sample recoveries between 70%-130% for a sample to be considered quantitative. Vista recoveries were often below 50% and sometimes below 25%. That will never stand up to chemical scrutiny for proper environmental testing – all those samples need to be retested for every sample where in-house QA/QC procedure did not meet EPA sampling requirements for USEPA Method 8000. Failure to follow adequate QA/QC procedures invalidates the conclusion that samples were below PQL – it cannot be substantiated without adequate in-house sample recoveries.

Jobs, Population, and Housing

The proposed project is inconsistent with the SCAG Regional Transportation Plan/Sustainable Communities Strategy 2020-2045 plan (Connect SoCal 2020) in both the jobs and housing element.

- The total number of industrial jobs projected for Riverside County based on the Connect SoCal RTP/SCS for the 2020-2045 has already been exceeded by the existing warehouses built from 2018-2024.
 - This is an unanticipated RTP and SCS impacts that will induce higher VMT, higher GHG emissions, and land-use impacts.

- The acreage of approved warehouses in Riverside County will generate approximately 3 times more jobs than anticipated in Connect SoCal 2020.
- The acreage of warehouses under CEQA review will add another 2 times more jobs than anticipated in Connect SoCal 2020.
- There is 6x more warehouses approved than planned for in Connect SoCal 2020 as of 2024 – that is a drastic regional difference that completely invalidates the RTP/SCS jobs projections for this sector.
- The County of Riverside is not in compliance with the 6th Cycle Final RHNA. As the MJPA consistently notes in its EJ element and climate adaptation plan sections, the MJPA defaults to County policies when there is uncertainty on an issue. Therefore, the 250 acres of developable land should be considered for residential zoning under the County obligations for 40,000 additional units of housing by 2029, which it is not on track to meet.
 - The project could, under a mixed-use development scenario such as the Veteran’s Village, provide at least 600 units of housing if kept in the C2 flight zone area at 6 dwelling units/acre to be consistent with ALUCP guidelines. This would require 100 acres of the 250 developable acres – with the remaining 150 developable acres being split between office park, mixed-use, and retail (not mixed-use business park with the special warehouse exemption).
 - This project alternative would have lower VMT, lower air quality impacts, lower noise impacts, less land-use incompatibility, and would meet County requirements to consider housing.
- This land should be treated as surplus land for housing based on Surplus Land Act §§54220-54234

The Western Riverside Council of Governments recently distributed their draft 2024 TUMF Nexus study (WRCOG, 2024). In it, they used the Connect SoCal 2020 estimates of industrial jobs in Riverside County to estimate the square footage of industrial development from 2018-2045. Table 6.2 shows the projected change in square feet of all industrial uses in Western Riverside County from 2018-2045, estimated at 61.5M Gross SQ FT.

Table 6.2 - Fee Calculation for Non-Residential Share

Non-Residential Sector	Employment Change	Trip Generation Rate per Employee	Trip Change	Percentage of Trip Change	Change in Square Feet of Gross Floor Area	Fee/SF
Industrial	76,581	0.6	45,949	15.1%	61,489,565	\$2.26
Retail	13,115	1.8	23,607	7.8%	6,557,500	\$10.88
Service	174,255	1.2	209,106	68.8%	66,735,957	\$9.47
Government/Public	12,071	2.1	25,349	8.3%	3,420,665	\$22.40
Total	276,022		304,011	100.0%	138,203,688	

Employment Change data based on SCAG 2020 RTP/SCS; Trip Generation based on ITE (2021); Change in Square Feet conversion factor based on Cordoba (1990), OCTA (2001), SCAG (2001) and County of Riverside (2015).

Using Warehouse CITY v1.19a, we can clearly demonstrate that is a gross underestimate (McCarthy and Phillips, 2023). Since 2018, there have been 91M SQ FT of warehouses built in Riverside County, there

are 117.8M SQ FT that have been approved but aren't built yet, and there is another 148.8M SQ FT under CEQA review, including the West Campus Upper Plateau. This does not include the 11M SQ FT of warehouses added from May and early June, including the Beaumont Heights project (5.7M SQ FT), Mesa Verde Specific Plan in Calimesa (4.4M SQ FT), Oasis at Indio (1.8M SQ FT), and Hemet Logistics Center (1.1M SQ FT).

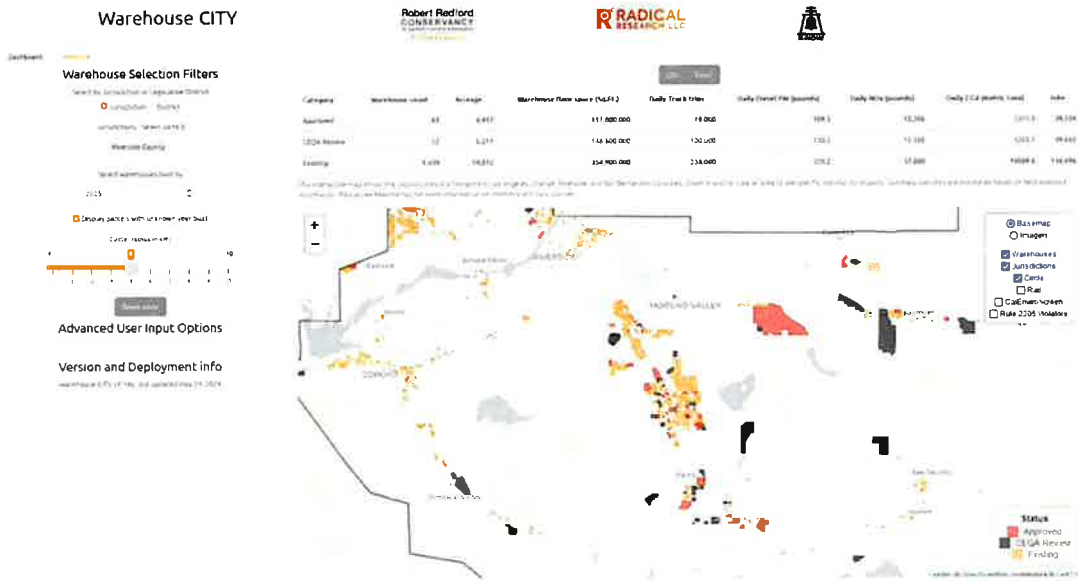


Figure 2. Warehouse CITY v1.19a map of existing, approved, and under CEQA review warehouses projects in Western Riverside County (April 2024).

The point of this is that there is a glut of warehouse projects and a glut of industrial zoning, but these projects are removing housing opportunities from the region. Our housing and zoning are out of balance, based on the projected changes by the inaccurate Connect SoCal 2020 plan – we’ve built 150% of the warehouses expected in 27 years in 6 years. And we have plans to build 600% in the next 5-10 years, while we’re in a housing and homelessness crisis.

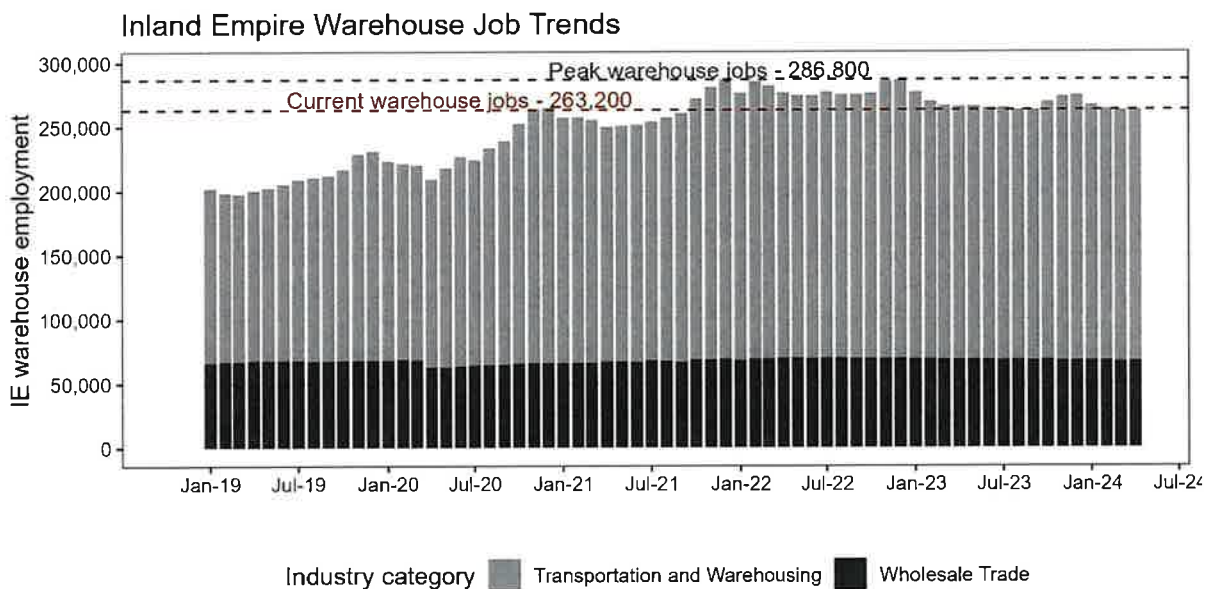
In other words, this project is inconsistent with the sustainable communities strategy because we’ve already far exceeded the projected growth in industrial jobs.

Errata on Jobs/Pop/Housing

- The estimated jobs report now includes ancillary jobs – specifically the truck drivers that are attracted to the warehouses.
 - We note that it is unlikely that most short-haul and last-mile truck drivers will be only doing one delivery a day, especially since the trucks category includes courier vehicles like amazon vans and UPS brown trucks; these types of trucks tend to make multiple trips daily.
 - Secondly, if ancillary jobs for independent contractors is the standard of employment, then residential a large number of ancillary jobs – delivery drivers, rideshare drivers, gardeners, childcare, pool technicians, independent construction workers, garbage collectors, and teachers all serve residential communities and could be considered ‘ancillary’ employment in the same way that an independent truck driver, who delivers

at least one load a day to the warehouse is an ‘employee’. We would like the MJPA to reconsider what a job providing service is if ancillary employees count.

- Despite the continuing boom in warehouse construction in the Inland Empire, warehouse jobs in the Wholesale Trade and Warehousing and Transportation NAICS categories have been in decline since peaking in November 2021. Thus, the claim that building more warehousing creates jobs is simply not based right now. See **Figure 3** for trends in IE warehouse jobs since 2019 based on CA EDD LMI data for the Riverside Metro area. We’re currently down 9% from the peak (25,600 jobs lost) over the last 30 months. Thus, the job claims are unsubstantiated.
- The Topical Response on jobs claims that CalEnviroScreen4.0 shows unemployment rates indicate a need for warehouse jobs based on TR6-1. CalEnviroScreen4.0 uses unemployment rates for the 2015-2019 census period (OEHHA, 2021), which is not applicable in 2024 after the construction of 30M SQ FT of warehouses along 215/60 corridor.
- Warehouse vacancy rates are up from 1.4% in 2021 when the project was proposed, to well over 6% in the 1st quarter of 2024. Multiple industrial real estate reports (Colliers, Avison Young, Lee & Associates) have come out stating substantial vacancy rate increases and available sublease warehouses at decade highs. Rents are declining and there is at least 20M SQ FT of warehouses under construction and over 100M SQ FT of approved warehouses not yet built, including the entirety of the World Logistics Center. Why do we need to approve more now?
- The response about warehouse jobs paying insufficiently to afford housing was answered with a table displaying that 4 out of the 5 zip codes surrounding the MJPA, and the zip code of the MJPA zip code of 92518 – were not affordable for the median warehouse and wholesale trade workers. Only one out of six zip codes was affordable. This analysis did not look at the total number of warehouse jobs in those zip codes, or whether there was a surplus of low-paying warehouse jobs in a high-rent, high-house price area. We appreciate Table TR6-2 confirming our views that warehouse jobs are low-paying and insufficient to prosper from.



Data from CA EDD Labor Market Info - www.labormarketinfo.edd.ca.gov

Figure 3. Monthly warehouse job counts in the Inland Empire metropolitan area from 2019. Warehouse jobs are down 25,600 from the peak – about a 9% decline since November 2021.

Park

The March JPA entered into the 2003 CAREE/CCA EJ Settlement Agreement and agreed to build a 60-acre park, starting with 48 acres and expandible to the full 60 acres. The FEIR relies upon that park to make multiple claims against the land use policies, including public amenities, community benefits, consistency with environmental justice, and resource management. Unfortunately, as discussed in the Development Agreement section, there are a series of cascading contingencies required for the Park to be developed – and the active park is not a guaranteed outcome based on the language.

- The Developer is required to fund and lead a parks feasibility study and complete it 6 months and no later than June 30, 2025
- The Park Feasibility Study can be accepted or rejected by the MJPA/successor-in-interest.
 - If accepted, the Developer must fund a \$23.5M Park fund account if (1) the entitlements for the Park are finalized or (2) three occupancy permits for warehouses are granted.
 - If rejected by the MJPA/successor-in-interest, the Park fee of \$23.5M shall go into a park fund within 1 year of occupancy of a third warehouse but the developer shall have no further liability or responsibility for completion of the park.

This second option, to absolve the Developer of any park responsibility and to give them a minimum of 15 years to implement the project, provides a Heavy-Duty Truck sized loophole to drive through. The developer can simply build two warehouses and then not have to pay a penny back to the MJPA, nor build a park. If they build three warehouses, the Developer does have to pay \$8.5M of its own money, and \$15M of taxpayer money, but the park can't get built until after the Development Agreement ends – no earlier than 2039.

This project is holding the park hostage to warehouse development, which I interpret as a modification of the 2003 CAREE/CCA EJ Settlement Agreement that doesn't include the agreement of all parties. Good luck with this Development Agreement!

Transportation

Project Table 4.15-1 provides the Project Trip Generation Summary. The Building B, Building C, and Remaining Industrial: High-Cube buildings were 1.25M SQ FT, 587k SQ FT, and 725k SQ FT, respectively. All of them were assigned a 'High-Cube Fulfilment' trip rate, which is not a recognized category of land-use in the ITE 11th Trip Generation Manual 2021. There are five categories of high-cube warehouses as shown in Table 1.

Table 1. ITE 11th edition weekday average trip rates and truck trip rates, as well as the trip rate used for the FEIR.

ITE Land use code	Trip rate	Truck rate
(154) High-Cube Transload and Short-Term Storage Warehouse	1.4	0.22
(155) High-cube Fulfilment Center Warehouse (non-sort)	1.81	0.23
(155) High-cube Fulfilment Center Warehouse (sort)	6.44	0.19
(156) High-Cube Parcel Hub Warehouse	4.63	0.58

(157) High-Cube Cold Storage	2.12	0.75
FEIR Trip Rate used in Table 4.15-1	2.13	0.389

The project high-cube fulfilment trip rates have higher truck trip rates than transload facilities, non-sort fulfilment centers, and sort fulfilment centers. They are lower than Parcel Hub warehouses. In contrast, the passenger trip rate is lower than the rates for parcel hubs and sort fulfilment warehouses, by a significant amount. Given the speculative nature of the project and the unidentified future tenants for a high-cube fulfilment center, the worst-case scenario for the project should be modeled for GHG and transportation impacts. If any of the high-cube fulfilment centers are parcel hub, the expected number of passenger and truck trip rates would significantly increase, thus rendering the FEIR an underestimate. If any of the high-cube fulfilment centers are (sort) last-mile delivery warehouses, the number of passenger trips would be significantly underestimated.

As a result, the estimate of total project trip rates is not conservative and may be underestimating the number of passenger trips by as much 11,000 daily passenger trips and may underestimate truck trip rates by as much as 520 daily truck trips.

Unstable Project Description

The FEIR continues its unstable heritage, with multiple versions of maps and text descriptions of the project that are inconsistent across the FEIR and its final technical appendices. As a result of these unstable project descriptions it is unclear exactly what the entirety of the project action under consideration is.

I incorporate by reference previous letters on the Draft EIR (I-832) and REIR (RI-254). The inconsistencies have not been fully addressed in the FEIR and its associated technical appendices and thus remain open questions for what the entirety of the project action entails.

The Agendized description for the traffic mitigation fee switches between \$200,000 (p.145, 894) and \$100,000 in multiple places (p.160, 299, 813) – the FEIR routinely mentioned \$100,000. Which is it?

Project Site doesn't include fire station, off-site construction, or road work. The FEIR adds multiple new components not mentioned in previous versions of the EIR and REIR that are not adequately evaluated, most specifically the development agreement contributions for the park, the timing and cost of the park feasibility study, and the new definitions for conformity to good neighbor guidelines listed in the topical response, given the lack of MJPA definition for what a 'sensitive receptor' is.

Development Agreement details have changed from the FEIR to the agendized motion.

VMT (Vehicle Miles Travelled)

The project excludes over 85% of the VMT from the project when calculating the VMT used to demonstrate conformity with CEQA requirements for transportation planning. As described in both the air quality emissions and GHG sections, the average trip length for passenger vehicles was 16.6 miles/trip for retail uses and 20.27 miles for business park and high-cube warehouse uses. For trucks, the average trip length in CalEEMod was 32.03 miles (p.4.2-26). These same trip lengths were used to generate GHG emissions of CO₂e in Section 4.7 (p.4.7-30).

Therefore, one would expect that the VMT from those analyses would be applied to the transportation VMT analysis as well, since the VMT from project trips is the thing that causes over 80% of project GHG and air quality emissions. As noted, VMT calculations are required under CEQA Section 15064.3. This only includes 'passenger' or light-duty vehicles (GVWR below 8,500 lbs) and does not include heavy-duty trucks (light, medium, or heavy). As described in the project trip generation Table 4.15-1, passenger cars are the light-duty vehicles, trucks are all the other heavier project vehicles.

Table 1 shows the trips per land use, as transcribed from Table 4.15-1 and the CalEEMod trip lengths – VMT is calculated trip length*number of trips.

Table 1. Weekday passenger trips and passenger VMT calculated using CalEEMod average trip lengths described in the air quality and GHG emissions sections of the FEIR. Retail mixed-use is shown in light blue to indicate that

Weekday	Weekday Daily Passenger Trips	Trip length passenger (mi/trip) (p.4.2-26)	Weekday daily VMT
Building B: High-Cube Fulfillment	2,188	20.27	44,351
Building C: High-Cube Fulfillment	1,028	20.27	20,838
High-cube Cold Storage	686	20.27	13,905
High-Cube Fulfillment	1,270	20.27	25,743
Business Park Office 324k	3,228	20.27	65,432
Business Park Office 60k	744	20.27	15,081
Business Park Warehouse 896k	10,640	20.27	215,673
Mixed Use Office 144.83k	1,602	20.27	32,473
Mixed Use Warehouse 338k	4,012	20.27	81,323
Retail Mixed use 160.9k	6,518	16.6	108,199
Park	2,200	16.6	36,520
Total Trips	33,260	Total VMT	659,536
Total non-Retail , non-Park trips	24,542	Non-Retail, non-park VMT	514,817

The threshold of significance identified on p. 4.15-20 of the FEIR is a VMT per employee of 25.47 VMT.

Table 4.15-5 indicates the VMT for the used to compare to the significance threshold for the project and clearly shows that they only estimate 58,874 VMT for 2,340 non-retail employees (not updated to new jobs estimate, unstable FEIR). These numbers are inconsistent with the number of non-retail employees assumed for the project and inconsistent with the VMT per use as described in the Air Quality and GHG emissions section. Reading closely, it turns out the methodology used for VMT consistency only include what is known as a home-based-work trip, which are origins and destinations for trips that start at home and end at work, or vice versa. In this project's case, that only accounts for 4,680 of the 26,742 trips per day.

Table 4.15-5. Non-Retail VMT per Employee

	Project Non-Retail
VMT ¹	58,874
Non-Retail Employment ²	2,340
VMT per Employee ³	24.12 ⁴

Source: Appendix N-1

Note:

- ¹ Includes only the Home-based work VMT generated by the non-retail employees
- ² Non-retail employment is calculated by adding employees estimated for Industrial and Business Park uses and as shown in Table 4.15-3.
- ³ VMT per Employee is a measure of all auto trips between home and work and does not include heavy duty truck trips or freight, which is consistent with OPR guidance.
- ⁴ VMT per employee was calculated by interpolating the value of the base year 2018 (i.e., 26.11 VMT per employee) and the cumulative year 2045 (i.e., 12.63 VMT per employee), which estimated to be 24.12 for the year 2022.

Table 2 shows my estimate of the VMT per employee based on the CalEEMod trip lengths used in the Air Quality and GHG emissions sections; these numbers are consistent with the GHG emissions estimates required to generate 78,376 Mg annual CO₂e calculated in Section 4.7 at a rate of approximately 400 g/mile. The project applicant claims that home-based-work VMT is consistent with WRCOG guidelines, but the appropriate guidelines to use for consistency are not the WRCOG guidelines by the County of Riverside Guidelines, as based on the Climate Action Plan and Environmental Justice Element adoption framework. The County of Riverside Transportation Analysis Guidelines for Level of Service and VMT (2020) suggest that countywide average VMT or net increase in total VMT should be used to justify that the finding of less than significant impact. It also specifically states that the 'Other Employment' land use, which is neither Residential, Office, or Retail, requires a threshold of 14.2 Work VMT/Employee, as shown in Figure 6 from the County guidance. This project has **10 times** that amount, with over 150 miles travelled daily, per employee. That is only way to account for the 26,000 trips for non-retail VMT. Note, excluding

Table 2. Project VMT based on bottom-up calculation of VMT per land-use (Table 1) and average trip length (CalEEMod) compared to random home-based-work only VMT analysis.

	Project Non-Retail (Table 4-15-5)	Project Non-Retail – non-park Passenger trips ^a
VMT	58,874	514,817
Employment	2,340	3,622
VMT per employee	24.1	142.1^a

- a) Park and retail uses removed from VMT - internal capture not removed but would change final VMT per non-retail by less than 2%.

Figure 6 – VMT Threshold of Significance

Land Use	VMT Threshold	Basis
Residential	15.2 VMT/capita	Existing county-wide average VMT per capita.
Office	14.2 Work VMT/employee	Existing county-wide average Work VMT per employee
Retail	Net regional change	Using the county as the basis or other area determined appropriate by the Transportation Department
Other Employment	14.2 Work VMT/employee	Existing county-wide average Work VMT per employee for similar land uses
Other Customer	Net regional change	Using the county as the basis or other area determined appropriate by the Transportation Department

Transportation planners from the City of Riverside specifically commented on the inadequacy of the VMT analysis in the Draft EIR phase – see comments A-9.17 and A9.18

Finally, I note that properly accounting for VMT would change the resulting analysis of the more impactful project for the alternatives analysis, resulting in an all commercial/retail scenario Alternative 5, being less impactful than this project.

Errata

- **Section 2.3.3** – Incorporation by reference of planning documents General Plan, Master EIR, and Airport Land Use Compatibility Plan and ‘other references’ are not available for download at the specified link. <https://marchjpa.com/mjpa-meridian-west-campus/>. It is therefore not clear which versions of those documents may be referenced from within the MJPA website.
- **Section 2.3.4** – NOP scoping period occurred during an unusual pandemic period and community was not notified of the project (via email, mailers, public postings in the community adjacent to the project, signage on the project property). It also did not incorporate any *post-hoc* EJ civic engagement policies (adopted April, 2024) due to existing deficiency in MJPA General Plan, thus failing to engage in early outreach during the NOP period. The City of Riverside also failed to communicate with community stakeholders and failed to incorporate via its *post-hoc* but under consideration Civic Engagement toolkit for projects.
- **Appendix C-2 HRA** – Table 2-4 still uses the non-conservative assumption that Building A 1.25M SQ FT of warehouses will have 40% fewer dock doors and 40% fewer truck trips on-site than Bldg. B – while being only 4% smaller. This doesn’t match vehicle-trip emissions rates and is speculative, given that there are no existing building plans for this parcel. Truck trip and dock doors should be, at minimum, within 5% of Bldg. B to be conservative based simply on allowed FAR ratios and ITE 11th edition trip rates.
- **Appendix C-2 HRA** – Exhibit 2-A – Why are off-site construction activity not included in model distances? For example, R7 is closer to off-site construction emissions.
- **Appendix C-2 Exhibit 2-C** – This still excludes the 215 freeway which is the largest source of emissions and is within the modeling domain. It is a truck route. It makes ZERO sense to exclude the freeway but include Cactus Avenue down to Graham St or include Sycamore Canyon down Eastridge, but not show any trucks entering or exiting the 215 freeway on this map, or even taking the on-ramps/off-ramps. This is absurdly realistic – 95% of trucks are going to get on the

215 based on your own transportation modeling section, yet you omit that for the HRA and avoid mentioning the primary freeway completely.

- **RI-254.105** – This comment states that I have made *‘inaccurate assumption that the 500,000 SQ FT of cold storage warehouse and 725,600 SQ FT of high-cube fulfillment center warehouse would be two separate buildings on the remaining Industrial Parcel.’* The Project description list four high-cube warehouses as specified on p. 3-5. Since Building B and Building C have site plans and tentative parcel maps, there is no other place that the other 1.25M SQ FT of high-cube warehouses can go but Parcel A to yield a total 3.1M SQ FT of warehouses in the industrial parcels. That’s the planning assumption.
 - Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
 - Building C – 587,000 SF of high-cube fulfillment center warehouse use
 - Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
 - Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- **Jobs** - The original claim was 2,600 employees, but the new claim based on water usage and an assumption that there will be one truck driver job generated per each daily truck trip pair (origin-destination and back). This of course assumes that the average truck driver will have only one delivery and pick-up per day and will drive an average of 64.06 miles daily – noting that the trucks category includes courier vehicles like amazon delivery vans and UPS parcel trucks.
- **A-10.5** – The March JPA contracts with the County Sheriff’s Office for 40 hours of patrols PER YEAR, not per week. Only off by a factor of 50. And \$100,000 will pay for approximately 250 hours of additional patrol at \$400/hr for a commercial enforcement office on overtime, so a little over 6 weeks of enforcement for a project that will impact our community for 30 years.
- **Automation** – The MJPA asserts that it is *‘speculative’* to assume future automation, despite multiple decades of improvement in warehouse automation and substantiated research from local experts such as Prof. Johannes Moenius describing a lower-worker density of warehouses. Assuming a baseline of more automated warehouses is less speculative than assuming that warehouses will have the same levels of automation as today. Moreover, it is no less speculative that the speculative warehouses themselves assuming tenancy and warehouse type when planning a project without disclosing the potential future tenants. The MJPA cannot simply assert that their jobs numbers in 2035 will be unaffected by trends in automation and autonomous vehicles when that is highly likely to occur.

Conclusion

I spent a lot of time, upwards of 50 hours, trying to read the responses to comments, the FEIR, and the agenda. It is simply too much to deal with in 10 days. No human can deal with 7,500+ pages of response to comments, a 1,200 page EIR, a 1,700 page agenda, and the updated appendices that were dropped on the public and elected officials with exactly the minimum amount of required time by law for review.

This is a wave of technocratic text. It is unresponsive and lacking in substance. It does not engage with the core issues of too many warehouses encroaching residential communities in an area with the worst air quality in the county in a 98th percentile Environmental Justice Census Tract. It’s all there, a microcosm of all the issues in Riverside County wrapped up in one garbage project. It’s emblematic of a serious lack of leadership in the Cities and County. I will pursue democratic and community-centered solutions to this problem with persistence.

Mike McCarthy, PhD

Riverside Neighbors Opposing Warehouses

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Cindy Camargo

From: Jamie Hall <jamie.hall@channellawgroup.com>
Sent: Tuesday, June 11, 2024 12:13 PM
To: Cindy Camargo; Dan Fairbanks
Cc: Veronica Lebron
Subject: Final EIR for the West March Upper Plateau Project (SCH#2021110304)
Attachments: CAREE comment letter 061124 copy.pdf

This firm represents Community Alliance for Riverside's Economy and Environment ("CAREE"). As you should know, the March Joint Powers Authority ("JPA") entered into a settlement agreement with CAREE on September 18, 2023. This Agreement resolved a lawsuit that was brought under the California Environmental Quality Act challenging the JPA's approval of General Plan Amendment 02-01, Specific Plan Amendment 02-01, Tentative Tract Map 30857, and MJPA's certification of the March Business Center Final Focused Environmental Impact Report in February of 2003 for the development of the 1,290-acre March Business Center.

The JPA has proposed to fund the creation of the park by approving the West March Upper Plateau Project and requiring the developer of that project to pay millions of dollars to the JPA. CAREE does not support the West March Upper Plateau Project and objects to the JPA's attempt to tether compliance with the settlement agreement to the approval of this highly impactful project. As explained in the attached letter, the JPA has an independent obligation to comply with the terms of the settlement agreement with CAREE. My client should not be forced to make a Sophie's choice – development of the West March Upper Plateau Project or fulfillment of the settlement agreement.

Please confirm receipt of this letter and ensure it is included in the Administrative Record.

Jamie T. Hall
Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211
Main Number: (310) 347-0050
Direct: (310) 982-1760
Fax: (323) 723-3960
Email: jamie.hall@channellawgroup.com
Website: www.channellawgroup.com

* To Book a Meeting with Me Via Zoom, Visit [Calendly](#)

****NOTICE****

I receive many e-mails on a daily basis and am unable to respond to all of them despite my best efforts. If you have sent me an e-mail that requires my attention and I have not responded, it may have been overlooked. I ask that you contact my paralegal, Veronica Lebron, at paralegal@channellawgroup.com. She will ensure your e-mail is elevated and a response received. Thank you for your patience and understanding.

