

## MEMORANDUM

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**To:** Dan Fairbanks, Planning Director, March Joint Powers Authority  
**From:** Nicole Cobleigh, Dudek  
**Subject:** West Campus Upper Plateau Project: Responses to Comments Received – June 11, 2024 through June 12, 2024 (Part 2)  
**Date:** June 12, 2024  
**Attachment(s):** 1. Table of Commenters, Comments and Responses  
2. Response to Sierra Club Letter, dated June 12, 2024  
3. Comment Letters Received

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After release of the Final Environmental Impact Report (EIR) for the West Campus Upper Plateau Project, and after submitting responses to the previous 96 pre-hearing letters, an additional 20 pre-hearing comment letters were received on June 11, 2024 and June 12, 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.

# **Attachment 1**

Table of Commenters, Comments and Responses

## Comment Letters Received – 06/11/24 and 06/12/24 (Part 2)

	Date	Commenter	Comment(s)	Response(s)
1	06/12/24	Sierra Club, George Hague	See Attachment 2 for summary of comments and responses	
2	06/12/24	League of Women's Voters	General opposition	Noted; no new issues raised.
3	06/12/24	Elizabeth Alanis	General opposition	Noted; no new issues raised.
4	06/12/24	Fera Momtaz	General opposition	Noted; no new issues raised.
5	06/12/24	Brian De Mint	General opposition	Noted; no new issues raised.
6	06/12/24	Jillian Menez	General opposition	Noted; no new issues raised.
7	06/12/24	Cindy Chiek	General opposition	Noted; no new issues raised.
8	06/12/24	Lauren Leinz	General opposition	Noted; no new issues raised.
9	06/12/24	Yesenia Contreras	General opposition	Noted; no new issues raised.
10	06/11/24	LaDonna Ardary	General opposition	Noted; no new issues raised.
11	06/11/24	Carolyn Rasmussen	1. Disappointment with RTC I-440.1 about increased truck traffic and the payment of \$100,000.  2. General opposition	1. No new comments raised; just disappointment over the response.  2. Noted; no new issues raised.
12	06/11/24	Adamaris Maldonado	General opposition	Noted; no new issues raised.

13	06/11/24	Aaron Echols	<p>1. Commenter asserts that it conducted independent surveys of the project area. Its report submits 6 photographs that it took of the site in 2023 (some of the photos may be the same photo and different scale) through the fence surrounding the property. Based on these photos, commenter asserts that San Diego tarweed is present on the site and is the dominant plant, covering 52% of the site, in some sections of the site. Based on the number of San Diego tarweed, commenter asserts that this is a “very rare” circumstance.</p>	<p>1. The San Diego tar weed is the same plant as the <i>paniculate tarplant</i>, which is addressed in the EIR which states:</p> <p style="padding-left: 40px;">Paniculate tarplant (<i>Deinandra paniculata</i>), a CRPR 4.2 species, was observed during the focused botanical surveys. The species was detected within the Specific Plan Area and the Staging Area along the access roads as well as within the northern portion of the site. Species with CRPR 4 are not considered “rare,” but only limited in distribution or infrequent throughout a broader range in California (e.g., “watch list” species) (CNPS 2020). Thus, given that CEQA requires findings of significance for projects that “threaten to...reduce the number or restrict the range of a rare or endangered plant,” paniculate tarplant will not be analyzed further.</p> <p>Thus, the biological surveys were accurate and identified this species consistent with the commenter. As the CNPS recognizes, paniculate tarplant is not a protected plant under CEQA. The presence of several non-protected species does not constitute a very rare circumstance and is a common occurrence. Paniculate tarplant is abundant and widespread in W. Riverside County. The occurrence and abundance of this species (like many members of the genus <i>Deinandra</i>) can vary greatly year over year based largely on precipitation. The abundance of this species on site does not constitute a ‘very rare circumstance’</p>
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			<p>2. Commenter also submitted a photo that it claims is a long spined spineflower.</p> <p>3. Commenter also asserts that CDFW needed to be consulted with to determine how to classify this habitat.</p> <p>4. Commenter asserts the dates of the surveys are inaccurate.</p>	<p>2. The photo is far too grainy and blurry to identify what species it is and is not substantial evidence that a long spined spineflower is on the project site.</p> <p>3. CDFW relies on consultants/EIR preparers to classify habitats and is typically not consulted during the survey process. At the time of our vegetation mapping and analysis non-native grassland was the dominant vegetation type. Annual variation in precipitation can affect species composition and coverage but the project site continues to be dominated by non-native grassland.</p> <p>4. As discussed in Form Letter Response C, these dates are accurate.</p>
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14	06/11/24	California Native Plant Society	<p>1. The commenter claims surveys are limited to late summer.</p> <p>2. Commenter asserts that four populations of long-spined spineflower that were not observed based on the timing of the surveys.</p> <p>3. The commenter asserts that a rare species “deinandra faciculata” is similar to species on the site.</p> <p>4. Commenter notes that the biological survey observed San Diego tarplant.</p>	<p>1. The survey dates for plants and wildlife on the cited dates were the general biological surveys. Rare plant surveys were separately conducted on June 6 and 7 of 2022 during the blooming period of those species. These surveys are not limited to late summer surveys as the commenter falsely claims.</p> <p>2. This annual species was not documented during the 2022 surveys. This species is not a state or federally-listed species, so like similar species of this status is generally considered adequately conserved through habitat-based conservation. Given the site location within the MSHCP and the project conservation of 445 acres.</p> <p>3. Paniculate tarplant was observed and is addressed in the EIR. This species is abundant and widespread in W. Riverside County.</p> <p>4. This is true. This is true. As explained in other responses, the San Diego tarplant is listed as 4.2 by CNPS and CNPS acknowledges it is not a species that needs to be evaluated under CEQA. (CNPS 2020).<sup>1</sup> Though not required under CEQA, presence of this species was disclosed and addressed in the EIR.</p>
15	06/11/24	Joyce Tice	General opposition	Noted; no new issues raised.

<sup>1</sup> [https://www.cnps.org/wp-content/uploads/2020/02/crpr4\\_technical\\_memo.pdf](https://www.cnps.org/wp-content/uploads/2020/02/crpr4_technical_memo.pdf)

16	06/11/24	Rosamonde Cook	<p>1. Wildlife: Complete MSHCP data set may not have been used to evaluate the potential for impacts. A complete data set should have been requested.</p> <p>2. Rare Plants: Seem to rely on personal knowledge instead of surveys. Rely on assumptions rather than cited references.</p>	<p>1. Commenter asserts that the biological consultant only reviewed the information available to the general public but not the information that has the “highest level of security” that CDFW and RCA maintain. ROCKS reviewed all data. There is no such thing biological survey information “highest level of security.” The commenter is referring to the RCA database. ROCKS consulted the RCA database, which is discussed in Biological Resources Response to Comments, Appendix D-2.</p> <p>2. ROCKS documented all the information in their field surveys. The biological survey is based on field data, not just personal knowledge of one individual. Commenter alleges that another person found a species on another site, the Grove, for which the commenter provides no information. Experienced biological botanists surveyed the site and looked for all rare and protected species. This is not substantial evidence that the project surveys are incorrect.</p>
17	06/11/24	Juan Carillo-Dominguez	General opposition	Noted; no new issues raised.
18	06/11/24	Andrea Tercero	General opposition	Noted; no new issues raised.
19	06/12/24	Jillian Kerstetter	General opposition	Noted; no new issues raised.
20	06/12/24	RAMV Rural Association of Mead Valley	Commenter raises two sites that are not proximate to the project site and have no relevance to this project. Commenter also asserts without any evidence that the investigation of contamination was inadequate.	This generalized comment is addressed in Response to Comments Topical Hazards and Section 4.8 Hazards and Hazardous Materials in the Final EIR. Please see Response to Comments Topical Alternatives for a discussion of Alternative Plan #2: Veterans Village Approach, Section 4.2 Air Quality in the Final EIR and Section 4.11 Noise in the Final EIR.

## **Attachment 2**

Response to Sierra Club Letter, dated June 12, 2024



## Response to Sierra Club comment letter – 6/12/2024

The comment provides the commenting organization’s opinion of the Final EIR’s Project consistency analysis with the AG’s Warehouse Best Practices as detailed in Topical Response 4, Project Consistency. The commenter disagrees with some of the conclusions. The following address several misstatements or misunderstandings:

- MM-AQ-1 requires the applicant provide evidence prior to issuance of each grading and building permit, that Tier IV or better equipment will be used. Zero-emission construction equipment would constitute equipment better than Tier IV. The required evidence may include contracts, plan specifications, etc.
- Regarding MM-AQ-3, inclusion of the phrase “to the extent feasible” acknowledges the possibility that not all construction equipment will be available in electric-powered form, and that generators may be necessary due to emergency situations or constrained supply.
- Noise and vibration impacts of Project construction are fully analyzed in Section 4.11, Noise, of the Final EIR and impacts were determined to be less than significant. Although not required for CEQA purposes, PDF-NOI-1 through PDF-NOI-4 represent the applicant’s commitment to be a good neighbor to the local community and minimize noise and vibration as much as feasible. Impacts related to fugitive dust are analyzed in Section 4.2, Air Quality, of the Final EIR. The Project will comply with SCAQMD’s regulations related to fugitive dust and the analysis determined impacts to be less than significant.
- Regarding MM-AQ-20, March JPA and the applicant cannot prohibit access to the site by any truck or vehicle that is otherwise legal to operate on California roads and highways. Limiting MM-AQ-20 to vehicles domiciled onsite represents the feasible actions March JPA and the applicant can take. The applicant is required to provide a feasibility study prior to each building permit or certificate of occupancy.
- The Project site is within the March ARB/IPA Airport Influence Area, which means that solar requirements and construction are not the sole purview of March JPA. MM-GHG-1 acknowledges ALUC’s role.
- MM-GHG-7 requires compliance with the voluntary provisions of Tier 2 of the 2022 CALGreen Code.
- Cumulative health impacts of the Project’s truck routes, including Cactus Avenue, are evaluated and disclosed in Section 4.2, Air Quality, of the Final EIR and Appendix C-2.
- Similar to MM-AQ-3, MM-AQ-24 addresses situations where a generator may be necessary.
- MM-AQ-21 imposes the requirements of SCAQMD Rule 2202 to tenants with less than 250 employees.
- MM-AQ-22 contains a list of topics to be covered annually for employees and truck drivers, as appropriate.

Project consistency with the SCAQMD 2022 Air Quality Management Plan is addressed in Topical Response 2 – Air Quality, in Chapter 9 of the Final EIR. The comment refers to one of the components from SCAQMD 2022 AQMP Appendix IV-A – Stationary and Mobile Source Control Measures, C-CMB-02, regarding emissions reductions from replacement with zero emission or low NOx appliances – commercial space heating. The comment suggests the Project buildings should be required to have zero emissions and electric appliances including stove tops/ovens and water heaters. The Project does not include residential uses, and the Project’s proposed land uses would not be anticipated to include many stove tops/ovens. As noted elsewhere in the consistency analysis in Topical Response 2, MM-GHG-4 requires installation of water heaters with an energy factor of .92 or higher.

Similarly, Project consistency with the EPA’s Mobile Source Pollution: Environmental Justice and Transportation guidance is addressed in Topical Response 2 – Air Quality, in Chapter 9 of the Final EIR. As explained therein, MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. As noted above, March JPA and the applicant cannot prohibit access to the site by any truck or vehicle that is otherwise legal to operate on California roads and highways. Limiting MM-AQ-20 to vehicles domiciled onsite represents the feasible actions March JPA and the applicant can take.

As explained in Topical Response 2 – Air Quality, comments on the EIR requested that all air quality mitigation measures included in the World Logistics Center Settlement Agreement, dated April 28, 2021, be incorporated into the Project. In response to these comments, Topical Response 2 includes a table that identifies settlement agreement measures from the World Logistics Center Settlement Agreement and identifies what mitigation measures for the proposed Project correlate with those from the World Logistics Center project. The comment states that the Project does not provide an air-conditioned lounge with vending machines; however, the comment includes the consistency analysis regarding MM-AQ-9, which requires any facility totaling more than 400,000 square feet to include a truck operator lounge equipped with clean and accessible amenities such as restrooms, vending machines, television, and air conditioning.

Similarly, comments were received requesting that all air quality mitigation measures included in the Centerpoint Properties Air Quality Conditions of Approval be incorporated into the proposed Project. In response to these comments, a table in Topical Response 2 – Air Quality, in Chapter 9 of the Final EIR identifies conditions of approval from the Centerpoint Properties Air Quality Conditions of Approval and identifies what mitigation measures for the proposed Project correlate with those from the Centerpoint Properties project. Construction emissions associated with PM<sub>10</sub> and PM<sub>2.5</sub> are addressed in Section 4.2, Air Quality, and Appendix C-1, of the EIR. Contrary to the comment’s suggestion Centerpoint does not require all onsite vehicles and equipment to be zero emissions from

the start of operations. As explained in the consistency analysis in Table 2 and consistent with Centerpoint, heavy-duty trucks will transition to zero -emission vehicles; however, MM-AQ-18 requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided from the start of operations.

The comment criticizes the references and abbreviations from the air quality mitigation measures included in the Stockton Mariposa Industrial Complex Mitigation Monitoring and Reporting Program (MMRP), which were provided in Topical Response 2 in response to comments.

# **Attachment 3**

Comment Letters Received

## Cindy Camargo

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**From:** George Hague <gbhague@gmail.com>  
**Sent:** Wednesday, June 12, 2024 2:45 PM  
**To:** Dan Fairbanks  
**Cc:** Cindy Camargo; Clerk  
**Subject:** Comments on the West Campus Upper Plateau warehouse project.for March JPA Commission  
**Attachments:** Sierra Club WCUP comments 6-10-2024.pdf

Good afternoon Mr Fairbanks,

Please confirm the timely receipt of the attached Sierra Club comments on the West Campus Upper Plateau (WCUP) warehouse project and that you were able to open it.

They are intended for the March JPA Commission members. Please make sure they will be provided to them prior to tonight's scheduled vote on the project.

If Mr Fairbanks is unavailable to do what I requested I hope others on this email will make sure it is.

Thank you very much,

George Hague



## SAN GORGONIO CHAPTER

Good afternoon March JPA Commission members,

June 12, 2024

Re: Proposed Project, West Campus Upper Plateau (WCUP) warehouse

Please explain how you could have read everything during only 10 days the public has had to respond to the 1,000's of pages we were provided. I hope you will acknowledge the very limited time the public and you have had to review prior to this important vote. **The Sierra Club believes the information found below will help you understand your vote should be NO.**

The developers of the Proposed Project, West Campus Upper Plateau (WCUP) tries to convince you and the community that they are consistent with the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." (September 2022) Beginning on page 9.1-6 of Response to Comments there is a side by side comparison of the Attorney General's Best Practices and how the Propose Project believes they have met what is found in Best Practices and Mitigation Measures.

You will find those side to side comparisons below, but instead with one on top of the other with Sierra Club comments in CAPS showing how the Proposed Project fails to meet that which the Attorney General sets as standards to protect residents and the environment.

### **AG's Warehouse Best Practices**

#### **Air Quality and Greenhouse Gas Emissions Mitigation - Construction**

Attorney General = Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.

Proposed Project = Consistent. MM-AQ-1 requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. MM-AQ-3 requires the construction contractor to use electric-powered hand

tools, forklifts and pressure washers, to the extent feasible

WCUP WAREHOUSE FAILS TO INCLUDE ZERO-EMISSION CONSTRUCTION EQUIPMENT AND TO INCLUDE TEIR IV REQUIREMENTS IN CONTRACTS.