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jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

June 11, 2024

VIA ELECTRONIC MAIL

Commission of the March Joint Powers Authority ("JPA"), including:

Ed Delgado, Chair
Michael Vargas, Vice Chair
Chuck Conder, Member
Rita Rogers, Member
Kevin Jeffries, Member
Jim Perry, Member
Dr. Yxstian Gutierrez, Member
Ulises Cabrera, Member

Submitted to:

Cindy Camargo, Clerk - camargo@marchjpa.com
Dan Fairbanks, Planning Director - Fairbanks@marchjpa.com
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: Final EIR for the West March Upper Plateau Project (SCH#2021110304)

Dear Chairman Delgado, Members of the Commission of the March Joint Powers Authority, and Planning Director Fairbanks:

This firm represents Community Alliance for Riverside's Economy and Environment ("CAREE"). As you should know, the March Joint Powers Authority ("JPA") entered into a settlement agreement with CAREE on September 18, 2023. This Agreement resolved a lawsuit that was brought under the California Environmental Quality Act challenging the JPA's approval of General Plan Amendment 02-01, Specific Plan Amendment 02-01, Tentative Tract Map 30857, and MIPA's certification of the March Business Center Final Focused Environmental Impact Report in February of 2003 for the development of the 1,290-acre March Business Center.

Section 2 of the Agreement required the MJPA to “provide public amenities.” Section 2.6.1 states: “March JPA shall provide for active recreation in the form of a community park. The park is to consist of 48-acres initially with potential expansion to 60-acres (“Park”).” Section 2.6.2 states: “Specific use of the Park shall be for softball, soccer or football fields for youth or adult recreation or other appropriate uses as determined through a parks feasibility study.”

Over 20 years has passed since the Agreement has been executed and the park with the specific uses have yet to be developed. Additionally, Section 2.6.3 of the Agreement required the JPA to provide a site for a Riverside County Fire Station and Section 2.6.4 required the JPA to provide a site for a City of Riverside Police Substation. The JPA has not provided either site.

The JPA has proposed to fund the creation of the park by approving the West March Upper Plateau Project and requiring the developer of that project to pay millions of dollars to the JPA. CAREE does not support the West March Upper Plateau Project and objects to the JPA’s attempt to tether compliance with the settlement agreement to the approval of this highly impactful project. The JPA has an independent obligation to comply with the terms of the settlement agreement with CAREE. My client should not be forced to make a Sophie’s choice – development of the West March Upper Plateau Project or fulfillment of the settlement agreement.

In any event, the EIR for the West March Upper Plateau Project contains significant defects as noted by many other commenters. These must be corrected and the EIR recirculated pursuant to CEQA Guidelines Section 15088.5(a)(1), (2) and (4). Moreover, the West March Upper Plateau Project as proposed cannot be approved given that there is a feasible alternative which reduces impacts.

Please keep this office on the list of interested persons to receive timely advance notice of all hearings, votes and determinations related to the West March Upper Plateau Project, its DEIR and requested entitlements. Pursuant to Public Resources Code Section 21167(f), please provide us with a copy of each and every Notice of Determination issued in connection with the Project.

Sincerely,



Jamie T. Hall

Cindy Camargo

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Tuesday, June 11, 2024 11:55 AM
To: Clerk; Dan Fairbanks
Subject: comment on FEIR for SCH 2021110304

Mr. Fairbanks, Ms. Camargo,

Please see the email below as a public comment on record for the FEIR of the West Campus Upper Plateau.

Mike McCarthy
RNOW

From: Michael McCarthy
Sent: Monday, June 10, 2024 9:28 PM
To: district1@rivco.org; district5@rivco.org; jerry@riversideca.gov; cconder@riversideca.gov; mayor@moval.org; Michael Vargas <mayor@cityofperris.org>; rrogers@cityofperris.org; edd@moval.org
Cc: Jennifer Larratt-Smith <jlarrattsmith@gmail.com>; jsydor@yahoo.com; aesilva4@earthlink.net
Subject: A modest proposition that a Development Agreement should promote community interests and not gift the developer with public funds

Good evening March JPA commissioners,

The Development Agreement #21-01 on p.145 of the Agenda is a masterful spin job, promising benefits to accrue to the community. Unfortunately, it is smoke and mirrors, and it is the taxpayer footing the bill.

1. The community park is supposedly getting \$30M from the Developer. The real number is \$9M from the Developer, \$15M from the taxpayer in the form of land credits, and a \$6M bogus credit for work already agreed to.
 - a. A \$500k feasibility study - True
 - b. \$6M for grading the parcel – False – this is required under the terms of the original 2004 Riverside LNR Development Agreement Section 3.1.5.4. Can't take credit for doing something agreed to under the terms of a 20 year old contract. See image below from the August 2023 TAC meeting.
 - c. \$23.5M for active park contributions – False – Only **\$8.5M** comes from the Developer – the other \$15M comes about by lowering the purchase price of the property in the 3rd Amendment to the DDA – that's taxpayer land and therefore taxpayer money, not a community benefit from the developer.
2. Fire Station – there's a required fire station on the North Campus built for **free** – what a deal!
 - a. What's this about a credit reimbursement agreement? Page 830 (N) –
 - i. The Developer gets all fire development impact fees and criminal justice public facilities development impact fees from all MJPA properties? Is there a time limit on this or is this in perpetuity?
 - ii. The Developer gets unspecified 'credits' for any remaining developments within the North and South Campus? How much is that worth exactly?

- iii. Why isn't there a specified value associated with how much a fire station costs and how much this deal pays the developer up front and over time?
 - b. Are the taxpayers getting a benefit here or is the Developer getting a permanent future income stream out of this?
- 3. Truck Route Enforcement – Nice \$200k for truck route enforcement over two years (p.145)
 - a. Oh wait, there's a whole bunch of places in here where it says \$100k (p.160, 299, 813).
 - b. Is it \$100k or \$200k? Either way, that's either 250 hours or 500 hours of commercial enforcement – about a month or two months of time at \$400/hr for a sheriff on OT. Not sure what happens after that dries up.
- 4. Also, you are modifying a price of a property on the DDA without getting a new appraisal – that is negligence.
 - a. The 2022 appraisal used a sales comparison approach that had no properties within Riverside County as comps.
 - b. The DDA Section 4.06 says the MIPA requires two appraisals to determine Fair Market Value – but you only got one. That appraisal is two years old and invalid after 120 days.
 - c. The Development Agreement allows the DDA to be lowered more if the park costs more than \$23.5M, when the current price (\$37M) of the 378 acres is under \$100k an acre.
 - i. County Parks said the park would likely cost \$30-50M and \$500k in annual maintenance fees.
 - ii. City of Riverside Parks estimated a cost of \$27/sq ft - \$56M for a 48-acre park.

The 'Community Benefits' are more like 'Developer Benefits'. Whoever is cooking this up does not have the interest of the taxpayer on their mind.

See you soon,

Mike McCarthy
R-NOW



2. Settlement/Development Agreements



2003 Settlement Agreement (MBC)

Center for Community Action and Environmental Justice
Community Alliance for Riverside's Economy and Environment v. March Joint Powers Authority

- 2.6.1 March JPA shall provide for a 48-acre Community Park expandible to a 60 acres (No Location Determined)
- 2.6.2 Park shall be for softball, soccer or football or other uses determined by a feasibility study

2004 Development Agreement (LNR)

3.1.5.4 Park

- Rough grade park site
- Stub utilities to park
- \$10,000 toward feasibility Study

Cindy Camargo

From: Noah Estrada <ndestrada23@gmail.com>
Sent: Tuesday, June 11, 2024 10:54 AM
To: Cindy Camargo
Subject: Riverside opposing Grove Warehouses project

Hello my name is Noah Estrada, I am a resident of Perris for close to 10 years.

I, along with the people at Riverside Neighbors Opposing Warehouses want to show our opposition to this project. The city of Riverside was famous for its untapped nature, filled with miles of orange groves, we are still lucky that a percentage of that golden age still exists today.

Have any of the residents in surrounding neighborhoods, including the Grove Community Church been notified of this proposed project? Not the landlords and realtors that own and/or rent the houses to tenants, the residents themselves, by going door to door. The reason as to why there is no opposition, is because the nearby residents are not notified until the applicant has already broken ground. According to the March Joint Powers Authority, your own organization, claims that 10,000 jobs were lost. Surprisingly your authority claims to have created over 30,000 new jobs.

We all share the opposition to projects both industrial and light industrial, that we do not want or require any more warehouses or distribution centers. Enough is enough and the quota has been met. Riverside does not need anymore. Perris does not need anymore warehouses. Mead Valley does not need any more warehouses. Moreno Valley does not need anymore warehouses. The list goes on.

We at the R-NOW suspect that there is no tenant that will purchase this warehouse once construction is completed. It will sit vacant making the nearby neighborhoods angry at the sight of 3 unused warehouses that stands at over a combined 130 acres of industrial park.

To remind you also that the semi trucks will be required to drive past the commercial and mixed use zones, sprinkling the consumers and residents with carbon dioxide poisoning on top of our already terrible air quality thanks to the smog from Los Angeles blown by the wind from the Pacific Ocean into our topographical location. The applicant is shaking hands with the resident and stomping on their foot at the same time.

These are my concerns. Me and the Riverside Neighbors Opposing Warehouses coalition will protest and make a big scene. You asked for this.

Noah Estrada

Cindy Camargo

From: Jamie Hall <jamie.hall@channellawgroup.com>
Sent: Tuesday, June 11, 2024 10:48 AM
To: Cindy Camargo; Dan Fairbanks
Cc: Greg Wittmann; Veronica Lebron
Subject: Final EIR for the West March Upper Plateau Project (SCH#2021110304)
Attachments: RNOW comment letter 061124.pdf

Dear Chairman Delgado, Members of the Commission of the March Joint Powers Authority, and Planning Director Fairbanks:

This firm represents R-NOW with regard to the West March Upper Plateau Project (“Project”). I am writing to advise you that the Environmental Impact Report (“EIR”) for the Project remains deficient and that no action with regard to the Project should be taken until defects in the EIR and the March Joint Powers Authority’s California Environmental Quality Act (“CEQA”) compliance are cured. As detailed in the attached comment letter, the March Joint Power Authority (“JPA”) has engaged in improper piecemealing of the analysis of development of the JPA Planning Area and proposed Project. This is a fatal flaw of the EIR. Even if impermissible piecemealing did not render the EIR fatally flawed, other defects in the EIR would necessitate correction and recirculation of the document. This is because the EIR fails to adequately address the indirect impacts of the proposed Project, and fails to accurately and adequately address the impacts of both Project and Cumulative development in the area. In addition, the response to comments in the FEIR are inadequate and fail to appropriately address comments demonstrating that impacts of the Project would be more severe than acknowledged in the EIR. The EIR for the Project is thus fatally flawed and must therefore be revised and recirculated for public review and comment.

Please confirm receipt of the attached letter and confirm it has been made part of the Administrative Record.

Jamie T. Hall
Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211
Main Number: (310) 347-0050
Direct: (310) 982-1760
Fax: (323) 723-3960
Email: jamie.hall@channellawgroup.com
Website: www.channellawgroup.com

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****NOTICE****

I receive many e-mails on a daily basis and am unable to respond to all of them despite my best efforts. If you have sent me an e-mail that requires my attention and I have not responded, it may have been overlooked. I ask that you contact my paralegal, Veronica Lebron, at paralegal@channellawgroup.com. She will ensure your e-mail is elevated and a response received. Thank you for your patience and understanding.

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JULIAN K. QUATTLEBAUM, III
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GREG WITTMANN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

June 11, 2024

VIA ELECTRONIC MAIL

Commission of the March Joint Powers Authority ("JPA"), including:

Ed Delgado, Chair

Michael Vargas, Vice Chair

Chuck Conder, Member

Rita Rogers, Member

Kevin Jeffries, Member

Jim Perry, Member

Dr. Yxstian Gutierrez, Member

Ulises Cabrera, Member

Submitted to:

Cindy Camargo, Clerk - camargo@marchjpa.com

Dan Fairbanks, Planning Director - Fairbanks@marchjpa.com

14205 Meridian Parkway, Suite 140

Riverside, CA 92518

Re: Final EIR for the West March Upper Plateau Project (SCH#2021110304)

Dear Chairman Delgado, Members of the Commission of the March Joint Powers Authority, and Planning Director Fairbanks:

This firm represents R-NOW with regard to the West March Upper Plateau Project ("Project"). I am writing to advise you that the Environmental Impact Report ("EIR") for the Project remains deficient and that no action with regard to the Project should be taken until defects in the EIR and the March Joint Powers Authority's California Environmental Quality Act ("CEQA") compliance are cured. As detailed in this comment letter, the March Joint Power Authority ("JPA") has engaged in improper piecemealing of the analysis of development of the JPA Planning Area and proposed Project. This is a fatal flaw of the EIR. Even if impermissible piecemealing did not render the EIR fatally flawed, other defects in the EIR would necessitate correction and recirculation of the document. This is because the EIR fails to adequately address the indirect impacts of the proposed Project, and fails to accurately and adequately address the impacts of both Project and Cumulative development in the area. In addition, the response to

comments in the FEIR are inadequate and fail to appropriately address comments demonstrating that impacts of the Project would be more severe than acknowledged in the EIR. The EIR for the Project is thus fatally flawed and must therefore be revised and recirculated for public review and comment.

1. INTRODUCTION

A. The Lead Agency

The Lead Agency for the EIR for the West March Upper Plateau Project is the March Joint Powers Authority (“JPA”). As noted on the JPA’s website:¹

The March JPA, in addition to being designated as the federally recognized reuse authority for the former active duty base, has also assumed other responsibilities. These authorities include:

California Redevelopment Agency

The March Joint Powers Redevelopment Agency was established with the formation of the March AFB Redevelopment Project Area, which includes the entire 6,500-acre former active duty base area, and approximately 450 acres adjacent to the base in the industrial area of the City of Moreno Valley.

Land Use Authority

On March 11, 1997, land use authority was transferred to March JPA from the County of Riverside. The March JPA has adopted development and building codes and standards. The March JPA General Plan has been developed by the March JPA in accordance with state statutes, as well as the associated Master Environmental Impact Report. The March JPA General Plan is designed to implement the March Final Reuse Plan and related activities.

Airport Authority

March Inland Port Airport Authority (MIPAA), is a governing body under the governance umbrella of the March JPA. MIPAA is responsible for the

¹ <https://marchjpa.com/about/march-jpa-mission/>

development and operation of the March Inland Port (MIP), a joint-use aviation facility targeted for air cargo operations.

As further detailed on the Lead Agency’s website:²

The March JPA is planning and implementing new uses for currently vacant lands, reuse of existing facilities, and joint use of the airfield facilities for the development of an air cargo facility. In short, long-term economic gains in the form of developing a civilian air cargo center, and the growth and development of an employment center to account for 38,000 jobs, are projected.

B. The Proposed Project

The proposed Project analyzed in the DEIR includes construction and operation of 3,062,561 square feet of industrial warehouse uses, 1,280,403 square feet of business park warehouse uses, and 482,765 square feet mixed-use warehouse uses, for a total of 4,825,729 square feet of warehouse uses on a 369-acre site within the March Joint Powers Authority (“JPA”) Planning Area. The Project includes 384,121 square feet of estimated office space for the business park and 144,830 square feet allocated for retail mixed-use. The Project also includes more than a thousand auto parking spaces and truck/trailer parking spaces, and construction of related infrastructure.³ The proposed Project thus includes a significant amount of warehouse use in a region that has been experiencing a substantial amount of past, present and reasonably foreseeable warehouse development.

The proposed Project is located within the March JPA Planning Area. According to the March Joint Powers Authority General Plan, the Planning Area includes the entire boundaries of the former March Air Force Base (“AFB”), prior to base realignment in April of 1996. The General Plan Planning Area includes 6,500 acres total,⁴ not just the 4,400 “non-cantonment” acres of surplus property resulting from the realignment of March Air Force Base in 1997, as represented in the EIR as the Planning Area.⁵ The additional 2,100 acres are the “cantonment” area retained by the Department of Defense (DOD) for the Air Force Reserves (AFRES). This is important because civilian aviation use of the airfield, including civilian cargo use, is provided

² <https://marchjpa.com/about/>

³ DEIR pages 1-4, 1-5, 3-8, and 3-9 and DEIR Tables 4.15-1 at 4.15-6 and 4.15-7.

⁴ General Plan of the March Joint Powers Authority (“General Plan”), available at

https://marchjpa.com/wp-content/uploads/2023/03/General-Plan_03-07-2023.pdf
Land Use Element, page 1-3 to 1-4.

⁵ DEIR page 4.3-32. See also DEIR page 4.10-25 which refers to “airfield uses adjacent to the planning area” when airfield uses are in fact within the Planning Area.

through joint use of the airfield within the cantonment area. The EIR ignores the likely and intended relationship of the proposed Project to planned growth in civilian cargo use of the adjacent airport, which perhaps explains why the airfield was excluded from the definition of the Planning Area in the DEIR.

Key goals of the 1999 General Plan include capitalizing on the realignment of March AFB to create an employment and economic center that will add to the Western Riverside County region and to achieve an equitable balance between job availability and housing supply.⁶ The objectives in the EIR fail to conform to or address the goals of the March Joint Powers Authority General Plan and are improperly tailored to promote the proposed Project.

C. Required Discretionary Approvals

The Proposed Project requires the following discretionary approvals from the JPA, as detailed on DEIR pages to 1-14 to 1-15, as well as other discretionary approvals from other agencies:

General Plan Amendment 21-01

The Project proposes to amend the site's General Plan Land Use designations as follows:

- **Increase Parks, Recreation, and Open Space (P/R/OS) from approximately 122 gross acres to 523.43 gross acres.²**
- Eliminate approximately 622.5 gross acres of Business Park designated property.
- Eliminate approximately 63 gross acres of Industrial designated property.
- Adopt the Meridian West Upper Plateau Specific Plan (SP-9) on approximately 369.60 gross acres, approving a mix of Business Park, Industrial, Mixed Use, Public Facility, Streets, and Open Space land uses.
- Amend the General Plan from Business Park to Public Facility on 2.87 acres to accommodate an existing water storage tank operated by Eastern Municipal Water District.

In addition, the approximately 445-acre Conservation Easement will be recorded as a permanent Conservation Easement. The amendment would modify the General Plan Land Use Plan, Table 1-1 (March JPA Planning Build Out); Exhibit 2-1, Transportation Plan; and Exhibit 2-3, Transportation Road Systems (March JPA 1999). The amendment to the

⁶ General Plan, page 1-5.

Transportation Element of the General Plan will incorporate the following changes:

- Extend Cactus Avenue west to Airman Drive, with a gated emergency vehicle access roadway extending to Barton Street.
- Extend Barton Street from Alessandro Boulevard to Grove Community Drive.
- Extend Brown Street from Alessandro Boulevard to Cactus Avenue.
- Add Arclight Drive, Linebacker Drive, Bunker Hill Drive, and Airman Drive.

Specific Plan 21-01 (SP-9)

The Project proposes adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13 containing development standards, design guidelines, infrastructure master plans, maintenance responsibilities, phasing schedule, and implementation procedures necessary to develop the Project site consistent with the requested General Plan Amendment designations. The proposed Specific Plan will address land uses, zoning, and design guidelines.

The proposed land uses within Specific Plan SP-9 include the following:³

- 42.22 acres of Mixed Use
- 65.32 acres of Business Park
- 143.31 acres of Industrial
- 37.91 acres of streets and roadways⁴
- 78 acres of undeveloped Parks/Recreation/Open Space
- 2.84 acres of Public Facility

Total gross acreage = 369.60

Zoning Designation

The Project site, including both the Specific Plan Area and Conservation Easement, has not previously been given a zoning designation; therefore, the Project proposes zoning consistent with the requested Specific Plan designations of Mixed Use (MU), Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility (PF) for the Specific Plan Area, Parks/Recreation/Open Space (P/R/OS) for the Conservation Easement, and Public Facility for the existing Eastern Municipal Water District water tank.

Tentative Parcel Map 38063

Concurrent with the General Plan and Zoning Amendments, the Specific Plan, and the Plot Plans, approval of a Tentative Parcel Map is required for the Specific Plan boundaries. Following the approval of Tentative Parcel Map, a Final Map would become the legal document that identifies developable parcels within the Specific Plan area. See Figure 3-8, Tentative Parcel Map, for more details.

Plot Plans 21-03 and 21-04

Concurrent with the General Plan and Zoning Amendments, the Specific Plan, and the Tentative Parcel Map, plot plan approvals are required to construct an approximately 1,250,000-square-foot industrial building on 59.55 acres at 20133 Cactus Avenue and a 587,000-square-foot industrial building on 27.49 acres at 20600 Cactus Avenue. Plot Plans for each of these proposed buildings are included as Figure 3-9, Building B Plot Plan, and Figure 3-10, Building C Plot Plan.

Development Agreement 21-01

Due to the scale and complexity of the proposed Project, a Development Agreement is proposed to vest the Project entitlements and fees, ensure financing of public improvements required by the conditions of approval, and provide certain Community Benefits including compliance with the terms of the CBD Settlement Agreement (Appendix S), and provision of new public benefits, including, but not limited to, expansion of employment opportunities for area residents. The Development Agreement is proposed between March JPA and Meridian Park LLC with a 15-year term and two potential 5-year extensions.

- ² A total of 8.62 acres within the 453.7 gross acres consists of streets located within the Conservation Easement.
- ³ A total of 8.62 acres within the 453.7 gross acres consists of streets located within the Conservation Easement.
- ⁴ Included in this area are 8.62 acres of streets and roadways that are within the Conservation Easement.

It should be noted that whereas the DEIR describes the General Plan Amendment as increasing Parks, Recreation, and Open Space (P/R/OS) from approximately 122 gross acres to 523.43 gross acres, the notice for consideration of the EIR and Project by the Commission described the General Plan Amendment as increasing Parks/Recreation/Open Space (P/R/OS)

“from approximately 122 acres to 445.43 acres.” It thus appears the Project has been modified to reduce the amount of land designated as P/R/OS since publication of the DEIR.

D. The Disposition and Development Agreement (“DDA”)

Despite the fact that the EIR identifies the Development Agreement between March JPA and Meridian Park LLC as one of the required permits and approvals and thus one of the discretionary approvals for which the EIR has been prepared, the JPA first entered into a West March Disposition and Development Agreement (“DDA”)⁷ with LNR Riverside, LLC (“LNR”) for the redevelopment of properties west of the I-215 freeway known as “West March” on December 27, 2001.⁸ On May 1, 2006 the First Amendment to the West March DDA was adopted to incorporate Parcel D-3 West.⁹ On August 7, 2015, LNR’s rights under the West March DDA were assigned in part to Meridian Park, LLC.¹⁰ The JPA considered a Second Amendment to the DDA at its October 26, 2022 meeting.¹¹ The amendment before the Commission is the third amendment of the Development Agreement.

D. The Project’s Significant Unavoidable Impacts

The proposed Project would result in a number of significant environmental impacts requiring mitigation, including the following significant and unavoidable impacts:¹²

- As discussed in Section 4.2, Air Quality, impacts associated with operational air quality were identified as being significant and unavoidable. Cumulative impacts associated with operational air quality were also identified as being significant and unavoidable.
- As discussed in Section 4.4, Cultural Resources, impacts to historical and archaeological resources were identified as being significant and unavoidable.
- As discussed in Section 4.11, Noise, impacts associated with operational traffic noise were identified as being significant and unavoidable.

⁷ https://www.marchjpa.com/documents/docs_forms/lnr_dda.pdf; <https://marchjpa.com/wp-content/uploads/2022/10/LNR-Development-Agreement.pdf>

⁸ See also, page 203: <https://marchjpa.com/wp-content/uploads/2022/10/10262022-regular-jpc-meeting1.pdf>

⁹ Ibid. page 204

¹⁰ Ibid.

¹¹ Ibid starting at page 202: <https://marchjpa.com/wp-content/uploads/2022/10/10262022-regular-jpc-meeting1.pdf>

¹² See the FEIR which is available at: <https://marchjpa.com/mjpa-meridian-west-campus/>

- Additionally, as discussed in Section 4.16, Tribal Cultural Resources, impacts associated with construction would result in significant and unavoidable impacts to tribal cultural resources (TCRs).

E. CEQA Recirculation Requirements

CEQA Guidelines Section 15088.5 specifies when recirculation of an EIR is required prior to certification. CEQA Guidelines Section 15088.5 states in part:¹³

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:
 - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and

¹³ CEQA Guidelines Section 15088.5(e) specifies: A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043)

2. **THE EIR IS FATALLY FLAWED DUE TO FAILURE TO ANALYZE THE WHOLE OF THE ACTION**

As explained in CEQA Guidelines § 15003. POLICIES: “(h) The lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect. (*Citizens Assoc. For Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151).” In fact, CEQA Guidelines § 15378 PROJECT defines a “Project” as:

(a) “Project” means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

(1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700.

(2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

(3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

As explained by the Association of Environmental Professionals:¹⁴

Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual

¹⁴ AEP CEQA Portal Topic Paper, Project Description, available at: <https://ceqaportal.org/tp/CEQA%20Project%20Description%202020%20Update.pdf>

pieces separately, each of which may have a less- than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies.

In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. When future phases of a project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.

March JPA has engaged in impermissible piecemealing both in terms of analysis of development of the Planning Area as a whole, and in conducting separate CEQA analysis for connected projects. Specifically, at a minimum March JPA has engaged in impermissible project splitting/piecemealing of the following projects:¹⁵

- The Proposed Project (SCH#2021110304)
- The Meridian D-1 Gateway Aviation Center Project (SCH#2021040012) (“Aviation Center”)
- South Campus Specific Plan and Village West Drive Extension Project (SCH#2020059028) (“South Campus Specific Plan”)

A. Impermissible Piecemealing of Development of the March JPA Planning Area

Development of the JPA Planning Area has been treated as a single project in past EIRs including the EIRs for the March Air Force Base Master Reuse Plan,¹⁶ the March Air Force Base Redevelopment Project,¹⁷ and the General Plan of the March Joint Powers Authority. Unfortunately, these Plans and their associated EIRs are woefully outdated, and rather than update the plan for the Planning Areas as a whole and its associated EIR, the JPA has proceeded with piecemealed review of development projects within the Planning Area. It has done this

¹⁵ Additional components of Planning Area development may also represent impermissible project splitting, however, insufficient information is available on the CEQAnet website to document this, and a Public Information Act Requests is required.

¹⁶ https://www.marchjpa.com/documents/docs_forms/final_reuse_plan.pdf

¹⁷ https://www.marchjpa.com/documents/docs_forms/redevelopment_1996.pdf

despite the fact that the JPA has an overall goal and vision for development within the JPA area (see **Attachment A**).

As part of implementing its vision for the Planning Area, the JPA essentially acquired ownership of the Planning Area on:¹⁸

January 28, 2000, the Air Force and the Authority entered into the Economic Development Conveyance Agreement Between the Department of the Air Force and the March Joint Powers Authority (the “EDC”). The EDC provides for transfer of the Property from the Air Force to the Authority at no cost. Consistent with federal law governing No-Cost Economic Development Conveyances, Section 2.1.1 of the EDC restricts the Authority’s use of proceeds from any sale, lease or other use of the Property to promotion of the economic redevelopment of the Property and generation of jobs. Pursuant to Section 2.1.3 of the EDC, allowable uses of such proceeds include construction of the Backbone Infrastructure.

Thus, with execution of the EDC, the JPA became not just the Lead Agency for development projects within the Planning Area, but also the owner of the property within the Planning Area no longer under Air Force control. This gave the JPA the ability to specify and control future land use in the Planning Area through the issuance of Disposition and Development Agreements.

Also, as part of implementing its vision for the development of the JPA Planning Area, the JPA entered into a Joint Use Agreement for March Air Force Base with the Air Force, which acknowledges that the JPA “desires to use the Flying Facilities at MARB for commercial passenger and air cargo operations.”¹⁹

Prior Environmental Review of March JPA

Prior environmental review documents for the Planning Area as a whole are significantly outdated. According to page 1-3 of the DEIR:

The Project site has been analyzed under both CEQA and the National Environmental Policy Act in the following documents:

- March Air Force Base Master Reuse Plan, March JPA (October 2, 1996)
- Final Environmental Impact Statement: Disposal of Portions of March Air Force Base (February 1996)

¹⁸ Page 2 West March Disposition and Development Agreement,
https://www.marchjpa.com/documents/docs_forms/joint_use_agreement.pdf

¹⁹ https://www.marchjpa.com/documents/docs_forms/joint_use_agreement.pdf

- Final Environmental Impact Report for the March Air Force Base Redevelopment Project (June 1996)
- Redevelopment Plan for the March Air Force Base Redevelopment Project (July 1996)
- March Joint Powers Authority Development Code (July 1997)
- General Plan of the March Joint Powers Authority (September 1999)
- Master Environmental Impact Report for the General Plan of the March Joint Powers Authority (September 1999)²⁰
- Final Air Installations Compatible Use Zone Study, March Air Reserve Base (2018)

Thus, environmental review of the whole of the action, reuse and redevelopment of the March JPA Planning Area, is 27 years old in the case of the Reuse Plan and Redevelopment Project EIRs and 24 years old in the case of its guiding March JPA General Plan and associated Master Environmental Impact Report for the General Plan of the March Joint Powers Authority. Clearly there have been:²¹

- (a) Substantial changes proposed in the planned reuse and redevelopment of the March JPA Planning Area since the issuance of the Master Environmental Impact Report for the General Plan of the March Joint Powers.
- (b) Substantial changes have occurred with respect to the circumstances in the area since the issuance of the Master Environmental Impact Report for the General Plan of the March Joint Powers.
- (c) New information, which was not known and could not have been known at the time since the Master Environmental Impact Report for the General Plan of the March Joint Powers was certified as complete, has become available.