XXXXX

Attorney General: Prohibiting off-road diesel-powered equipment from being in the “on” position for more than 10 hours per day.

Proposed Project: Consistent. MM-AQ-2 prohibits the operating hours of construction equipment to exceed 8 hours and requires the construction contractor to submit a biweekly log to March JPA to ensure compliance.

WCUP WAREHOUSE APPEARS TO BE IN COMPLIANCE.

XXXXX

Attorney General = Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.

Proposed Project = Consistent. MM-AQ-3 requires the construction contractor to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible, and to designate an area where such equipment can be charged. MM-AQ-3 further prohibits the use of dieselpowered portable generators, unless necessary due to emergency situations or constrained supply.

WCUP WAREHOUSE USES “TO THE EXTENT FEASIBLE” TO AVOID REQUIRING ONLY ELECTRIC POWERED HAND TOOLS AND WILL STILL PERMIT DIESEL POWERED PORTABLE GENERATORS.

XXXXX

Attorney General = Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.

Proposed Project = Consistent. MM-AQ-3 requires the designation of an area where electric-powered construction vehicles and equipment can be charged.

WCUP WAREHOUSE IS CONSISTENT WITH PROVIDING A SPACE FOR ELECTRIC CHARGING. WE JUST HOPE THEY HAVE ONLY ELECTRIC EQUIPMENT THAT NEEDS CHANGING.

XXXXX

Attorney General = Limiting the amount of daily grading disturbance area.

Proposed Project: Consistent. MM-AQ-2 limits amount of daily grading as follows: During Phase 1, areas of active ground disturbance shall not exceed a maximum of 20 acres per day for Mass Grading and 20 acres per day for Blasting & Rock Handling. During Phase 2, the area of active ground disturbance shall not exceed a maximum of 20 acres per day for Remedial Grading. The construction contractor shall submit a grading log to the March JPA every two weeks documenting acreage graded or equivalent cubic yardage to ensure compliance.

WCUP WAREHOUSE: WHILE THE ACREAGE IS LIMITED, THE 20 ACRES EXCEEDS WHAT IS REASONABLE FOR THE AREA. THE MENTION OF BLASTING AND ROCK HANDLING INDICATES THAT THIS PROPOSED PROJECT WOULD LIKELY IMPACT RESIDENTS WELL BEYOND ITS PERIMETER WITH NOISE/VIBRATION/ADDITIONAL DUST WHICH HAS NOT BE FULLY ANALYZED AND MITIGATED. THE PUBLIC NOTICE OF MEETINGS FOR THIS PROJECT MUST GO BEYOND WHAT HAS BEEN DONE TO CAPTURE THOSE IMPACTED BY THE "BLASTING".

XXXXX

Attorney General:= Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.

Proposed Project = Not Applicable The Project would have a less than significant air quality construction impact with the implementation of MM-AQ-1 through MM-AQ-4. However, to further reduce the Project's air quality construction impacts, MM-AQ-3 prohibits grading on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the project area (Source Receptor Area 23).

WCUP WAREHOUSE USES AIR QUALITY INDEX OF 150 FOR PARTICULATES OR OZONE AND NOT THE 100 SET BY THE ATTORNEY GENERAL. MM-AQ -1 through MM-AQ -4 DO NOT MEET THE STANDARDS OF THE ATTORNEY GENERAL.



XXXXXX

### **Air Quality and Greenhouse Gas Emissions Mitigation - Operation**

Attorney General = Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.

Proposed Project = Consistent. MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later

WCUP WAREHOUSE LIMITS THIS TO DOMICILED TRUCKS WHICH MAY NEVER BE PART OF THE PROJECT. THEIR DEFINITION OF DOMICILED IS VEHICLE IS PARKED OR KEPT OVERNIGHT 70% OF THE CALENDAR YEAR. MM-AQ-20 GIVES THEM MANY OUTS TO NEVER IMPLEMENT THE AG'S RECOMMENDATION. THEY ALSO USE THE LAST DAY IN 2030 AND WILL DECIDE IF THAT IS EVEN FEASIBLE --- IF NOT, WILL WAIT EVEN LONGER TO IMPLEMENT AT SOME UNKNOWN DATE.

XXXXXX

Attorney General = Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.

Proposed Project = Consistent. MM-AQ-18 requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable.

WCUP WAREHOUSE DOESN'T REQUIRE ALL ON-SITE MOTORIZED OPERATIONAL EQUIPMENT TO BE ZERO EMISSIONS, BUT ONLY REQUIRE THAT THEY WILL BE USED — IS THAT MORE THAN ONE? MM AQ—18 READS “COMPRESSED NATURAL GAS (CNG) POWERED EQUIPMENT SHALL ALSO BE ACCEPTABLE.”

XXXXXX

Attorney General = Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.

Proposed Project = Consistent. MM-AQ-20 requires industrial tenants utilize a “clean fleet” of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following “clean fleet” requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application whichever date is later.

WCUP WAREHOUSE LIMITS THIS TO DOMICILED VANS/TRUCKS WHICH MAY NEVER BE PART OF THE PROJECT. THEIR DEFINITION OF DOMICILED IS VEHICLE IS PARKED OR KEPT OVERNIGHT 70% OF THE CALENDAR YEAR. MM-AQ-20 GIVES THEM MANY OUTS TO NEVER IMPLEMENT THE AG’S RECOMMENDATION. THEY ALSO USE THE LAST DAY IN 2030 AND WILL DECIDE IF THAT IS FEASIBLE --- IF NOT, WILL WAIT EVEN LONGER TO IMPLEMENT AT SOME UNKNOWN DATE. THEY MAY NEVER HAVE ANYTHING RESEMBLING A “CLEAN FLEET” FOR ANOTHER DECADE.

XXXXX

Attorney General = Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.

Proposed Project = Consistent. MM-AQ-17 limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to “neutral” or “park,” and the parking brake is engaged and for truck drivers to shut off engines when not in use.

THE WCUP WAREHOUSE DIESEL TRUCKS WILL BE ALLOWED TO KEEP THEIR ENGINES RUNNING WHILE THEY WAIT IN LONG LINES AND FOR MANY OTHER REASONS BASED ON MM-AQ-17

XXXXX

Attorney General = Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.

Proposed Project = Consistent. MM-AQ-17 requires legible, durable, weather-proof signs placed at truck access gates, loading docks, and truck parking areas that identify: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than three (3) minutes once the vehicle is stopped, the transmission is set to “neutral” or “park,” and the parking brake is engaged; and 3) telephone numbers of the building facilities manager, South Coast Air Quality Management District and the California Air Resources Board to report violations. One six square foot sign providing this information shall be located on the building between every two dock-high doors and the sign shall be posted in highly visible locations at the entrance gates, semi parking areas, and trailer parking locations.

WCUP WAREHOUSE APPEARS TO COVER THIS. IT WOULD BE BETTER IF THE SIGNS WERE DESCRIBED AS “PERMANENT” AND WERE DESIGNATED IN DELIVERY AREAS AS MENTIONED BY THE ATTORNEY GENERAL.

xxxxx

Attorney General = Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building’s projected energy needs, including all electrical chargers.

Proposed Project = Consistent. MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building’s power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.

WCUP WAREHOUSE LIMITS ITS SOLAR IN MM-GHG-1 TO THE “BUILDING ROOFTOP, SO AS TO COMPLY WITH THE 2019 RIVERSIDE COUNTY CLIMATE ACTION PLAN, UP TO THE MAXIMUM PERMITTED BY THE RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION” THE ATTORNEY GENERAL ALLOWS FOR SOLAR ANYWHERE ON THE “PROJECT SITE” WHICH AMONG OTHER THINGS WOULD INCLUDE THE PARKING AREAS TO PROVIDE ENERGY FOR ALL CHARGERS. THE DEVELOPER ALSO LIMITS THE REQUIRED SOLAR TO BUILDING USE AND NOT ALL THE ELECTRIC CHARGERS NEEDED BY OUTSIDE EQUIPMENT LIKE FORKLIFTS/HOSTLERS AND THE CHARGING OF EMPLOYEE ELECTRIC VEHICLES AS WELL AS THE GROWING NEED FOR ELECTRIC CLASS 2 THROUGH 8 VEHICLES SERVING THE SITE.

xxxxx

Attorney General = Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.

Proposed Project = Consistent. MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.

WCUP WAREHOUSE LIMITS ROOFTOP SOLAR TO THE REQUIREMENTS OF THE BUILDING, BUT MORE SOLAR WILL BE NEEDED FOR CHARGERS TO POWER ALL THE OUTSIDE EQUIPMENT, EMPLOYEE ELECTRIC VEHICLES, AND ELECTRIC CLASS 2-8 VEHICLES SEVERING THE SITE WELL INTO THE FUTURE. THEREFORE ALL ROOFS AND MAYBE MORE NEEDS TO BUILT "TO ACCOMMODATE THE MAXIMUM FUTURE COVERAGE OF SOLAR PANELS AND INSTALLING THE MAXIMUM SOLAR POWER GENERATION CAPACITY FEASIBLE" AS THE ATTORNEY GENERAL WRITES.

xxxxx

Attorney General = Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.

Proposed Project = Consistent. PDF-GHG-1 requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. MM-AQ-11 requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy duty and delivery trucks when these trucks become available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.

WCUP WAREHOUSE ONLY ALLOWS FOR FUTURE INSTALLATIONS OF SOME UNKNOWN NUMBER OF CHARGING STATIONS WHILE THE ATTORNEY GENERAL EXPECTS THEM INSTALLED DURING CONSTRUCTION TO MATCH THE NUMBER OF DOCK DOORS.

xxxxx

Attorney General = Running conduit to designated locations for future electric truck charging stations.

Proposed Project = Consistent. PDF-GHG-1 requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.

WCUP WAREHOUSE APPEARS TO MEET THIS RECOMMENDATION.

XXXXX

Attorney General = Oversizing electrical rooms by 25% or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.

Proposed Project = Consistent. MM-AQ-11 requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available.

WCUP WAREHOUSE FAILS TO GUARANTEE OVERSIZING THE ELECTRICAL ROOM BY AT LEAST 25% FOR FUTURE EXPANSION. WE ARE SUPPOSE TO TRUST THE DEVELOPER WILL DO THE RIGHT CALCULATION TO ACCOMMODATE FUTURE ELECTRICAL NEEDS. THEIR 'CLEAN FLEET' WHICH REQUIRES DOMICILED TRUCKS MAY RESULT IN NO ELECTRIC ZERO EMISSION TRUCKS AND THEREFORE THEY MAY THINK THEY WILL NOT NEED TO HAVE A SECONDARY ELECTRICAL ROOM OR A 25% EXPANSION WHICH THE SIERRA CLUB FINDS TOTALLY UNACCEPTABLE.

XXXXX

Attorney General = Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)

Proposed Project = Consistent. MM-GHG-7 requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022

CALGreen Code, which provides charging stations in excess of 10% of employee parking spaces.

WCUP WAREHOUSE BY RELYING ON CALGREEN CODE DOESN'T REQUIRE AT LEAST 10% OF EMPLOYEE PARKING SPACES WITH WORKING LEVEL 2 EV CHARGERS.

xxxxxx

Attorney General = Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.

Proposed Project = Consistent. MM-GHG-7 requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code, which provides additional EV capable parking sites.

WCUP WAREHOUSE BY USING CAL GREEN CODE THEY ONLY ARE REQUIRING ABOUT 20% EV CAPABLE PARKING SPACES WHICH DOESN'T PROVIDE EV SUPPLY EQUIPMENT AKA INSTALLED AND WORKING AS EXPECTED BY THE ATTORNEY GENERAL. SIGNIFICANTLY LESS EV SUPPLY EQUIPMENT (EVSE). IT ALSO DOESN'T REQUIRE LEVEL 2 CHARGERS.

xxxxxx

Attorney General = Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.

Proposed Project = Not Applicable. Recirculated Section 4.2, Air Quality and Appendix C-2 assessed the Project's health risks and determined the Project would result in less than significant human health and cancer risks.

WCUP WAREHOUSE APPENDIX C-2 FAILS TO SHOW ON EXHIBIT 2-B TRUCK MOVEMENT ON CACTUS AVE. EXHIBIT 2-D SENSITIVE RECEPTORS FAILS TO MEASURE THE DISTANCE FROM CACTUS AVE TO THE NEAREST HOMES. SINCE CACTUS AVE IS THE ROUTE OF ALL TRUCK TRIPS INTO AND OUT OF THE PROJECT ITS USE WILL GENERATE MAJOR POLLUTION. FAILURE TO INCLUDE CUMULATIVE IMPACTS ALSO PROVES FALSE THE DEVELOPER'S STATEMENT ABOUT AIR FILTRATION SYSTEMS BEING "NOT APPLICABLE".

xxxxxx

Attorney General = Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.

Proposed Project = Not Applicable. Recirculated Section 4.2, Air Quality and Appendix C-2 assessed the Project's health risks and determined the Project would result in less than significant human health and cancer risks.

WCUP WAREHOUSE IN REPEATING THE ABOVE RESPONSE = APPENDIX C-2 FAILS TO SHOW ON EXHIBIT 2-B TRUCK MOVEMENT ON CACTUS AVE. EXHIBIT 2-D SENSITIVE RECEPTORS FAILS TO MEASURE THE DISTANCE FROM CACTUS AVE TO THE NEAREST HOMES. SINCE CACTUS AVE IS THE ROUTE OF ALL TRUCK TRIPS INTO AND OUT OF THE PROJECT ITS USE WILL GENERATE MAJOR POLLUTION. FAILURE TO INCLUDE CUMULATIVE IMPACTS ALSO PROVES FALSE THE DEVELOPER'S STATEMENT ABOUT THAT IT IS "NOT APPLICABLE" THAT THEY SHOULD BE RESPONSIBLE FOR INSTALLING AN AIR MONITORING STATION PROXIMATE TO SENSITIVE RECEPTORS. THIS PROJECT IS RESPONSIBLE FOR ADDING TO THE POLLUTION AND ALSO GROWTH ENDUCING IMPACTS OF POLLUTION WHICH NEEDS TO BE MONITORED.

xxxxxx

Attorney General = Requiring all stand-by emergency generators to be powered by a non-diesel fuel.

Proposed Project = Consistent. MM-AQ-24 prohibits the use of diesel backup generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the

minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.

WCUP WAREHOUSE IS NOT CONSISTENT AND NOR IS MM-AQ-24 BECAUSE OF WHAT IS ALLOWED. THROUGHOUT IT READS MANY EXCEPTIONS, BUT AVOIDS THAT THEY WILL BE POWERED BY NON-DIESEL FUEL AS REQUIRED BY THE ATTORNEY GENERAL. THE LAST LINE READS TENANTS SHALL MAKE EVERY EFFORT WHEN NEEDING BACK UP GENERATORS TO MEET CARB'S TIER 4 DIESEL GENERATORS OR HAVE THE LEAST EMISSIONS.

xxxxx

Attorney General = Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

Proposed Project = Consistent. MM-AQ-22 requires the facility operator to provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks

WCUP WAREHOUSE IS ONLY GOING TO "PROVIDE INFORMATION" WHICH COULD BE A SHORT CONVERSATION OR SOMETHING ON A SINGLE PIECE OF PAPER. THIS A BIG DIFFERENCE FROM THE ACTUAL TRAINING OF MANAGERS AND EMPLOYEES AS SHOWN ABOVE BY THE ATTORNEY GENERAL.

xxxxx

Attorney General = Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.

Proposed Project = Consistent. Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, MM-AQ-21 requires each facility to implement or join a transportation demand management program, which would include:

- Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM



program, activities and features to all employees.

- Create and maintain a “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work.
- Inform employees of public transit and commuting services available to them (e.g., social media, signage).
- Provide on-site transit pass sales and discounted transit passes.
- Guarantee a ride home.
- Offer shuttle service to and from public transit and commercial areas/food establishments, **if warranted**. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees.
- Designating areas for employee pickup and dropoff.
- Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program

WCUP WAREHOUSE CONSISTS OF SEVERAL BUILDINGS EACH OF WHICH MAY NOT HAVE MORE THAN 250 EMPLOYEES, BUT COLLECTIVELY THEY VERY LIKELY WOULD. ALL SCAQMD RULE 2202 REQUIRES IS ONE PERSON TO TAKE THE FIVE (5) HOURS OF ZOOM TRAINING TO BECOME AN EMPLOYEE TRANSPORTATION COORDINATOR (ETC), BUT REQUIRES NOTHING TO HAPPEN AFTER THE TRAINING. SEVERAL ITEMS FOR UNDER 250 EMPLOYEES ARE GOOD. THEY, HOWEVER, USE “IF WARRANTED” WHEN OFFERING SHUTTLE SERVICE TO AND FROM PUBLIC TRANSIT AND COMMERCIAL AREAS/FOOD ESTABLISHMENTS — WHO DECIDES THIS?

xxxxxx

Attorney General = Meeting CALGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.

Proposed Project = Consistent. MM-GHG-7 requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. The Project will comply with the CALGreen Code green building standards, as applicable.

WCUP WAREHOUSE LIMITS EV CHARGING TO THE YEAR 2022 CALGREEN CODE INSTEAD OF WHAT IS CURRENT WHEN THE PROJECT IS BUILT. THE DEVELOPER ALSO DOESN'T AGREE TO "COMPLY" WITH TIER 2 GREEN BUILDING STANDARDS BUT JUST THEIR REGULAR GREEN BUILDING STANDARDS – "AS APPLICABLE".

XXXXX

Attorney General = Designing to LEED green building certification standards.

Proposed Project = Consistent. MM-AQ-6 requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent, at a minimum.

WCUP WAREHOUSE AGAIN PUTS A YEAR OF 2023 ON THE LEED CERTIFICATION INSTEAD OF THE CURRENT LEED STANDARDS WHEN THE PROJECT IS BUILT. THE DEVELOPER FAILS TO MEET THE ATTORNEY GENERAL'S STANDARD OF "DESIGNING" THEIR BUILDING TO MEET LEED CERTIFICATION STANDARDS. ACCORDING TO MM-AQ-6 THE DEVELOPER AGREES ONLY TO PROVIDE THE MARCH JPA WITH EVIDENCE, BUT THEY DO NOT WRITE WHO SUPPLIES THE EVIDENCE. IT NEEDS TO COME FROM A PROFESSIONAL WHO IS A QUALIFIED LEED PROFESSIONAL TO CERTIFY BUILDINGS AND NOT FROM A CONTRACTOR.

XXXXX

Attorney General = Providing meal options on site or shuttles between the facility and nearby meal destinations.

Proposed Project = Consistent. Tenants with 250 or more employees must comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. For tenants employing less than 250 employees, MM-AQ-21 requires each facility to implement a transportation demand management program, which would include offering shuttle service to and from public transit and commercial areas/food establishments, **if warranted**. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees

WCUP WAREHOUSE CONSISTS OF SEVERAL BUILDINGS EACH OF WHICH MAY NOT HAVE MORE THAN 250 EMPLOYEES, BUT COLLECTIVELY THEY VERY LIKELY WOULD. THIS RESPONSE IS THE SAME AS RIDE SHARE FOUND ABOVE WITH SOME ADDITIONS. ALL SCAQMD RULE 2202 REQUIRES IS ONE PERSON TO TAKE THE FIVE (5) HOURS OF ZOOM TRAINING TO BECOME AN EMPLOYEE

TRANSPORTATION COORDINATOR (ETC), BUT REQUIRES NOTHING TO HAPPEN AFTER THE TRAINING. SEVERAL ITEMS FOR UNDER 250 EMPLOYEES ARE GOOD. THEY, HOWEVER, USE “IF WARRANTED” WHEN OFFERING SHUTTLE SERVICE TO AND FROM PUBLIC TRANSIT AND COMMERCIAL AREAS/FOOD ESTABLISHMENTS — WHO DECIDES THIS?

THE ATTORNEY GENERAL WRITES TO “PROVIDING MEAL OPTIONS ON SITE OR SHUTTLES BETWEEN THE FACILITY AND NEARBY MEAL DESTINATIONS.” THE DEVELOPER JUST NEED TO AGREE TO THIS INSTEAD JUST APPEARING TO DO THIS.

XXXXX

Attorney General = Posting signs at every truck exit driveway providing directional information to the truck route.

Proposed Project = Consistent. MM-AQ-15 requires signs clearly identifying the approved truck routes installed along the truck routes to and from the project site and within the project site.

WCUP WAREHOUSE IS CONSISTENT BY PUTTING UP TRUCK ROUTE SIGNS WHICH HOPEFULLY ARE PERMANENT IN BOTH ENGLISH AND SPANISH.

XXXXX

Attorney General = Improving and maintaining vegetation and tree canopy for residents in and around the project area.

Proposed Project = Consistent. Section 3.5.2 of the proposed Specific Plan requires a 15-foot landscaped setback, measured from the Landscaping and Lighting Maintenance District (LLMD) or the public right-of-way, will be required for all front and side yards adjacent to public streets. Section 4.5 of the proposed Specific Plan outlines the Landscape Design Guidelines, including streetscape landscaping comprised of a combination of evergreen and deciduous trees, low shrubs, and masses of groundcovers to create a visually pleasing experience for pedestrians and passing motorists.

WCUP WAREHOUSE POINTS OUTS SECTION 2.5.2 OF THE SPECIFIC PLAN WHICH IS A VERY SHORT PARAGRAPH OF LESS THAN 50 WORDS. IT MAINLY FOCUSES ON LANDSCAPING ALONG STREETS AND PUBLIC RIGHT-OF-WAY. WHAT IS NEEDED IS A FOCUS ON “RESIDENTS” AS IN WHAT THE ATTORNEY GENERAL WRITES. SEVERAL ROWS OF OVERLAPPING EVERGREEN TREES OF AT LEAST 50 FEET BETWEEN THE TRUCKS AND RESIDENTS NEEDS TO BE FULLY EXPLAINED. EVERGREEN ARE NEEDED TO HELP FILTER POLLUTION WHICH THE

DECIDUOUS TREES THEY ARE ALSO PLANNING TO USE DO NOT PROVIDE THIS THROUGHOUT THE YEAR. THE OVERLAPPING OF TREES ARE POSSIBLE WITHOUT CREATING A FIRE HAZARD. THE ATTORNEY GENERAL'S WORD "MAINTAINING" NEEDS TO IN THE DOCUMENT WITHOUT USING THE WORD "SHOULD" AS THEY DO IN THE 4.5.2 IRRIGATION SECTION AND ELSEWHERE.

xxxxxx

Attorney General = Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.

Proposed Project = Consistent. MM-AQ-21 requires the providing information to employees and truck drivers as appropriate:

- Building energy efficiency, solid waste reduction, recycling, and water conservation.
- Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting.
- Participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies.
- Health effects of diesel particulates, state regulations limiting truck idling time, and the benefits of minimized idling.
- The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity.
- Efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

WCUP WAREHOUSE IS NOT CONSISTENT. THEY HAS USED MM-AQ-21 SEVERAL OTHER TIMES AND THEREFORE THE RESPONSE IS BASICALLY THE SAME WITH SOME ADDITIONS. MM-AQ-21 MAINLY DEALS WITH HELPPING REDUCE VEHICLE MILES TRAVELED BY EMPLOYEES AND NOT WHAT THE ATTORNEY GENERAL REQUIRES IN THIS SECTION.

WAREHOUSE CONSISTS OF SEVERAL BUILDINGS EACH OF WHICH MAY NOT HAVE MORE THAN 250 EMPLOYEES, BUT COLLECTIVELY THEY VERY LIKELY WOULD. ALL SCAQMD RULE 2202 REQUIRES IS ONE PERSON TO TAKE THE FIVE (5) HOURS OF ZOOM TRAINING TO BECOME AN EMPLOYEE TRANSPORTATION

COORDINATOR (ETC), BUT REQUIRES NOTHING TO HAPPEN AFTER THE TRAINING. SEVERAL ITEMS FOR UNDER 250 EMPLOYEES ARE GOOD. THEY, HOWEVER, USE "IF WARRANTED" WHEN OFFERING SHUTTLE SERVICE TO AND FROM PUBLIC TRANSIT AND COMMERCIAL AREAS/FOOD ESTABLISHMENTS — WHO DECIDES THIS?

EVERYTHING WRITTEN ABOVE BY THE PROPOSED PROJECT AFTER THE FIRST SENTENCE IS NOT FOUND IN MM-AQ-21. THERE IS A BIG DIFFERENCE BETWEEN THE ATTORNEY GENERAL'S WORDS OF "TRAINING" ABOUT CARB REGULATIONS AND THE PROPOSED PROJECT ONLY "PROVIDING INFORMATION" — WHICH COULD BE JUST A CONVERSATION OR HANDING PEOPLE A PIECE OF PAPER WITH INFORMATION.

XXXXXX

Attorney General = Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.

Proposed Project = Consistent. MM-AQ-20 encourages tenants to become SmartWay partners, if eligible. MM-AQ-8 requires all loading docks to be compatible with SmartWay trucks.

WCUP WAREHOUSE ONLY "ENCOURAGES" TENANTS TO BECOME SMARTWAY PARTNERS WHILE THE ATTORNEY GENERAL IS "REQUIRING" TENANTS TO ENROLL IN EPA'S SMARTWAY PROGRAM AND REQUIRING TENANTS WITH MORE THAN 100 TRUCKS TO USE CARRIERS THAT ARE SMARTWAY CARRIERS.

XXXXXX

Attorney General = Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

Proposed Project = Consistent. MM-AQ-19 requires tenants be provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.

WCUP WAREHOUSE IS CONSISTENT IN SHARING DOCUMENTATION ON FUNDING OPPORTUNITIES SUCH AS THE CARL MOYER PROGRAM.

As you read above you understand that the WCUP warehouse project has done very little to be truly in compliance with the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." — especially to reduce air quality impacts. They try to give the impression that they have because you must approve overriding considerations as it relates to air quality impacts.

The WCUP developer decided not to include all air quality section of the Attorney General's Best Practices such as the following:

*Forbidding idling of heavy equipment for more than two minutes*

Pollution from heavy equipment will have a major impact on air quality — especially to those who live around the area.

The same is true for SCAQMD 2022 Appendix IV — Station and Mobile Source Control Measures. Many of the WCUP responses are the same they used on the Attorney General's and therefore will again have very little impact on reducing the project's impact on air quality.

SCAQMD: C-CMB-02: Emissions Reductions From Replacement With Zero Emission or Low NOx Appliances – Commercial Space Heating

Proposed Project Consistent. MM-GHG-4 requires use of heating, ventilation, and air conditioning (HVAC) equipment with a season energy efficiency ratio (SEER) of 14 or higher and energy efficiency ratio [EER] 14/78% annual fuel utilization efficiency [AFUE] or 8 heating seasonal performance factor [HSPF]

WCUP STATES THEY WILL HAVE HVAC WITH A SEER ENERGY RATING OF 14. THERE ARE CURRENTLY HVAC'S WITH A SEER ENERGY RATING OF 20. MY ALMOST 10 YEAR OLD HAVAC HAS A SEER RATING OF 16. THE WCUP NEEDS TO DO AS MUCH AS POSSIBLE TO REDUCE ENERGY — ESPECIALLY PETROLEUM BASED.

ALL BUILDINGS MUST BE REQUIRED TO HAVE ONLY ZERO EMISSIONS AND IDEALLY ELECTRIC APPLIANCE WHICH MUST INCLUDE ALL STOVE TOPS/OVENS AND WATER HEATERS. THE WCUP FAILER TO COMMIT TO THIS IS ANOTHER EXAMPLE OF HOW THEY AVOID REDUCING ITS POLLUTION.

The WCUP warehouse can do better to reduce its impacts to air quality but makes decisions to not do what is recommended by SCAQMD and the Attorney General.

The same is true when they try to compare the WCUP to CARB's Strategy for South Coast and EPA's program. They both have a Clean Truck plan for Class 2-6 and Class 7&8. In both cases the WCUP responds the same way they did with the Attorney General and SCAQMD.

THROUGHOUT WCUP'S COMPARISON WITH OTHER STANDARDS WHEN IT COMES TO CLASS 2-6 AND ESPECIALLY CLASS 7 AND 8 TRUCKS THEY REQUIRE THEM TO BE DOMICILED WITH THE FOLLOWING DEFINITION: "DOMICILED AT THE PROJECT SITE SHALL MEAN THE VEHICLE IS PARKED OR KEPT OVERNIGHT AT THE PROJECT SITE MORE THAN 70% OF THE CALENDAR YEAR." AS EXPLAINED SEVERAL TIMES ABOVE THEIR DEFINITION OF DOMICILED WILL WITHOUT ADDITIONAL PROOF/DOCUMENTATION RESULT ESSENTIALLY NO ZERO EMISSION CLASS 2-6 AND ESPECIALLY CLASS 7 & 8 TRUCKS.

Their definition of domiciled without proof to the otherwise is expected to result in no zero emission trucks in this warehouse project built on speculation - unless the company they sell to has their own fleet which very few do. To use domiciled in any analyses as if there'll actually be zero emission Class 2-6 and Class 7&8 on site 70% of the time will provide false data.

Some others use the following definitions of domiciled which makes more sense in our area with independent truckers: "Domiciled at the project" site shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere). This needed to be the definition of domiciled for the WCUP if the developer was even slightly serious about ever having zero emission vans and trucks — Class 2-6 and Class 7 & 8.

While this definitions has a higher likelihood of zero emission vans and trucks there is no evidence or proof that it will be any better.

The WCUP also attempted to compare what they are planning with the more than three year old settlement of the World Logistic Center (WLC). At the time of the WLC settlement standards for idling and availability of electric equipment is not what it is today. It is understood that the WLC is a little over 20 times larger than the WCUP, but that doesn't mean you can misrepresent the comparisons and/or fail to do a proportional mitigation.

World Logistics Center (WLC) vs this Proposed Project

Operational GHG and Criteria Pollutant Emissions Reduction Measures

xxxxxx

WLC: Electric Truck and Car Grant Programs

Proposed Project: Consistent. MM-AQ-19 requires tenants be provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using

cleaner-than-required engines and equipment.

WCUP WAREHOUSE IS NOT EVEN CLOSE TO BEING “CONSISTENT”. THE WLC WILL PROVIDE 500 CLASS 8 ELECTRIC TRUCK GRANTS WITH MOST WORTH MORE THAN \$22,000 EACH. THEY ALSO PROVIDE UP TO 60 CLASS 4 THROUGH 7 ELECTRIC MEDIUM TRUCK GRANTS. GRANTS PER TRUCK (CLASS 6-7) ABOUT \$12,000 EACH. GRANTS PER TRUCK (CLASS 4-5) ABOUT \$8,000 EACH. THE WLC WILL PROVIDE UP TO 120 GRANTS FOR CLASS 2B AND 3 LOCAL DELIVERY TRUCKS TO BE USED BY TENANTS. EACH GRANT WORTH MORE THAN \$8,000

THE WLC WILL PROVIDE FUNDING FOR \$1,000 EACH FOR 1,000 ELECTRIC CLEAN VEHICLE GRANTS. EVEN IF THEY ARE SMALLER THEY COULD HAVE ALSO PROVIDED GRANTS FOR HEAVY DUTY ELECTRIC TRUCKS INSTEAD OF \$30 MILLION DOLARS ON A PARK — ESPECIALLY SINCE THEY NEED OVERRIDING CONSIDERATIONS FOR THEIR IMPACTS TO OUR AIR QUALITY.