Development Projects in the Planning Area Since Certification of the Master Environmental Impact Report for the General Plan of the March Joint Powers Authority Was Certified

According to CEQAnet, the following past and present projects producing related or cumulative impacts are within the Planning Area (see **Attachment B** for links to State Clearinghouse documents which are incorporated herein by reference):

²⁰ Public Resource Code Section 21157.6. Limitation Period on Use of Environmental Impact Report limits the use of a Master Environmental Impact Report to five years from the date of certification, except under limited conditions.

²¹ Paraphrasing Public Resources Code (“PRC”) Section 21166

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
SCH#2024041124: Taxiway G Realignment and Pavement Management Areas 4, 5, 12, 13, 14, and 15 Project (NOE) https://ceqanet.opr.ca.gov/2024041124	On December 13, 2023, the Commission of the March Inland Port Airport Authority (MIPAA) approved an updated 5-year Airport Capital Improvement Plan (ACIP) consistent with FAA funding criteria. The ACIP included phases of the FAA approved Pavement Management Plan (PMP) for MIPAA. The Taxiway G Realignment and Rehabilitation/Reconstruction of PMP Phases 4, 5, 12, 13, 14 and 15 s proposed to be completed in a single phase and would replace an estimated 34,000 square yards of deteriorated pavement. No expansion of pavement surface is proposed.
SCH#2024041085: GP 23-02 March JPA Environmental Justice Element https://ceqanet.opr.ca.gov/2024041085/3	In compliance with SB 1000, the March JPA Environmental Justice Element is a policy document for the March JPA General Plan. The project 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.
SCH#2023060739: Meridian Storm Drain Pipeline Extension Project (MND) https://ceqanet.opr.ca.gov/2023060739	The project consists of a master planned storm drain improvement project including the construction of an underground 6-foot by 4-foot reinforced concrete box (RCB) from an existing 6-foot by 3-foot RCB, extending approximately 2,350 linear feet south and connecting to existing dual 48-inch RCP’s at the Riverside County Transportation Commission (RCTC) railroad right-of-way.
SCH#2023040073: *PROJECT WITHDRAWN PER LEAD* Demolition of Abandoned Security Police Kennel Support Facility (NOE) https://ceqanet.opr.ca.gov/2023040073	
SCH#2022100591: West March Disposition and Development Agreement, Amendment No. 2 (NOE) https://ceqanet.opr.ca.gov/2022100591	

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
SCH#2022100592: Amended lease between the March Joint Powers Authority and the County of Riverside (NOE) https://ceqanet.opr.ca.gov/2022100592	
SCH#2022090637: Memorandum of Understanding between the March Joint Powers Authority and Meridian Park LLC for the Perris Valley Flood Control and Drainage Project, Lateral B (NOE) https://ceqanet.opr.ca.gov/2022090637	
SCH#2022080226: Grant of Temporary Construction Easements and Permanent Access, Pipeline and Tunnel Easements to the Metropolitan Water District (MWD) (NOE) https://ceqanet.opr.ca.gov/2022080226	
SCH#2022060180: Grant of Easement to Southern California Edison - Installation of Infrastructure Improvements for the Implementation of the AT&T Tower at March Field Air Museum (NOE) https://ceqanet.opr.ca.gov/2022060180	
SCH#2021110304: West Campus Upper Plateau Project (EIR) https://ceqanet.opr.ca.gov/Project/2021110304	This is the Proposed Project
SCH#2021120547: Cooperative Reimbursement Agreement between the March Joint Powers Authority, March Inland Port Airport Authority	

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
and Riverside County Flood Control District (NOE) https://ceqanet.opr.ca.gov/2021120547	
SCH#2021120453: PP 18-04 (NOE) https://ceqanet.opr.ca.gov/2021120453	On December 11, 2019, the March Joint Powers Commission approved multiple applications on the 35.4-acre K4 parcel, including the Final EIR, a General Plan Amendment to approve the Industrial land use designation, and a Plot Plan application to allow a 718,000 square foot warehouse distribution building. The supporting Zone Change was formally adopted on January 8, 2020. The building is near construction completion, and the developer requests that the required solar voltaic system be deferred for up to a five-year period, or until another tenant occupies the building.
SCH#2021060538: Lease Agreement between the March Joint Powers Authority and the County of Riverside Facilities Management Department (NOE) https://ceqanet.opr.ca.gov/2021060538	
SCH#2021040702: Memorandum of Understanding between the March Joint Powers Authority, Riverside County Flood Control and Water Conservation District and March Air Reserve Base (NOE) https://ceqanet.opr.ca.gov/2021040702	
SCH#2021040012: Meridian D-1 Gateway Aviation Center Project (NOP) https://ceqanet.opr.ca.gov/2021040012	The proposed Project consists of two components, the Air Cargo Center Component and the Off-Site Component. The Air Cargo Center Component would be constructed within approximately 64-acres under March Joint Powers Authority jurisdiction. The Off-Site Component would be constructed within approximately 24 acres, and would include

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
	<p>taxiway construction, widening, and realignment, storm-drain extensions, and an access roadway construction within March Air Reserve Base (approx. 23 acres), as well as work within the public-right-of-way along Heacock Street adjacent to the eastern boundary of the Project site (approx. 1 acre). The following discretionary approvals would be required: (1) A plot plan approval to construct: an approximate 201,200-square-foot air cargo building with 9 grade level doors and 42 dock positions; a parking apron sufficient to support commercial cargo airplanes; 90 trailer storage positions; 214 stalls for employee parking; an approximate 69,620-square-foot maintenance building with grade level access and 42 stalls for employee parking; an expansion of the existing taxiway/tarmac within March Air Reserve Base; construction of stormwater facilities, including an underground detention basin; removal of an existing security fence and construction of a new security fence; and a signalized entrance onto Heacock Street, aligned with the facility entrance across Heacock Street; (2) a zoning designation of Aviation (AV) for the approximate 64-acres of the Project site within March Joint Powers Authority jurisdiction.</p>
<p>SCH#2021010211: The Westmont Village Industrial Warehouse Project (EIR)</p> <p>https://ceqanet.opr.ca.gov/2021010211/2</p>	<p>The Project site consists of ±221.82 acres designated under MJPA’s General Plan land use as Industrial Zoning and Institutional Residential Zoning under the Specific Plan Amendment proposal. Notice that the March Joint Powers Authority (MJPA) will be the lead agency and will prepare a Draft Environmental Impact Report (DEIR) for the Westmont Village Specific Plan Amendment (Project).</p>
<p>SCH#2020059028: South Campus Specific Plan and Village West Drive Extension Project (Subsequent EIR)</p> <p>https://ceqanet.opr.ca.gov/Project/2020059028</p>	<p>The proposed Project involves an amendment to the March Business Center Specific Plan (SP-1), originally approved in 2003. The proposed Project includes Plot Plan approvals for the following components of the South Campus buildout: development of a Commercial Parcel; construction of 800,000 square-foot Building D;</p>

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
	<p>construction of a 6.2-acre Dog Park and Paseo; construction of Gless Ranch Road and Caroline Way; and the extension of Village West drive south of Lemay Drive to Nandina Avenue. In addition, the SEIR will analyze up to 700,000 square feet of high-cube cold storage warehousing, request a revision to the definition of "Business Enterprise" in the Specific Plan, and include a definition for "Grocery Store" in the Specific Plan. The following discretionary approvals would be required: 1) General Plan Amendment: GP 20-01; 2) Specific Plan Amendment (SP-1, Amendment 8): SP 20-01; 3) Plot Plan: PP 20-03 for 45,000 square feet Grocery Store and two shop buildings and Village West Drive extension; 4) Plot Plan: PP 20-04 Building D within the South Campus and Caroline Way; 5) Plot Plan: PP 20-05 South Campus Dog Park and Paseo; 5) Conditional Use Permit: CUP 20-02 for Alcohol sales at 45,000 square foot Grocery Store; 6) Tentative Parcel Map: TPM 20-02 South Campus.</p>
<p>SCH#2020090483: AT&T Tower at March Field Air Museum (NOE)</p> <p>https://ceqanet.opr.ca.gov/2020090483/2</p>	
<p>SCH#2020090415: Final Map 3790 I (Final Map 20-03) for condominium purposes for the MS Van Buren II Business Park (NOE)</p> <p>https://ceqanet.opr.ca.gov/2020090415/2</p>	<p>Final Map 37901 (Final Map 20-03) for condominium purposes was approved to create separate air space for each of the thirteen buildings previously approved as part of the MS Van Buren II Business Park. The condominium map would now allow individual sale and ownership of each building. This will facilitate small business owners to occupy and own their own facility. In addition to the condominium conversion described above, the parcel map will make minor adjustments to internal parcels lines to better align with existing parking lot improvements.</p>

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
<p>SCH#2020080041: Tentative Parcel Map 20-03 (TPM 20-03) for condominium purposes for the MS Van Buren II Business Park (NOE)</p> <p>https://ceqanet.opr.ca.gov/2020080041/2</p>	<p>Tentative Parcel Map 20-03 (TPM 20-03) for condominium purposes was approved to create separate air space for each of the thirteen buildings previously approved as part of the MS Van Buren II Business Park. The condominium map will allow individual sale and ownership of each building. This will facilitate small business owners to occupy and own their own facility. In addition to the condominium conversion described above, the parcel map will make minor adjustments to internal parcels lines to better align with existing parking lot improvements.</p>
<p>SCH#2020040290: Design Plan 19-05: Eagle Business Park (NOE)</p> <p>https://ceqanet.opr.ca.gov/2020040290/2</p>	<p>On April 8, 2020, the March Business Center Design Implementation Committee Project: I approved Design Plan 19-05 for the development of a business park development ranging from 78,960 to 123,500 square feet (sf) with a combined total of 390,480 I sf consisting of four (4) buildings on I 9 .84 acres. The business park is designed to accommodate a combination of both Business Enterprise (warehouse uses I under 50,000 sf) and Light Manufacturing uses consistent with the Permitted Uses Table 111-1 on page III- 1 I and Table III-2 on page III-14 of the March Business Center Specific Plan (SP-I, A7). Site access would be provided I through five driveways all located off Krameria Avenue - 3 passenger car only driveways and 2 service driveways for trucks.</p>
<p>SCH#2020060596: Offer of Dedication: Brown Street, County of Riverside (NOE)</p> <p>https://ceqanet.opr.ca.gov/2020060596/2</p>	<p>A 28' wide, approximately 2,543.82 linear feet, portion of Brown Street, west of the intersection of Meridian Parkway and Alessandro Boulevard, south of Alessandro Boulevard, surrounded by March Joint Powers Authority (JPA) properties to the east, south and west. The project also includes the full construction of Brown Street along the easterly property line, adjacent to the MJPA jurisdictional boundary, Riverside County, California</p>

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
<p>SCH#2020060150: Determination of Substantial Conformance No. 2 for the approved Plot Plan 17-05 for the MS Van Buren II Business Park located at 21750 -21880 Van Buren Blvd</p> <p>https://ceqanet.opr.ca.gov/2020060150/2</p>	
<p>SCH#2018121026: Heacock Street Truck Terminal Facility (MND)</p> <p>https://ceqanet.opr.ca.gov/Project/2018121026</p>	<p>The project would include landscaping encompassing approx 1.43 acres. Open space (1.57 acres) and a retention basin (0.61 acre) are proposed south of the proposed parking area. South of the open space and retention basin is an existing retention basin that is not proposed to be modified, and it encompasses approx 0.6 acres. The project also includes the installation of two 36-in pipelines to connect to the existing two 36-in pipelines that convey surface water into the onsite drainage channel. The two proposed 36-in pipelines would convey storm water received offsite to the proposed open space. The surface water from the proposed truck parking area would be collected in pipelines that would convey the storm water to a proposed underground infiltration basin under the parking lot. The infiltration basin would have a capacity of approx 0.53 acre-feet after which storm water would be conveyed by pipeline to the proposed retention basin. Finally, the project includes the installation of a 12-ft high screen wall along the eastern and southern property lines.</p>
<p>SCH#20160661020: Meridian West Campus – Lower Plateau Project (EIR)</p> <p>https://ceqanet.opr.ca.gov/Project/2016061020</p>	<p>The approximately 130 acre project site is located south of Alessandro Blvd, west of Meridian Parkway, north of Opportunity Way, and generally east of Plummer Street, in unincorporated Riverside County, CA. Note that a September 2012 Settlement Agreement for the development of the project site, identified 120 acres of development and 10 acres of new roadways. The roadways are no longer proposed and the area would formerly envisioned to be public roadways would be absorbed into the</p>

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
	project site plan; the proposed footprint of development would remain unchanged from the Settlement Agreement. Specifically, the project site is located to the west of the intersection of Meridian Parkway and Cactus Ave. I-215 is located approximately 0.5 mile east of the project site.
SCH#2016081061: Veterans Industrial Park 215 (VIP215) (EIR) https://ceqanet.opr.ca.gov/Project/2016081061	The proposed project is seeking a plot plan, general plan amendment, specific plan, parcel map and development agreement in support of the development of industrial buildings that would allow for a mix of (non-aviation) logistics center uses that could support wholesale, storage, distribution, manufacturing and/or assembly center uses. A total of 2,219,852 sf of building space is proposed in two buildings with parking, landscaping, drainage facilities and off-site improvements. The proposed project site encompasses 142.5 acres
SCH#2009071069: Meridian North Campus Specific Plan Amendment (Subsequent EIR) https://ceqanet.opr.ca.gov/Project/2009071069	Meridian Specific Plan land uses including following: Business Park (BP): including administrative, financial, light manufacturing, and commercial services Industrial (IND): including manufacturing, warehousing, and associated uses. Office (OF): commercial office building accommodating professional and/or administrative services Mixed Use (MU): complementary uses, including commercial retail, office, research and development, industrial, and others. Commercial (COM): retail and service oriented land uses Park/Recreation/Open Space (P/R/OS): primarily passive open space and recreational areas. The proposed project would be amendment to the Meridian (formerly March Business Center) Specific Plan. The Meridian Specific Plan (aka Meridian) is a business park located in the northwestern portion of Riverside County, California. Meridian is situated west of I-215 and south of Alessandro Boulevard, on land that was formerly a part of the March Air Force Base (MAFB). The environmental consequences of the Meridian Specific Plan were disclosed, together

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
	with approved mitigation measures, in the March Business Center Focused EIR (February 2003) (SCH# 2002071089). The focused EIR provided a Project level environmental review. Following FEIR certification and permitting, development commenced on the 669-acre North Campus area of Meridian, which is located on the west side of I-215, to the south of Alessandro Boulevard and to the north of Van Buren Boulevard. Numerous parcels have been developed and occupied since 2003, while others are in various stages of development. The previous focused EIR for the Meridian Specific plan was a Project level review. The SEIR prepared for the proposed Amendment will also provide a project-level review of environmental impacts associated with the proposed Specific Plan Amendment. The proposed Amendment is limited to a subset of the lots contained in the Meridian North Campus area; no changes are proposed in the South Campus. The Amendment consists of the following changes, revisions, and new information.
SCH#2008071021: March Lifecare Campus Specific Plan (EIR) https://ceqanet.opr.ca.gov/Project/2008071021	Development of a 3,555,000 square foot medical campus, allowing the following land use designations: (1) General Medical Office; (2) Medical Related Retail; (3) Research and Education; (4) Residential Care Facilities; (5) Wellness; and (6) Mixed Use. U.S. Vets Transitional Program Specific Plan (SP-6) Specific Plan Amendment #1 (SP-6, A1), Plot Plan 10-02, Amendment #1 (PP 10-02, A1) Fifth Amendment to March LifeCare Campus Disposition and Development Agreement
SCH#2002071089: March Business Center Specific Plan (EIR) https://ceqanet.opr.ca.gov/Project/2002071089	The project involves the development of approximately 1,290 acres of mostly vacant land in the north western portion of Riverside County, California. The type, intensity, and organization of project land uses are regulated by the March Business Center Specific Plan. The following general land use designations are proposed : Business Park(BP): (539 acres) including

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
	<p>administrative, financial and commercial services. Industrial(IND): (370 acres) including manufacturing, warehousing and associated uses. Office(OF): (44 acres) commercial office building accommodating professional and/or administrative services. Mixed Use(MU): (125 acres) complementary uses including commercial retail, office, research and development, industrial and others. Commercial(COM): (38 acres) providing retail and service oriented land uses. Park/Open Space Recreation: (174 acres)</p>
<p>SCH#1997071095 - General Plan of the March Joint Powers Authority</p> <p>(EIR)</p> <p>https://ceqanet.opr.ca.gov/1997071095/2</p>	<p>The March JPA Planning Area encompasses 6,500 acres which was formerly March Air Force Base. March AFB realigned to March ARB in 1996, & the site had no formal zoning or general plan land use designation prior. Site has historically been classified as federal property, not subject to local land use zoning & GP regulations.</p> <p>The March Joint Powers Authority General Plan is a long range comprehensive plan designed to outline and delineate use and development opportunities of the area, while preserving the environmental quality. The General Plan contains goals, policies, and programs to guide future development and change in the Planning Area. 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. The March JPA General Plan contains the state mandated seven elements, additional element components have been added as part of the General Plan. The elements comprise the March JPA General Plan in accordance with the State General Plan Guidelines.</p>
<p>SCH # = State Clearinghouse Number (NOE) = Notice of Exemption</p> <p>It should be noted that many of the projects within the Planning Area include multiple actions, a number of which are processed with an NOE. For the full list of actions for each State Clearinghouse Number, click on the provided summary link for each State Clearinghouse Number.</p>	

TABLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
The administrative record for each of these development projects is incorporated herein by reference. This list of projects within the JPA Planning Area is not exhaustive.	

Improper Piecemealing of Environmental Review of Projects Within the JPA Planning Area

Both the General Plan and the Master EIR for the General Plan are outdated. The March JPA General Plan is 24 years old and has reached the end of its useful life. According to the State Office of Planning and Research (“OPR”):²²

By statute, the general plan is required to be updated “periodically.” While there is no requirement for how often to update the general plan, the planning period has traditionally been 15-20 years. Some cities and counties update their general plans as often as every 5 years, while others update in portions over time.”

The most recent environmental document for development of the March JPA as a whole is the Master Environmental Impact Report for the General Plan of the March Joint Powers Authority (September 1999).²³ Pursuant to Public Resources Code (“PRC”) § 21157.6:

§ 21157.6. LIMITATION PERIOD ON USE OF ENVIRONMENTAL IMPACT REPORT

(a) The master environmental impact report shall not be used for the purposes of this chapter if either of the following has occurred:

- (1) The certification of the master environmental impact report occurred more than five years prior to the filing of an application for the subsequent project.
- (2) The filing of an application for the subsequent project occurs following the certification of the master environmental impact report, and the approval of a project that was not described in the master environmental impact report, may affect the adequacy of the

²² https://opr.ca.gov/docs/General_Plan_Guidelines_FAQ.pdf

²³ Public Resource Code Section 21157.6. Limitation Period on Use of Environmental Impact Report limits the use of a Master Environmental Impact Report to five years from the date of certification, except under limited conditions.

environmental review in the master environmental impact report for any subsequent project.

There is therefore no Master EIR or other EIR which addresses the impacts of planned development of the Planning Area as a whole. For this reason, it is very important that March JPA as both the Lead Agency, and essentially the landowner, not engage in project-splitting/piecemealing when conducting environmental review of development projects within the March JPA designed to achieve the JPA’s purposes in redeveloping the Planning Area. The effect of multiple large-scale projects, such as the proposed Project should be addressed in a single EIR, rather than in separate EIRs, as is currently happening with the multiple development projects within the Planning Area that are currently or recently under review. In the absence of a current Master EIR, the March JPA has engaged in improper piecemealing of review within the JPA Planning Area, and the EIR for the proposed Project is an example of this improper piecemealing. The EIR for the proposed Project is thus fundamentally and basically inadequate when it comes to a true understanding of the impacts of the proposed Project and development within the Planning Area.

B. Impermissible Piecemealing of Environmental Review of Current Projects By Essentially the Same Developer and the JPA

Not only has the JPA engaged in improper piecemealing of the environmental review of development projects within the Planning Area as a whole, it has also engaged in improper piecemealing of related and interdependent development projects by essentially the same developer within the Planning Area. (See **Attachment C** for a copy of the NOCs for each of the three projects, the title page of each environmental document showing that Dudek is the environmental consultant for all three projects, as well as the Secretary of State’s public records for each LLC demonstrating the three LLCs are related). As shown the **Table 2**, the JPA is currently processing two projects, including the proposed Project, which include significant warehouse and distribution facility square footage and is also currently processing development of an air cargo facility by essentially the same applicant, but it is doing so via three separate EIRs. This constitutes impermissible piecemealing. The three interdependent developments, essentially by the same applicant as the proposed Project are described in **Table 2**. The same environmental consultant, Dudek, has prepared the cited environmental documents for each development listed in **Table 2**, as shown in **Attachment C**.

TABLE 2 THREE RELATED PROJECTS CURRENTLY BEING PROCESSED BY THE JPA			
	The Proposed Project – West Campus Upper Plateau Project	Meridian D-1 Gateway Aviation Center	South Campus Specific Plan and Village West Drive Extension Project
SCH#	2021110304 https://ceqanet.opr.ca.gov/Project/2021110304	2021040012 https://ceqanet.opr.ca.gov/2021040012	2020059028 https://ceqanet.opr.ca.gov/Project/2020059028

**TABLE 2
THREE RELATED PROJECTS CURRENTLY BEING PROCESSED BY THE JPA**

	The Proposed Project – West Campus Upper Plateau Project	Meridian D-1 Gateway Aviation Center	South Campus Specific Plan and Village West Drive Extension Project
NOC:	<p>https://files.ceqanet.opr.ca.gov/274204-1/attachment/jdU0-C1cRLxVjUK5fl5ivGsEmedV_alQ0mhqmpvwdxBADTEGnDXJQapt2LHyFNFEXQZAeYrY7flLTk0</p> <p>DEIR: https://ceqanet.opr.ca.gov/2021110304/2</p>	<p>https://files.ceqanet.opr.ca.gov/268734-1/attachment/i2Fc1ozLFVidK8ARHXvrsP4GVmMQzJBM3X8owMIw32gHdYm6zeLD23YivN9y26bkRXMJywma4L7REPgM0</p> <p>Initial Study: https://files.ceqanet.opr.ca.gov/268734-1/attachment/15IZYXrrBpRW6jzrmrucVTV3kAlb1NIZ5Woy1115yGgWCoRN6M58jjs6AWNj8-ekOjmNSp0k_AAHwP0</p> <p>EIR: https://ceqanet.opr.ca.gov/2021040012/2</p>	<p>https://files.ceqanet.opr.ca.gov/261879-2/attachment/aSLfEReDbTJZN4y17Q74AiDNN9_PPGKg-rnTU973oSjwZ3ZRyQryAdTI_QPvOghqvLGTGCOIizAPhde0</p> <p>SEIR: https://ceqanet.opr.ca.gov/2020059028/3</p>
Applicant	Meridian Park West, LLC, Attn: Timothy Reeves 1156 North Mountain Avenue, Upland, CA 91786	Meridian Park D-1, LLC 1156 North Mountain Avenue, Upland, CA 91786	Meridian Park South, LLC 1156 N. Mountain Avenue, Upland, CA 90785
NOP Issued:	11/19/2021	4/1/2021	5/18/2020
Includes:	<p>The Project consists of: Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use;</p> <p>Building C – 587,000 SF of high-cube fulfillment center warehouse use;</p> <p>Industrial Area – 725,561 SF of high-cube</p>	<p>The Project consists of two components, the Air Cargo Center Component and the Off-Site Component. The Air Cargo Center Component would be constructed within approximately 64-acres under March JPA jurisdiction. The Air Cargo Center Component of the Project would include development of an air cargo center, including the construction of an approximate</p>	<p>The proposed Project includes Plot Plan approvals for the following components of the South Campus buildout: development of a Commercial Parcel; construction of 800,000 square-foot Building D; construction of a 6.2-acre Dog Park and Paseo; construction of Gless Ranch Road and Caroline Way;</p>

**TABLE 2
 THREE RELATED PROJECTS CURRENTLY BEING PROCESSED BY THE JPA**

	The Proposed Project – West Campus Upper Plateau Project	Meridian D-1 Gateway Aviation Center	South Campus Specific Plan and Village West Drive Extension Project
	fulfillment center warehouse use; Industrial Area – 500,000 SF of high-cube cold storage warehouse use; Business Park Area – 1, 280,403 SF of business park use; Mixed Use Area – 160,921 SF of retail use (25%); Mixed Use Area – 482,765 SF of business park use (75%); 60.28-acre park (with Active and Passive uses); 17.72 acres of Open Space use; Public Facility – 2.84 acres for future sewer lift station and electrical substation (within the Specific Plan Area)	201,200-square-foot cargo building with 9 grade-level loading doors and 42 truck dock positions and an approximate 69,620-square-foot maintenance building with grade-level access.	and the extension of Village West drive south of Lemay Drive to Nandina Avenue. In addition, the SEIR will analyze up to 700,000 square feet of high-cube cold storage warehousing
Copies of the NOCs and Corporate filings from the California Secretary of State’s website for these three LLCs are provided in Attachment C to this letter.			

March JPA clearly has a goal of promoting the JPA as a civilian air cargo center (see **Attachment A**). To that end, in addition to UPS operations, Amazon Air started operations at March Air Reserve Base in 2018.²⁴ Due to the efforts of the March JPA, civilian air cargo

²⁴ “Amazon Air to start operations at March Air Reserve Base”, ABC 7 Eyewitness News, October 10, 2018

operations have increase from very few annual flights to approximately 1,592 flights in 2018 and 3,840 flights in 2019.²⁵ According to page 16 of the Homestead Air Reserve Base Joint Use Study:

The increased annual civilian operations at March Air Reserve Base and March Inland Port, most recently recorded as 3,840 takeoffs and landings in 2019, will likely continue to boost the facility’s economic impact.⁴⁰ Its joint use agreement limits civilian airport operations to 21,500 takeoffs and landings, still allowing for significant growth of its civilian operations in the coming years.⁴¹

⁴⁰ Email correspondence with March Inland Port Airport Authority Airport Director, Gary W. Gosliga, dated August 24, 2020.

⁴¹ Communication with March Inland Port Airport Authority Airport Director, Gary W. Gosliga on September 11, 2020.

Clearly the Meridian D-1 Gateway Aviation Center is intended to provide cargo service and increased air cargo access for both the proposed Project and the South Campus Specific Plan and Village West Drive Extension Project. Warehouse rents near cargo airports are substantially higher than warehouses that don’t have convenient air cargo access, nearly 20 percent higher,²⁶ and there is therefore a benefit to developing warehouse facilities in concert with air cargo facilities. According to page 4 to the Initial Study for the Aviation Center:

The proposed expansion of the existing taxiway/tarmac would allow for improved access to the existing taxiway for Project tenants and existing airport users south of the Project site. Once operational, the Project is anticipated to average 17 flights per day. Flight operations would occur 6 days a week. Generally, inbound flights would occur in the early morning hours, and outbound flights would occur in the late evening hours. Inbound flights would approach from the west, over non-residential land uses. During the holiday season, increased flight operations would be anticipated (estimated to result in an additional 256 flights over a 4-week period); however, the maximum annual flight operations would not exceed the currently available civilian air cargo operations capacity under the Joint Use Agreement.

<https://abc7.com/amazon-air-planes-delivery-operation/4456840/>

²⁵ Homestead Air Reserve Base Joint Use Study, September 18, 2020, Miami-Dade Board of County Commissioners, Office of the Commission Auditor: <https://www.miamidade.gov/auditor/library/homestead-air-reserve-base-studv.pdf>; See also: <https://marchjpa.com/march-inland-port-airport/operations/>

²⁶ FreightWaves, “Warehouse rents near cargo airports skyrocket, report says”: <https://www.freightwaves.com/news/warehouse-rents-near-cargo-airports-skyrocket-report-says>

Seventeen flights a day, six days a week, represents 5,304 new cargo flights a year resulting from the new Aviation Center. This represents more than a doubling of the number of flights in 2019. According to UPS Air Cargo, the UPS fleet currently includes the following aircraft types: 757-200F, 767-300F, A300-600F, MD-11F, 747-400F, and 747-8F. UPS serves more than 220 countries using a combination of more than 500 UPS and chartered aircraft.²⁷ Amazon Air uses Boeing 737 and 767 aircraft, all of which are operated by contract partners.²⁸ While the specific cargo aircraft which will make use of the new Aviation Center is not known, the following table provides an idea of the payload ranges of the likely aircraft.²⁹

Comparison of cargo aircraft capabilities

Aircraft	Volume (m ³)	Payload	Cruise	Range	Usage
Airbus A400M	270	37,000 kg (82,000 lb)	780 km/h (420 kn)	6,390 km (3,450 nmi)	Military
Airbus A300-600F	391.4	48,000 kg (106,000 lb)	–	7,400 km (4,000 nmi)	Commercial
Airbus A330-200F	475	70,000 kg (154,000 lb)	871 km/h (470 kn)	7,400 km (4,000 nmi)	Commercial
Airbus A380 ^[24]	342	68,000 kg (150,000 lb)	871 km/h (470 kn)	13,300 km (8,000 nmi)	Commercial
Airbus Beluga	1210	47,000 kg (104,000 lb)	–	4,632 km (2,500 nmi)	Commercial
Airbus BelugaXL	2615	53,000 kg (117,000 lb)	–	4,074 km (2,200 nmi)	Commercial
Antonov An-124	1028	150,000 kg (331,000 lb)	800 km/h (430 kn)	5,400 km (2,900 nmi)	Both
Antonov An-22	639	80,000 kg (176,000 lb)	740 km/h (400 kn)	10,950 km (5,910 nmi)	Both
Antonov An-225	1300	250,000 kg (551,000 lb)	800 km/h (430 kn)	15,400 km (8,316 nmi)	Commercial
Boeing C-17		77,519 kg (170,900 lb)	830 km/h (450 kn)	4,482 km (2,420 nmi)	Military
Boeing 737-700C	107.6	18,200 kg (40,000 lb)	931 km/h (503 kn)	5,330 km (2,880 nmi)	Commercial
Boeing 757-200F	239	39,780 kg (87,700 lb)	955 km/h (516 kn)	5,834 km (3,150 nmi)	Commercial
Boeing 747-8F	854.5	134,200 kg (295,900 lb)	908 km/h (490 kn)	8,288 km (4,475 nmi)	Commercial
Boeing 747 LCF	1840	83,325 kg (183,700 lb)	878 km/h (474 kn)	7,800 km (4,200 nmi)	Commercial
Boeing 767-300F	438.2	52,700 kg (116,200 lb)	850 km/h (461 kn)	6,025 km (3,225 nmi)	Commercial
Boeing 777F	653	103,000 kg (227,000 lb)	896 km/h (484 kn)	9,070 km (4,900 nmi)	Commercial
Bombardier Dash 8-100	39	4,700 kg (10,400 lb)	491 km/h (265 kn)	2,039 km (1,100 nmi)	Commercial
Lockheed C-5		122,470 kg (270,000 lb)	919 km/h	4,440 km (2,400 nmi)	Military
Lockheed C-130		20,400 kg (45,000 lb)	540 km/h (292 kn)	3,800 km (2,050 nmi)	Military
Douglas DC-10-30		77,000 kg (170,000 lb)	908 km/h (490 kn)	5,790 km (3,127 nmi)	Commercial
McDonnell Douglas MD-11	440	91,670 kg (202,100 lb)	945 km/h (520 kn)	7,320 km (3,950 nmi)	Commercial

The three proposed projects are thus functionally connected, are by essentially the same developer on land controlled by the JPA, will result in the movement of a significant amount of air cargo, and are being processed concurrently, but separately, using environmental documents prepared by the same consultant. The Aviation Center development is a reasonably foreseeable

²⁷ <https://www.aircargo.ups.com/en-US/aircraft#:~:text=Our%20fleet%20currently%20includes%20the.500%20UPS%20and%20chartered%20aircraft.>

²⁸ https://en.wikipedia.org/wiki/Amazon_Air#:~:text=Amazon%20Air%20uses%20Boeing%20737.consists%20of%20the%20following%20aircraft.&text=Deliveries%20begin%20late%202023.&text=6%20aircraft%20awaiting%20conversion%20or%20delivery%20to%20operator.