XXXXX

WLC: Maximize On-site Solar

Proposed Project: Consistent. MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building’s power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission

WCUP WAREHOUSE IS ONLY WILLING TO GENERATE POWER FOR THE BUILDING AND NOT ALL THE ELCTRIC TRUCKS, CARS, FORKLIFTS, HOSTLERS AND ELCTRIC LIGHTS WHICH ARE OUTSIDE OF THE BUILDING. THE WLC IS WILLING TO MAXIMIZE THE ALLOWABLE SOLAR TO POWER EVERYTHING ON THE PRJECT SITE. THE WLC IS NOT LIMITED TO “ROOFTOP” AND COULD USE PARKING AREAS FOR SOLAR.

XXXXX

WLC: Hot water heaters for office and bathrooms shall be powered either through solar cells mounted on the roofs of the buildings or solar-generated electricity.

iv. Only electric appliances shall be used in building office areas (e.g., electric stoves).

Proposed Project: Consistent. MM-AQ-18 requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable. MM-AQ-14 requires use of electric or battery-operated equipment for landscape



maintenance. MM-GHG-4 requires installation of water heaters with an energy factor of .92 or higher. MMGHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. MM-AQ-24 prohibits the use of diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.

WCUP WAREHOUSE IS NOT "CONSISTENT" WITH ALL OF THIS SECTION BECAUSE THE WLC WILL HAVE ONLY ALLOW ELECTRIC APPLIANCE AND HOT WATER HEATERS. THE WCUP MAINLY PROVIDES SOLAR, BUT DOESN'T PROIBIT THE USE OF GAS APPLIANCES AND GAS WATER HEATERS LIKE THE WLC.

xxxxx

#### Auxiliary Power Unit (APU)

WLC: i. All truck idling shall be limited to no more than 5 minutes.

ii. Each warehouse building shall provide an on-site air-conditioned lounge with a vending machine(s), a seating area, restrooms, workstations, shower facilities, and a television. The lounge shall be regularly maintained, cleaned, and stocked.

iii. WLC shall provide at least one APU plug-in for every 35 dock doors at multiple locations within the Specific Plan area where trucks park and signage shall be provided in English and Spanish identifying where such APU plug-ins are located

Proposed Project: Consistent. MM-AQ-17 limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use. MM-AQ-9 requires any facility totaling more than

400,000 square feet to include a truck operator lounge equipped with clean and accessible amenities such as restrooms, vending machines, television, and air conditioning. MM-AQ-8 requires all TRU loading docks provide electrical hookups and all loading docks are designed to be compatible with SmartWay trucks.

WCUP WAREHOUSE IS NOT "CONSISTENT" BECAUSE IT DOESN'T EVEN ADDRESS APU'S WHICH RUN WHEN THE TRUCK'S ENGINE IS OFF TO ALLOW THINGS LIKE AIR CONDITIONING. WCUP ALSO DOESN'T PROVIDE AN AIR-CONDITIONED LOUNGE THAT HAS WELL STOCKED VENDING MACHINES AMONG OTHER THINGS.

xxxxx

The March JPA did their mailings to the public for the June 12<sup>th</sup> March JPA Commission hearing to vote on the project to allow us only 10 days to read 1,000's of pages on the WCUP.

If the March JPA had provide more time, I could have done with each comparison the same way I compared the Attorney General's Best Practices with this Proposed Project. I, however, read each one and find the same type of problems with each and in many cases the same logic they tried to pass off when comparing the WCUP to the Attorney General Best Practices was used again and again and again.....

The WCUP also compared their Proposed Project with the Centerpoint Properties warehouse project. Because of the 10 day time limitations I have pulled a few comparisons to show the WCUP could have agreed to more to reduce its impacts on air pollution. They must do everything feasible and reasonable to reduce those impacts prior to having an overriding considerations vote on air quality impacts. As shown above and below the Sierra Club strongly believes the WCUP has failed in this regards.

Centerpoint = The project's construction contractor shall comply with the following Bay Area Air Quality Management District (BAAQMD) Best Management Practices (BMPs) for reducing construction emissions of PM10 and PM2.5:  
Dust control measures.

Proposed Project = Consistent. The Project will comply with SCAQMD Rule 403, Fugitive Dust.

THE WCUP WAREHOUSE IS NOT "CONSITENT" BECAUSE THEY DO NOT EVEN ADDRESS CONSTRUCTION EMISSIONS OF PM10 AND PM2.5. THE SAME WAS TRUE WHEN THEY DIDN'T INCLUDE THE 2 MINUTE IDLING REQUIREMENT FOR OFFROAD EQUIPMENT BY THE ATTORNEY GENERAL.

xxxxx

Centerpoint = The property owner/tenant/lessee shall ensure **all** onsite equipment and vehicles (e.g., yard hostlers, yard equipment, forklifts, yard trucks and tractors, and pallet jacks) used within the project site are zero emission

from start of operations.

Proposed Project = Consistent. MM-AQ-18 requires the use of electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or CNG powered equipment shall also be acceptable.

WCUP WAREHOUSE IS NOT "CONSISTENT" BECAUSE THEY DO NOT REQUIRE "ALL" ONSITE VEHICLES AND EQUIPMENT ARE ZERO EMISSION FROM START OF OPERATIONS AS REQUIRED BY CENTERPOINT. THE WCUP ONLY REQUIRES THEIR USE ON SITE WHICH COULD BE AS FEW AS TWO.

XXXXX

Centerpoint = Idling is strictly prohibited on the subject property and adjacent streets in the Richmond/San Pablo area. The property owner/tenant/lessee shall inform all truck drivers associated with the business of this prohibition

Proposed Project = Consistent. MM-AQ-17 limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged and for truck drivers to shut off engines when not in use.

WCUP WAREHOUSE IS NOT "CONSISTENT" BECAUSE IT ALLOWS THREE MINUTES OF IDLING AND THE CENTERPOINT IS STRICTLY PROHIBITED ON NOT ONLY THE PROJECT SITE, BT ALOS IN ADJACENT STREETS.

XXXXX

The WCUP also compares their Proposed Project with the Stockton Mariposa Industrial Complex, but in doing so fails to meet the CEQA requirement of making sure documents are easily read and understood by the general public. They use letters and Rules like SJVAPCD Rule 9510, SJVAPCD Regulation VIII, SJVAPCD Rule 9410, SJVAPCD Rule 4101, and SJVAPCD Rule 4601 that the Stockton Mariposa Industrial Complex is required to follow, but the public has no idea of what all those Letters/Rules and others mean or require.

It is evident in parts that the WCUP is still lacking in doing everything possible to reduce its impacts on air quality compared to the Stockton Mariposa Project. Such things as the amount of solar must increase as more electrical demand is generated by the project, Stockton Mariposa requires all forklifts, yard trucks and yard equipment be zero emission, but the WCUP only requires their use which could mean only a couple would be on site. The Stockton Mariposa also requires owners, operators, and tenants to enroll and participate in the Smartway program for eligible businesses while the WCUP only "encourages tenants to become Samrtway partners if eligible". Throughout the side by side comparison the document reads that the

WCUP and the Stockton Mariposa Industrial Complex are “Consistent” in each area compared. I have showed you above only a few that are not and there are others. The document has sections not only difficult for the public to read/understand, but is purposely misleading by using the word Consistent in bold lettering throughout this section.

The Proposed project also compares itself to the City of Fontana’s Industrial Warehouse Ordinance. Fontana city council majority is probably the most pro-warehouse jurisdiction in the entire Inland Empire. Almost anything they agree to is far from what should happen to truly protect people and the environment. Everything the WCUP agree favorably with the Fontana Standards needs to be questioned. All the Attorney General agreed to was far from what they originally proposed, but because of the makeup of Fontana’s city council they settled for something much less. This is very evident when you compare the ordinance with Attorney General’s “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act.” The City of Fontana had a few warehouse projects that were being considered and they were not willing to accept anything that might impact their approval. The ordinance is also more than two years old and many improvements in warehouse settlements have been made in the meantime.

The Sierra Club strongly believes the West Campus Upper Plateau (WCUP) warehouse project hasn’t done nearly enough to reduce its impacts on the environment – especially on air quality. They try to mislead and give the impression that they are doing everything recommended by the Attorney General’s “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act.” As we showed using CAPS when compared the WCUP is not Consistent with the Attorney General’s Best Practice and most other agencies and settlements they selected. In almost most every case the WCUP fell short.

A large massive warehouse project in 2024 should have provided significant improvements on each category the WCUP tried to compare instead of not even being able to meet old standards for protecting the environment and people. It appears they are more willing to promise 10’s of millions of dollars into things like a park to encourage votes in their favor instead of into requirements/mitigations that will reduce air pollution impacts in our non-attainment area.

Instead of hiding behind the word “Domiciled” they need to require a certain number of Heavy Duty diesel trucks (Class 7 & 8) to become zero emission every couple of years – 2026=10% , 2028=35% , 2030=65 % and until about 2032 when all such trucks are required to be 100% electric. Class 2 through 6 vans/trucks need to be on a similar schedule or ideally even reaching 100% a few years earlier.

**Please vote No!** If there are future meetings, please keep the Sierra Club informed along with documents related to the West Campus Upper Plateau (WCUP) warehouse project.

Sincerely,  
George Hague  
Sierra Club  
San Gorgonio Chapter

go

## **Cindy Camargo**

---

**From:** Vicki Broach <vbroach55@gmail.com>  
**Sent:** Wednesday, June 12, 2024 2:37 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 board member of the League of Women Voters and 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 devastating effect on the human and physical environment far outweighs any potential economic value.

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

Sincerely,

Vicki Broach  
Riverside, 92506

## Cindy Camargo

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**From:** Elizabeth Alanis <elizabethvalanis@gmail.com>  
**Sent:** Wednesday, June 12, 2024 2:17 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 will negatively impact our neighborhoods, increase traffic, produce poor air quality, and ultimately bring down our home values!**

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

Sincerely,  
Elizabeth Alanis  
92508

## Cindy Camargo

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**From:** fera momtaz <fera\_momtaz@yahoo.com>  
**Sent:** Wednesday, June 12, 2024 12:44 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.

<ADD YOUR PERSONAL REASONS FOR OPPOSING HERE>

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

Sincerely,

Fera S.Momtaz  
Orange Crest community  
92508

Sent from my iPhone



## **Cindy Camargo**

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**From:** Brian De Mint <brian.demint@gmail.com>  
**Sent:** Wednesday, June 12, 2024 12:35 PM  
**To:** Cindy Camargo  
**Subject:** Opposition to Warehouses in Orangecrest, Riverside

Ms. Camargo,

My name is Brian De Mint and I am a father, home owner, and small business owner in the area. I strongly oppose the building of the warehouses behind The Grove in Orangecrest, Riverside. This would negatively affect our daily life, our home values, and the health and safety of the community. Also, I often take my kids bike riding on those nature trails. I ask that you do not allow these warehouse buildings to be built.

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Thank you,

**Brian E. De Mint**

## Cindy Camargo

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**From:** Jill Menez <jillmenez99@gmail.com>  
**Sent:** Wednesday, June 12, 2024 10:50 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 and a community advocate for the Community Coalition Perris Neighbors in Action. Our coalition opposes the West Campus Upper Plateau project on which the Commission will vote on today, 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 project is unanimously opposed by all environmental and social justice groups that are aware of it. This project does not have the support of the community and should the commission choose to vote yes to bring it into fruition today, then that will do nothing else, but show that the commission is truly not making decisions for the people.

This project is surrounded on three fronts by homes, it is out of compliance with necessary environmental review and fails to take into account the history of the site and the probable hazards that are present in its soil. I know by now that the commission is well-versed in all of the issues surrounding this project and should the commission choose today to vote yes on it regardless of those issues, that will do nothing but prove that the commission is not making decisions for the community, rather for the logistics companies that line your pockets and fuel your political careers.

On behalf of Perris Neighbors in Action, I want to make it clear that we oppose this project and implore the commission to vote no at today's meeting.

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

Sincerely,

Jillian Menez  
Perris Neighbors in Action

## Cindy Camargo

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**From:** Cindy <clchiek@gmail.com>  
**Sent:** Wednesday, June 12, 2024 10:48 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.

The continual opposition and fight against this project proves and shows that the surrounding community and residents are against these warehouses. These warehouses bring an increase in health risk, noise, pollutants, road congestion, potholes, and larger road damage reducing the quality of life. This land is within 1.5 miles of elementary schools, preschools, and parks. This land is frequently used by hikers, mountain bikers, photographers, and nature enthusiasts. Other cities have made groundbreaking steps to protect wildlife, like the corridor passing in Agoura Hills. Riverside could do something simple and just as groundbreaking by protecting its local Orangecrest's wildlife and quality of life by not building warehouses on this land. Please consider the future health impact of Riverside residents, especially the youth and elders, and vote NO.

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

Sincerely,

Cindy Chiek  
92508

## Cindy Camargo

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**From:** lleinz2003@yahoo.com  
**Sent:** Wednesday, June 12, 2024 10:31 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:** Grove Community Warehouses

Dear Committee Member:

I am writing this email to you and your fellow councilmen and committee members, in hopes that you will listen to the people who will be directly affected by your decision today.

I am a mother and grandmother living in the quaint and safe neighborhood of Orangecrest. My husband and I have owned our lovely home, and we have been members of the Grove Community Church, for 23 years.

As a voting constituent, I strongly oppose the building of warehouses behind The Grove Church and surrounding area. It is not just the noise, increased traffic and decreased home values that concerns me.

As a retired RPD Traffic employee, I know that warehouses cause increased crime, and more importantly, they trigger a surge in traffic collisions and pedestrian fatalities. My grandchildren, and my friends' and neighbors' children and grandchildren, are being put at risk out of ignorance and greed. I strongly urge you to vote against these warehouses.

Sincerely,  
Lauren Leinz

## Cindy Camargo

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**From:** Yesenia Contreras <yesi.contreras26@yahoo.com>  
**Sent:** Wednesday, June 12, 2024 7:28 AM  
**To:** Cindy Camargo  
**Cc:** 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  
**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 infrastructure is struggling as it is and we have the second worst particle pollution in the nation. These warehouses will not only affect homes within a few hundred feet of the project, but surrounding cities as well. Riverside and surrounding cities are overrun with warehouses, which despite what develops say, provide low-paying, laborious jobs with high turnover rates. We do not need any more warehouses or trucks passing through our cities. Folks on the Commission may be able to leave Riverside, but many residents cannot afford that luxury and will pay the price with their health in coming years. I strongly urge every member to vote no for the health and safety of your constituents.

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

## Cindy Camargo

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**From:** LaDonna Ardary <ladonnaardary@icloud.com>  
**Sent:** Tuesday, June 11, 2024 9:42 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 already have plenty of empty warehouses so why do we need to build more??? just because we can??? We also have already destroyed so much of the beautiful natural environment in our area. I feel sorry for the animals that the building of these unnecessary warehouses who get displaced them from their homes and lose access to their food. No wonder, we have coyotes walking through our neighborhoods hunting for food. How unlucky for the outdoor cats. Our cats are never allowed outside. We open the doors and windows so they can enjoy the fresh air safely. Please don't build these warehouses in our neighborhood.

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

Sincerely,  
LaDonna Ardary  
Orangecrest  
92508

LaDonna Ardary  
Sent from my iPhone

## Cindy Camargo

---

**From:** Carolyn Rasmussen <crasmu@ucr.edu>  
**Sent:** Tuesday, June 11, 2024 7:46 PM  
**To:** Dan Fairbanks; Clerk; Conder, Chuck  
**Subject:** Response to comment I-440.1

Dear Mr. Fairbanks, Commissioner Conder, and colleagues at March JPA,

I submitted a letter ( I-440.1 in the response to comments document you provided two weeks ago) about the already extant and significant truck traffic on Alessandro Blvd. supported by **10 independent photographs of trucks on Alessandro during the morning commute**. That the response refers to this photographic documentation as "purported" is astonishing and frankly insulting. Anyway, I am deeply disappointed that my concerns about traffic will be met with a paltry response of \$100,000 worth of additional support to enforce traffic laws. This translates to approximately 6 weeks of additional traffic monitoring **for a project that will last past my lifetime**.

I am strongly opposed to the below market value sale of public land (**that has already been legally promised as park space**) to subsidize a billionaire developer. This billionaire developer will be putting in up to 4.7 million square feet of warehouses, which will generate **additional** truck traffic and subsequent damage to both our roads and our lungs, will provide only a small amount of low quality jobs, will destroy our open spaces, and will disrupt ecologically important riparian areas. **Please reject this project.**

Your neighbor living in 92508,  
Carolyn Rasmussen

--

Carolyn Rasmussen  
Associate Professor of Plant Cell Biology  
University of California, Riverside  
[carolyn.rasmussen@ucr.edu](mailto:carolyn.rasmussen@ucr.edu)  
Tel. 951-827-4415

## Cindy Camargo

---

**From:** Adamaris Maldonado <adamarism99@gmail.com>  
**Sent:** Tuesday, June 11, 2024 7:25 PM  
**Cc:** Cindy Camargo; Conder, Chuck; district1@rivco.org; district5@rivco.org; edd@moval.org; Dan Fairbanks; jerry@riversideca.gov; mayor@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org  
**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.

We need to preserve our neighborhoods and land. There is no need for this warehouse that will no doubt increase traffic and pollution. Our air quality is already the worst in the area. We need to focus on building up our community for the future.

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



## Cindy Camargo

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**From:** Aaron Echols <aechols22@gmail.com>  
**Sent:** Tuesday, June 11, 2024 6:37 PM  
**To:** Cindy Camargo; Dan Fairbanks; mayor@moval.org; edd@moval.org; mvargas@cityofperris.org; rrogers@cityofperris.org; jperry@riversideca.gov; Conder, Chuck; district1@rivco.org; district5@rivco.org  
**Cc:** Arlee Montalvo  
**Subject:** West Campus Upper Plateau project final environmental impact report (item 12) California Native Plant Society Comments and Recomendations  
**Attachments:** Upper Plateau Project Idenpendant Botanical Site Assessment and Findings.pdf; Upper Plateau Project Comment Letter to JPA Commission CNPS.pdf

Greetings Commissioners,

I am providing comments on Item 2 of tomorrow's public hearing and the certification the West Campus Upper Plateau Project Environmental Impact Report. I strongly urge you to review these comments and the attached independent biological report as they may weigh heavily on the validity of the potential certification.

Aaron Echols  
Independent Botanist and Conservation Chair of the California Native Plant Society Riverside/San Bernardino Chapter

# INDEPENDENT BIOLOGICAL ASSESSMENT OF THE UPPER PLATEAU PROJECT BIOLOGICAL TECHNICAL REPORT

Prepared By Aaron Echols, Independent Botanist and Ecologist

## **Introductory Statement:**

On the dates of 5/28/2023, 5/29/2023, and 6/9/2024 an independent Botanist from the Riverside area conducted an independent preliminary biological assessment of the Upper Plateau Project area footprint, excluding open space and park designation areas approximating 60 acres to the west of structural development area as shown on the maps provided within this report. All surveys were conducted from publicly accessible areas; non-accessible areas and the interior areas that are restricted with fencing were not entered, but visual inspections of interior lands were able to be made with binoculars.

The purpose of the assessment was to determine the accuracy and validity of information contained within UPPER PLATEAU PROJECT BIOLOGICAL TECHNICAL REPORT, Prepared by Rock Biological Consulting. This independent assessment was determined to be necessary due to a several apparent inadequacies with survey timings and methodologies by the consultant; (1) Botanical site visits were conducted July 28, 2021 and August 6, 2021 when most annual plant species are not identifiable, (2) Botanical site visits were conducted during a narrow one week window drought year, (3) the number of field visits (two days) performed in 2022 by the consultant is far too little time to conduct a thorough analysis of the resources present given the size, extent, and complexity of the project area, and (4) the consultant erroneously discounted the potential presence of several rare plant species with a likelihood of occurring given the soil characteristics of the area and failed to perform targeted or any general investigations for rare plant species.

The following sections detail independent findings of the investigation which strongly conflict with the information presented in the UPPER PLATEAU PROJECT BIOLOGICAL TECHNICAL REPORT, prepared by Rock Biological Consulting.

## **I. Rare Plants**

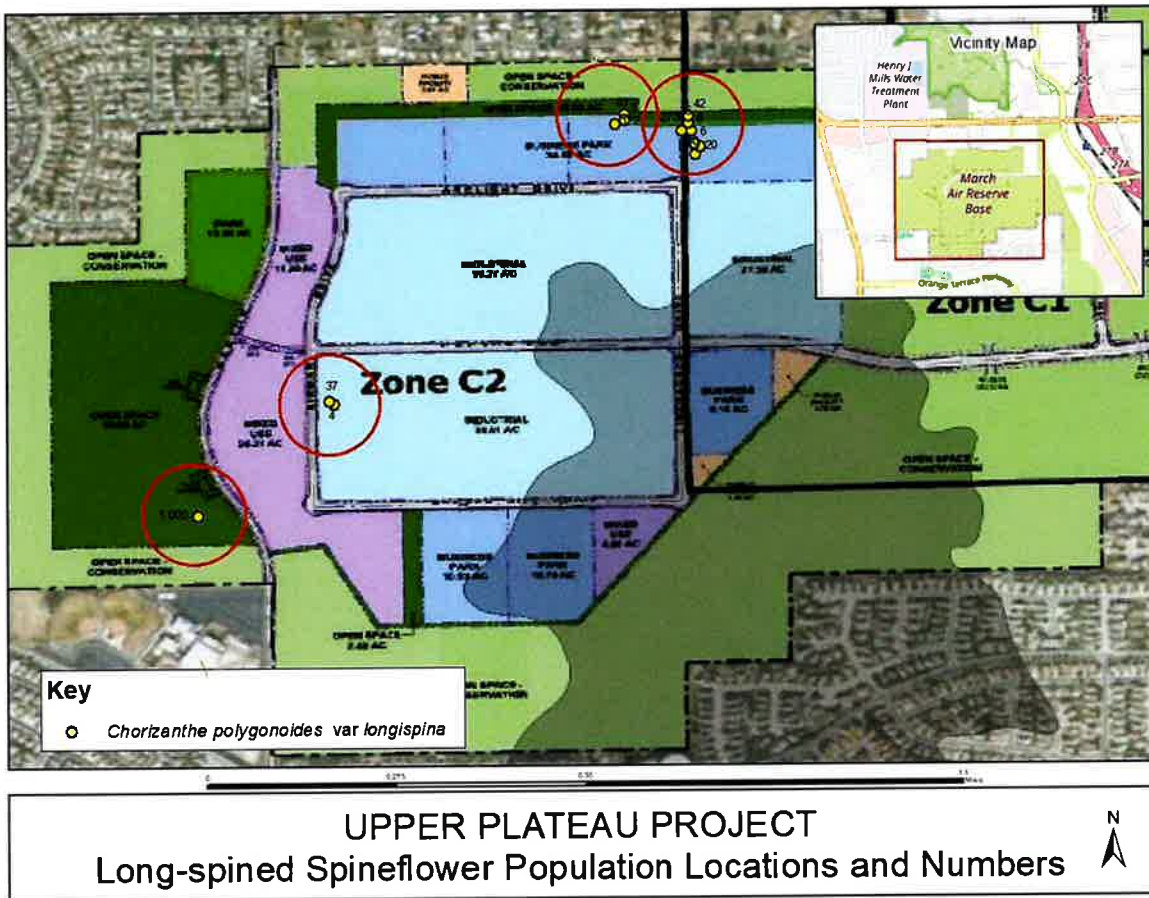
**Long-spined spineflower:** During the independent surveys, the independent Botanist documented several occurrences of long spined spineflower (*Chorizanthe polygonoides* var. *longispina*). This species holds a California Rare Plant Rank of 1B.2 and is therefore a candidate rare species for listing under the Endangered Species Act. These plants were **not** documented by the consultant and nor therefore were potential impacts to this species disclosed to the public in previously released CEQA documents. Approximately 1,891 individual plants were inventoried and counted within four distinct populations within the northern and western sections of the project impact footprint (see figures below). Given this finding, additional populations seem likely in areas with corresponding soil types and aspects within the

off-limits area of the proposed impact footprint. As of the documentation of these occurrences of long-spined spineflower, the populations within the project footprint constitute **the northern most extent of this species** (see Figure 2) and impacts to this population would therefore significantly constrict the species range. Photo evidence of this occurrence is provided in Photo 3 in Section IV of this document

**Of significant note, these plants are within the CDFW vegetated streambank and jurisdictional banks named NWW-1, NWW-2, NWW-4, and NWW-5 by the consultant and identified on the CDFW Streambanks and Riparian Habitats map of the UPPER PLATEAU PROJECT BIOLOGICAL TECHNICAL REPORT, Prepared by Rock Biological Consulting.**

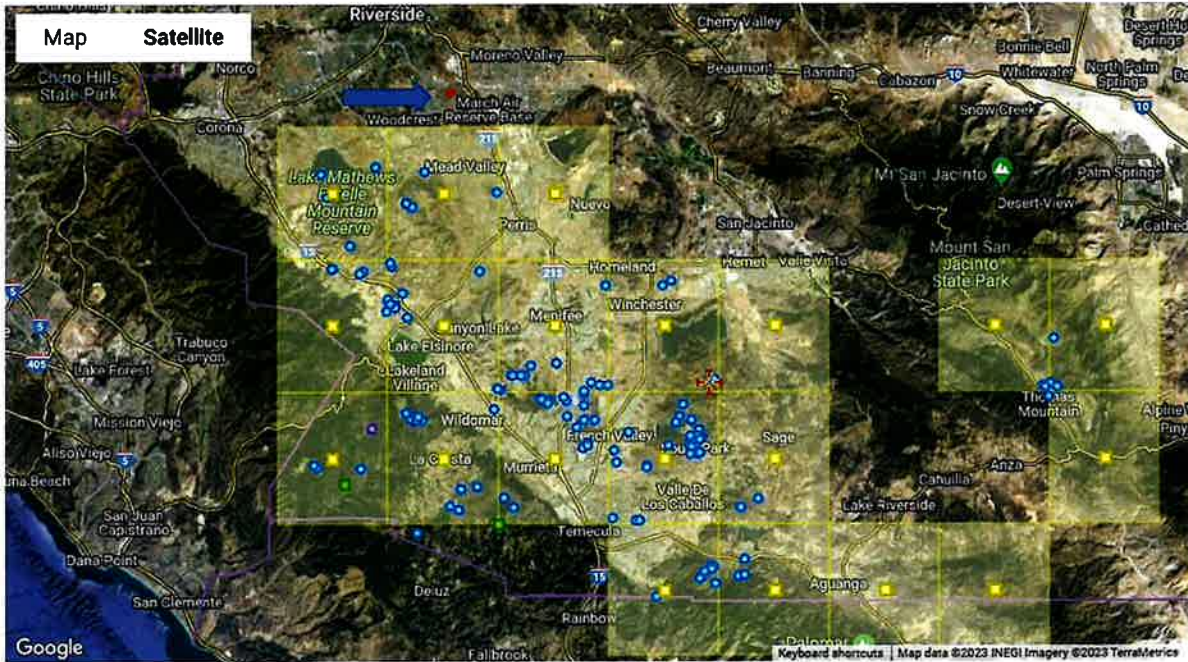
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Figure 1 Long-spined spineflower occurrences and numbers within project overlay



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Figure 2 Current extent of long spined spineflower and the range expansion to the north that include the documented populations indicated by the red point



## II. Plant Species Inventory

During the assessment the Botanist noted incidental species present throughout the Upper Plateau Project area to be contrasted with the list which was developed by the consultant. The following table is a compilation of species that are present, but were not included in the biological documents. In total, the Botanist noted 25 species that were not recorded by the consultant. The majority of the observed species are native annual plants that would be difficult to distinguish outside of the winter and spring seasons; typically February through April. Appendix B of the UPPER PLATEAU PROJECT BIOLOGICAL TECHNICAL REPORT identifies 77 plant species that were documented, therefore nearly one quarter of present plant species within the project area were not appropriately inventoried by the consultant.

Table 1 Plant species missed by consultant surveys

Family	Common Name	Scientific Name
<i>Asteraceae</i>	pineappleweed	<i>Matricaria discoidea</i>
<i>Asteraceae</i>	California cottonrose	<i>Logfia filaginoides</i>
<i>Asteraceae</i>	matchweed	<i>Gutierrezia californica</i>
<i>Asteraceae</i>	everlasting bedstraw	<i>Stylocline gnaphalioides</i>
<i>Asteraceae</i>	silver puffs	<i>Uropappus lindleyi</i>
<i>Asteraceae</i>	smooth cat's ear	<i>Hypochaeris glabra</i>
<i>Asteraceae</i>	goldfields	<i>Lasthenia gracilis</i>

<i>Boraginaceae</i>	sagebrush combseed	<i>Pectocarya linearis</i> subsp. <i>ferocula</i>
<i>Boraginaceae</i>	valley popcorn flower	<i>Plagiobothrys canescens</i>
<i>Brassicaceae</i>	shining pepperweed	<i>Lepidium nitidum</i>
<i>Caryophyllaceae</i>	Boccone's sand spurry	<i>Spergularia bocconi</i>
<i>Crassulaceae</i>	pygmy weed	<i>Crassula connata</i>
<i>Fabaceae</i>	dwarf white milk vetch	<i>Astragalus didymocarpus</i> var. <i>didymocarpus</i>
<i>Fabaceae</i>	miniature lupine	<i>Lupinus bicolor</i>
<i>Fabaceae</i>	strigose lotus	<i>Acmipson strigosus</i>
<i>Fabaceae</i>	small flowered lotus	<i>Acmispon micranthus</i>
<i>Juncaceae</i>	common toad rush	<i>Juncus bufonius</i>
<i>Lilliaceae</i>	splendid mariposa lily	<i>Calochortus splendens</i>
<i>Montiaceae</i>	red maids	<i>Calandrinia menziesii</i>
<i>Poaceae</i>	salt and pepper grass	<i>Melica imperfecta</i>
<i>Poaceae</i>	nodding needle grass	<i>Stipa cernua</i>
<i>Poaceae</i>	purple needle grass	<i>Stipa pulchra</i>
<i>Polygonaceae</i>	long-spined spineflower	<i>Chorizanthe polygonoides</i> var. <i>longispina</i>
<i>Themidaceae</i>	common goldenstar	<i>Bloomeria crocea</i> var. <i>crocea</i>
<i>Themidaceae</i>	blue dicks	<i>Dipterostemon capitatus</i> subsp. <i>capitatus</i>

### III. Vegetation Mapping

Table 1 of UPPER PLATEAU PROJECT BIOLOGICAL TECHNICAL REPORT (Reference Figure 1, page 16) summarizes vegetation classifications and acreages present across the project area. With reference to this table, the consultant described 436.55 acres (over 90% of the surveyed project area) as “non-native grassland”, also called *Bromus rubens* - *Schismus barbatus* Herbaceous semi-Natural Alliance under the Manual of California Vegetation (“MCV2”) classification. In contrast to this information, the mapping results provided by the Independent Botanist show that the vast majority of the project impact area was erroneously assessed by the consultant. The large majority of the areas designated by the consultant as “non-native grassland” that were able to be surveyed (fenced areas within interior were not accessible) are primarily dominated by native forb species, specifically by the rare plant, San Diego tarweed (*Deinandra paniculata*).