²⁹ Table source: https://en.wikipedia.org/wiki/Cargo_aircraft

consequence of the massive expansion in warehouse square footage within the JPA resulting from the proposed Project, and the proposed Project and the South Campus Specific Plan project are a reasonably foreseeable consequence of the expansion of air cargo capacity resulting from the Aviation Center development. This is a clear example of impermissible piecemealing and project splitting, and has resulted in an underestimate of impacts. The EIR must therefore be redone and recirculated.

Both the proposed Project and the South Campus Specific Plan project are reasonably foreseeable consequences of the Aviation Center Project. Similarly, the Aviation Center Project with expanded air cargo processing capacity is a reasonably foreseeable consequence of the two developments which include substantial new warehousing capacity. The future expansion of air cargo capacity proposed in the Aviation Center project is significant, and when taken together with the proposed Project, changes the scope and nature of the proposed Project's environmental effects, as it does with the South Campus Specific Plan development.

The Initial Study for the Meridian D-1 Gateway Aviation Center³⁰ indicates that it has the potential to result in significant impacts in the following issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

In fact, the DEIR for the Meridian D-1 Gateway Aviation Center indicates on page 4-10 that:³¹

³⁰ https://files.ceqanet.opr.ca.gov/268734-1/attachment/151ZYXrrBpRW6jzrmrucVTV3kA1b1NIZ5Woy1_115yGgWCoRN6M58jjjs6AWNj8-ekOjmNSp0k_AAHwP0

³¹ https://files.ceqanet.opr.ca.gov/268734-2/attachment/16Ad1T6fnesBpq_T8X9ceg25gBFD0neSHHdPBpMsRTzTY39eQFVVxzWE7oHkuK7yXq4cz4CWvwfq7lbdr0

To summarize, the following issue areas would result in significant impact even after mitigation measures, when feasible, have been incorporated, thus resulting in unavoidable impacts:

- **Air Quality.** As discussed in Section 3.2.5, the Proposed (Meridian D-1 Gateway Aviation Center) Project would exceed operational regional thresholds of significance for volatile organic compounds, oxides of nitrogen, and carbon monoxide emissions, resulting in a significant impact. Mitigation Measure (MM) AQ-3 through MM-AQ-6 would reduce emissions, but not to a less-than-significant level. As such the Proposed (Meridian D-1 Gateway Aviation Center) Project would have a significant and unavoidable impact related to **Threshold AQ-2** and would result in a cumulatively considerable net increase in criteria pollutants for which the region is in nonattainment. Additionally, the Proposed (Meridian D-1 Gateway Aviation Center) Project would have a significant and unavoidable impact related to **Threshold AQ-1** and would conflict with the South Coast Air Quality Management District's 2022 Air Quality Management Plan.
- **Noise.** The Proposed (Meridian D-1 Gateway Aviation Center) Project would expose noise-sensitive residential receptors nearest the March ARB/Inland Port Airport flight path to excessive operational noise levels. Due to the nature of noise levels generated by aircraft landings and take-offs (i.e. acoustic energy affecting the roof, walls, windows, and doors), reducing the noise-level increase resulting from airborne operations is difficult. The primary mitigation measures suitable for addressing airborne aircraft noise can include modifications to the flight path, restrictions on hours of operation, limiting the number of flight operations, substituting aircraft type, or providing sound insulation treatment programs for those affected by aviation noise. However, March JPA does not have the authority to modify the flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, the level of restriction on flight operations and incomplete involvement in sound insulation programs often result in limitations on achieving the necessary noise level reductions. MM-NOI-2 would reduce impacts but not to a less-than significant level. Therefore, **Threshold NOI-3** in Section 3.11.5 would be significant and unavoidable even with the application of feasible mitigation. (Emphasis added).

The Initial Study for the South Campus Specific Plan and Village West Drive Extension Project³² indicates that it has the potential to result in significant impacts in the following issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use / Planning
- Noise
- Recreation
- Transportation
- Utilities/Service Systems
- Wildfire

In fact, the Meridian South Campus Specific Plan and Village West Drive Extension Draft Subsequent EIR, page 1-10 states:

As discussed in Section 4.2, Air Quality, and Section 4.12, Transportation, impacts associated with operational air quality and transportation were identified as being significant and unavoidable. Cumulative impacts associated with operational air quality and transportation were also identified as being significant and unavoidable.

3. DEFECTIVE CUMULATIVE IMPACTS ANALYSIS AND THE DANGERS OF IMPROPER PIECEMEALING

The cumulative impact analysis in the EIR for the proposed Project understates the cumulative impacts of the proposed Project in combination with the Aviation Center project and South Campus Specific Plan project as well as other past, present and reasonably foreseeable future projects, in part because of the limited detail in the cumulative analysis and also because **the cumulative analysis omits the Meridian D-1 Gateway Aviation Center project** from the list of cumulative projects (see DEIR and FEIR Table 4.2) as shown in the following screengrab

³² https://files.ceqanet.opr.ca.gov/261879-2/attachment/afIv_v9NPGzNVDbRECEOITsvKqj2aXukVYQouweZcVQhD9xTa1SAp0CwHSSdFuulMkvyAsB6pBWWS210

of the March JPA cumulative projects list included in DEIR Table 4.2 which is the same as FEIR Table 4-2.

Table 4-2. Cumulative Projects

ID	Project Name	Land Use ¹	Quantity	Units ²
<i>March Joint Powers Authority</i>				
MJPA1	Meridian Business Park (West Campus)	Industrial Park	2,278.852	TSF
MJPA2	K4 Parcel	Warehouse	718.000	TSF
MJPA3	Economic Business Center	Warehouse	124.523	TSF
MJPA4	Freeway Business Center	Warehouse	709	TSF
MJPA5	Veteran's Industrial Plaza/VIP 215	Warehouse	2,000.000	TSF
MJPA6	Veteran's Plaza	Commercial Retail	198.000	TSF
MJPA7	MS Van Buren I	Warehouse	176.396	TSF
MJPA8	MS Van Buren II	Warehouse	162.041	TSF
MJPA9	MS Prime Six	General Office	74.922	TSF

Table 4-2. Cumulative Projects

ID	Project Name	Land Use ¹	Quantity	Units ²
MJPA10	Meridian Distribution Center IV	Warehouse	90.000	TSF
MJPA11	Meridian Distribution Center III	Warehouse	262.269	TSF
MJPA12	Eagle Business Park	Business Park	390.480	TSF
MJPA13	South Campus	Office	388.011	TSF
		Commercial Retail	282.730	TSF
		Business Park	1,764.180	TSF
		Industrial Park	1,774.437	TSF

It should be noted that DEIR page 4-4 states that “Figure 4-1, Cumulative Development Location Map, shows geographically where the projects listed in Table 4-2 are located, however, Figure 4-1 is absent from the DEIR. The DEIR thus obscures and fails to disclose the physical relationship and proximity between these and other cumulative projects in the JPA Planning Area as well as the physical relationship between the proposed Project and the MIP airport. The FEIR for the proposed Project was corrected to include the promised Figure 4-1, however the omission in the DEIR inhibited comments.

As shown in **Figure 1** below, the proposed Project, the proposed Meridian D-1 Gateway Aviation Center and the proposed South Campus Specific Plan and Village West Drive Extension developments are located in close proximity to each other and to the airfield.



Figure 1 – Proximity of the Proposed Project to the proposed Aviation Center and South Campus Specific Plan Developments

Source: Google Earth, Figure 3-5 of the DEIR, Figure 1 of the Meridian Park D-1 Gateway Aviation Project Initial Study, and Figure 3-4C of the South Campus Specific Plan and Village West Drive Extension DEIR. Figure prepared by Channel Law.

The cumulative impact analysis clearly understates the cumulative impacts associated with the proposed Project and lacks the kind of detailed impact analysis of the combined effects of the three developments and the three developments in combination with other past, present and reasonably foreseeable future projects that would occur in either a Master EIR for the JPA or a Program EIR for the three developments. For example, the Meridian South Campus Specific Plan and Village West Drive Extension Draft Subsequent EIR identified significant unavoidable cumulative traffic impacts as resulting from that development. However, the EIR for the proposed Project found that the cumulative traffic impacts of the proposed Project were less than significant. Given the existence of significant unavoidable cumulative traffic impacts from a nearby project, the DEIR for the proposed Project clearly erred in finding that the proposed Project's contribution to cumulative traffic impacts was less than cumulatively considerable. The EIR has failed to identify a significant unavoidable cumulative impact and thus must be revised and recirculated. Most of the other cumulative impact judgements are also likely underestimated.

Cumulative impacts would be even greater if the Aviation Center development had been included in the analysis, as it should have been, given that it was a reasonably foreseeable project. The cumulative impact analysis in the DEIR is thus fatally flawed, understates impacts, fails to identify all of the unavoidable cumulative impacts, and serves to highlight why the JPA's

impermissible piecemealing of environmental review has led to an understatement of impacts, the failure to identify and mitigate all impacts, and a fatally flawed EIR. The EIR for the proposed Project must therefore be corrected and recirculated.

4. DEFECTS IN THE EIR

Setting aside for the moment the fact that the JPA has engaged in impermissible piecemealing, the EIR as a stand-alone document, includes a number of defects sufficient to trigger the need for recirculation of the EIR.

A. Lack of an Accurate, Stable or Finite Project Description

As detailed by a number of commenters on the DEIR, the EIR lacks an accurate and stable project description. All comments on the EIR submitted during the comment period or during the administrative process are incorporated herein by reference.

Commenters that have identified the lack of an accurate and stable project description include, but are not limited to:

- Shute, Mihaly & Weinberger LLP, letter dated March 10, 2023 (Letter O-8; Comment O-8.10-14). This letter explains that the DEIR lacks the necessary detail regarding the Project design, Project plans, the Project Development Agreement, and Project construction to enable independent analysis of likely Project impacts. Several of the noted defects were not corrected until the FEIR, thus impacting the public's ability to accurately understand the Project Description.
- Mike McCarthy, PhD, letters dated January 10, 2023 (Letter I-8) and March 9, 2023 (Letter I-832 and I-833) detail inconsistencies in the description of the proposed Project contained in the various maps included in the EIR as well as changes in the Project Description since issuance of the Initial Study/Notice of Preparation ("IS/NOP"). Mr. McCarthy also details how the Project Description is inconsistent with various planning documents and ordinances (Letter I-833).

B. Inappropriate Definition of Project Objectives

As noted on DEIR page 6-1 and FEIR Section 3.5.6, the proposed Project requires a General Plan Amendment, a Specific Plan, Zoning Amendment, Tentative Parcel Map, two Plot Plans, and a Development Agreement to redevelop the former munitions bunkers of the March AFB, along with a conservation easement over the Conservation Easement. Rather than being designed to fulfill the objectives of the General Plan and Specific Plan for the area, the proposed Project requires amendments to the General Plan, Zoning and Specific Plan. The Project as proposed is thus not designed to further the key objectives of the March JPA.

Rather than including objectives as specified in the General Plan, the EIR has specified objectives designed to support selection of the Project as proposed. In this way, the objectives are inappropriately narrow. As detailed on DEIR pages 6-1 to 6-2 the Project Objectives include:

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

The project objectives thus include the objective of impacting the munitions bunkers by redeveloping the majority of the former munition's storage area. This objective was included in the DEIR prior an updated assessment of the cultural resource value of the bunkers. Conclusions in the EIR that these structures are not historic are currently under challenge. Having an objective of causing a significant and unmitigable impact, such as a potentially significant unavoidable historic resource impact resulting from the loss of the majority of the potentially historic munitions bunkers, is inappropriate and contrary to the basic policies of CEQA. CEQA Guidelines Section 15003(f) specifies that one of the policies of CEQA is as follows:

15003. POLICIES

- (f) CEQA was intended to be interpreted in such a manner as to afford the fullest possible protection to the environment within the reasonable scope

of the statutory language. (*Friends of Mammoth v. Board of Supervisors*, 8 Cal. 3d 247.)

Including a project objective of causing a potentially significant impact is contrary to this important CEQA policy and should not be included as a Project Objective.

The EIR and the JPA need to be honest about the ability of the proposed Project to meet Project objectives and needs to have more clearly defined objectives to allow for comparison between possible alternatives. For example, the EIR includes the objective to: “Provide increased job opportunities for residents through the provision of employment-generating businesses.” However, this objective is vague and says nothing about the quality of the jobs, the income categories, the employment per square foot, or retention rates. If the objective were stated as providing high quality, long-term jobs, warehousing would fare poorly in comparison to other job types. According to *Warehouse & Logistics News*:³³

The statistics show that warehouses are among the top four workplaces for the highest staff turnover. On average, warehouse staff turnover is 37% in one year. To put that into perspective, the average turnover rate across all industries is 3.6%. Turnover, however, is a normal part of the business, but there are some businesses running warehouse operations, like Amazon, for example, that has a terrible reputation. On average, Amazon loses 3% of staff per week or 150% per year.

According to the employment firm, Harver:³⁴

According to the US Bureau of Labor Statistics, the average turnover rate across all industries in the U.S. is between 12% to 15% annually. Employee turnover in the warehouse industry stands at a whopping 46.1%.

The JPA needs to ask the question, if promotion of employment is an important objective, are high employment turnover warehouses the best use of JPA land? EIR objectives need to be written so as to better capture the intent of General Plan which states that:

³³ <https://warehousenews.co.uk/2022/06/why-do-warehouses-have-such-a-high-staff-turnover-rate/>
See also: <https://www.businessinsider.com/labor-shortage-warehouse-jobs-workers-put-off-hours-conditions-2021-10/>; <https://harver.com/blog/warehouse-turnover-rate/#:~:text=Employee%20turnover%20in%20the%20warehouse,the%20list%20could%20go%20on>
<https://www.kanelogistics.com/blog/warehouse-labor-the-real-cost-of-warehouse-worker-turnover/>; See also <https://www.supplychaindive.com/news/pay-is-only-one-piece-of-the-warehouse-worker-retention-puzzle/625646/>
which puts the turnover rate at 49%.

³⁴ <https://harver.com/blog/warehouse-turnover-rate/#:~:text=According%20to%20the%20US%20Bureau.in%20this%20industry%20so%20high%3F>

Due to the economic loss to the regional with realignment of March AFB and March ARB, capitalizing on the creation of an employment and economic center that will add to the Western Riverside County region and achieve an equitable balanced between job availability and housing supply are primary goals. There are opportunities for enhancing the quality of life in the region of the March JPA Planning Area; while at the same time addressing the needs and issues of the March JPA for economic growth and development.³⁵

C. Inappropriate Reliance on Project Design Features (“PDFs”) When Making Impact Judgements

The EIR for the proposed project understates Project impacts by improperly relying on Project Design Features (“PDFs”), which are in fact mitigation measures, as a basis for concluding that Project impacts are less than significant. In *Lotus vs. Department of Transportation* (2014) 223 Cal.App.4th 645 (Lotus), the court found that an EIR violated CEQA by incorporating proposed mitigation measures into the description of the project, and then basing its conclusion of less-than-significant impacts in part on those mitigation measures. This is exactly what has been done in the EIR for the proposed Project. The court found that this improperly compressed the analysis of impacts and mitigation measures into a single issue.

In *Lotus v. Dep’t of Transp.* (2014) 223 Cal.App.4th 645 (Lotus), Caltrans was found to have certified an insufficient EIR based on its failure to properly evaluate the potential impacts of a highway project. The *Lotus* court found that Caltrans erred by:

. . . incorporating the proposed mitigation measures into its description of the project and then concluding that any potential impacts from the project will be less than significant. As the trial court held, the “avoidance, minimization and/or mitigation measures,” as they are characterized in the EIR, are not “part of the project.” They are mitigation measures designed to reduce or eliminate the damage to the redwoods anticipated from disturbing the structural root zone of the trees by excavation and placement of impermeable materials over the root zones. By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA. (*Lotus v. Dep’t of Transp.*, *supra*, 223 Cal.App.4th at pp. 655–656, *emph. added*.)

The court ordered Caltrans’ certification of the EIR be set aside, finding:

[T]his shortcutting of CEQA requirements subverts the purposes of CEQA by omitting material necessary to informed decisionmaking and informed

³⁵ General Plan page 1-5.

public participation. It precludes both identification of potential environmental consequences arising from the project and also thoughtful analysis of the sufficiency of measures to mitigate those consequences. The deficiency cannot be considered harmless. *Ibid.*

(*Id.* at 658.)

The EIR for the proposed Project relies on a number of PDFs which are in fact mitigation measures.³⁶ These include, but are not limited to, the following:

- Aesthetics, Light and Glare – PDF-AES-2, PDF-AES-3, and PDF-AES-13. For example, PDF-AES-13 states: “Lighting is prohibited that could be mistaken for airport lighting or that would create glare in the eyes of pilots of aircraft using the nearby March Air Reserve Base (on-site).” This is clearly a mitigation designed to avoid air hazards impacts associated with project lighting. (This can be compared to MM-HAZ-3 which is also designed to avoid impacts to safe air operations). Furthermore, the EIR includes mitigation measure MM-AES-2 requiring a photometric study to demonstrate compliance with PDF-AES-1 through PDF-AES-16, further confirming their mitigation nature. MM-AES-2 is deficient as it does not specify what must happen in the event that the proposed Project is not found to be in compliance with PDF-AES-1 through PDF-AES-16. The potential for impacts remains. These PDFs are clearly mitigation measures and the EIR has thus understated the potential for light and glare and associated hazards impacts.
- Air Quality – Remaining PDF-AQ-14 prohibits the use of natural gas. The PDF specifies that non-compliance shall necessitate additional environmental review. The measure is thus clearly designed to restrict. The remaining air quality PDF is clearly a mitigation measure and the EIR has thus understated the potential for air quality impacts.
- Cultural Resources – PDF-CUL-1 requires that “Two Weapons Storage Area igloos will be retained on the Project site.” “These igloos will remain visually accessible to the public and signage will be incorporated to share the historical nature and use of these facilities as part of the former March Air Force Base.” This is clearly a mitigation designed to reduce impacts associated with the removal of a number of the historic igloos.
- Hazards and Hazardous Materials – PDF-HAZ-1 (ALUC), PDF-HAZ-2 (wildlife), PDF-HAZ-4 (wildlife). These are clearly mitigation measures.

³⁶ See also DEIR comment letter from Shute, Mihaly & Weinberger LLP dated March 10, 2023 incorporated herein by reference.

- Noise (blasting and drilling) – PDF-NOI-2, PDF-NOI-3 are clearly mitigation measures. For example, PDF-NOI-2 is clearly a mitigation measure. It reads as follows:

PDF-NOI-2 Blasting and Drilling Limits. No blasting shall occur within 1,000 feet of any residence or other sensitive receptor. In the event bedrock material that is not rippable by bull-dozer is encountered within 1,000 feet of any residence or other sensitive receptor, the construction contractor shall utilize expansive epoxy or other non-explosive demolition agent for any necessary removal operations. In addition to the distance limits, any blasting or drilling activities shall not exceed the City construction noise threshold of 75 dBA leq for City residents or the County’s construction noise threshold of 65 dBA Lmax for County residents.

This mitigation measure in the guise of a PDF provides no mechanism for halting construction activities that do not comply with the stated thresholds, and the EIR has failed to demonstrate that the measure is feasible. New PDF-NOI-4 is also essentially a mitigation measure. The potential for impacts remains.

- Transportation and Traffic – PDF-TRA-3 states: “**Truck Route Enforcement Program.** To address trucks turning left from Cactus Avenue onto Brown Street or otherwise violating the established truck routes, the Project applicant shall provide the March Joint Powers Authority compensation of \$100,000 to fund a truck route enforcement program for a period of two years commencing with the issuance of the first certificate of occupancy.” This is clearly designed to avoid impacts such as impacts to roadway paving and road hazards. In addition, since the PDF sunsets after two years, it does not appear that it is sufficient to avoid long-term impacts. This is clearly a mitigation measure. The potential for impacts has been understated and the potential for impacts remains.
- Wildfire – PDF-FIRE-2. This PDF requires Project compliance with a Fire Protection Plan (FPP) that not only complies with existing fire code requirements and requirements of the Riverside County Fire Department, but also “**with Project-specific measures** based on the Project site, its intended use, and its fire environment, as defined and memorialized in the FPP.” It is clearly a mitigation measure and can be compared to other mitigations for the proposed Project such as MM-FIRE-1.

The analysis of both the proposed Project and alternatives are fatally flawed because many of the PDFs are in fact mitigation measures. This issue was brought to the JPA’s attention by Comment Letter O-8 (Comment O-8-16 and O-8-37) in terms of the air quality impacts, but the issue also pertains to each of the issue areas for which there are PDFs that are in fact

mitigation measures. While the JPA converted one PDF to a mitigation measure (MM-AQ-18), it has failed to address the *Lotus* issue as it pertains to other issue areas and it added an additional PDF (PDF-NOI-4) to the FEIR, which is in fact a mitigation measure and modified several of the PDFs to improve their mitigation value (see PDF-TRA 1-3).

The EIR thus understates impacts in a way that is far more extreme than what happened in *Lotus*. Under CEQA, significance determinations must be made without consideration of avoidance, minimization, and/or mitigation measures. The EIR for the proposed Project has violated this precept and has thus understated and failed to identify impacts. The EIR is therefore fatally flawed. This must be corrected and the EIR recirculated pursuant to CEQA Guidelines Section 15088.5(a)(1), (2) and (4).

D. Mitigation Measures Which Have Not Been Demonstrated To Be Feasible and Inadequate Mitigation

There are a number of mitigation measures which have either not been demonstrated to be feasible, or which are inadequate as written. The potential for impacts thus remains.

As written, Mitigation Measure MM-GHG-11 does not ensure that the specified bus shelter will actually be installed and in fact anticipates that it won't. It is therefore inadequate:

MM-GHG-11. Prior to the issuance of any grading permit, the Project will provide an in-lieu payment to the March Joint Powers Authority for the installation of a bus shelter on Alessandro Boulevard, not to exceed \$17,000. If the bus shelter is not installed within 7 years of Project approval, the amount will be refunded to the developer.

Mitigation Measure MM-HAZ-2 only addresses the potential for storage, handling and use of toxic gases in close proximity to a school. As noted on DEIR page 4.1-2, the "closest school to the Project site is a preschool, located at the Grove Community Church approximately one-quarter mile southwest of the Project." "The Benjamin Franklin Elementary School is located approximately 0.8 miles south of the Project site and the Amelia Earhart Middle School is located approximately 1 mile south of the Project site." MM-HAZ-2 fails to address off-site toxic emissions due to transport, or the use, storage or handling of other hazardous materials or substances within one-quarter mile of a school and is therefore inadequate:

MM-HAZ-2. Materials Storage Near School. Facilities located within one-quarter mile of an existing school, including public or private schools as well as preschools, shall not store, handle, or use toxic or highly toxic gases at quantities that exceed threshold levels established by California Health and Safety Code Section 25532.

MM-HAZ-2 is not adequate to protect school children, given that MM-HAZ-3 – Airport Compatibility, which specifies the following, clearly indicates that the use, transport and storage of non-gaseous toxic materials is contemplated. MM-HAZ-3 states in part:

- Within Airport Compatibility Zone C1, above ground storage of more than 6,000 gallons of flammable or hazardous materials shall be reviewed by the Riverside County Airport Land Use Commission, prior to consideration of these facilities by the March JPA.
- Irrespective of above bullet, use/storage of acutely hazardous materials within Airport Compatibility Zone C1, in excess of threshold levels as identified by the state of California in Title 8 of the Code of Regulations Appendix A to Section 5189 - List of Acutely Hazardous Chemicals, Toxics and Reactive, shall file for approval by the Riverside County Airport Land Use Commission prior to review and approval of the use by the March JPA.

Judgements that these impacts will be less than significant after mitigation is therefore not supported. The potential for significant unmitigated impacts remains.

E. Failure to Identify Indirect Impacts Resulting from Project-Induced Growth in Cargo Operations

As previously noted, a “Project” as defined by CEQA is “an activity which may cause either a direct physical change in the environment, or **a reasonably foreseeable indirect physical change in the environment.**”³⁷ The EIR is fatally flawed because it has failed to analyze the indirect impacts of the proposed Project resulting from its demand for increased air cargo operations at the March Inland Empire Airport. These indirect impacts include the impacts resulting from developments such as the proposed Meridian D-1 Gateway Aviation Center currently undergoing review which is designed to increase civilian cargo handling capacity at the MIP airport.

The proposed Project is located within the March JPA Planning Area and in close proximity to March Inland Port Airport, within a joint use military/civilian airfield, which is also within the March Joint Powers Authority General Plan Planning Area. Both the Planning Area and March Inland Port Airport are located within Foreign Trade Zone 244,³⁸ which “allows U.S.-based companies to defer, reduce, or even eliminate Customs duties on products admitted to the zone. In fact, March JPA with its airfield acts as the heart of the FTZ.”³⁹ The proposed Project is uniquely situated to make use of expanded cargo operations at MIP airport and will clearly result in increased demand for MIP airport cargo capacity, given the MIPs current limited capacity.

³⁷ PRC § 21065.

³⁸ For a map of the FTZ see:
https://www.marchjpa.com/documents/docs_forms/04292019_FTZ244_Service_Area_Map_w-FTZ_header.pdf

³⁹ <https://marchjpa.com/foreign-trade-zones/>

March Inland Port Airport “contains a runway with a length of 13,300 feet, which can technically, as well as market-wise serve civilian aviation operations, both passenger and air cargo.”⁴⁰ To facilitate joint use of the airfield, the March Inland Port Airport Authority (“MIPPA”) was created by the March JPA in 1996 and formalized through the execution of a joint use agreement with the military (“AFRES”) in 1997 to provide for civilian use of the airport facilities. The agreement includes approximately 360 acres for civilian aviation facilities at the southern end of the airfield.⁴¹ In touting the March Inland Port to potential civilian users, the JPA states:⁴²

The setting of March Inland Port is ideal for many reasons:

Airfield is located in one of the fastest growing regions of the United States.

MIP is accessible to four major freeways.

Access to MIP has been upgraded from Interstate 215, as a High Priority Project through TEA-21. This \$9 million ground access project was completed in mid-2000 and was further improved in 2015.

The regional location of March has been planned and developed to assure land use compatibility with the operation of March Airfield.

As a joint use facility, operational costs are highly competitive

As noted on General Plan page 1-8: “The unique opportunity of a joint use airfield with the AFRES will shape the type of industry and commerce attracted to the March JPA Planning Area.” In fact, Goal 7 of the General Plan Land Use Element is to: “Maximize the development potential as a regional Intermodal Transportation facility to support both passenger and freight-related air services.” To that end, General Plan Land Use Element Policy 7.7 is to: “Encourage commerce and industry that are complementary to the joint use of the airfield.” Furthermore, Policy 7.8 is to: “Plan for uses which support and contribute to the establishment and development of commercial aviation.” It is therefore inexcusable that the EIR fails to analyze the proposed Project’s indirect impacts resulting from its inducement of the growth of air cargo operations at March Inland Port.

⁴⁰ General Plan, page 1-6.