Under the exact language of MCV2 the characteristics and membership rules for *Bromus rubens* - *Schismus barbatus* Herbaceous semi-Natural Alliance are as follows:

#### *Characteristic Species*

*Bromus rubens*, *Schismus arabicus* and/or *Schismus barbatus* is **dominant** or co-dominant with other **non-natives** in the herbaceous layer. Emergent shrubs may be present at low cover.

### Membership Rules

- ***Bromus rubens* > 80% relative cover** in the herbaceous layer (cf. Keeler-Wolf et al. 1998b, Evens and San 2005, Klein and Evens 2005).
- ***Schismus barbatus* > 80% relative cover** with *B. rubens* present or lacking in the herbaceous layer (cf. Keeler-Wolf et al. 1998b).

To determine if the areas in question can indeed be appropriately described as “non-native grassland” according to the membership rules above, herbaceous quadrat monitoring was conducted by the Botanist during the independent site assessment. This monitoring was done specifically within the areas shown on Figure 6 below. Importantly, the consultant did not perform any type of quantitative or qualitative monitoring or Releve<sup>1</sup> assessments to support their findings. The results of the quadrat monitoring performed by the Botanist indicated that approximately 52% of land cover (within the green areas on the Figure 4) is occupied by native plant species and 34% by non-native species, with the remaining percentage designated as bare ground. In terms of relative cover, approximately 60% composition is native and 40% composition is non-native. Several high resolution photos of each quadrat were captured during monitoring to support the findings and the results of the monitoring are found below in Table 2. Given these findings, it follows without question that consultant’s vegetation mapping effort failed to accurately describe the existing natural communities across several hundred acres of the project area. The consultant also failed to divulge that the natural vegetation community within the project area is likely a very rare, **undescribed alliance or special stand dominated by the rare plant San Diego Tarweed, i.e., the *Deinandra paniculata* Herbaceous Alliance**. The consultant should have consulted with the CDFW statewide vegetation team to determine the best path forward to describe vegetation composition as accurately as possible, again, given the very likely probability that this is a very rare and undescribed vegetation stand.

As evidence of the assertions above, the following maps, figures, and photos provided below:

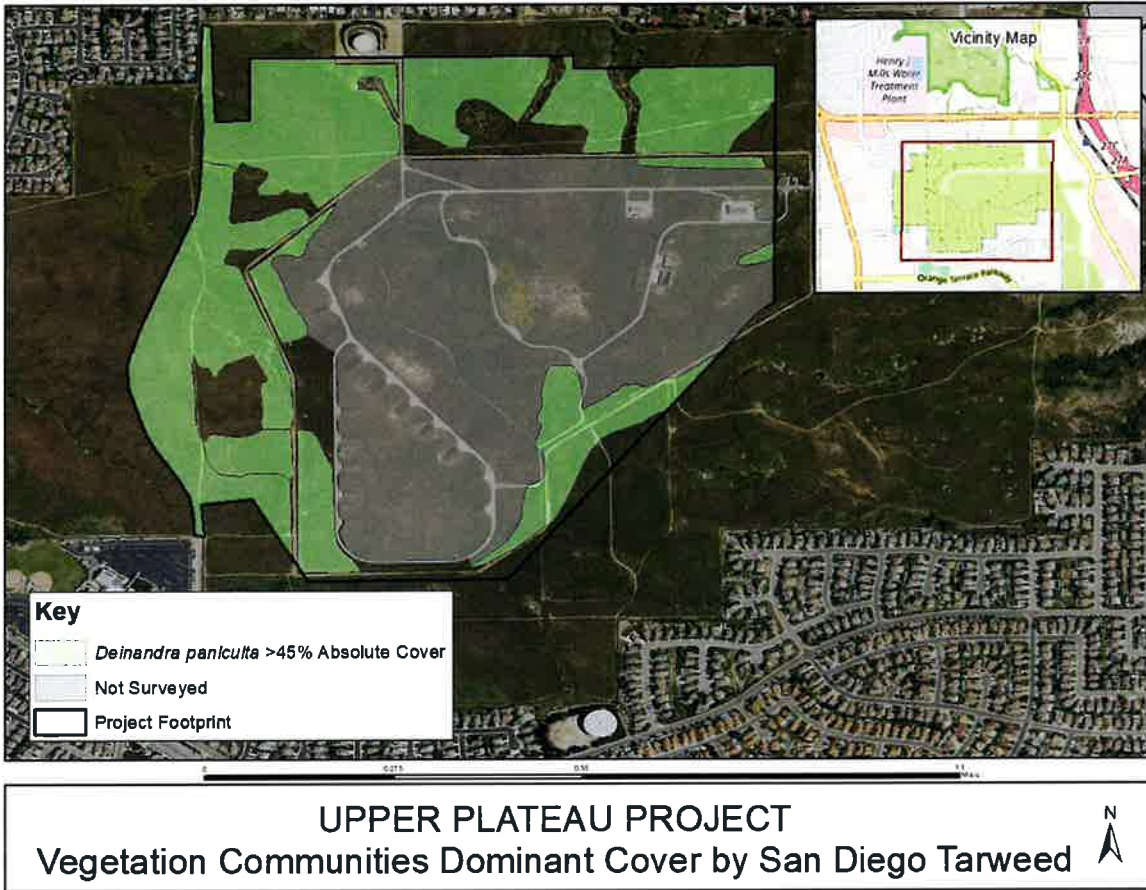
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<sup>1</sup> CALIFORNIA NATIVE PLANT SOCIETY RELEV PROTOCOL ([cnps.org](https://cnps.org/wp-content/uploads/2018/03/cnps_releve_protocol_20070823.pdf)), [https://cnps.org/wp-content/uploads/2018/03/cnps\\_releve\\_protocol\\_20070823.pdf](https://cnps.org/wp-content/uploads/2018/03/cnps_releve_protocol_20070823.pdf)

## (1) Mapping Results

Figure 3 The areas designated in green on this map indicate the San Diego tarweed was the dominant plant present during the 2023 site visit by the Botanist.

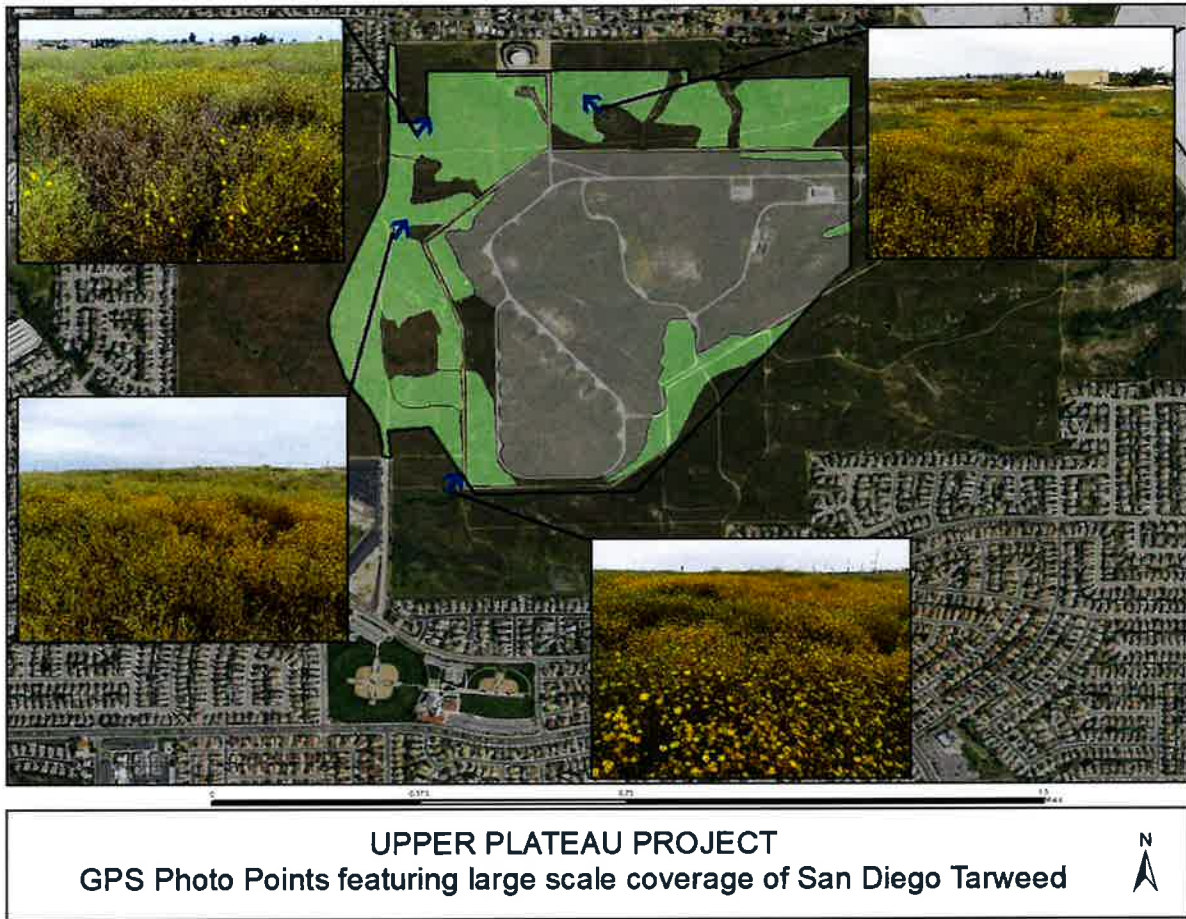


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**(2) GPS Photo Points** taken by the Botanist show vast stands of yellow San Diego tarweed in areas designated by the consultant as non-native grassland are shown in the map below.

*Figure 4 GPS photopoints exhibiting that the majority of the project area is dominated by San Diego tarweed. During the site assessment in 2023 by the independent biologist approximately only 40% of San Diego tarweed was flowering with 60% yet to flower. All non-yellow green color visible in photos is San Diego tarweed that has yet to bloom. In late May all “non-native grasses” would be browned and dead which is clearly not the case. This figure constitutes clear evidence that the vegetation delineations by the consultant indicating that the majority of the project impact area consists of “non-native grassland”, are erroneous.*



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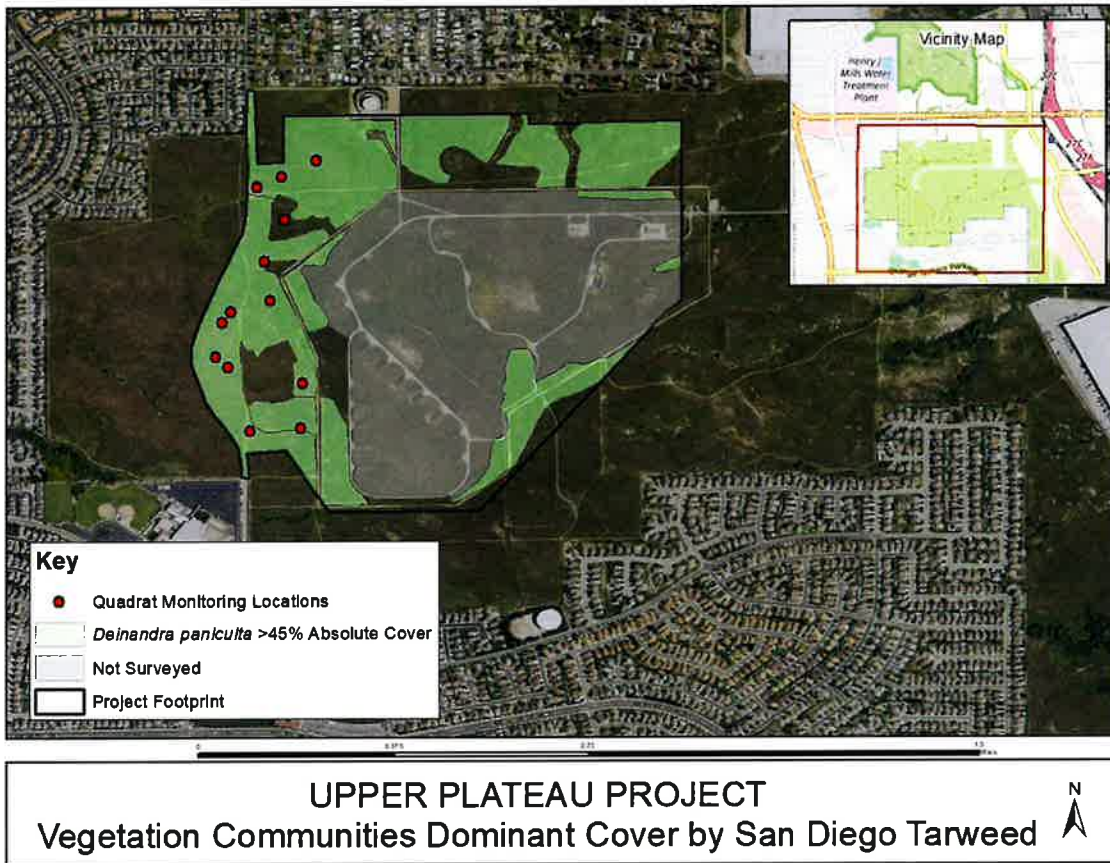
### (3) Half meter quadrat monitoring

Table 2 Quadrat Monitoring Results

Species	%Cover	%Cover	%Cover	%Cover	%Cover	%Cover	%Cover	%Cover	%Cover	%Cover	%Cover	%Cover	%Cover	AVG	Absolute Native % Cover	Absolute Nonnative % Cover	Relative Native % cover	Relative Nonnative % cover	
	T1	T2	T3	T4	T5	T6	T7	T8	T9	T10	T11	T12	T13						
<i>Acmispon micranthus</i>	0	0	0	0	0	0	0	0	0	0	0	3	0	0.2	0.2	/		0.3	
<i>Amsinckia menziesii</i>	0	0	0	5	0	0	0	0	2	0	0	0	0	0.5	0.5	/		0.6	
<i>Astragalus didymocarpus</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	46	3.5	3.5	/	4.1	
<i>Avena fatua</i> *	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0.1	/	0.1		0.1
<i>Bromus diandrus</i> *	0	0	0	0	0	0	0	0	60	0	0	0	0	0	4.6	/	5.4		6.2
<i>Bromus madritensis</i> *	5	7	1	7	4	0	2	18	0	40	2	5	1	7.1	/	7.3		8.4	
<i>Corethrogyne filaginifolia</i>	0	0	0	0	6	0	0	0	0	0	0	0	15	7	2.2	2.2	/	2.5	
<i>Crassula connata</i>	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0.1	0.1	/	0.1	
<i>Croton setiger</i>	1	1	7	0	0	15	0	8	0	0	0	0	18	2	4.0	4.0	/	4.6	
<i>Deinandra paniculata</i> !	20	55	0	4	7	0	50	0	90	40	74	0	0	26.2	26.2	/	30.3		
<i>Erodium cicutarium</i> *	6	22	65	20	15	50	18	5	4	3	9	9	20	18.9	/	18.9		21.9	
<i>Euphorbia albomarginata</i>	0	0	0	0	17	0	0	0	0	0	0	0	5	0	1.7	1.7	/	2.0	
<i>Lasthenia gracilis</i>	35	2	0	0	30	0	0	0	0	0	0	0	0	0	5.2	5.2	/	6.0	
<i>Lepidium nitidum</i>	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0.2	0.2	/	0.3	
<i>Lupinus bicolor</i>	0	0	0	55	0	6	0	0	0	5	0	13	8	6.7	6.7	/	7.7		
<i>Pectocarya linearis</i>	0	0	0	0	0	0	0	0	0	0	0	2	0	0.2	0.2	/	0.2		
<i>Plagiobothrys canescens</i>	0	0	0	0	0	0	6	0	0	0	0	0	0	0	0.5	0.5	/	0.5	
<i>Schismus barbatus</i> *	0	0	5	0	9	8	5	0	4	0	2	2	0	2.7	/	2.7		3.1	
<i>Tirchostema lanceolatum</i>	0	0	12	0	0	0	0	0	0	0	0	0	0	0.9	0.9	/	1.1		
<i>Vulpia myuros</i> *	0	0	0	0	1	0	0	0	0	0	0	0	0	0.1	/	0.1		0.1	
Bare ground	30	13	15	8	25	21	20	9	0	15	13	28	16	16.4					
Total	100	100	105	100	114	100	102	100	100	103	100	100	100	101.8	52.0	34.4	60.2	39.8	

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Figure 1 Quadrat Monitoring Locations



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#### IV. Photo Documentation

*Photo 1 Large areas dominated by the rare plant, San Diego tarweed. San Diego tarweed is unique amongst other southern California tarweed by typically have 8 petals (ray florets) which can be seen in this photo.*



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*Photo 2 San Diego Tarweed dominating areas with the interior closed area. All green, non yellow plants as well as the yellow flowering plants are San Deigo tarweed*



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Photo 3 One of several Long spined spineflower populations documented by the Botanist. This species holds a rare plant ranking of 1B making it a candidate species for listing under the Endangered Species Act



Photo 4 Close up of Long-spined spineflower flower; ~2mm.