⁴¹ See: <https://marchjpa.com/march-inland-port-airport/>; <https://marchjpa.com/march-inland-port-airport/formation-of-mipaa/>

⁴² <https://marchjpa.com/march-inland-port-airport/formation-of-mipaa/>

As previously discussed, all of the prior environmental documents and studies for the JPA are 24 or more years old.⁴³ The EIR for the proposed Project therefore needed to analyze not just impacts associated with the growth in surface traffic associated with the proposed Project, but also the growth in air traffic associated with the proposed Project. It also needed to analyze all of the indirect impacts resulting from air cargo expansion, such as Meridian Park D-1 Gateway Aviation Project which are designed to serve the demand for air cargo facilities created by the proposed Project. The Meridian Park D-1 Gateway Aviation Project is not only reasonably foreseeable, it is a known consequence of the proposed Project's increase in warehouse space.

CEQA Guidelines, § 15064, subd. (d) requires:

15064. DETERMINING THE SIGNIFICANCE OF THE ENVIRONMENTAL EFFECTS CAUSED BY A PROJECT

(d) In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project **and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.**

As explained by CEQA Guidelines Section 15358:

15358. EFFECTS

“Effects” and “impacts” as used in these Guidelines are synonymous.

(a) Effects include:

- (1) Direct or primary effects which are caused by the project and occur at the same time and place.
- (2) Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.

(b) Effects analyzed under CEQA must be related to a physical change.

⁴³ See also: <https://marchjpa.com/documents-forms/>

Note: Authority cited: Section 21083, Public Resources Code;
Reference: Sections 21068 and 21100, Public Resources Code.

The JPA was clearly required to analyze the indirect impacts of the proposed Project, including the reasonably foreseeable indirect impacts resulting from the Aviation Center development. This requirement is consistent with the principle set forth by the court in *Laurel Heights* that an EIR must include an analysis of a future project or expansion if “(1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396).

Judgements such as the following, on DEIR page 4.11-19/FEIR page 4-11.20 are thus clearly in error, and result from a failure to identify significant indirect impacts of the proposed Project:

Threshold NOI-4 is applied to any proposal that would increase the incidence of commercial cargo flights departing or arriving at MARB/IPA. The Project does not propose any air cargo operations that would use MARB/IPA, nor does it include residential land uses that could be impacted sleep disturbance resulting from increased nighttime air cargo operations at MARB/IPA. Therefore, the Project would have no impacts and no further noise analysis is provided under Threshold NOI-4.

As previously noted, the Initial Study for the Aviation Center development identified the potential for a number of significant impacts and the EIR for that project identifies significant unmitigable impacts, including noise impacts from air traffic. These are potential indirect impacts of the proposed Project which the EIR has failed to address and identify. The EIR is therefore fatally flawed. This must be corrected and the EIR recirculated pursuant to CEQA Guidelines Section 15088.5(a)(1), (2) and (4).

F. Inadequate Cumulative Impacts Analysis

As previously discussed, the cumulative impacts analysis is inadequate. It would be helpful if Table 4-1 included the State Clearinghouse Numbers for the different developments in the JPA, as it is difficult to validate the list, based on the project names. The cumulative analysis did not include the SCH#2021040012: Meridian D-1 Gateway Aviation Center Project.⁴⁴ This is a fatal flaw of the EIR, as the impacts associated with development designed to address project-induced demand for air cargo operations and expansion have not been addressed in the EIR. The EIR must be corrected and recirculated.

G. Inadequate Alternatives

⁴⁴ <https://ceqanet.opr.ca.gov/2021040012>

The DEIR includes evaluation of four alternatives: Alternative 1 – No Project; Alternative 2 – Reduced Development Alternative; Alternative 3 – Restricted Industrial Building Size Alternative; and Alternative 4 – Reduced Cultural Resource Impact Alternative. In response to comments, the JPA has added one of the additional alternatives suggested in comments, Alternative 5 – Non-Industrial Alternative. As described on FEIR pages 6-4 to 6.5:

Under Alternative 5, the Non-Industrial Alternative, the parcels adjacent to Barton Street would be designated Commercial Retail. Unlike the Project, these parcels would have access to Barton Street to provide neighborhood commercial services. With the exception of the Public Facility and Park/Recreation/Open Space parcels, the remaining acreage within the Specific Plan Area would be designated Office Park. The Project's three Industrial parcels would be divided into 15 Office Park parcels under Alternative 5. See Figure 6-2, Alternative 5 – Non-Industrial Alternative. Development under Alternative 5 would involve smaller, but more numerous buildings compared to the Project. The maximum height of Alternative 5's buildings would be 45 feet compared with the Project's 50 feet. Under Alternative 5, warehousing and other industrial activities would not be permitted under either the Commercial Retail or Office Park designations. Table 6-13 details the development square footages by land use for the Project and Alternative 5. Compared to the Project, Alternative 5 represents an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage.

FEIR Topical Response 8 - Alternatives rejected analysis of four other alternatives suggested by commenters without providing adequate or accurate justification:

- All Residential Alternative – This alternative was rejected without environmental review because it did not meet two of the Project Objectives. However, CEQA requires only that an alternative meet most of the Project Objectives to be viable.

According to the FEIR, this alternative did not meet the objective to provide increased job opportunities for residents through the provision of employment-generating businesses.⁴⁵ However, as discussed in Sections 1B and 3B of this letter, the objectives in the EIR fail to conform to or address the goals of the March Joint Powers Authority General Plan and are improperly tailored to promote the proposed Project. This alternative was also rejected without analysis for failing to meet the terms and conditions of the CBD

⁴⁵ See FEIR page 9.1-66.

Settlement Agreement (FEIR Appendix S).⁴⁶ However, the FEIR fails to document how such an alternative would violate the Settlement Agreement. It appears possible to design this alternative to comply with the Settlement Agreement by avoiding development in the Conservation Easement area.

The FEIR also rejects this alternative due to ALUC Compatibility. However, as shown in **Figure 2** below, the majority of the developable portion of the Project site is within ALUC Zone C2, with the remainder in Zone C1. These zones allow the following uses, which includes residential uses:

Zone C1 (Primary Approach/ Departure Zone):

- **Residential Density:** Less than or equal 3.0 dwelling units per acre (du/ac)
- **Other Uses:** An average of 100 people per acre or 500 people for one acre
- **Required Open Land:** No requirement for open land
- **Prohibited Uses:** Children's schools, day care centers, libraries; hospitals, congregate care facilities, places of assembly; noise-sensitive outdoor nonresidential uses; and hazards to flight
- **Other Development Conditions:** Critical community infrastructure facilities discouraged; aboveground bulk storage of hazardous materials discouraged; sound attenuation as necessary to meet interior noise level criteria; airspace review requirements for objects greater than 70 feet tall; electromagnetic radiation notification; deed notice and disclosure

Zone C2 (Flight Corridor Zone):

- **Residential Density:** Less than or equal to 6.0 du/ac
- **Other Uses:** An average of 200 people per acre or 500 people for one acre
- **Required Open Land:** No requirement for open land
- **Prohibited Uses:** Highly noise-sensitive outdoor nonresidential uses; hazards to flights
- **Other Development Conditions:** Children's schools discouraged; airspace review requirement for objects greater than 70 feet tall; electromagnetic radiation notification; and deed notice and disclosure



⁴⁶ The Settlement Agreement is available at: <https://marchjpa.com/wp-content/uploads/2024/05/S-1.-2012-CBD-Settlement-Agreement.pdf>

FIGURE 2: Location of Developable Portion of Project Site In Relation to ALUC Compatibility Zones and the 60 dBA Noise Contour (blue overlay).

Source: FEIR Figures 3-3 (proposed zoning), 4.10-2 (ALUC compatibility), and 4.10-1 AICUZ Noise Contours

Figure 2 demonstrates that residential development is a feasible alternative, and given the crisis of housing affordability in the State, could be designed to provide affordable housing for workers within the JPA.

- **Alternative Plan #1: The Campus Approach** – The FEIR rejects this alternative from consideration, mistakenly stating that:⁴⁷

use of the land as an educational/higher learning facility is identified as a prohibited use within the Riverside County Airport Land Use Plan for March Air Reserve Base/March Inland Port within the C1 Primary Approach/Departure Zone, because the likelihood of an aviation incident is “moderate”, and the development of an educational facility with public assembly (classrooms) could create the potential for a catastrophic event. The potential for an aviation incident in the less intense Flight Departure Zone (C2), is considered “moderate to low”, such that there is no specific prohibition on public assembly. However, a general concern is provided for Children’s Schools, which are discouraged and further identified that such uses should not be permitted unless no feasible alternative is available. Though the risk is somewhat reduced to “moderate to low” within the C2 compatibility zone, the conservative approach is not to locate a major educational/public assembly facility within the C2 compatibility zone, due to the moderate to low potential for an aviation incident.

There is no prohibition on universities within either zone, and this alternative could be developed such that the campus is located exclusively within the C2 zone with the entire C1 portion of the site reserved for additional open space. The FEIR appears to value the lives of university students and employees above the lives of proposed Project workers. If there is “the potential for a catastrophic event” within the C1 Zone, then no workers should be located on this portion of the Project Site or this hazard should be identified as a significant unmitigated impact of the Project.

- **Alternative Plan #2: Veterans Village Approach**⁴⁸ - As with Alternative Plan #1, the FEIR rejects this alternative from consideration based on ALUC zones and the decades old Housing Element of the March JPA General Plan. This Housing Element was written

⁴⁷ See FEIR page 9.1-67.

⁴⁸ See FEIR pages 9.1-67 to 68.

long before provision of affordable housing became a priority of the State and the region. The FEIR rejects this alternative from consideration stating that: "Since, with the exception of housing, Alternative Plan #2 could be developed under the proposed Project Specific Plan, this alternative was not evaluated further." This ignores the fact that the differing mix of uses would result in differing impacts.

- Alternative Plan #3: The State of County Park Approach⁴⁹ - This alternative was rejected due to failure to meet the objective of the decades old March JPA General Plan.

Given the unmitigable impacts of the Proposed Project, the EIR should have considered other alternatives which reduce these impacts consistent with CEQA Guidelines Section 15126.6 which states that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." As noted in Section 15126.6(b):

(b) Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The FEIR fails to demonstrate that Project Alternatives were designed with the intent of reducing impacts, or that the rejected suggested alternatives fail to reduce impacts.

5. INADEQUATE RESPONSES TO COMMENTS

The responses to comments contained in the FEIR are inadequate and fail to address the issues raised. All comments on the EIR are incorporated herein by reference and remain valid. The 5,362 pages of comments and responses provide substantial evidence, including supporting studies, demonstrating the proposed Project's potential to result in significant impacts not adequately identified in the EIR. The FEIR largely dismisses the documentation provided by commenters of the potential for additional significant or more severe impacts.

The FEIR fails to comply with CEQA Guidelines §15088.5(f) which states that "In no case shall the lead agency fail to respond to pertinent comments on significant environmental issues." The FEIR for the proposed Project fails to provide a good faith, reasoned analysis in response to many of the significant issues raised and instead provides conclusory statements unsupported by factual information, or merely reiterates the information contained in the EIR, which commenters have documented as inadequate. CEQA Guidelines Section 15088 requires:

⁴⁹ See FEIR pages 9.1-68.

15088. EVALUATION OF AND RESPONSE TO COMMENTS

- (a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.
- (b) The lead agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.
- (c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment.
- (d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the Lead Agency should either:
 - (1) Revise the text in the body of the EIR, or
 - (2) Include marginal notes showing that the information is revised in the response to comments.

Case law regarding what is required in response to comment reinforces and elaborates on these requirements. The court in *People v. County of Kern*, made the point that the necessity of comments was to prevent "stubborn problems or serious criticism" concerning a project from "being swept under the rug." *People v. County of Kern* (1974) 39 Cal.App.3d 830, 841. The appellate court held that the "failure to respond with specificity in the final EIR to the comments and objections to the draft EIR renders the final EIR fatally defective." *Id.* at p. 842; See also

Clery v. Cnty. of Stanislaus (1981) 118 Cal.App.3d 348, 358; City of Irvine v. Cnty. of Orange (2015) 238 Cal.App.4th 526, 553.

Respondents failed to respond adequately to comments submitted by members of the public and other agencies, including but not limited to the comments submitted by: R-Now members; League of Women Voters Riverside; Blum, Colling & Ho LLP; Stone Creek Residents for Smart Growth; the Sierra Club; the Redford Conservancy at Pitzer College; Shute, Mihaly & Weinberg (RNOW); Riverside Neighborhood Partnership and numerous individuals. Instead, the responses given to numerous comments regarding the Project's impacts were dismissive, conclusory, evasive, confusing, merely reiterated information in the DEIR, or were otherwise non-responsive and designed to sweep valid criticism under the rug, contrary to the requirements of CEQA.

Examples of inadequate responses include but are not limited to:

- Topical Response 7 – Cumulative Projects (FEIR Section 9.1.7) which fails to adequately address the numerous comments regarding the EIRs failure to consider other warehouse projects in the area in the cumulative impact analysis and dismisses suggestions for other cumulative projects that should have been included in the analysis. The cumulative list was limited to projects within a 5-mile radius of the Project site, based on the traffic study guidelines for WRCOG, without providing justification that this radius is sufficient for traffic and other issue area analysis. The topical response indicates that the list was based on cumulative developments that were known at the time of the Notice of Preparation dated November 18, 2021. However, the cumulative list did not include the JPA's own Meridian D-1 Gateway Aviation Center, which was clearly known to the JPA by November 18, 2021, given that the NOP for the Aviation Center EIR was issued on April 1, 2021, as shown in Table 2 of this letter. In responding to comments regarding defects in the cumulative analysis, the JPA clearly failed to seriously consider the comments or to relook at the cumulative projects list to make sure that no developments were missing from the list.
- As discussed in Section F of this letter, the JPA failed to adequately consider alternatives suggested by commenters on the DEIR.
- Biological Resource comments including those in letter I-757 from Dr. David Reznick a professor in the Department of Evolution, Ecology and Organismal Biology at UC Riverside, and letter I-949 from Rosamonde Cook, who holds a Ph.D in Ecology from UC Davis, has more than 20 years of experience in biological monitoring, and worked for 11 years as a Lead Biologist and Data Manager for the Biological Monitoring Program of the Western Riverside County Multiple Species Conservation Plan (MSHCP).

- Comment I-813.5 and other comments regarding the lack of inclusion of the 215 Freeway in the air quality and transportation analysis.

By failing to provide adequate responses to public comments and proposed alternatives, the JPA has failed to proceed in the manner required by law. Moreover, JPA's finding that adequate responses to comments were provided is not supported by substantial evidence.

6. **THE PROJECT AS PROPOSED MUST BE REJECTED**

The Project as proposed must be rejected in favor of Alternative 2. As summarized on DEIR pages 1-82 to 1-83/FEIR page 1-180 :

Alternative 2, the Reduced Development Alternative, would be the Environmentally Superior Alternative. Alternative 2 reduces the development footprint more than Alternative 3, Restricted Industrial Building Size Alternative, as well as also slightly reduces the development footprint when compared to Alternative 4, Reduced Cultural Resource Impact Alternative, thereby providing a greater reduction in workforce and total vehicle trips. . . . **Alternative 2 was found to result in fewer aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire impacts. Alternative 2 would achieve all the Project objectives, but not to the same extent as the Project.** (Emphasis added).

As shown in FEIR Table 6-6 reproduced below, Alternative 2 is feasible and would achieve all of the Project Objectives:

Table 6-6. Summary of Alternative 2 Success at Meeting Project Objectives

Project Objective	Does Alternative 2 Meet Objective?
1. Provide increased job opportunities for residents through the provision of employment-generating businesses.	Yes. Alternative 2 would provide increased job opportunities through the provision of employment-generating businesses. Alternative 2 would achieve this objective to a lesser extent than the Project.
2. Provide open space amenities to serve the region.	Yes. Alternative 2 would provide open space amenities to serve the region. Alternative 2 would achieve this objective to a greater extent than the Project.
3. Provide an active park consistent with the 2009 Safety Study prepared by March JPA.	Yes. Alternative 2 would provide the same 60.28-acre Park as the proposed Project. Alternative 2 would fully achieve this Project objective.
4. Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.	Yes. Alternative 2 would provide all the same roadway infrastructure as the proposed Project. As such, Alternative 2 would fully achieve this Project objective.
5. Remove and redevelop a majority of the former munitions storage area of the March AFB.	Yes. Alternative 2 would remove and redevelop a majority of the former munitions storage area. As such, Alternative 2 would fully achieve this Project objective.
6. Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system, which is both safe and comfortable.	Yes. Under Alternative 2, the buildout would include the provision of new roadways that could accommodate all modes of travel, including pedestrian and bicycle movement.
7. Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in <i>Center for Biological Diversity v. Jim Bartel, et al.</i> to preserve open space through establishing a Conservation Easement.	Yes. Alternative 2 would place the Conservation Easement under a conservation easement. As such, Alternative 2 would fully achieve this Project objective.

As specified in Public Resources Code (PRC) Section 21002 and CEQA Guidelines Section 15021(a)(2) a Lead Agency should not approve a project if there are feasible alternatives available that would lessen the significant environmental impacts of proposed development:

§ 21002. APPROVAL OF PROJECTS; FEASIBLE ALTERNATIVE OR MITIGATION MEASURES

The Legislature finds and declares that it is the policy of the state that **public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects**, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

**15021. DUTY TO MINIMIZE ENVIRONMENTAL DAMAGE AND
BALANCE COMPETING PUBLIC OBJECTIVES**

- (a) CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible.
 - (1) In regulating public or private activities, agencies are required to give major consideration to preventing environmental damage.
 - (2) **A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment.**
- (b) In deciding whether changes in a project are feasible, an agency may consider specific economic, environmental, legal, social, and technological factors.
- (c) The duty to prevent or minimize environmental damage is implemented through the findings required by Section 15091.
- (d) CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment.

Note: Authority cited: Section 21083, Public Resources Code;
Reference: Public Resources Code Sections 21000, 21001, 21002, 21002.1, and 21081; *San Francisco Ecology Center v. City and County of San Francisco*, (1975) 48 Cal. App. 3d 584; *Laurel Hills Homeowners Association v. City Council*, (1978) 83 Cal. App. 3d 515.

Therefore, March JPA cannot approve the Project as Proposed.

7. **CONCLUSION**

As detailed in this comment letter, the EIR for the proposed Project contains significant defects. These must be corrected and the EIR recirculated pursuant to CEQA Guidelines Section 15088.5(a)(1), (2) and (4). Moreover, the Project as proposed cannot be approved given that there is a feasible alternative which reduces impacts.

Please keep this office on the list of interested persons to receive timely advance notice of all hearings, votes and determinations related to the Project, its DEIR and requested entitlements. Pursuant to Public Resources Code Section 21167(f), please provide us with a copy of each and every Notice of Determination issued in connection with the Project.

As previously noted, we adopt and incorporate by reference all Project comments and objections raised by all others during the environmental review and land use entitlement processes for the Project. Pursuant to PRC Section 21167.6(e) and *Consolidated Irrig. Dist. v. Superior Court*, 205 Cal.App.4th 697 (2012), please include all of the hyperlinked references cited in each of the comment letters submitted during the administrative process in the administrative record.

Sincerely,



Jamie T. Hall

ATTACHMENTS

- A. March JPA
- B. Cumulative Projects At March JPA Since the JPA General Plan and EIR
- C. NOCs for Each of the Three Related Projects As Well As the Secretary of State Public Records For Each LLC Demonstrating the Three LLCs and Projects are Related

Attachment A

ATTACHMENT A
MARCH JPA



History of March Joint Powers Authority

March Air Force Base (AFB), California, a military installation in use almost continually since 1918, served as an active duty aerial refueling and deployment base, and encompassed approximately 6,500 acres. Recommended for realignment by BRAC in 1993, March AFB converted to March Air Reserve Base (ARB) on April 1, 1996, resulting in the surplus of approximately 4,400 acres of property and a number of buildings. Base realignment resulted in a significant impact to the local economy. The impacts are measured in direct loss of military and civilian jobs, loss of contract spending by the base, and loss of indirect economic activity as a result of the changes. Prior to realignment, the base employed more than 9,000 military personnel and civilian employees. The existence of the base in its pre-realignment condition contributed an estimated \$500 million annually to the regional economy.

The March Joint Powers Authority (JPA), formed in 1993 and is charged with the responsibility of base reuse, planning, and development, including establishing a joint-use aviation facility. While base realignment and the associated loss to the region came at an inopportune time, the opportunities relative to the planning and implementation of new uses and providing for unmet needs of the region have arisen. The March JPA is planning and implementing new uses for currently vacant lands, reuse of existing facilities, and joint use of the airfield facilities for the development of an air cargo facility. Overall, long-term economic gains in the form of developing a civilian air cargo center and the growth and development of an employment center to account for 38,000 jobs are projected.

History of March Air Force Base

Located within the western Riverside County region of Southern California, March Air Force



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Located within the western Riverside County region of Southern California, March Air Force Base (AFB) encompassed approximately 6,500 acres straddling Interstate 215 (Highway 395) just south of Highway 60. March AFB was first established as a military installation in 1918, and has operated almost continually since. In July, 1993, March AFB was selected to be realigned, and subsequently converted from an active duty base to a Reserve Base, effective April 1, 1996. The decision to realign March AFB resulted in approximately 4,400 acres of property and facilities being declared surplus and available for disposal actions, as well as joint use of the airfield.

Prior to base realignment, the base employed over 10,000 military personnel and civilian employees. The existence of the base in its pre-realignment condition contributed an estimated \$500 million annually to the regional economy. With the announcement of realignment, the regional economic loss with the change in military mission at March was immediately recognized. While base realignment and the associated loss to the region came at an inopportune time, the opportunities relative to the planning and implementation of new uses and providing for unmet needs of the region have arisen.

The March JPA is planning and implementing new uses for currently vacant lands, reuse of existing facilities, and joint use of the airfield facilities for the development of an air cargo facility. In short, long-term economic gains in the form of developing a civilian air cargo center, and the growth and development of an employment center to account for 38,000 jobs, are projected.



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DATE	MILESTONE
1917	As World War I dragged on, stalemated by trench warfare, the U.S. government determined to restore the initiative by gaining aerial supremacy. The establishment of nearly two dozen additional training fields during 1917 was capped by the activation of a field that was later to become March Field.
1918	<p>On February 7, 1918, the War Department accepted the Alessandro Aviation Field site as an aviation training camp, consisting of 640 acres plus three nearby sites of 160 acres each. Original lease was for five months and thirteen days at a cost of \$1 with an option for renewal and purchase. The Riverside Chamber of Commerce carried a \$64,000 bond to guarantee the cost. This barley field alongside the railroad and the Alessandro station had been used since the fall of 1917 as a cross-country stop for aviators from Rockwell Field, San Diego, where they shared a station with the U.S. Navy on an island now called Coronado Naval Station.</p> <p>On February 16, Sergeant Garlick and three other enlisted men arrived by truck with tents, cookstove, provisions, and fuel. The first official landing was by Cadet Harold Compare on March 1. On March 11, Captain William Carruthers relieved Sgt. Garlick as commander of the 818th Aero Squadron.</p>

On March 20, the field was renamed in honor of Lt. Peyton C. March, an aviator who died in Texas from injuries suffered in an aircraft crash.

The first cadets arrived in April and their 96 planes, unassembled Curtiss JN-4D "Jennys," were put together by the cadets and housed in 12 wood and tarpaper hangars.

In July, cadets in the first class to graduate were commissioned "2nd Lt." and sent to Kelly Field, Texas, for advanced training.

When the Armistice came in November, the cadets had recorded 35,468 flying hours, with 185 cadets earning their wings.

- 1919 In May, 1919, the Federal government purchased the field and it became a permanent base. A primary flight school was in operation until 1921 when training was discontinued. This was followed in 1922 when the base was reduced to caretaker status and was closed in 1926.
- 1927 1927 marked the reactivation of March as a primary training base, and permanent construction of "Spanish Mission" architecture was authorized.
- 1931 It became a tactical base in 1931 with the 7th Bombardment Group and the 17th Pursuit Group, both in the 1st Bombardment wing. Being near the aircraft industrial center of Los Angeles, many planes were test-flown from March by famous flyers, both civilian and military. Much of this activity was due to the inspired leadership of "Hap" Arnold, the base commander from 1931 to 1936.
- 1942 With the attack on Pearl Harbor, March entered its third training era, with the B-17 and later the B-24 heavy bombers. The base doubled in area and supported 75,000 troops.
- 1946 The Tactical Air Command took over control, and the 12th Air Force was assigned with P-80 jet-equipped fighter groups.
- 1947 When the U.S. Air Force was activated in 1947, March Field became March Air Force Base.
- 1949 The Strategic Air Command came in 1949 when the 15th Air Force and the 22nd Bomb Group with B-29s arrived.
- 1953 In 1953, the 22nd Bomb Group was converted to B-47s, and the 22nd Air Refueling Squadron was activated with KC-97s.
- 1960 Air Force Reserve units were assigned in 1960 to carry out rescue and troop carrier missions.

1963 The B-47s were phased out in 1963 by the arrival of the B-52, and the jet-powered KC-135 replaced the



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- 1992 Communities generate support to keep MAFB open and make their position to the public and the BRAC Commission.
- 1993 Command was transferred from the Strategic Air Command to the Air Mobility Command, and the 15th AF moved to Travis AFB. In June, the Base Realignment and Closure (BRAC) Commission recommended that March AFB be included in the "third round" (BRAC 3) of military base closures or realignments. The recommendation was approved by the President in July. Air Force Reserve and Air National Guard units remained at March AFB and the base was redesignated "March Air Reserve Base." The Base decreased to approximately 1/3 of its previous size. Resolutions from Riverside County and the cities of Perris, Moreno Valley, and Riverside formed the March Joint Powers Authority in September.
- 1994 In January the Joint Powers Commission set policies, hired initial staff, procured first grant from the Office of Economic Adjustment, and initiated the base reuse planning process. In May, the Air Force published a listing of properties that were excess to its needs in the Federal Register; other agencies have the opportunity to "claim" for their use. The first draft MAFB Master Reuse Plan was completed to include Land Use and Circulation sections; used as preferred alternative for EIS in September. Assembly Bill 3769 was passed by the California Legislature, granting special authority to permit the development of the base in September. In December, the JPA submitted a request to the Secretary of Defense to conduct homeless assistance screening and planning under new legislation.
- 1995 The JPA adopted the Homeless Assistance Plan in December. The JPA and the Air Force agreed to terms on a number of interim leases, and the JPA sub-leased the facilities to tenants.
- 1996 The JPA established the Redevelopment Agency in January. After July, 1995, the JPA instituted

feasibility analyses to examine the potential of establishing a redevelopment agency. The Air Force issued the Final Environmental Impact Statement (FEIS) in March.

In July, Certification of Final Environmental Impact Report (FEIR), and adoption of March JPA Redevelopment Agency Project Area & Plan.

The National Park Service approved the JPA's application for a no-cost conveyance of the March AFB Golf Course in December.

1997 The JPA assumed land use control for all surplus property, and the JPA staff began the process of completing the California General Plan in January. In May, The Air Force and the JPA formally signed a "Joint Use Agreement" for the shared use of the airfield facilities. The Air Force signed the first Partial "Record of Decision" (ROD) designating the final cantonment area boundaries and the properties to be designated as "airport related" in a future conveyance.

The Federal Aviation Administration approved the JPA's public benefit conveyance application for the "airport related" properties in June.

TBD The Air Force conveyed property to new owners per the multiple ROD.

Today March AFB is an Air Mobility Command facility, and the home of the 163rd Air Refueling Wing and the 452nd Air Mobility Wing. The KC-10 operates from March, as well as the reserve-flown C-141 and the KC-135 flown by the Guard. U.S. Customs maintains a fleet of smaller planes including two Blackhawk helicopters in their efforts against drug delivery.



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The March JPA, in addition to being designated as the federally recognized reuse authority for the former active duty base, has also assumed other responsibilities. These authorities include:

California Redevelopment Agency

The March Joint Powers Redevelopment Agency was established with the formation of the March AFB Redevelopment Project Area, which includes the entire 6,500-acre former active duty base area, and approximately 450 acres adjacent to the base in the industrial area of the City of Moreno Valley.

Land Use Authority

On March 11, 1997, land use authority was transferred to March JPA from the County of Riverside. The March JPA has adopted development and building codes and standards. The March JPA General Plan has been developed by the March JPA in accordance with state statutes, as well as the associated Master Environmental Impact Report. The March JPA General Plan is designed to implement the March Final Reuse Plan and related activities.

Airport Authority

March Inland Port Airport Authority (MIPAA), is a governing body under the governance umbrella of the March JPA. MIPAA is responsible for the development and operation of the March Inland Port (MIP), a joint-use aviation facility targeted for air cargo operations.

With realignment, the AFRES reduced the annual number of military operations at March ARB to 51,426. Projected civilian (air cargo) operations capacity, under the current State Implementation Plan (SIP), is denoted in the table below.

	1999	2000	2001	2005	2007	2008	2010
TOTAL	6,788	9,053	12,774	17,156	18,581	19,808	21,001


Currently, MIP realizes less than 4,000 operations per year. Airspace at MIP is unconstrained due to location of other airports, and orientation of Runway 14/32 with respect to flight tracks and patterns. Furthermore, MIP is in the Hemet Sector of the Southern California TRACON, which can handle 25-30 IFR flights per hour.

Southern California Air Cargo Demand

Compared to past years when air cargo was carried primarily in the belly holds of passenger aircraft, most regional air cargo is now transported by dedicated all-cargo freighters. Cargo carried by freighter is estimated to range from about 60% to 64%, depending on the season. MIP has the capability and facilities to accommodate cargo operations. The vast growth in warehouse/distribution facilities in Riverside County, primarily the Cities of Moreno Valley and Perris, proved to make MIP a viable goods movement facility for import/export businesses coming to the region, especially those within the March JPA Foreign Trade Zone.

International air cargo handling capacity in the region is a particular problem. Delays during peak periods are continuing to mount at LAX, mainly because of a shortage of ramp space, on-airport warehouse space, and peak-period lift capacity. Even with substantial improvements assumed to be made pursuant to the ongoing LAX Master Plan Study, it is highly doubtful that LAX and highways will handle the tremendous growth in international air cargo volume that is forecast over the next twenty years, most of which growth will come from the Inland Empire.

Many existing air carrier airports lack the space to accommodate the extensive warehousing, manufacturing, and intermodal facilities that are associated with state-of-the-art cargo-handling airports. MIP has the land and ability to construct high-tech manufacturing/distribution centers with intermodal capabilities, or "inland port."



MIPAA was formed by the March JPA in 1996 for the purpose of creating a public use airport. This airport is being created as a joint use facility in cooperation with the U.S. Air Force Reserve Command at March Air Reserve Base in Riverside County, California. MIPAA is responsible for the development and operations of the “Public Use” airport.

Joint Use Airport

When March AFB was announced for realignment in 1993, one of the first actions of the DOD was to offer the formation of a public “joint use airport.” The Air Force defines a “joint use airport” as one where the facilities which are owned and operated by the Air Force are made available for use by civil aviation. Approximately 360 acres east and west of the main runway are available for “airport related uses” as a result of the alignment of March Air Force Base in 1996.

MIP is a joint use aviation that shares essential aviation facilities with the Air Force Reserves. These facilities include the control towers, taxiways, nav aids, and runways, as well as maintenance of facilities. At 13,300 feet, Runway 14-32 is one of the longest civilian runways on the west coast. Given the runway data for this facility, all freighter aircraft (including 747-400 and AN 124) can depart fully loaded under most conditions. The facility is ideal to serve commercial air cargo freighters that generally operate heavy loads for long stage lengths. The airfield is in compliance with FAA design standards as detailed in FAA Advisory Circular 150/5300-13 (Change 4 Airport Design) and Federal Aviation Regulations Part 77 Objects Affecting Navigable Airspace.

On May 7, 1997, a joint use agreement was entered into by the DOD and March Joint Powers Authority (JPA). The JPA is the recognized local reuse agency charged with planning for the economic redevelopment of surplus properties at the base. Under the agreement, the civilian (JPA) and the military (AFRC) entities share essential aviation facilities such as the control towers and runways, as well as maintenance of facilities.



MARCH JOINT POWERS AUTHORITY

"BRINGING GOOD JOBS TO RIVERSIDE COUNTY"

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March AFB Master Reuse Plan and EIS – The Base Reuse Plan designates approximately 360 acres of land for civilian aviation facilities at the southern end of the airfield at March. The EIS evaluated the environmental elements of the reuse plan and alternatives in accordance with NEPA.

Facilities – Setting – Description

March Inland Port consists of very desirable elements, as well as an ideal setting both in terms of aviation and physical location.

March Inland Port consists of the following key aviation elements:

The longest runway in California at 13,300 lineal feet.

Index E Fire Fighting Capacity Fire Station.

An operational airfield with a fully manned control tower.

Airspace is non-congested, as no arrival or departure routes are “shared” by other airports within the Southern California region. This also holds true for the NAVAIDs, which utilize the Homeland VOR.

Airfield is close to all airways.

New Jet-A and AVGAS fuel facility

Land side, MIP contains more than one million (1,000,000) square feet of ramp area that is stressed to accommodate aircraft up to 900,000 pounds.

Million Air FBO services from a brand new executive terminal (2015).

The setting of March Inland Port is ideal for many reasons:

Airfield is located in one of the fastest growing regions of the United States.

MIP is accessible to four major freeways.

Access to MIP has been upgraded from Interstate 215, as a High Priority Project through TEA-21. This \$9 million ground access project was completed in mid-2000 and was further improved in 2015.

The regional location of March has been planned and developed to assure land use compatibility with the operation of March Airfield.

As a joint use facility, operational costs are highly competitive

March JPA has streamlined the way to do business in California. March JPA has land use authority, and is responsible for all entitlements, building permits, and clearances. Furthermore, the March JPA formed a California Redevelopment Agency and project area to assist with development of MIP. This means that all business dealings at MIP are conducted with “one” cohesive legislative group. All aviation criteria and regulations have been satisfied, and MIP is open for public use.

More than \$28 million in federal funds have been granted to MIP. MIP is designated as a “Reliever Airport” in the FAA’s National Plan of Integrated Airports System (NPIAS) which makes MIP eligible for such funds. The funds are necessary for airport infrastructure project that either rehabilitate existing infrastructure or construction of new infrastructure to support civil aviation.

MIP is adjacent to Interstate 215, which links with Interstate 15 approximately 22 miles to the south, to serve the San Diego market. The airport is 3 miles south of Highway 60, which links with Interstate 10 approximately 13 miles to the east. Access to MIP is via the Harley Knox Blvd. exit at I-215.



MARCH JOINT POWERS AUTHORITY

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14205 Meridian Parkway,
Ste. 140
Riverside, CA 92518

951.656.7000
info@MarchJPA.com

Hours of Operation

Mon: 7:30am – 5:00pm

Tue: 7:30am – 5:00pm

Wed: 7:30am – 5:00pm

Thu: 7:30am – 5:00pm



The March JPA along with the U.S. Air Force pursued the establishment of March Air Field as a public joint use airport. The Air Force defines a “joint use airport” as one where the facilities which are owned and operated by the Air Force are made available for use by civil aviation. A joint use agreement between these parties was executed May 7, 1997, along with land leases for over 350 acres, as the civilian airport name March Inland Port.

The MIP is the civilian facility that is managed and operated by the MIP Airport Authority (MIPAA). With premier aviation facilities, MIP can accommodate the largest of air cargo and passenger aircraft.

March Inland Port boasts an operational airfield, with a 13,300 lineal foot runway and fully manned control tower. With more than one million square feet of ramp area fully stressed to accommodate aircraft up to 900,000 pounds, the MIP has more than 350 acres of runway-accessible property available for development. Airport fees for aviation operations and service vendors are some of the lowest in Southern California. MIP is a public use airport accessible to commercial and general aviation. For recreational and corporate aircraft operators, MIP has a fully functioning world-class Fix Based Operator (FBO) – Million Air.

March Inland Port Airport Links

Formation of MIPAA

Operations

Foreign Trade Zones

Conducting Business at MIPAA

Noise Disturbance Form

Airport Documents and Forms



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14205 Meridian Parkway,
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Hours of Operation

Mon: 7:30am – 5:00pm
Tue: 7:30am – 5:00pm
Wed: 7:30am – 5:00pm
Thu: 7:30am – 5:00pm
Fri: Closed

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Military and Public Use Airport

Military Owns and Operates Airfield 07:00 L - 23:00 L

MIPAA Owns 356 Acres of Airport Property for Public Use

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MARCH INLAND PORT (KRIV)

**NOW OPEN TO THE
PUBLIC!**

WELCOME!



March Inland Port Airport is a public joint use airport. The flying facility is jointly used by March Inland Port Airport Authority (MIPAA) and United States Air Force. MIPAA owns 361 acres of runway accessible property upon which significant development has occurred. The property became available when March Air Force Base was realigned in 1996. Previous to the realignment, March Air Force Base was an "active" military base and is now an Air Force "Reserve" Base. The FAA 4-letter designator for the airport is KRIV. March Inland Port has a 13,300 foot runway, manned tower (0700-2300 LCL) and professional aviation services providers for general aviation and commercial aircraft. March Inland Port is capable of meeting the needs of growing commercial and business aviation demands apparent to significant business and residential development in Western Riverside County. March Inland Port is also located in [Federal Trade Zone](#) No. 244. A FTZ offers significant tax and tariff benefits to business operating within it.

The Partnership with the US Air Force is a *Win - Win!*

Civil Aircraft Operations Offset Military Operating Costs While Existing Military Infrastructure and Operational Support Keep Civil Operating Costs Down all the While Creating Good Jobs in Riverside County!


The United States Air Force owns the majority of the flying facility while the civil airport authority utilizes its runways, taxiways and navigational aids for civil aircraft operations. The civil airport uses the facilities in accordance with the 1997 Joint Use Agreement and subsequent amendments. Airport [rates and charges](#) are competitive as the civil airport authority shares operating and maintenance expenses with the US Air Force, thereby keeping civil airport costs low and associated user fees competitive.

Administration, Operations and Maintenance of KRIV is controlled by the Air Force and its Base Operation Services (BOS) contractor. Airport administration, operations, maintenance and capital improvement projects on MIPAA's owned airport property are controlled and managed by the March Inland Port Airport Director with support from the [March Joint Powers Authority](#), the governing body of MIPAA.

March Joint Powers Authority is March Joint Powers Authority is comprised of four jurisdictions whose boundaries merge with the former March Air Force Base properties. The four jurisdictions include the County of Riverside and the cities of Moreno Valley, Perris, and City of Riverside. Each jurisdiction selects two elected officials to serve on the Authority's governing body - the March Joint Powers Commission. The Authority is designated as the federally recognized reuse authority for the former active duty base surplus property. **The MJPA is commissioned to reuse surplus military property, stimulate community development and to create jobs.**

MIPAA's Airport Director reports to the MJPA Executive Director. The MJPA provides MIPAA fiscal and development support. Development projects are expedited through the MJPA Planning Department, the permitting and regulatory department for all development within the MJPA's 4,400 acre development area. To find out more about the MJPA, please visit them at <http://www.marchjpa.com>.

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Unlike LA basin and coastal airports, KRIV's arrival and departure routes are not as impacted by the congested LA Basin airspace. There are virtually no interruptions to arriving or departing aircraft using KRIV. The tower is manned with professional US Air Force Controllers who provide a high degree of safe and controlled airspace. KRIV is conveniently located for arrival and departure to the Pacific Rim, Mexico and other international destinations. KRIV is located close to the Ports of Los Angeles and Long Beach ([link](#)). Another benefit of the airfield's location is less congested access to major interstate highways than other airports in Southern California. Moreover, the weather is exceptional with only a few days of inclement weather affecting air operations.

Foreign Trade Zone

On August 21, 2000, the Department of Commerce Foreign Trade Zones Board adopted Board Order No. 1104 - Grant of Authority, Establishment of a Foreign Trade Zone, Riverside County, California Area. This designation is FTZ No. 244, and includes the March Inland Port property, and property on West March designated for business, commerce and industry. The March Inland Port FTZ includes the air cargo airport facilities and 2000+ acres of vacant land slated for the development of business and commerce center in Riverside County, at former March Air Force Base. **What is a Foreign Trade**

Zone? Click Link for More Information [Foreign Trade Zone](#)

A foreign trade zone is a restricted-access site, in or adjacent to a Customs port of entry, operated pursuant to public utility principles under the sponsorship of a corporation granted authority by the Board and under supervision of the Customs Service and Regulations of the Foreign Trade Zones Board (19 CFR Part 400)

[More information about the Foreign Trade Zone](#)

March Inland Port Airport *"Means Business"*

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Military and Public Use Airport

Military Owns and Operates Airfield 07:00 L - 23:00 L

MIPAA Owns 356 Acres of Airport Property for Public Use

MARCH INLAND PORT AIRPORT AUTHORITY



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Foreign Trade Zone Information Page

FTZs are treated, for the purposes of the tariff laws and Customs entry procedures, as being outside the Customs Territory of the United States. Under FTZ procedures, foreign and domestic merchandise may be admitted into zones for operations such as storage, exhibition, assembly, manufacture and processing, without being subject to formal Customs entry procedures, the payment of Customs duties or the payment of federal excise taxes.

When merchandise is removed from a FTZ, Customs duties may be eliminated if the goods are then exported from the United States. If the merchandise is formally entered into U.S. commerce, Customs duties and excise taxes are due at the time of transfer from the FTZ.

For merchandise that is manufactured in a FTZ with permission of the FTZs Board, the importer may elect to pay Customs duty at the lower rate of either the finished product or its foreign components. In this manner, use of a FTZ zone can result in the reduction of Customs duty owed by companies that manufacture products in an FTZ.

Regulatory Agencies Involved in the Foreign Trade Zone Program

The legal authority to establish FTZs is found in the U.S. FTZs Act of 1934 (19 U.S.C. 81a-u) and its implementing FTZs Board Regulations (15 CFR Part 400) and U.S. Customs Service Regulations (19 CFR Part 146). Designation as a FTZ is granted by the U.S. FTZs Board, which is an independent agency housed within the U.S. Department of Commerce. The Board consists of the Secretary of Commerce and the Secretary of the Treasury. An Executive Secretary administers the day-to-day activities of the Board and supervises the FTZ's Board Staff.

The other important federal agency involved in the FTZ program is the U.S. Customs Service. As the local representative of the Foreign Trade Zones Board, the Customs Port Director has oversight responsibilities for zones located within his or her area of jurisdiction. These responsibilities include: controlling the dutiable merchandise moving to and from zones, collecting revenue owed to the U.S. government, and ensuring that there is no evasion or violation of U.S. laws and regulations governing imported and exported merchandise.

Types of Foreign Trade Zones

There are two types of FTZs. A general-purpose zone (GPZ) is established for multiple activities by multiple users. A GPZ must be operated as a public utility and be located within 60 statute miles or 90 minutes driving time from the outer limits of a U.S. Customs port of entry. GPZ projects may consist of one or multiple sites, e.g., a single building, an industrial park, a deep water port, or an international airport. While activities such as storage, inspection and distribution are permitted at all FTZs, processing and manufacturing require special permission from the FTZs Board.

In instances where a firm wants FTZ status for its own plant or facility, or when the existing GPZ cannot accommodate the firm's proposed activity, the designation of subzone may be granted. There is no legal difference in the types of activity that may be undertaken in GPZs or subzones. Typically, subzones are designated for an individual company's manufacturing operations. Subzones can be located anywhere within a State, as long as a sponsoring grantee of a GPZ exists in the State and the U.S. Customs Service can fulfill its proper oversight functions at the proposed location of the subzone.

Benefits of the U.S. Foreign Trade Zones Program

It is the intent of the U.S. FTZ program to stimulate economic growth and development in the United States. In an expanding global economy there is increased competition among nations for jobs, industry and capital. The FTZ program was designed to promote American competitiveness by encouraging companies to maintain and expand their operations in the United States.

The FTZ program encourages U.S.-based operations by removing certain disincentives associated with manufacturing in the United States. The duty on a product manufactured

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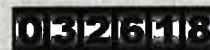
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abroad and imported into the U.S. is paid at the rate of the finished product rather than that of the individual parts, materials or components of the product. A U.S.-based company finds itself at a disadvantage vis-à-vis its foreign competitor when it must pay the higher rate on parts, materials or components imported for use in the manufacturing process. The FTZ program corrects this imbalance by treating a product made in a U.S. FTZ, for purposes of tariff assessment, as if it were produced abroad.

Benefits for the Community

When companies are persuaded that they can increase their cash flow, save taxes and improve their bottom line by locating their operations in U.S. FTZs, communities benefit in several important ways. Economic growth and development are stimulated because jobs are retained and created in the community. The FTZ program impacts indirect employment as well, because a business location not only creates jobs specific to itself, but also creates opportunities for suppliers and service providers in the community. An FTZ project can be a valuable asset when a community is trying to attract new business investment to its area. Finally, a community with a FTZ may experience an improved infrastructure and expanded tax-base as a result of higher employment and the influx of new businesses. For all of these reasons, more than 200 communities throughout the United States support and rely on the benefits that the FTZ program offers public as well as private entities.

Approved General-Purpose Zones and Subzones

Benefits for Business

For U.S.-based companies involved in international trade, the FTZ program provides a means of improving their competitive position vis-à-vis their counterparts abroad. The fundamental benefit offered by the FTZ program to U.S.-based companies is the ability to defer, reduce or even eliminate Customs duties on products admitted to the zone.

Deferral of Duties:

Customs duties are paid only when and if merchandise is transferred into U.S. Customs territory. This benefit equates to a cash flow savings that allows companies to keep critical funds accessible for their operating needs while the merchandise remains in the zone. There is no time limit on the length of time that merchandise can remain in a zone.

Reduction of Duties:

In a FTZ, with the permission of the FTZs Board, users are allowed to elect a zone status on merchandise admitted to the zone. This zone status determines the duty rate that will be applied to foreign merchandise if it is eventually entered into U.S. commerce from the FTZ. This process allows users to elect the lower duty rate of that applicable to either the foreign inputs or the finished product manufactured in the zone. If the rate on the foreign inputs admitted to the zone is higher than the rate applied to the finished product, the FTZ user may choose the finished product rate, thereby reducing the amount of Customs duty owed.

Elimination of Duties:

No Customs duties are paid on merchandise exported from a FTZ. Therefore, duty is eliminated on foreign merchandise admitted to the zone but eventually exported from the FTZ. Generally, Customs duties are also eliminated for merchandise that is scrapped, wasted, destroyed or consumed in a zone.

Miscellaneous Benefits

Elimination of Drawback:

In some instances, Customs duties previously paid on exported merchandise may be refunded through a process called drawback. The drawback law has become increasingly complex and expensive to administer. Through the use of a FTZ, the need for drawback may be eliminated allowing these funds to remain in the operating capital of the company.

Labor, Overhead and Profit:

In calculating the dutiable value on foreign merchandise removed from a zone, zone users are authorized to exclude zone costs of processing or fabrication, general expenses and profit. Therefore, Customs duties are not owed on labor, overhead and profit attributed to production in a FTZ.

Taxes:

By federal statute, tangible personal property imported from outside the U.S. and held in a zone, as well as that produced in the U.S. and held in a zone for exportation, are not subject to State and local ad valorem taxes.

Quotas:

U.S. quota restrictions do not apply to merchandise admitted to zones, although quotas will apply if and when the merchandise is subsequently entered into U.S. commerce. Merchandise subject to quota, with the permission of the FTZs Board, may be substantially transformed in a FTZ to a non-quota article that may then be entered into U.S. Customs territory, free of quota restrictions. Quota merchandise may be stored in a FTZ so that when the quota opens, the merchandise may be immediately shipped into U.S. Customs territory.

Zone-to-Zone Transfer:

An increasing number of firms are making use of the ability to transfer merchandise from one zone to another. Because the merchandise is transported in-bond, Customs duty may be deferred until the product is removed from the final zone for entry into the U.S. Customs territory.

Other

Additional benefits, sometimes referred to as intangible benefits, have begun to play a greater role in a company's evaluation of the FTZ program. Many companies in FTZs find that their inventory control systems run more efficiently, increasing their competitiveness. FTZ users also find that in meeting their FTZ reporting responsibilities to the U.S. government, they are eligible to take advantage of special Customs procedures such as direct delivery and weekly entry. These procedures expedite the movement of cargo, thereby supporting just-in-time inventory methodologies.

March Receives Foreign Trade Zone Status - Article

Redevelopment efforts at March Air Reserve Base received a major boost Tuesday when the federal government agreed to establish a 2,480-acre foreign trade zone on the site of the downsized military base, as Foreign Trade Zone No. 244. The federal designation will allow businesses located within the trade zone to avoid or defer paying customs duties on products shipped to the base from overseas. Foreign trade zones are considered prime assets in the race to attract large manufacturing and distribution businesses.

Initially, the zone will be used by Philips Consumer Electronics, which recently moved into a new \$7 million warehouse at March. But officials say they are confident that the trade-zone designation will help attract even more companies that do business overseas. "It really heightens our ability to market March," said Riverside Mayor Ron Loveridge, a commissioner with the March Joint Powers Authority, a government agency that guides reuse efforts at the base. "It increases the hand we can play in attracting new businesses."

The foreign trade zone concept, created by Congress in 1934, is designed to help U.S. businesses compete with foreign companies. The trade zones allow manufacturing and warehousing operations to be set up in the United States without being subject to U.S. Customs laws. Companies benefit from this by avoiding tariffs on imported products or delaying such payments until the final product is shipped to a domestic buyer. Products that are sent out of the country pay no tariff at all.

Nationwide, there are now 244 federally-designated foreign trade zones and more than 400 smaller sub-zones. Their primary role is to keep businesses and jobs from fleeing to other countries. "The basic idea is to encourage domestic economic activity that, for tariff or logistical reasons, might otherwise be most cost effectively done overseas," said Greg Jones, an Alabama trade consultant and former president of the National Association of Foreign Trade Zones.

"It's a way to help U.S.-based operations adjust to a changing trade environment," Jones said.

In Southern California, full-scale trade zones are located at the ports of Los Angeles and Long Beach, as well as at Palm Springs International Airport and along the Mexican border in San Diego. Smaller sub-zones are located at Ontario International Airport and San Bernardino International Airport, among other sites. The U.S. Department of Commerce awards foreign trade zone designations, but many of them never get off the ground. In 1998, for instance, only 145 zones were actively importing products from overseas. Locally, the trade zones located in San Bernardino and Palm Springs have yet to attract any businesses capable benefiting from the designation. But officials from both airports say they are optimistic about their prospects.

In 1998, the most recent year that data is available, the nation's 145 active foreign trade zones imported \$157 billion worth of goods, most of which were later distributed within the United States. About \$17 billion of goods were re-exported to other nations, according to the Commerce Department.

Visit the following website for general FTZ information -
<http://ia.ita.doc.gov/ftzpage.tic.html>

Attachment B

ATTACHMENT B

**CUMULATIVE PROJECTS AT MARCH JPA SINCE THE
JPA GENERAL PLAN AND EIR**

Search Results

Start Range 1999-01-01

Lead/Public Agency March Joint Powers Authority

Edit Search

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177 document(s) found

SCH Number	Type	Lead/Public Agency	Received	Title
2009071069	NOE	March Joint Powers Authority	7/18/2023	Substantial Conformance Determination for a Car Wash Use Within the Commercial Zoning District in the Meridian Specific Plan (SP-5, A5) Area
2023060739	MND	March Joint Powers Authority	6/28/2023	Meridian Storm Drain Pipeline Extension Project
2008071021	NOE	March Joint Powers Authority	6/19/2023	Authorize the Executive Director to take any and all action necessary to confirm the March JPA's ownership of the former Signature Healthcare Property
2008071021	NOD	March Joint Powers Authority	4/26/2023	Fourth Amendment to March LifeCare Campus Disposition and Development Agreement ("Fourth Amendment to the DDA")
2023040073	NOE	March Joint Powers Authority	4/4/2023	*PROJECT WITHDRAWN PER LEAD* Demolition of Abandoned Security Police Kennel Support Facility

2021110304	EIR	March Joint Powers Authority	1/10/2023	West Campus Upper Plateau Project
2020059028	NOD	March Joint Powers Authority	12/20/2022	South Campus Buildings F and G Project
2002071089	NOD	March Joint Powers Authority	12/19/2022	Conditional Use Permit 22-02 (CUP 22-02) – Allow the Sale of Alcoholic Beverages for On-Site Consumption of Beer and Wine
2020059028	NOE	March Joint Powers Authority	11/9/2022	Design Plan 22-06: South Campus Buildings H and I Warehouse Project
2020059028	NOE	March Joint Powers Authority	10/27/2022	Meridian South Buildings 1-3
2022100592	NOE	March Joint Powers Authority	10/27/2022	Amended lease between the March Joint Powers Authority and the County of Riverside
2022100591	NOE	March Joint Powers Authority	10/27/2022	West March Disposition and Development Agreement, Amendment No. 2
2016061020	NOD	March Joint Powers Authority	10/26/2022	Meridian West – Building 4 Industrial Warehouse Building Project: Plot Plan 22-01 (PP 22-01)
2022090637	NOE	March Joint Powers Authority	9/30/2022	Memorandum of Understanding between the March Joint Powers Authority and Meridian Park LLC for the Perris Valley Flood Control and Drainage Project, Lateral B
2022080226	NOE	March Joint Powers Authority	8/10/2022	Grant of Temporary Construction Easements and Permanent Access, Pipeline and Tunnel Easements to the Metropolitan Water District (MWD)
2016081061	NOE	March Joint Powers Authority	8/10/2022	Veterans Industrial Park (VIP) 215 Project - Final Map 37220
2020059028	NOE	March Joint Powers Authority	8/8/2022	Design Plan 22-05: South Campus Building E

2009071069	NOE	March Joint Powers Authority	7/14/2022	Determination of Substantial Conformance 4, for a Minor Modification to the Approved Greens Group / Veterans Plaza Commercial Center – Plot Plan PP16-02
2022060180	NOE	March Joint Powers Authority	6/8/2022	Grant of Easement to Southern California Edison - Installation of Infrastructure Improvements for the Implementation of the AT&T Tower at March Field Air Museum
2002071089	NOD	March Joint Powers Authority	6/3/2022	Meridian Conservation Easement NOV Restoration (Lake and Streambed Alteration Agreement EPIMS Notification No. RIV-19057-R6)
2008071021	NOD	March Joint Powers Authority	2/2/2022	Third Amendment to March LifeCare Campus Disposition and Development Agreement (“Third Amendment to the DDA”)
2021120547	NOE	March Joint Powers Authority	12/22/2021	Cooperative Reimbursement Agreement between the March Joint Powers Authority, March Inland Port Airport Authority and Riverside County Flood Control District
2021120453	NOE	March Joint Powers Authority	12/20/2021	PP 18-04
2008071021	NOD	March Joint Powers Authority	12/16/2021	Eastern / Western Intertie Connection (PRV) Station/Facility: Administrative Plot Plan (PP 21-11)
2020059028	NOD	March Joint Powers Authority	11/29/2021	2021 March JPA Truck Route Ordinance (Ordinance #JPA 21-02)
2021110304	NOP	March Joint Powers Authority	11/19/2021	West March Upper Plateau
2020059028	NOD	March Joint Powers Authority	9/24/2021	2021 March JPA Truck Route Ordinance (Ordinance #JPA 21-02)
2002071089	NOD	March Joint Powers Authority	9/15/2021	Plot Plan 21-01 UPS Onsite Refueling Facility
2021060538	NOE	March Joint Powers	6/23/2021	Lease Agreement between the March Joint Powers Authority and the County of Riverside Facilities Management Department

Authority

2016081061	NOD	March Joint Powers Authority	6/9/2021	Cooperative Agreement between the March Joint Powers Authority, Riverside County Flood Control and Water Conservation District and Riverside Inland Development,
2016081061	NOD	March Joint Powers Authority	5/27/2021	Veterans Industrial Park 215 (VIP 215) Project: Plot Plan Amendment #1 (PP 20-02, A1) and Tentative Parcel Map 37220
2020059028	NOE	March Joint Powers Authority	4/29/2021	Final Map 37878 (Final Map 20-02) for the South Campus of the March Business Center Specific Plan
2021040702	NOE	March Joint Powers Authority	4/29/2021	Memorandum of Understanding between the March Joint Powers Authority, Riverside County Flood Control and Water Conservation District and March Air Reserve Base
2021040012	NOP	March Joint Powers Authority	4/1/2021	Meridian D-1 Gateway Aviation Center Project
2020059028	NOD	March Joint Powers Authority	2/16/2021	Amendment No. 8 to the March Business Center Specific Plan (SP-1)
2009071069	NOE	March Joint Powers Authority	2/4/2021	Determination of Substantial Conformance 3, for a Minor Modification to the Approved Greens Group / Veterans Plaza Commercial Center – Plot Plan PP16-02
2020059028	NOD	March Joint Powers Authority	1/28/2021	South Campus Specific Plan and Village West Drive Extension Project
2009071069	NOE	March Joint Powers Authority	1/28/2021	Final Map 37744 (Final Map 19-01) For the MS Prime Six Business Park
2021010211	NOP	March Joint Powers Authority	1/20/2021	Notice Of Preparation / Notice Of Scoping Meeting For A Draft Environmental Impact Report For The Westmont Village Industrial Warehouse Project
2016081061	NOD	March Joint Powers Authority	1/19/2021	Veterans Industrial Park 215 (VIP 215)
2016081061	NOD	March Joint Powers Authority	1/19/2021	Veterans Industrial Park 215 (VIP 215)

		Powers Authority		
2020090483	NOE	March Joint Powers Authority	9/24/2020	AT&T Tower at March Field Air Museum
2020090415	NOE	March Joint Powers Authority	9/21/2020	Final Map 3790 I (Final Map 20-03) for condominium purposes for the MS Van Buren II Business Park
2020059028	SBE	March Joint Powers Authority	9/3/2020	South Campus Specific Plan and Village West Drive Extension Project
2020080041	NOE	March Joint Powers Authority	8/5/2020	Tentative Parcel Map 20-03 (TPM 20-03) for condominium purposes for the MS Van Buren II Business Park
2020060596	NOE	March Joint Powers Authority	6/25/2020	Offer of Dedication: Brown Street, County of Riverside
2020060150	NOE	March Joint Powers Authority	6/8/2020	Determination of Substantial Conformance No. 2 for the approved Plot Plan 17-05 for the MS Van Buren II Business Park located at 21750 -21880 Van Buren Blvd
2020059028	NOP	March Joint Powers Authority	5/18/2020	South Campus Specific Plan and Village West Drive Extension Project
2020040290	NOE	March Joint Powers Authority	4/23/2020	Design Plan 19-05: Eagle Business Park
2016081061	EIR	March Joint Powers Authority	3/11/2020	Veterans Industrial Park 215 (VIP 215) Project
2018121026	NOD	March Joint Powers Authority	2/13/2020	Grant of Easements to Southern California Edison and the Western Municipal Water District for the installation of utility systems and improvements for the imple
2009071069	NOD	March Joint Powers Authority	12/12/2019	MS Prime Six - Development C

2009071069	NOD	March Joint Powers Authority	11/14/2019	MS Prime Six- Development C
2019100499	NOE	March Joint Powers Authority	10/24/2019	Easement for Right of Way and Pedestrian Access to the City of Moreno Valley
2019090138	NOE	March Joint Powers Authority	9/4/2019	Substantial Conformance Determination for a Minor Modification to the Approved Greens Group I Veterans Plaza - Plot Plan PPI 6-02, located at 22400 Van Buren Bo
2019090029	NOE	March Joint Powers Authority	8/29/2019	Final Map 30857-9, Amendment No. I
2019070518	NOE	March Joint Powers Authority	6/27/2019	Declaration of Covenants, Servit-cies, Conditions, Restrictions and Easements (CC&R's) for Veterans Plaza (Greens Group/Greens rnv. 11, LLC),
2019070519	NOE	March Joint Powers Authority	6/27/2019	Final Map 371 16-1
2018111036	EIR	March Joint Powers Authority	4/18/2019	K4 Warehouse and Cactus Channel Improvements Project
2019038712	NOE	March Joint Powers Authority	3/29/2019	Offer of Dedication of Easement, Castle Street - CAL FIRE
2018121026	NOD	March Joint Powers Authority	3/28/2019	Heacock Street Truck Terminal Facility
2019011068	NOD	March Joint Powers Authority	3/28/2019	The Meridian Trunk Sewer Improvement Project
2018121026	NOD	March Joint Powers Authority	3/14/2019	Heacock Street Truck Terminal Facility
2019028307	NOE	March Joint Powers Authority	2/14/2019	Resolution #JPA 19-01. by which the March Joint Powers Commission ("Commission") of the March Joint Powers Authority approved minor tenant improvements...