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Photo 5 Sample quadrat showing high coverage of a variety of native annual species. Early flowering species such as goldfields were recorded with reduced coverage due to surveys conducted in late May. Goldfields and other early flowering annual species are present but difficult to determine due to the need to identify plants by skeletons and seeds left behind.



Goldfields (*Lasthenia gracilis*)

San Diego tarweed (*Deinandra paniculata*)

Sandmat (*Euphorbia albomarginata*)

Sand aster (*Corethrogyne filaginifolia*)

## V. Conclusions

By their own admission, the consultant stated that they conducted their assessments on July 28, 2021 and August 6, 2021 at a time when the majority of herbaceous annual species have senesced, are unidentifiable, and true landscape cover of annual species would be undeterminable. As a result of the findings laid forth in this document, it is clear that the UPPER PLATEAU PROJECT BIOLOGICAL TECHNICAL REPORT and the information therein is inaccurate and incomplete. Common protocols and methodologies issued by a variety of entities including the California Department of Fish and Wildlife for determining vegetation composition, especially in herbaceous communities, require assessments to be performed when plants can appropriately be identified, and covers can be properly determined. In most, if not all cases several visits across a single season are necessary to capture information for both early and late germinating plant species.<sup>2</sup> It is the position of the preparer of this report that biological surveys and vegetation mapping should be re-conducted with a higher level of integrity and attention and focused surveys should be performed to identify additional long-spined spineflower populations. Following biological re-assessments additional mitigation measures and avoidance measures should be

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<sup>2</sup> [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities \(ca.gov\)](#)



determined. The consultant should have also consulted with CDFW regarding the undescribed vegetation stand and mitigation measures developed. Sensitive vegetation types are not covered by the Riverside County Multiples Species Habitat Conservation Plan and avoidance and/or mitigation measures need to be developed in addition to complying with the MSHCP.

## VI. Reference Figures

Reference Figure 1 Vegetation Communities Determination from the Upper Plateau Project Biological Technical Report

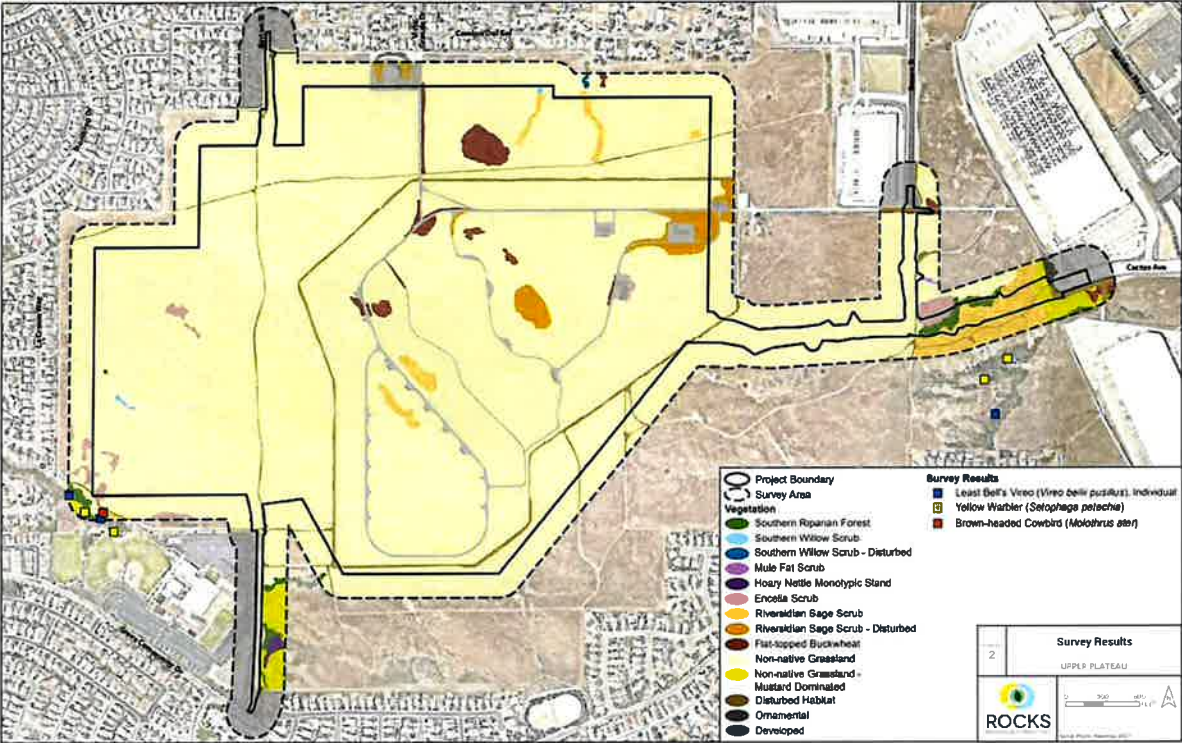
### UPPER PLATEAU PROJECT BIOLOGICAL TECHNICAL REPORT

based on Holland (1986) were then crosswalked with MCV2 (Sawyer et al. 2009); Table 1 provides a summary of vegetation acreages for the survey area as well as the equivalent vegetation community in the MCV2 classification system.

Table 1. Summary of Vegetation within the Upper Plateau Project Survey Area

Vegetation	MCV2 Classification System <sup>1</sup>	Global/ State Rank	Upper Plateau Survey Area (acres)
<b>UPLAND VEGETATION COMMUNITIES</b>			
Encelia Scrub	<i>Encelia farnosa</i> Shrubland Alliance	G5/S4	3.64
Flat-Topped Buckwheat	<i>Eriogonum fasciculatum</i> Shrubland Alliance	G5/S5	5.33
Non-native Grassland	<i>Bromus rubens</i> - <i>Schismus arabicus</i> , <i>barbatus</i> ) Herbaceous Semi-Natural Alliance	No Rank	436.55
Non-native Grassland - Mustard Dominated	<i>Brassica nigra</i> - <i>Centaurea (solstitialis, melitensis)</i> Herbaceous Semi-Natural Alliance	No Rank	5.11
Ornamental	Developed/Disturbed	No Rank	0.53
Riversidan Sage Scrub	<i>Eriogonum fasciculatum</i> Shrubland Alliance	G5/S5	10.98
Riversidan Sage Scrub - Disturbed	<i>Eriogonum fasciculatum</i> Shrubland Alliance - Disturbed	G5/S5	5.47
<b>Subtotal</b>			<b>467.61</b>
<b>RIPARIAN VEGETATION COMMUNITIES</b>			
Hoary Nettle Monotypic Stand	<i>Urtica dioica</i> Alliance	No Rank	0.45
Mulefat Scrub	<i>Baccharis salicifolia</i> Shrubland Alliance	G4S4	0.09
Southern Riparian Forest	<i>Salix gooddingii</i> - <i>Salix laevigata</i> Forest & Woodland Alliance <sup>2</sup>	G4S3	3.17
Southern Willow Scrub	<i>Salix lasiolepis</i> Shrubland Alliance	G4S4	0.21
Southern Willow Scrub - Disturbed	<i>Salix lasiolepis</i> Shrubland Alliance	G4S4	0.11
<b>Subtotal</b>			<b>4.03</b>

Reference Figure 2 Natural Vegetation Communities Map from Upper Plateau Project Biological Technical Report





Riverside/ San Bernardino Chapter  
CALIFORNIA  
NATIVE PLANT SOCIETY

June 11<sup>th</sup>, 2024

Re: West March Upper Plateau Project

Submitted electronically to:

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Riverside County Supervisor Kevin Jeffries [district1@rivco.org](mailto:district1@rivco.org)  
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Dear Commission,

The following comments are submitted on behalf of the Riverside/San Bernardino Chapter of California Native Plant Society ("CNPS"). Specifically, we are offering comments regarding unaddressed impacts to rare plant resources and new findings associated with the proposed West March Upper Plateau Project.

CNPS is a non-profit environmental organization with 13,000 members in 36 Chapters across California and Baja California, Mexico. CNPS's mission is to protect California's native plant heritage and preserve it for future generations through the application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, communities, and local planners to advocate for well-informed policies, regulations, and land management practices.

Our Chapter became aware of this project in the spring of 2023 when it was brought to our attention that the biological consultant (Rocks Biological Consulting) responsible for conducting biological investigations for this project failed to follow standard protocols for conducting botanical surveys and vegetation mapping. According to the Biological Appendix of the Environmental Impact Report ("EIR") surveys were conducted in the middle of summer on the dates of July 28, 2021 and August 6, 2021. A highlighted excerpt from Appendix D of the Biological Technical Section of the EIR is provided below:

## 2.2 VEGETATION MAPPING AND GENERAL BIOLOGICAL SURVEYS

RBC biologists conducted vegetation mapping in the field to provide a baseline of the biological resources that occur or have the potential to occur within the survey area on July 28, 2021, and August 6, 2021. RBC conducted vegetation mapping by walking throughout the project site and mapping vegetation communities on aerial photographs at a 1:2400 scale (1 inch = 200 feet). Vegetation was identified in buffer areas via binoculars from the project site during the general biological survey.

The extent of each habitat type (delineated as a habitat polygon on the vegetation maps) was calculated using the ArcGIS Geographic Information System (GIS). Habitats were classified based on the dominant and characteristic plant species utilizing vegetation community classifications outlined in Holland's *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986) and consistent with MSHCP vegetation mapping classification; best professional judgement was used to determine the most appropriate vegetation community names for the project, which occasionally requires finer delineation of habitats than outlined by Holland. The vegetation communities were also crosswalked with *The Manual of California Vegetation, 2<sup>nd</sup> Edition* (MCV2) (Sawyer et al. 2009), and the equivalent classification is provided in Section 3.

RBC biologists conducted a general biological survey for plants and wildlife concurrently with vegetation mapping on July 28, 2021, and August 6, 2021. Photos taken during the general biological survey are provided in Appendix A. Plant species encountered during the field survey were identified and recorded in field notebooks. Plant species that could not be identified were brought to the laboratory for identification using the dichotomous keys in the *Jepson Manual* (Baldwin et al. 2012) and following the taxonomic treatment of the *Jepson Manual* with input from

California Department of Fish and Wildlife (“CDFW”) protocols require botanical impact surveys to be conducted when plants are “evident and identifiable” and usually requires several visits across the year to capture seasonal variation. A highlighted excerpt from the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*<sup>1</sup> detailing as much is provided below:

### Field Survey Method

Conduct botanical field surveys using systematic field techniques in all habitats of the project area to ensure thorough coverage. The level of effort required per given area and habitat is dependent upon the vegetation and its overall diversity and structural complexity, which determines the distance at which plants can be identified. Conduct botanical field surveys by traversing the entire project area to ensure thorough coverage, documenting all plant taxa observed. Parallel survey transects may be necessary to ensure thorough survey coverage in some habitats. The level of effort should be sufficient to provide comprehensive reporting. Additional time should be allocated for plant identification in the field.

### Timing and Number of Visits

Conduct botanical field surveys in the field at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting. Space botanical field survey visits throughout the growing season to accurately determine what plants exist in the project area. This usually involves multiple visits to the project area (e.g., in early, mid, and late-season) to capture the floristic diversity at a level necessary to determine

<sup>11</sup> Ecological Subregions of the United States, available at: <http://www.fs.fed.us/land/pubs/ecoregions/loc.html>

<sup>12</sup> Available at: <https://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>. When creating a list of special status plants with the potential to occur in a project area, special care should be taken to search all quads with similar geology, habitats, and vegetation to those found in the project area.

The two survey dates conducted in the middle of summer do not meet the level of what can be considered adequate to properly inventory botanical resources. Because of this oversight and concerns about potential failures of the biological inventories, a subsequent botanical inventory of

<sup>1</sup> [2018 Protocols 13 rev1.pdf \(ca.gov\)](https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline), <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

portions of the property was conducted by an independent qualified biologist in 2023 and 2024 and the following findings were made:

1. New evidence of undocumented rare plants species

Four populations of long-spined spineflower (*Chorizanthe polygonoides* var. *longispina*), were documented to be within the project footprint. The total number of plants across the four populations is estimated to be approximately 1,800 individuals. This plant holds a California Rare Plant Ranking 1B.2 making it a candidate for listing under the Endangered Species Act and all records of the occurrence of the plant across the project area have been added to the California Natural Diversity Database. Additional details are provided in the findings report attached to this letter. The consultant incorrectly concluded this species had a “very low” potential to occur across the property and did not adequately inventory populations, nor include adequate information about this species’ presence in the EIR for public review, nor include adequate mitigation/avoidance measures. A highlighted excerpt from Appendix D of the Biological Technical Section of the EIR is provided below:

UPPER PLATEAU PROJECT BIOLOGICAL TECHNICAL REPORT

Species	Status	Habitat Description	Potential to Occur
Chaparral ragwort ( <i>Senecio aphanactis</i> )	CRPR 2B.2	Annual herb. Blooms January-April/May. Chaparral, ciemontano woodland, and coastal scrub. Often a wet site with saline soils. Elevation 50-2,625 feet.	None. Suitable habitat not present. This species is not known to occur in Riverside County and is the far easternmost range of species in the mountains of the Inyo and Owens Valley. No chaparral or ciemontano woodland or coastal scrub habitat present on site.
Chaparral sand-vetcher ( <i>Ononis villosa</i> var. <i>aurita</i> )	CRPR 1B.1	Annual herb. Blooms January/March-September. Sandy chaparral, coastal scrub and desert dunes. Elevation 245-5,250 feet.	None. Suitable sandy chaparral, coastal scrub and desert dunes habitat not present.
Coulter's goldfields ( <i>Lasthonia glabrata</i> ssp. <i>coulteri</i> )	CRPR 1B.1	Annual herb. Blooms February-June. Coastal salt marshes and swamps, playas, and vernal pools. Elevation 5-4,005 feet.	None. Suitable habitat not present.
Coulter's matilija poppy ( <i>Romneya coulteri</i> )	CRPR 4.2	Perennial rhizomatous herb. Blooms March-July/August. Chaparral and coastal scrub. Elevation 65-3,035 feet.	None. Suitable chaparral and coastal scrub habitat not present. Species is not known from the vernal pools.
Deep Canyon snepdragon ( <i>Pseudotsurum cyathiferum</i> )	CRPR 2B.3	Annual herb. Blooms February-April. Sonoran desert scrub. Elevation 0-2,625 feet.	None. Sonoran desert scrub habitat not present.
Engelmann oak ( <i>Quercus engelmannii</i> )	CRPR 4.2	Perennial deciduous tree. Blooms March-June. Chaparral, ciemontano woodland, riparian woodland, and valley and foothill grassland. Elevation 165-4,264 feet.	None. Suitable chaparral, ciemontano woodland, and riparian woodland habitat not present. Grassland habitat on site is disturbed. This species would have been observed if present.
Horn's milk-vetch ( <i>Astragalus hornii</i> var. <i>hornii</i> )	CRPR 1B.1	Annual herb. Blooms May-October. Meadows and seeps, and playas. Elevation 195-2,790 feet.	None. Suitable meadows and seeps, and playa habitats not present.
Little mouse-tail ( <i>Myosurus minimus</i> ssp. <i>apus</i> )	CRPR 3.1	Annual herb. Blooms May-June. Valley and foothill grassland, and vernal pools. Elevation 65-2,100 feet.	Very low. Grassland habitat on site is disturbed and vernal pools not documented at site.
Long-spined spineflower ( <i>Chorizanthe polygonoides</i> var. <i>longispina</i> )	CRPR 1B.2	Annual herb. Blooms April-July. Chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, and vernal pools. Elevation 100-5,020 feet.	Very low. Suitable habitat not present; grassland habitat on site is disturbed.