2019011068	MND	March Joint Powers Authority	1/30/2019	Meridian Trunk Sewer Improvement Project
2019018513	NOE	March Joint Powers Authority	1/29/2019	Determination of Substantial Conformance No. 1 for the approved Plot Plan 16-07 and Plot Plan 16-07, Amendment 1 within the March Business Center Specific Plan
2018121026	MND	March Joint Powers Authority	12/12/2018	Heacock Street Truck Terminal Facility
2018118511	NOE	March Joint Powers Authority	11/29/2018	Substantial Conformance Determination for a Minor Modification to the Approved Greens Group/Veterans Plaza-Plot Plan PP16-02, located at 22400 Van Buren Bouleva
2018111036	NOP	March Joint Powers Authority	11/19/2018	K4 Warehouse and Cactus Channel Improvements Project
2002071089	NOD	March Joint Powers Authority	10/25/2018	March Business Center Specific Plan Amendment - Land Swap Addendum
2009071069	NOD	March Joint Powers Authority	9/27/2018	MS Van Buren II - Development B
2009071069	NOD	March Joint Powers Authority	9/13/2018	Economic Business Center
2009071069	NOD	March Joint Powers Authority	9/13/2018	MS Van Buren II - Development B
2018098296	NOE	March Joint Powers Authority	9/13/2018	Ordinance #JPA 18-02 - March JPA Cannabis Ordinance
2002071089	NOD	March Joint Powers Authority	7/2/2018	Petition of March Joint Powers Authority to the Local Agency Formation Commission of Riverside County for Local Government Reorganization to Facilitate Developm
2018068676	NOE	March Joint	6/28/2018	Final Map 37107

Powers
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2018058040	NOE	March Joint Powers Authority	5/2/2018	Determination of Substantial Conformance No. 1 for approved Plot Plan 17-03, within the Meridian North Campus Specific Plan (SP-5) area
2015031015	NOD	March Joint Powers Authority	3/9/2018	D-3 Parcel Freeway Business Center Project (Streambed Alteration Agreement No. 1600-2015-0097-R6)
2015031015	NOD	March Joint Powers Authority	2/28/2018	Freeway Business Center
2015031015	NOD	March Joint Powers Authority	2/15/2018	Freeway Business Center
2015031015	OTH	March Joint Powers Authority	2/1/2018	Freeway Business Center
2002071089	NOD	March Joint Powers Authority	12/19/2017	March JPA Truck Route Update: 1) An Action to Adopt Resolution #JPA 17-33 Adopting CEQA Findings and Approving General Plan Amendment GP 17-03 to Modify Exhibit
2017128438	NOE	March Joint Powers Authority	12/19/2017	The March Inland Port Taxway Golf Realignment
2017128402	NOE	March Joint Powers Authority	12/18/2017	Ordinance #JPA 17-05: Transportation Uniform Mitigation Fee Update
2016061020	NOD	March Joint Powers Authority	11/9/2017	Meridian West Campus-Lower Plateau Project
2016061020	NOD	March Joint Powers Authority	10/26/2017	Meridian West Campus-Lower Plateau Project
2016061020	OTH	March Joint Powers Authority	10/13/2017	Meridian West Campus-Lower Plateau Project

2016061020	EIR	March Joint Powers Authority	6/19/2017	Meridian West Campus-Lower Plateau Project
2009071069	NOD	March Joint Powers Authority	4/27/2017	Veterans Plaza - Specific Plan Amendment-SPA 16-03 A3
2009071069	NOD	March Joint Powers Authority	4/13/2017	Veterans Plaza - Master Conditional Use Permit-CUP 16-02, Plot Plan-PP 16-02, Specific Plan Amendment-SPA 16-03 A3, Tract Map-TM 16-01, Variance-V 16-01
2017048244	NOE	March Joint Powers Authority	4/13/2017	Offer of Dedication of Land, City of Moreno Valley
2008071021	NOD	March Joint Powers Authority	4/3/2017	Plot Plan 16-01 Riverside Behavioral Healthcare Hospital Project within the March LifeCare Campus Specific Plan Area to be located at 15245 6th Street, Riversid
2016128262	NOE	March Joint Powers Authority	12/16/2016	Third Amendment to Lease Agreement with Pyro Spectaculars, Inc. and March Joint Powers Authority for Fireworks Storage
2016128263	NOE	March Joint Powers Authority	12/16/2016	Determination of Substantial Conformance No. 1 of Plot Plan 06-04 for the Phase II Expansion, within the March Business Center Specific Plan Area
2016118112	NOE	March Joint Powers Authority	11/8/2016	Determination of Substantial Conformance No. 2 of Plot Plan 15-01, within the Meridian Specific Plan (SP-5) Specific Plan Area
2016118110	NOE	March Joint Powers Authority	11/8/2016	Design Plan 16-05; Building A at 2-901 Krameria Avenue
2016118111	NOE	March Joint Powers Authority	11/8/2016	Design Plan 15-02'; Meridian Distribution Center III
2008071021	NOD	March Joint Powers Authority	10/4/2016	Grant of Easement for the Following Public Utility Company: southern California Edison
2002071089	NOD	March Joint Powers Authority	10/4/2016	Approval of Determination of Substantial Conformance between Tentative Map 30857, Amendment #3 and Final Map 30857-7 for the South Campus of the March Business

2016081061	NOP	March Joint Powers Authority	8/24/2016	Veterans Industrial Park 215 (VIP 215)
2013111019	NOD	March Joint Powers Authority	8/11/2016	March Joint Powers Authority Heacock Channel, Sunnymead Line B Stages 3 and 4 Project (Streambed Alteration Agreement No.1600-2015-0066-R6)
2016078194	NOE	March Joint Powers Authority	7/15/2016	Ordinance #JPA 16-03 ` Water Efficient Landscape Regulations
2016061020	NOP	March Joint Powers Authority	6/9/2016	Meridian West Campus-Lower Plateau Project
2015031015	EIR	March Joint Powers Authority	5/10/2016	Freeway Business Center
2002071089	NOD	March Joint Powers Authority	3/17/2016	March Business Center Specific Plan, Amendment #5 (SP-1, A5); General Plan Amendment 15-02, Tentative Map 30857 Amendment #3, and Modifications of the March Bus
2002071089	NOD	March Joint Powers Authority	3/2/2016	March Business Center Specific Plan, Amendment #5 (SP-1, A5); General Plan Amendment 15-02, Tentative Map 30857 Amendment #3, and Modifications of the March Bus
2015031015	NOP	March Joint Powers Authority	3/4/2015	Freeway Business Center
2014108373	NOE	March Joint Powers Authority	10/22/2014	Design Plan PP 14-01
2013111019	EIR	March Joint Powers Authority	9/4/2014	Heacock Channel Improvement Project
2013111019	NOP	March Joint Powers Authority	11/6/2013	Heacock Channel Improvement Project
2013068421	NOE	March Joint Powers	6/27/2013	SP-1 Amendment #4 and March JPA Resolution #JPA 13-14

Authority

2010051046	NOD	March Joint Powers Authority	8/15/2012	March Inland Port Airport General Aviation Facilities Development
2010051046	EIR	March Joint Powers Authority	6/27/2012	March Inland Port Airport General Aviation Facilities Development
2010051046	EIR	March Joint Powers Authority	5/3/2012	March Inland Port Airport General Aviation Facilities Development
2010051046	NOP	March Joint Powers Authority	2/14/2012	March Inland Port Airport General Aviation Facilities Development
2011119010	NOD	March Joint Powers Authority	11/29/2011	Withdrawn Per Lead - AT&T Wireless Facility at Cactus Booster Station - Conditional Use Permit 11-01
2009071069	NOD	March Joint Powers Authority	11/16/2011	Addendum to the Meridian Specific Plan Amendment (SP-5) Subsequent EIR and Plot Plan Amendment 11-05 - Liquefied Gas Storage for the Sysco Facility
2008071021	NOD	March Joint Powers Authority	11/16/2011	U.S. Vets Transitional Housing Specific Plan (pass, approve, and adopt a second reading Ordinance #JPA 11-05, an Ordinance approving the US Vets Specific Plan (S
2008071021	NOD	March Joint Powers Authority	11/16/2011	U.S. Vets Transitional Housing Program
2008071021	NOD	March Joint Powers Authority	7/25/2011	March Lifecare Campus Specific Plan
2002071089	NOD	March Joint Powers Authority	7/25/2011	Approval and adoption of an Addendum prepared for Plot Plan Amendment 11-04 for the construction of a 102,200 square foot parking structure, including a redistribr
2002071089	NOD	March Joint Powers Authority	6/2/2011	Approval and adoption of an Addendum prepared for a site plan in the Meridian Business center for a 600,000 square foot distribution center on 26.95 acres
		March Joint	6/2/2011	Approval and adoption of an Addendum prepared for a site plan in

2009071069	NOD	Powers Authority		the Meridian Business center for a 600,000 square foot distribution center on 26.95 acres
2010128139	NOE	March Joint Powers Authority	12/16/2010	Resolution #JPA 10-27
2009071069	NOD	March Joint Powers Authority	8/9/2010	Meridian Specific Plan Amendment Project Approvals
2009071069	NOD	March Joint Powers Authority	7/22/2010	Meridian Specific Plan Amendment Project Approvals
2009071069	OTH	March Joint Powers Authority	6/24/2010	Meridian North Campus Specific Plan Amendment
2010051054	NOP	March Joint Powers Authority	5/19/2010	March JPA Vision 2030 General Plan Update
2010051046	NOP	March Joint Powers Authority	5/17/2010	March Inland Port Airport General Aviation Facilities Development
2009071069	SBE	March Joint Powers Authority	4/8/2010	Meridian North Campus Specific Plan Amendment
2008071021	NOD	March Joint Powers Authority	12/7/2009	March Lifecare Campus Specific Plan
2008101136	NOD	March Joint Powers Authority	12/2/2009	PP 09-02; Design and Plot Plan
2008101136	FIN	March Joint Powers Authority	11/19/2009	PP 09-02: Plot Plan and Design Plan for Expansion of Fresh and Easy Food Processing and Warehouse Facility
2008071021	NOD	March Joint Powers Authority	11/19/2009	March Lifecare Campus Specific Plan

2008071021	FIN	March Joint Powers Authority	11/9/2009	March Lifecare Campus Specific Plan
2008101136	SBE	March Joint Powers Authority	8/10/2009	PP 09-02: Plot Plan and Design Plan for Expansion of Fresh and Easy Food Processing and Warehouse Facility
2009071069	NOP	March Joint Powers Authority	7/20/2009	Meridian North Campus Specific Plan Amendment
2008071021	EIR	March Joint Powers Authority	7/13/2009	March Lifecare Campus Specific Plan
2009028180	NOE	March Joint Powers Authority	2/23/2009	Tenant Improvement Application by 2 Sisters Food Group ("2SFG") at 21842 Opportunity Way
2002071089	NOD	March Joint Powers Authority	1/22/2009	March Business Center Specific Plan
2008101136	NOP	March Joint Powers Authority	10/27/2008	Fresh & Easy Food Processing and Distribution Center
2008071021	NOP	March Joint Powers Authority	7/7/2008	March Lifecare Campus Specific Plan
2002071089	NOD	March Joint Powers Authority	6/18/2008	Amendment of the March Business Center Specific Plan for the Removal of the School Buffer Overlay Zone Surrounding the Closed Arnold Heights School Site
1997071095	NOD	March Joint Powers Authority	6/5/2008	General Plan of the March Joint Powers Authority
2008058174	NOE	March Joint Powers Authority	5/15/2008	Approval of the March Joint Powers Authority of the Amended Joint Use Agreement between the March Joint Powers Authority and the U.S. Air Force
2006111094	NOD	March Joint Powers Authority	4/16/2008	Adoption of a revised Mitigation Monitoring and Reporting Program for Project Sunfield

1997071095	MND	March Joint Powers Authority	3/19/2008	Arnold Heights School Demolition
2007078312	NOE	March Joint Powers Authority	7/26/2007	Design Application PP 05-07, Design Approval for the LNR Industrial Development, located at 15001 Meridian Parkway
2002071089	NOD	March Joint Powers Authority	4/18/2007	March Business Center
2007048134	NOE	March Joint Powers Authority	4/18/2007	Tetntative Tract Map 30857-Amended
2006111094	NOD	March Joint Powers Authority	1/17/2007	Approval and Adoption of a MND, Mitigation Monitoring and Reporting Plan, and Plot Plan PP 06-04 for Project Sunfield
2006111093	NOD	March Joint Powers Authority	1/17/2007	Approval and Adoption of a MND, Mitigation Monitoring and Reporting Plan, and Plot Plan PP 06-05 for Project Garden
2006111093	MND	March Joint Powers Authority	11/17/2006	Plot Plan Application PP 06-05; Project Garden
2006111094	MND	March Joint Powers Authority	11/17/2006	Plot Plan Application PP 06-04; Project Sunfield
2006098074	NOE	March Joint Powers Authority	9/12/2006	Design Application PP 06-03 for the TESCO Development at 14900 Meridian Parkway
2004081027	NOD	March Joint Powers Authority	9/7/2006	Aviation Facility at March Inland Port
2002071089	NOD	March Joint Powers Authority	3/28/2006	March Business Center
2002071089	NOD	March Joint Powers Authority	3/17/2006	March Business Center

Authority

2005121065	NOD	March Joint Powers Authority	3/17/2006	Pyrospectaculars
2005121065	NEG	March Joint Powers Authority	1/25/2006	Pyrospectaculars
2005081074	NOD	March Joint Powers Authority	1/20/2006	Arnold Heights Demolition
2005121065	NEG	March Joint Powers Authority	12/13/2005	Pyrospectaculars
2005081074	EIR	March Joint Powers Authority	11/14/2005	Arnold Heights Demolition
2005041076	FIN	March Joint Powers Authority	9/30/2005	Z 04-04 Request for Aviation Zoning for Installation/Operation of New, Permanent, Central, Fuel Farm
2005041076	NOD	March Joint Powers Authority	9/30/2005	Z 04-04 Request for Aviation Zoning for Installation/Operation of New, Permanent, Central, Fuel Farm
2005081074	NOP	March Joint Powers Authority	8/11/2005	Arnold Heights Demolition
2005041076	EIR	March Joint Powers Authority	6/9/2005	Z 04-04 Request for Aviation Zoning for Installation/Operation of New, Permanent, Central, Fuel Farm
2005041076	SIR	March Joint Powers Authority	6/9/2005	Z 04-04 Request for Aviation Zoning & Installation/Operation of the Proposed New Fuel Farm
2005041076	NOP	March Joint Powers Authority	4/14/2005	Z 04-04 Request for Aviation Zoning for Installation/Operation of New, Permanent, Central, Fuel Farm
2004081027	NOD	March Joint	12/17/2004	Aviation Facility at March Inland Port

Powers
Authority

2004081027	NOD	March Joint Powers Authority	10/6/2004	Aviation Facility at March Inland Port
2004081027	NOD	March Joint Powers Authority	10/6/2004	Aviation Facility at March Inland Port
2004081027	NEG	March Joint Powers Authority	8/4/2004	Aviation Facility at March Inland Port
2002071089	NOD	March Joint Powers Authority	3/12/2003	March Business Center
2002071089	EIR	March Joint Powers Authority	10/21/2002	March Business Center Specific Plan
2002071089	NOP	March Joint Powers Authority	7/18/2002	March Business Center Specific Plan
1997071095	EIR	March Joint Powers Authority	7/12/1999	General Plan of the March Joint Powers Authority

Search Results

Start Range 2023-06-01

Lead/Public Agency March Joint Powers Authority

Edit Search

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14 document(s) found

SCH Number	Type	Lead/Public Agency	Received	Title
2021110304	FIN	March Joint Powers Authority	5/31/2024	West Campus Upper Plateau Project
2021040012	EIR	March Joint Powers Authority	5/23/2024	Meridian D-1 Gateway Aviation Center
2024041124	NOE	March Joint Powers Authority	4/25/2024	Taxiway G Realignment and Pavement Management Areas 4, 5, 12, 13, 14 and 15 Project
2024041085	NOE	March Joint Powers Authority	4/25/2024	GP 23-02 March JPA Environmental Justice Notice of Exemption
2002071089	NOD	March Joint Powers Authority	3/19/2024	Determination of Substantial Conformance No. 3 to Plot Plan 16-01, Amendment No. 1 For a Truck Parking Lot and Barton Street Improvements

2008071021	NOD	March Joint Powers Authority	3/14/2024	U.S. Vets Transitional Program Specific Plan (SP-6) Specific Plan Amendment #1 (SP-6, A1), Plot Plan 10-02, Amendment #1 (PP 10-02, A1)
2008071021	NOD	March Joint Powers Authority	2/26/2024	Fifth Amendment to March LifeCare Campus Disposition and Development Agreement
2008071021	NOD	March Joint Powers Authority	2/15/2024	U.S. Vets Transitional Program Specific Plan (SP-6) Specific Plan Amendment #1 (SP-6, A1), Plot Plan 10-02, Amendment #1 (PP 10-02, A1)
2009071069	NOE	March Joint Powers Authority	1/22/2024	Rooftop Wireless Communications Facility Project
2021110304	EIR	March Joint Powers Authority	12/1/2023	West Campus Upper Plateau Project
2008071021	NOD	March Joint Powers Authority	11/14/2023	EMWD/WMWD Intertie Connection (MARB Service Connection No. 6)
2009071069	NOE	March Joint Powers Authority	7/18/2023	Substantial Conformance Determination for a Car Wash Use Within the Commercial Zoning District in the Meridian Specific Plan (SP-5, A5) Area
2023060739	MND	March Joint Powers Authority	6/28/2023	Meridian Storm Drain Pipeline Extension Project
2008071021	NOE	March Joint Powers Authority	6/19/2023	Authorize the Executive Director to take any and all action necessary to confirm the March JPA's ownership of the former Signature Healthcare Property

Attachment C

ATTACHMENT C

**NOCS FOR EACH PROJECT AS WELL AS THE
SECRETARY OF STATE PUBLIC RECORDS FOR
EACH LLC DEMONSTRATING THE THREE LLCS ARE
RELATED**

**THE PROPOSED PROJECT – WEST CAMPUS UPPER
PLATEAU PROJECT**

Meridian Park West, LLC

DRAFT

**West Campus Upper Plateau Project
Environmental Impact Report
State Clearinghouse No. 2021110304**

Prepared for:

March Joint Powers Authority

14205 Meridian Parkway #140
Riverside, California 92518
Contact: Dan Fairbanks

Prepared by:

DUDEK

605 Third Street
Encinitas, California 92024
Contact: Nicole Cobleigh

JANUARY 2023

201525710460

LLC-5 Application to Register a Foreign Limited Liability Company (LLC)

To register in California an LLC from another state, country or other place, fill out this form, and submit for filing along with:

- A \$70 filing fee, and
- A certificate of good standing, issued within the last six (6) months by the agency where the LLC was formed.
- A separate, non-refundable \$15 service fee also must be included, if you drop off the completed form.

Important! LLCs in California may have to pay a minimum \$800 yearly tax to the California Franchise Tax Board. For more information, go to https://www.ftb.ca.gov.

Registered LLCs cannot provide in California "professional services," as defined by California Corporations Code sections 13401(a) and 13401.3.

FILED
Secretary of State
State of California
SEP 03 2015

This Space For Office Use Only

For questions about this form, go to www.sos.ca.gov/business/be/filing-tips.htm

LLC Name to be used for this LLC in California

1 a. Meridian Park West, LLC
LLC Name List the LLC name you use now (exactly as listed on your certificate of good standing)

b. Alternate Name
If the LLC name in Item 1a does not comply with California Corporations Code section 17701.08, list an alternate name to be used in California exactly as it is to appear on the records of the California Secretary of State. The alternate name must include: LLC, L.L.C., Limited Liability Company, Limited Liability Co., Ltd. Liability Co. or Ltd. Liability Company; and may not include: bank, trust, trustee, incorporated, inc., corporation, or corp., insurer, or insurance company. For general entity name requirements and restrictions, go to www.sos.ca.gov/business/be/name-availability.htm.

LLC History

2 a. Date your LLC was formed (MM, DD, YYYY): 09/02/2015
b. State, country or other place where your LLC was formed: Delaware
c. Your LLC currently has powers and privileges to conduct business in the state, country or other place listed above.

Service of Process (List a California resident or a California registered corporate agent that agrees to be your initial agent to accept service of process in case your LLC is sued. You may list any adult who lives in California. You may not list an LLC as the agent. Do not list an address if the agent is a California registered corporate agent as the agent's address for service of process is already on file.)

3 a. Lewis Operating Corp.
Agent's Name
b. Agent's Street Address (if agent is not a corporation) - Do not list a P.O. Box City (no abbreviations) State Zip CA

If the agent listed above has resigned or cannot be found or served after reasonable attempts, the California Secretary of State will be appointed the agent for service of process for your LLC.

LLC Addresses

4 a. 1156 N. Mountain Avenue Upland CA 91786
Street Address of Principal Executive Office - Do not list a P.O. Box City (no abbreviations) State Zip
b. Street Address of Principal Office in California, if any - Do not list a P.O. Box City (no abbreviations) State Zip CA
c. Mailing Address of Principal Executive Office, if different from 4a or 4b City (no abbreviations) State Zip

Read and sign below:

I am authorized to sign this document under the laws of the state, country or other place where this LLC was formed.

Sign here [Signature]

John M. Goodman
Print your name here

Authorized Person
Your business title

Make check/money order payable to: Secretary of State
Upon filing, we will return one (1) uncertified copy of your filed document for free, and will certify the copy upon request and payment of a \$5 certification fee.

By Mail
Secretary of State
Business Entities, P.O. Box 944228
Sacramento, CA 94244-2280

Drop-Off
Secretary of State
1500 11th Street, 3rd Floor
Sacramento, CA 95814

Delaware

PAGE 1

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "MERIDIAN PARK WEST, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE THIRD DAY OF SEPTEMBER, A.D. 2015.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "MERIDIAN PARK WEST, LLC" WAS FORMED ON THE SECOND DAY OF SEPTEMBER, A.D. 2015.


AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE NOT BEEN ASSESSED TO DATE.

5815019 8300

151254449

You may verify this certificate online
at corp.delaware.gov/authver.shtml




Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 2701752

DATE: 09-03-15

201525710460



Secretary of State
Statement of Information
 (Limited Liability Company)

LLC-12

For Office Use Only

-FILED-

File No.: BA20231265906

Date Filed: 8/9/2023

This form is due within 90 days of initial registration and every two years thereafter.

Filing Fee - \$20.00

Certification Fee (Optional) - \$5.00

This Space For Office Use Only

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name.)

MERIDIAN PARK WEST, LLC

2. Secretary of State Entity Number

2 0 1 5 2 5 7 1 0 4 6 0

3. State, Foreign Country or Place of Organization
 (only if formed outside of California)

Delaware

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box	City (no abbreviations)	State	Zip Code
1156 N. Mountain Avenue	Upland	CA	91786
b. Mailing Address of LLC, if different than item 4a	City (no abbreviations)	State	Zip Code
PO BOX 670	Upland	CA	91785
c. Street Address of California Office, if Item 4a is not in California Do not list a P.O. Box	City (no abbreviations)	State	Zip Code
		CA	

5. Manager(s) or Member(s)

If no managers have been appointed or elected, provide the name and address of each member. At least one name and address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an additional managers/members, enter the names(s) and address(es) on Form LLC-12A.

a. First Name, if an individual - Do not complete Item 5b	Middle Name	Last Name	Suffix
b. Entity Name - Do not complete Item 5a			
MERIDIAN PARK HOLDINGS, LLC			
c. Address	City (no abbreviations)	State	Zip Code
1156 N. Mountain Avenue	Upland	CA	91786

6. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box	City (no abbreviations)	State CA	Zip Code

CORPORATION – Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 6a or 6b
Lewis Management Corp.

7. Type of Business

Describe the type of business or services of the Limited Liability Company
Real Estate Investment and Development

8. Chief Executive Officer, if elected or appointed

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

9. Labor Judgment (See Instructions)

Does a Manager or Member, as further defined by California Corporations Code section 17702.09(a)(8), have an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal is pending, for the violation of any wage order or provision of the Labor Code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	---

10. Email Notifications

Provide an email address to opt-in to receive entity related notifications, including Statement of Information reminders, by email rather than USPS mail. Note: If no email address is provided, you will continue to receive notices and reminders by USPS mail.
Yes, I opt-in to receive entity notifications via email, Email Address: [REDACTED]
To change your option after filing, you must submit a new complete Statement of Information.

By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.

0731.23 David O. Team [Signature]
Date Type or Print Name Authorized Agent
Title Signature

MERIDIAN D-1 GATEWAY AVIATION CENTER

Meridian Park D-1, LLC

INITIAL STUDY MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT

Prepared for:

March JPA

14205 Meridian Parkway, Suite 140

Riverside California 92518

Contact: Jeffrey M. Smith, AICP

Prepared by:

DUDEK

605 Third Street

Encinitas, California 92024

Contact: Wendy Worthey

MARCH 2021

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Meridian D-1 Gateway Aviation Center Project

Lead Agency: March Joint Powers Authority Contact Person: Jeffrey M. Smith
 Mailing Address: 14205 Meridian Parkway, Suite 140 Phone: (951) 656-7000
 City: N/A Zip: 92518 County: Riverside

Project Location: County: Riverside City/Nearest Community: No City/March Air Reserve Base and Moreno Valley
 Cross Streets: Heacock Street, between Cardinal Avenue and Krameria Avenue Zip Code: 92158
 Longitude/Latitude (degrees, minutes and seconds): 33 ° 52 ' 40 " N / 117 ° 14 ' 49 " W Total Acres: 80
 Assessor's Parcel No.: 294-170-010/294-170-006 Section: 25 Twp.: 3 Range: 4 Base: San Bernardino BM
 Within 2 Miles: State Hwy #: Interstate 215 Waterways: Heacock Channel/Perris Valley Channel
 Airports: March Air Reserve Base Railways: Metrolink's 91/Perris Valley Line Schools: Multiple

Document Type:

CEQA: NOP Draft EIR NEPA: NOI Other: Joint Document
 Early Cons Supplement/Subsequent EIR EA Final Document
 Neg Dec (Prior SCH No.) Draft EIS Other: _____
 Mit Neg Dec Other: Initial Study FONSI

Local Action Type:

General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) Other: Zone

Development Type:

Residential: Units _____ Acres _____
 Office: Sq.ft. _____ Acres _____ Employees _____
 Commercial: Sq.ft. _____ Acres _____ Employees _____
 Industrial: Sq.ft. 270,820 Acres 64 Employees 200
 Educational: _____
 Recreational: _____
 Water Facilities: Type _____ MGD _____
 Transportation: Type Aviation/Tarmac (15 acres)
 Mining: Mineral _____
 Power: Type _____ MW
 Waste Treatment: Type _____ MGD
 Hazardous Waste: Type _____
 Other: <1 acre Heacock Street ROW disturbance

Project Issues Discussed in Document:

<input checked="" type="checkbox"/> Aesthetic/Visual	<input type="checkbox"/> Fiscal	<input checked="" type="checkbox"/> Recreation/Parks	<input checked="" type="checkbox"/> Vegetation
<input checked="" type="checkbox"/> Agricultural Land	<input checked="" type="checkbox"/> Flood Plain/Flooding	<input checked="" type="checkbox"/> Schools/Universities	<input checked="" type="checkbox"/> Water Quality
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Forest Land/Fire Hazard	<input checked="" type="checkbox"/> Septic Systems	<input checked="" type="checkbox"/> Water Supply/Groundwater
<input checked="" type="checkbox"/> Archeological/Historical	<input checked="" type="checkbox"/> Geologic/Seismic	<input checked="" type="checkbox"/> Sewer Capacity	<input checked="" type="checkbox"/> Wetland/Riparian
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Minerals	<input checked="" type="checkbox"/> Soil Erosion/Compaction/Grading	<input checked="" type="checkbox"/> Growth Inducement
<input type="checkbox"/> Coastal Zone	<input checked="" type="checkbox"/> Noise	<input checked="" type="checkbox"/> Solid Waste	<input checked="" type="checkbox"/> Land Use
<input checked="" type="checkbox"/> Drainage/Absorption	<input checked="" type="checkbox"/> Population/Housing Balance	<input checked="" type="checkbox"/> Toxic/Hazardous	<input checked="" type="checkbox"/> Cumulative Effects
<input checked="" type="checkbox"/> Economic/Jobs	<input checked="" type="checkbox"/> Public Services/Facilities	<input checked="" type="checkbox"/> Traffic/Circulation	<input checked="" type="checkbox"/> Other: <u>Tribal Cultural</u>

Present Land Use/Zoning/General Plan Designation:

Undeveloped Land and Aviation Uses/No Zoning Designation/Aviation (AV)

Project Description: (please use a separate page if necessary)

The proposed Project consists of two components, the Air Cargo Center Component and the Off-Site Component. The Air Cargo Center Component would be constructed within approximately 64-acres under March Joint Powers Authority jurisdiction. The Off-Site Component would be constructed within approximately 24 acres, and would include taxiway construction, widening, and realignment, storm-drain extensions, and an access roadway construction within March Air Reserve Base (approx. 23 acres), as well as work within the public-right-of-way along Heacock Street adjacent to the eastern boundary of the Project site (approx. 1 acre). The following discretionary approvals would be required: (1) A plot plan approval to construct: an approximate 201,200-square-foot air cargo building with 9 grade level doors and 42 dock positions; a parking apron sufficient to support commercial cargo airplanes; 90 trailer storage positions; 214 stalls for employee parking; an approximate 69,620-square-foot maintenance building with grade level access and 42 stalls for employee parking; an expansion of the existing taxiway/tarmac within March Air Reserve Base; construction of stormwater facilities, including an underground detention basin; removal of an existing security fence and construction of a new security fence; and a signalized entrance onto Heacock Street, aligned with the facility entrance across Heacock Street; (2) a zoning designation of Aviation (AV) for the approximate 64-acres of the Project site within March Joint Powers Authority jurisdiction.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".
If you have already sent your document to the agency please denote that with an "S".

- | | |
|---|---|
| <input checked="" type="checkbox"/> Air Resources Board | <input checked="" type="checkbox"/> Office of Historic Preservation |
| <input type="checkbox"/> Boating & Waterways, Department of | <input type="checkbox"/> Office of Public School Construction |
| <input type="checkbox"/> California Emergency Management Agency | <input checked="" type="checkbox"/> Parks & Recreation, Department of |
| <input type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input checked="" type="checkbox"/> Caltrans District # <u>8</u> | <input checked="" type="checkbox"/> Public Utilities Commission |
| <input type="checkbox"/> Caltrans Division of Aeronautics | <input checked="" type="checkbox"/> Regional WQCB # <u>8</u> |
| <input checked="" type="checkbox"/> Caltrans Planning | <input checked="" type="checkbox"/> Resources Agency |
| <input type="checkbox"/> Central Valley Flood Protection Board | <input checked="" type="checkbox"/> Resources Recycling and Recovery, Department of |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy | <input type="checkbox"/> S.F. Bay Conservation & Development Comm. |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Colorado River Board | <input type="checkbox"/> San Joaquin River Conservancy |
| <input checked="" type="checkbox"/> Conservation, Department of | <input type="checkbox"/> Santa Monica Mtns. Conservancy |
| <input type="checkbox"/> Corrections, Department of | <input type="checkbox"/> State Lands Commission |
| <input type="checkbox"/> Delta Protection Commission | <input type="checkbox"/> SWRCB: Clean Water Grants |
| <input type="checkbox"/> Education, Department of | <input checked="" type="checkbox"/> SWRCB: Water Quality |
| <input checked="" type="checkbox"/> Energy Commission | <input type="checkbox"/> SWRCB: Water Rights |
| <input checked="" type="checkbox"/> Fish & Game Region # <u>6</u> | <input type="checkbox"/> Tahoe Regional Planning Agency |
| <input type="checkbox"/> Food & Agriculture, Department of | <input checked="" type="checkbox"/> Toxic Substances Control, Department of |
| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input checked="" type="checkbox"/> Water Resources, Department of |
| <input checked="" type="checkbox"/> General Services, Department of | |
| <input type="checkbox"/> Health Services, Department of | Other: _____ |
| <input type="checkbox"/> Housing & Community Development | Other: _____ |
| <input checked="" type="checkbox"/> Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date March 31, 2021 Ending Date April 29, 2021

Lead Agency (Complete if applicable):

Consulting Firm: <u>Dudek</u>	Applicant: <u>Meridian Park D-1, LLC</u>
Address: <u>605 Third Street</u>	Address: <u>1156 North Mountain Avenue</u>
City/State/Zip: <u>Encinitas, CA 92024</u>	City/State/Zip: <u>Upland, CA 91786</u>
Contact: <u>Wendy Worthey, Senior Project Manager</u>	Phone: <u>(909) 985-0971</u>
Phone: <u>(760) 942-5147</u>	

Signature of Lead Agency Representative: Jeffrey M. Smith Digitally signed by Jeffrey M. Smith
Date: 2021.03.31 07:21:19 -0700 **Date:** March 31, 2021

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

202012210545



Secretary of State
Application to Register a Foreign Limited Liability Company (LLC)

LLC-5

FILED ZPR
Secretary of State
State of California
APR 28 2020

IMPORTANT - Read Instructions before completing this form.
Must be submitted with a current Certificate of Good Standing issued by the government agency where the LLC was formed. See Instructions.

Filing Fee - \$70.00

Copy Fees - First page \$1.00; each attachment page \$0.50;
Certification Fee - \$5.00

Note: Registered LLCs in California may have to pay minimum \$800 tax to the California Franchise Tax Board each year. For more information, go to https://www.ftb.ca.gov.

100 This Space For Office Use Only

1a. LLC Name (Enter the exact name of the LLC as listed on your attached Certificate of Good Standing.)

MERIDIAN PARK D-1, LLC

1b. California Alternate Name, If Required (See Instructions - Only enter an alternate name if the LLC name in 1a not available in California.)

2. LLC History (See Instructions - Ensure that the formation date and jurisdiction match the attached Certificate of Good Standing.)

Table with 2 columns: a. Date LLC was formed in home Jurisdiction (MM/DD/YYYY) and b. Jurisdiction (State, foreign country or place where this LLC is formed.)

c. Authority Statement (Do not alter Authority Statement)
This LLC currently has powers and privileges to conduct business in the state, foreign country or place entered in Item 2b.

3. Business Addresses (Enter the complete business addresses. Items 3a and 3b cannot be a P.O. Box or "in care of" an individual or entity.)

Table with 4 columns: a. Street Address of Principal Executive Office, b. Street Address of Principal Office in California, c. Mailing Address of Principal Executive Office, City, State, Zip Code.

4. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL - Complete Items 4a and 4b only. Must include agent's full name and California street address.

Table with 4 columns: a. California Agent's First Name, Middle Name, Last Name, Suffix; b. Street Address, City, State, Zip Code.

CORPORATION - Complete Item 4c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) - Do not complete Item 4a or 4b

Lewis Management Corp.

5. Read and Sign Below (See Instructions. Title not required.)

By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized to sign on behalf of the foreign LLC.

Signature [Handwritten Signature]

John M. Goodman, Authorized Person
Type or Print Name

Delaware

Page 1

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "MERIDIAN PARK D-1, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-EIGHTH DAY OF APRIL, A.D. 2020.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "MERIDIAN PARK D-1, LLC" WAS FORMED ON THE TWENTY-FOURTH DAY OF APRIL, A.D. 2020.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN ASSESSED TO DATE.



7946277 8300

SR# 20203212939

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed in a small font.

Authentication: 202839029

Date: 04-28-20

202012210545



**Secretary of State
Statement of Information
(Limited Liability Company)**

LLC-12

For Office Use Only

-FILED-

File No.: BA20220376179
Date Filed: 5/6/2022

IMPORTANT — This form can be filed online at bizfile.sos.ca.gov.

Read instructions before completing this form.

Filing Fee - \$20.00

Copy Fees - First page \$1.00; each attachment page \$0.50;
Certification Fee - \$5.00 plus copy fees

This Space For Office Use Only

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, see instructions.)

MERIDIAN PARK D-1, LLC

2. 12-Digit Secretary of State Entity Number

2	0	2	0	1	2	2	1	0	5	4	5
---	---	---	---	---	---	---	---	---	---	---	---

3. State, Foreign Country or Place of Organization
(only if formed outside of California)

Delaware

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box	City (no abbreviations)	State	Zip Code
1156 N. Mountain Avenue	Upland	CA	91786
b. Mailing Address of LLC, if different than item 4a	City (no abbreviations)	State	Zip Code
PO BOX 670	Upland	CA	91785
c. Street Address of California Office, if Item 4a is not in California Do not list a P.O. Box	City (no abbreviations)	State	Zip Code
		CA	

5. Manager(s) or Member(s)

If no managers have been appointed or elected, provide the name and address of each member. At least one name and address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an additional managers/members, enter the names(s) and address(es) on Form LLC-12A.

a. First Name, if an individual - Do not complete Item 5b	Middle Name	Last Name	Suffix
b. Entity Name - Do not complete Item 5a			
Lewis Management Corp.			
c. Address	City (no abbreviations)	State	Zip Code
1156 N. Mountain Avenue	Upland	CA	91786

6. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL - Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box		City (no abbreviations)	State CA Zip Code

CORPORATION - Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) - Do not complete Item 6a or 6b
Lewis Management Corp.

7. Type of Business

Describe the type of business or services of the Limited Liability Company
Real Estate Investment and Development

8. Chief Executive Officer, if elected or appointed

a. First Name	Middle Name	Last Name	Suffix
b. Address		City (no abbreviations)	State Zip Code

9. Labor Judgment


Does any Manager or Member have an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal therefrom is pending, for the violation of any wage order or provision of the Labor Code?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
--	------------------------------	--

10. By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.

3/25/22
Date

David O. Team
Type or Print Name

President of Wayzwin Property Group, LLC,
Managing Member of WPG Member Park, LLC,
Managing Member of Member Park Holdings, LLC
Title


Signature

**SOUTH CAMPUS SPECIFIC PLAN AND VILLAGE
WEST DRIVE EXTENSION PROJECT**

Meridian Park South, LLC

DRAFT

**Meridian South Campus Specific Plan and Village West Drive
Extension Draft Subsequent EIR**

State Clearinghouse No. 2020059028

Prepared for:

March Joint Powers Authority

14205 Meridian Parkway, Suite 140

Riverside, California 92518

Contact: Lauren Sotelo, Senior Planner

Prepared by:

DUDEK

38 North Marengo Avenue

Pasadena, California 91101

Contact: Nicole Cobleigh

SEPTEMBER 2020

Notice of Completion & Environmental Document Transmittal

2020059028

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: South Campus Specific Plan and Village West Drive Extension Project

Lead Agency: March Joint Powers Authority Contact Person: Lauren Sotelo
 Mailing Address: 14205 Meridian Parkway, Suite 140 Phone: (951) 656-7000
 City: Riverside Zip: 92518 County: Riverside

Project Location: County: Riverside City/Nearest Community: Riverside
 Cross Streets: Van Buren Boulevard and Village West Drive Zip Code: 92508
 Longitude/Latitude (degrees, minutes and seconds): 33 ° 52 ' 54 " N / 117 ° 18 ' 09 " W Total Acres: 568.2
 Assessor's Parcel No.: multiple Section: 27 and 28 Twp.: 3S Range: 4W Base: San Bernardino BM
 Within 2 Miles: State Hwy #: Interstate 215 Waterways: Heacock Channel, Perris Valley Storm Drain Channel
 Airports: March Air Reserve Base Railways: Metrolink's 91/Perris Valley Line Schools: Tomas Rivera Elem., Amelia Earhart Middle

Document Type:

CEQA: NOP Draft EIR NEPA: NOI Other: Joint Document
 Early Cons Supplement/Subsequent EIR Draft EIS Other:
 Neg Dec (Prior SCH No.) FONSI Other:
 Mit Neg Dec Other: Initial Study

GOVERNOR'S OFFICE OF PLANNING & REVENUE
 MAY 18 2020

Local Action Type:

General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) Other:

STATE CLEARINGHOUSE

Development Type:

Residential: Units _____ Acres _____
 Office: Sq.ft. _____ Acres 4.6 Employees _____
 Commercial: Sq.ft. 45,000 Acres 23.5 Employees _____
 Industrial: Sq.ft. 800,000 Acres 200.3 Employees _____
 Educational: _____
 Recreational/Open Space: 140.3 acres
 Water Facilities: Type _____ MGD _____
 Transportation: Type _____
 Mining: Mineral _____
 Power: Type _____ MW _____
 Waste Treatment: Type _____ MGD _____
 Hazardous Waste: Type _____
 Other: 0.9 acres of Public Facilities

Project Issues Discussed in Document:

Aesthetic/Visual Fiscal Recreation/Parks Vegetation
 Agricultural Land Flood Plain/Flooding Schools/Universities Water Quality
 Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Archeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
 Biological Resources Minerals Soil Erosion/Compaction/Grading Growth Inducement
 Coastal Zone Noise Solid Waste Land Use
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Cumulative Effects
 Economic/Jobs Public Services/Facilities Traffic/Circulation Other: Tribal Cultural

Present Land Use/Zoning/General Plan Designation:

South Campus Specific Plan (including Office, Commercial, Mixed Use, Business Park, Industrial, and Park/Open Space)

Project Description: *(please use a separate page if necessary)*

The proposed Project involves an amendment to the South Campus Specific Plan, originally approved in 2003. The proposed Project includes Plot Plan approvals for the following components of the South Campus buildout: development of a Commercial Parcel; construction of 800,000 square-foot Building D; construction of a 6.2-acre Dog Park and Paseo; construction of Caroline Way; and the addition of Village West Drive Extension. In addition, the EIR will analyze up to 700,000 square feet of high-cube cold storage warehousing, request a revision to the definition of "Business Enterprise" in the Specific Plan, and include a definition for "Grocery Store" in the Specific Plan. The following discretionary approvals would be required: 1) General Plan Amendment: GP 20-01; 2) Specific Plan Amendment (SP-1, Amendment 8): SP 20-01; 3) Plot Plan: PP 20-03 for 45,000 square feet Grocery Store and two shop buildings and Village West Drive extension; 4) Plot Plan: PP 20-04 Building D within the South Campus and Caroline Way; 5) Plot Plan: PP 20-05 South Campus Dog Park and Paseo; 6) Conditional Use Permit: CUP 20-02 for Alcohol sales at 45,000 square foot Grocery Store; 7) Tentative Parcel Map: TPM 20-02 South Campus.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".
If you have already sent your document to the agency please denote that with an "S".

- | | |
|--|---|
| <input checked="" type="checkbox"/> Air Resources Board | <input type="checkbox"/> Office of Historic Preservation |
| <input type="checkbox"/> Boating & Waterways, Department of | <input type="checkbox"/> Office of Public School Construction |
| <input type="checkbox"/> California Emergency Management Agency | <input checked="" type="checkbox"/> Parks & Recreation, Department of |
| <input type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input checked="" type="checkbox"/> Caltrans District # <u>8</u> | <input checked="" type="checkbox"/> Public Utilities Commission |
| <input type="checkbox"/> Caltrans Division of Aeronautics | <input type="checkbox"/> Regional WQCB # <u>8</u> |
| <input checked="" type="checkbox"/> Caltrans Planning | <input checked="" type="checkbox"/> Resources Agency |
| <input type="checkbox"/> Central Valley Flood Protection Board | <input checked="" type="checkbox"/> Resources Recycling and Recovery, Department of |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy | <input type="checkbox"/> S.F. Bay Conservation & Development Comm. |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Colorado River Board | <input type="checkbox"/> San Joaquin River Conservancy |
| <input checked="" type="checkbox"/> Conservation, Department of | <input type="checkbox"/> Santa Monica Mtns. Conservancy |
| <input type="checkbox"/> Corrections, Department of | <input type="checkbox"/> State Lands Commission |
| <input type="checkbox"/> Delta Protection Commission | <input type="checkbox"/> SWRCB: Clean Water Grants |
| <input type="checkbox"/> Education, Department of | <input type="checkbox"/> SWRCB: Water Quality |
| <input checked="" type="checkbox"/> Energy Commission | <input type="checkbox"/> SWRCB: Water Rights |
| <input type="checkbox"/> Fish & Game Region # <u>6</u> | <input type="checkbox"/> Tahoe Regional Planning Agency |
| <input type="checkbox"/> Food & Agriculture, Department of | <input type="checkbox"/> Toxic Substances Control, Department of |
| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input type="checkbox"/> Water Resources, Department of |
| <input checked="" type="checkbox"/> General Services, Department of | Other: _____ |
| <input type="checkbox"/> Health Services, Department of | Other: _____ |
| <input type="checkbox"/> Housing & Community Development | |
| <input type="checkbox"/> Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date Monday, May 18, 2020 Ending Date Friday, June 19, 2020

Lead Agency (Complete if applicable):

Consulting Firm: <u>Dudek</u>	Applicant: <u>Meridian Park South, LLC</u>
Address: <u>38 North Marengo Avenue</u>	Address: <u>1156 N. Mountain Avenue</u>
City/State/Zip: <u>Pasadena, CA 91101</u>	City/State/Zip: <u>Upland, CA 91785</u>
Contact: <u>Nicole Cobleigh, Senior Project Manager</u>	Phone: <u>(909) 579-1294</u>
Phone: <u>(626) 204-9829</u>	

Signature of Lead Agency Representative: Lauren Sotelo Digitally signed by Lauren Sotelo
Date: 2020.05.08 11:23:33 -07'00' **Date:** 05/08/2020

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



Secretary of State
Application to Register a Foreign Limited Liability Company (LLC)

LLC-5

201914910075

FILED *RATB*

Secretary of State
 State of California

MAY 21 2019 *W*

IMPORTANT — Read Instructions before completing this form.
 Must be submitted with a current Certificate of Good Standing issued by the government agency where the LLC was formed. See Instructions.

Filing Fee - \$70.00

Copy Fees - First page \$1.00; each attachment page \$0.50;
 Certification Fee - \$5.00

Note: Registered LLCs in California may have to pay minimum \$800 tax to the California Franchise Tax Board each year. For more information, go to <https://www.ftb.ca.gov>.

llc This Space For Office Use Only

1a. LLC Name (Enter the exact name of the LLC as listed on your attached Certificate of Good Standing.)

MERIDIAN PARK SOUTH, LLC

1b. California Alternate Name, if Required (See Instructions – Only enter an alternate name if the LLC name in 1a not available in California.)

2. LLC History (See Instructions – Ensure that the formation date and jurisdiction match the attached Certificate of Good Standing.)

a. Date LLC was formed in home jurisdiction (MM/DD/YYYY) 05 / 17 / 2019	b. Jurisdiction (State, foreign country or place where this LLC is formed.) Delaware
--	---

c. Authority Statement (Do not alter Authority Statement)

This LLC currently has powers and privileges to conduct business in the state, foreign country or place entered in Item 2b.

3. Business Addresses (Enter the complete business addresses. Items 3a and 3b cannot be a P.O. Box or "in care of" an individual or entity.)

a. Street Address of Principal Executive Office - Do not enter a P.O. Box 1156 N. Mountain Avenue	City (no abbreviations) Upland	State CA	Zip Code 91786
b. Street Address of Principal Office in California, if any - Do not enter a P.O. Box	City (no abbreviations)	State CA	Zip Code
c. Mailing Address of Principal Executive Office, if different than item 3a	City (no abbreviations)	State	Zip Code

4. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL – Complete Items 4a and 4b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box	City (no abbreviations)	State CA	Zip Code

CORPORATION – Complete Item 4c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 4a or 4b

Lewis Management Corp.

5. Read and Sign Below (See Instructions. Title not required.)

I am authorized to sign on behalf of the foreign LLC.

John M Goodman
 Signature

John M. Goodman, Authorized Person
 Type or Print Name

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "MERIDIAN PARK SOUTH, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-FIRST DAY OF MAY, A.D. 2019.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "MERIDIAN PARK SOUTH, LLC" WAS FORMED ON THE SEVENTEENTH DAY OF MAY, A.D. 2019.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN ASSESSED TO DATE.



7424657 8300

SR# 20194236014

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed.

Authentication: 202863952

Date: 05-21-19

201914910075



**Secretary of State
Statement of Information
(Limited Liability Company)**

LLC-12

For Office Use Only

-FILED-

File No.: BA20230653717
Date Filed: 4/11/2023

This form is due within 90 days of initial registration and every two years thereafter.

Filing Fee - \$20.00

Certification Fee (Optional) - \$5.00

This Space For Office Use Only

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name.)

MERIDIAN PARK SOUTH, LLC

2. Secretary of State Entity Number

2	0	1	9	1	4	9	1	0	0	7	5
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3. State, Foreign Country or Place of Organization
(only if formed outside of California)

Delaware

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box	City (no abbreviations)	State	Zip Code
1156 N. Mountain Avenue	Upland	CA	91786
b. Mailing Address of LLC, if different than item 4a	City (no abbreviations)	State	Zip Code
PO BOX 670	Upland	CA	91785
c. Street Address of California Office, if Item 4a is not in California Do not list a P.O. Box	City (no abbreviations)	State	Zip Code
		CA	

5. Manager(s) or Member(s)

If no managers have been appointed or elected, provide the name and address of each member. At least one name and address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave item 5b blank). If the manager/member is an additional managers/members, enter the names(s) and address(es) on Form LLC-12A.

a. First Name, if an individual - Do not complete Item 5b	Middle Name	Last Name	Suffix
b. Entity Name - Do not complete Item 5a			
Meridian Park Holdings, LLC			
c. Address	City (no abbreviations)	State	Zip Code
1156 N. Mountain Avenue	Upland	CA	91786

6. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL - Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box	City (no abbreviations)	State CA	Zip Code

CORPORATION - Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) - Do not complete Item 6a or 6b

Lewis Management Corp.

7. Type of Business

Describe the type of business or services of the Limited Liability Company

Real Estate Investment and Development

8. Chief Executive Officer, if elected or appointed

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

9. Labor Judgment (See instructions)

Does a Manager or Member, as further defined by California Corporations Code section 17702.09(a)(8), have an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal is pending, for the violation of any wage order or provision of the Labor Code?

Yes No

10. Email Notifications

Provide an email address to opt-in to receive entity related notifications, including Statement of Information reminders, by email rather than USPS mail. Note: If no email address is provided, you will continue to receive notices and reminders by USPS mail.

Yes, I opt-in to receive entity notifications via email. Email Address:



To change your option after filing, you must submit a new complete Statement of Information.

By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.

04.07.23
Date

David O. Team
Type or Print Name

Authorized Agent
Title

Signature

Cindy Camargo

From: Steve Walker <walkersteve553@gmail.com>
Sent: Tuesday, June 11, 2024 9:59 AM
To: Cindy Camargo
Subject: Please No more warehouses

Dear Clerk Camargo,

I am a homeowner living in Orangecrest and I am writing to you to let you know that I am opposed to more warehouses being built in the Orangecrest and Mission Grove area. Traffic and pollution is bad enough now. More warehouses will only make these issues worse, and will cause other problems that decrease our quality of life. Please do not allow more warehouses and industrial facilities in our neighborhood.

Thank you,
Steve Walker

Cindy Camargo

From: susan allen <l_susan_allen@yahoo.com>
Sent: Tuesday, June 11, 2024 9:01 AM
To: Cindy Camargo
Subject: Opposition to Proposed West Campus Upper Plateau Project - June 12, 2024
Public Hearing Comment

As a homeowner in Mission Grove within the proposed General Plan and Specific Plan Amendment area, I **hereby wish to go on record in opposition** to the proposed amendments to build 184 million sq ft of warehouse/industrial buildings for the following reasons:

I oppose the project for the following reasons:

- The development will be too close to current residential neighborhoods and schools;
- The big rigs and over weight vehicles do not belong on City/County residential streets. This will be a problem as our streets are used now during heavy traffic congestion on the surrounding roadways and 215/60/91.
- The traffic on Alessandro and Van Buren is horrible now; with additional traffic the 215 will be a parking lot all day and night, causing and sending traffic fumes and smog emissions into the air;
- The noise will be unbearable. As it is now, I can hear the traffic on the 215 inside my home.
- There will be more cargo planes from MAFB. When I moved into my home 20 years ago, I was assured no additional flights would be added. That has not been true either.
- The traffic; the noise; the loss of wildlife; the toxic emissions from the warehouses; and the unsightly concrete buildings will distract from the beauty of Riverside and the loss of the open space.

As a former City employee, I realize my concerns will fall by the wayside as a decision has already been made as the City of Moreno Valley and Riverside would rather increase revenues than protect the rights of their citizens that live here.

Linda Allen

Cindy Camargo

From: L S <nichole19161@gmail.com>
Sent: Tuesday, June 11, 2024 4:28 AM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; Supervisor Jeffries - 1st District; jperry@riversideca.gov; mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

MJPA land already has the highest density of warehouses in the Inland Empire. If you look beyond the money and look at the cumulative negative impact of all the warehouses you've approved, you would vote no on this project. If you or your family personally lived in the projects surrounding neighborhood, you would vote no. Would you be okay with your family being affected by significant environmental impacts from this project, particularly with harmful air quality and noise (per the EIR), while in your own home trying to live the American dream? In addition to all the other existing MJPA warehouse traffic choking us out and clogging/damaging our streets and freeways, do you think it's acceptable to add over 35,314 more vehicle trips on the weekdays as a result of this project? Please press pause and form a community advisory committee, as recommended by the Grand Jury. There are still other options for that parcel. Please stop just looking at dollar signs. This is our health, wellness, quality of life and property values being affected by your decisions.

Thank you for considering my comments before you vote on this project.

Respectfully,

Laura Sandidge
Mission Grove 92508

Cindy Camargo

From: Alyssa De Mint <alyssa.demint@yahoo.com>
Sent: Monday, June 10, 2024 11:55 PM
To: Cindy Camargo
Subject: Regarding Warehouses in Orangecrest, Riverside, CA

Hello Ms. Camargo,

I'm messaging you in regard to the proposed warehouses behind The Grove Community Church in Orangecrest in Riverside, CA.

As a home owner, small business owner, Grove Community Church member, and mother within this community, I oppose the building of warehouses behind The Grove Church and the surrounding area. Riverside is already being covered in too many warehouses, the noise and traffic over the several years of building this and thereafter, will be a big nuisance to residents, and the natural wildlife and land there have made a very popular place for hikers and families. Also, our home values will be negatively affected if the beauty and peace of this neighborhood is replaced with even more warehouses. Please don't destroy our neighborhood. I strongly urge against these warehouses.

Thank you for your time,
Alyssa De Mint

Cindy Camargo

From: Kevin Heinemann <kevinheinemann@gmail.com>
Sent: Monday, June 10, 2024 10:22 PM
To: district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org;
mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov;
mayor@moval.org; edd@moval.org; Dan Fairbanks; Cindy Camargo
Subject: Public Comment for the West Campus Upper Plateau Public Hearing 6/12

Dear March JPA Commission,

I am writing as a concerned resident who opposes the West Campus Upper Plateau project on which the Commission will vote on Wednesday, June 12, 2024. I urge you to vote no on up to 4.7 million square feet of warehouses on land surrounded almost entirely by residential homes.

This is a terrible plan to put warehouses in the middle of a neighborhood. It will increase noise and air pollution, traffic and be zero benefit to the neighborhood and city as a whole. Please consider other options for this land.

Thank you for considering my comments before you vote on this project.

Sincerely,

Kevin Heinemann
92508

Cindy Camargo

From: Zhiyun Qian <zhiyunq@cs.ucr.edu>
Sent: Monday, June 10, 2024 6:38 PM
To: Cindy Camargo
Subject: Urgent Concern: Opposing The Grove Warehouses Project

Dear Cindy Camargo,

I hope this message finds you well. My name is Zhiyun Qian, a professor at UC Riverside, and I am a resident of the Mission Grove area in Riverside. I am writing on behalf of myself and my family members to express our strong opposition to the proposed Grove Warehouses project (i.e., the West Campus Upper Plateau Project) planned by the March JPA.

I have been a resident of the Mission Grove area for 10 years since I joined UC Riverside as a professor. I have no regret in deciding to move from New Jersey 10 years ago and live here. As a new parent to a beautiful baby son, who will grow up in this community over the next decade and beyond, I am deeply invested in the future of our neighborhood. This project poses several significant concerns that could adversely affect our quality of life and the health and well-being of our children. I may have to move out of the area if the project comes to fruition.

Firstly, the increased traffic and noise pollution associated with such a large-scale warehouse project will undoubtedly disrupt the peace and tranquility of our residential area. The constant movement of heavy trucks and the associated industrial noise will create an unsafe and unhealthy environment for our children to grow up in.

Moreover, the potential environmental impact is deeply troubling. The increase in vehicle emissions and potential industrial pollutants could severely compromise the air quality in our neighborhood. As Riverside is already one of the worst places in the entire United States in terms of air quality, and as someone who deeply cares about the health and safety of my newborn, the thought of exposing my child to such risks is distressing.

Additionally, the Grove Warehouses project threatens local wildlife and encroaches on the open spaces we cherish for biking and walking.

These open spaces are essential for the physical and mental well-being of all residents, especially our children. The project also raises concerns about public safety, with increased traffic heightening the risk of accidents and other safety issues.

The value of our properties and the overall aesthetics of our community are at stake. A massive warehouse complex will not only be an eyesore but could also lead to a decline in property values, affecting the financial well-being of all residents.

I urge you to consider the long-term consequences of this project on the families and future generations who call this place home. Please take a stand for our community and advocate for more sustainable and family-friendly development alternatives that enhance, rather than degrade, our quality of life.

People in our family feel helpless and angry about warehouses taking over our community, but we are determined to fight to preserve our neighborhoods. We hope for your support in ensuring a safe and healthy environment for my child and all the children in our community.

Thank you for your time and attention to this matter. I look forward to your support and action against this detrimental project.

Sincerely,

Zhiyun Qian,
Everett and Imogene Ross professor
zhiyunq@cs.ucr.edu
734-730-9457