ROCKS BIOLOGICAL CONSULTING 29

2. New evidence of an undescribed, sensitive vegetation community alliance

Per the Appendix D of the Biological Technical Section, 436.55 acres of land within the project footprint was characterized as “non-native grassland” by the consultant as a result of the timing of summer survey work when most herbaceous plant species have senesced and are not readily identifiable. A highlighted excerpt from Appendix D of the Biological

Technical Section of the EIR indicating the results of the vegetation delineations is provided below:

Table 1. Summary of Vegetation within the Upper Plateau Project Survey Area

Vegetation	MCV2 Classification System <sup>1</sup>	Global/ State Rank	Upper Plateau Survey Area (acres)
<b>UPLAND VEGETATION COMMUNITIES</b>			
Encelia Scrub	<i>Encelia farinosa</i> Shrubland Alliance	G5/S4	3.64
Flat-Topped Buckwheat	<i>Eriogonum fasciculatum</i> Shrubland Alliance	G5/S5	5.33
Non-native Grassland	<i>Bromus rubens</i> - <i>Schismus (arabicus, barbatus)</i> Herbaceous Semi-Natural Alliance	No Rank	436.55
Non-native Grassland - Mustard Dominated	<i>Brassica nigra</i> - <i>Centaurea (solstitialis, melitensis)</i> Herbaceous Semi-Natural Alliance	No Rank	5.11
Ornamental	Developed/Disturbed	No Rank	0.53
Riversidian Sage Scrub	<i>Eriogonum fasciculatum</i> Shrubland Alliance	G5/S5	10.98
Riversidian Sage Scrub - Disturbed	<i>Eriogonum fasciculatum</i> Shrubland Alliance - Disturbed	G5/S5	5.47
<i>Subtotal</i>			<b>467.61</b>
<b>RIPARIAN VEGETATION COMMUNITIES</b>			
Hoary Nettle Monotypic Stand	<i>Urtica dioica</i> Alliance	No Rank	0.45
Mulefat Scrub	<i>Baccharis salicifolia</i> Shrubland Alliance	G4S4	0.09
Southern Riparian Forest	<i>Salix gooddingii</i> - <i>Salix laevigata</i> Forest & Woodland Alliance <sup>2</sup>	G4S3	3.17
Southern Willow Scrub	<i>Salix lasiolepis</i> Shrubland Alliance	G4S4	0.21
Southern Willow Scrub - Disturbed	<i>Salix lasiolepis</i> Shrubland Alliance	G4S4	0.11
<i>Subtotal</i>			<b>4.03</b>

Photo evidence and quantitative data collected over the project area provided in the independent report attached to this letter details the inaccuracy of this delineation. Much of the area characterized as “non-native grassland” is dominated by native herbaceous species including very dense stands of the rare plant, *Deinandra paniculata* (San Diego tarweed). In addition to the 77 plant species listed as present by the consultant, the independent survey work revealed an additional 25 plant species (mostly native forbs) bringing the site total to 102 and illuminating further, the inadequacy the botanical surveys. As is detailed in the independent report, the consultant failed to accurately identify vegetation communities because of the timing of botanical work and therefore also failed to divulge that the natural vegetation community within the project area is likely a very rare, **undescribed alliance or special stand dominated by the rare plant San Diego Tarweed, i.e., the *Deinandra paniculata* Herbaceous Alliance**. The consultant should have consulted with the CDFW statewide vegetation team to determine the best path forward to describe vegetation composition as accurately as possible, again, given the very likely probability that this is a very rare and undescribed vegetation stand.

The Manual of California Vegetation (the standard resource for determining vegetation communities) lists the *Deinandra fasciculata* Herbaceous Alliance as having a State Rarity Ranking of S2 and is considered sensitive at the state and global level. The *Deinandra fasciculata* Herbaceous Alliance is very similar to the vegetation present across the project footprint with the primary difference being that *D. paniculata* (as opposed to *D. fasciculata*) is of considerably higher overall rarity and, again, is a listed rare plant in the California Rare Plant Ranking. Significantly, “Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents.”<sup>2</sup> A highlighted excerpt of the Online Manual of California Vegetation indicating the rarity ranking as S2 is provided below:

**CNPS**  
California Native Plant Society  
A Manual of California Vegetation Online

***Deinandra fasciculata* Herbaceous Alliance**  
Clustered tarweed fields

**Characteristic Species**  
*Deinandra fasciculata* is so dominant or conspicuous in the herbaceous layer with *Amsinckia menziesii*, *Atriplex argentea*, *Atriplex coronata* var. *notata*, *Centaurea melitensis*, *Centaurea solstitialis*, *Covillea hirsuta*, *Cressa truxillensis*, *Deschampsia danthonioides*, *Erodium cicutarium*, *Frankenia salina*, *Hirschfeldia incana*, *Hordeum depressum*, *Hordeum intercedens*, *Hordeum murinum*, *Lasthenia californica*, *Lasthenia fremontii*, *Marrubium vulgare*, *Mesembryanthemum nodiflorum*, *Plagobothrys* spp. and *Infolium* spp. Emergent shrubs may be present at low cover including *Artemisia californica*, *Eriogonum fasciculatum*, *Gutierrezia* spp., *Hazardia squarrosa* or *Suaeda moquini*.

**Vegetation Layers**  
Herbs - 1 m; cover is open to continuous.

**Membership Rules**

- Deinandra fasciculata* > 30% relative cover or seasonally present in the herbaceous layer with a variety of other annuals (Klein and Evens 2003)

**Habitats**  
Clay flats and bottomlands, edges of vernal pools, shallow pools, alkaline flats. Soils of fine textured alluvium with periodic or intermittent inundation, and may be underlain by claypan or other impervious layer. They are poorly drained.

**Other Habitat, Alliance and Community Groupings**

MCV (1995): California annual grassland series, San Jacinto Valley vernal pool habitat  
 NVCs (2009): South coastal California vernal pool  
 Calveg: Annual grasses and forbs, Wet grasses and forbs

**USDA Ecological Section Map**

**Summary Information**

- Primary Life Form: Herb
- Elevation: 0-900 m
- State Rarity: S2
- Global Rarity: G2
- Distribution: USA, CA, Mexico (NatureServe)
- Endemic to California: No
- Endemic to California Floristic Province and Deserts: No
- Date Added: 2009/09/01

Indeed, the consultant openly stated in the Biological appendix that “RBC surveyors observed paniculate tarplant (San Diego tarplant) throughout nearly the entire project site”. This highlighted section of the Biological Appendix is excerpted below:

<sup>2</sup> [Natural Communities \(ca.gov\)](https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#grasslands) <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#grasslands>

in San Diego, Los Angeles, Riverside, and San Bernardino Counties at elevations ranging from 82 to 3,084 feet amsl. This species is commonly found in coastal scrub, valley and foothill grassland, and vernal pool habitats (CNPS 2021).

Smooth tarplant is a CRPR rank 1B.1 species, meaning it is rare, threatened, or endangered in California and elsewhere, and seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat). Smooth tarplant is also a State Rank S2, meaning it is imperiled in the state because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or state/province (CNPS 2021).

The site supports suitable habitat and smooth tarplant was reported in the immediate project area in 1995 (CDFW 2021b; Figure 4A); however, focused surveys conducted in June 2022 were negative for smooth tarplant on the project site.

#### ***Paniculata Tarplant***

Paniculate tarplant is an annual herb in the sunflower family (Asteraceae) with small yellow flowers that bloom from March to November. Paniculate tarplant is native to California and Baja California and occurs in the U.S. from San Diego County to Santa Barbara County at elevations less than 3,000 feet amsl. This species is commonly found in coastal scrub, valley and foothill grassland, and vernal pool habitats (CNPS 2021). Paniculate tarplant is a CRPR rank 4.2 species, meaning it is of limited distribution and moderately threatened in California (20-80% of occurrences threatened). Paniculate tarplant is also a State Rank S4, meaning it is "apparently secure within California."

Paniculate tarplant was observed along the access roads as well as within the southern portion of the project during 2021 general biological surveys. RBC surveyors observed paniculate tarplant throughout nearly the entire project site during 2022 summer-blooming rare plant surveys, with notably dense populations located in the northern portion of the site and along access roads. It was estimated that over 100,000 individuals occur within the project site.

Despite noting "100,000 individual plants" of *D. paniculata* and noting "dense populations" in specific areas of the property, the consultant failed to include this information in their overall vegetation community descriptions for unknown reasons. The CDFW makes specific recommendations for grasslands and flower fields and specifically notes that "consultants have tended to underestimate the significance of native herbaceous plants". The CDFW also notes that relative native covers of as low as 10% can be determinative of a native herbaceous stand. Data from the independent vegetation quadrat monitoring performed in 2023 and included in the independent report noted that approximately 60% relative native cover of the areas designated as "non-native grassland". 60% relative cover is much higher than the suggested standard of 10% and also much higher than the accepted membership rules for "non-native grassland" A highlighted excerpt on "Semi-naturals stands and addressing grasslands and flower fields" is included below:



## Semi-Natural Stands and Addressing Grasslands and Flower Fields

Semi-natural alliances have their own membership rules, that is, the minimum percent relative or absolute cover of the non-native to define a stand, which can be ecosystem-dependent. However, California's grasslands and flower fields vegetation types are among the most difficult to analyze and study. The greatest challenge comes from the variation in species composition and abundance from early to late season and between years. Researchers and consultants have tended to underestimate the significance of native herbaceous plants because they are frequently at their highest cover either very early or very late in the season and may have very low cover during the spring and summer, when non-native grasses dominate and when field work is often performed. Additionally, in some years, a given area may be characterized by an abundance of non-native forbs and grasses, while in other years native herbs may dominate. This inter-seasonal and inter-annual variance of cover between the diagnostic species and the less diagnostic species leads us to conclude that rules for an herbaceous vegetation type's identification should be more broadly inclusive for nativity, with relative cover as low as 10% natives determining a native stand.

Use of the Manual of California Vegetation requires looking closely to determine if native indicator species are evenly distributed and interspersed with non-native plants while visiting the sites throughout the growing season. Although this often makes for more difficult field identification, detection of native plants ensures a proper assessment of the stand's conservation and biodiversity value.

There are indeed many grasslands or herbaceous stands populated almost entirely by non-natives; some have been heavily disturbed in the past and others invaded by exotics that can preclude natives almost completely, such as medusa-head (*Elymus caput-medusae*) and perennial pepperweed (*Lepidium latifolium*). Vegetation scientists at NatureServe, the California Native Plant Society, and CDFW determine non-native stands based on a rule of at least 90% cover of non-native species without evenly distributed or diverse native forbs and grasses at any time in the growing season. Conversely, a stand is considered native if 10% or more relative cover consists of native taxa that are evenly distributed in the stand and present at any time during growing season. For example, the Sonoma County Vegetation Key (PDF) includes this rule for the *Deschampsia caespitosa* alliance: *Deschampsia caespitosa*, *Danthonia californica*, and/or *Eryngium armatum* dominate or co-dominate individually or in combination (if *Holcus lanatus* has the highest cover, but these three species have at least 10% combined cover, key to *Deschampsia*).

### Conclusion and Recommendations

The occurrence of four populations of long-spined spineflower combined with the photo and quantitative documentation of a rare undescribed vegetation alliance constitutes a significant finding that was not analyzed in the FEIR. This information was not available during the time of the assembly of the current EIR because the hired consultant failed to follow proper survey protocols and therefore failed to adequately inventory biological resources. **Under 14 Cal Code Regs§15162(a)(3) and current court precedent, this is significant new information and meets the threshold for triggering supplemental review and the preparation of a subsequent EIR.**

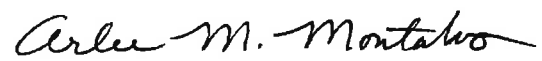
It is important to note that in the context of CEQA, this is not a difference of opinion among experts, but rather a difference in collected objective facts about the biological content of the project footprint. When differences of opinion among experts has been brought to the courts, they have looked for adequacy, completeness, and a good faith effort at full disclosure.

Sincerely,

Aaron Echols, Conservation Chair, Riverside/San Bernardino Chapter, California  
Native Plant Society

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

Arlee M. Montalvo, Chapter President, Riverside/San Bernardino Chapter, California  
Native Plant Society

A handwritten signature in black ink, reading 'Arlee M. Montalvo', written in a cursive style.

## Cindy Camargo

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**From:** Joyce Tice <ctice@verizon.net>  
**Sent:** Tuesday, June 11, 2024 6:35 PM  
**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

My reason is there are already too many warehouses in our high end bedroom communities, and also this is affecting air pollutions, tearing up roads & freeways, excessive traffic congestion from the thousands of trucks accessing nearby freeways and roads daily, and decreases home values. There are so many other more rural areas available in Riverside County too. This would never happen in Orange County because they value there communities and make sure they maintain clean and safe freeways and roads. Riverside needs to see the bigger picture and not sell us short. Due to the high increases in obtaining a home in Southern California we are now a viable alternative and we're losing wonderful land that could be developed for that purpose; because we're instead building warehouses on it. Whose idea was that?? #SAVEORANGECREST

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, <NAME>  
<NEIGHBORHOOD or ZIP CODE>

## Cindy Camargo

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**From:** Rose Cook <RRaeCook@outlook.com>  
**Sent:** Tuesday, June 11, 2024 6:27 PM  
**To:** Clerk  
**Subject:** Followup Comments to FEIR

Please accept my follow-up comments to the review of my initial comments in the DEIR. Grove Warehouse proposed development

### Wildlife

With respect to the 10 additional special status bird species with records of occurrence in the MSHCP database within 3 miles of the project site, reviewers acknowledged that these species occur within the greater MSHCP, but state they are not known from the vicinity of the project site. If the reviewers conducted their own analysis of the MSHCP data, they must not have used the full dataset. They would have had to make a request to CDFW or the RCA for the complete dataset which is given the highest level of security for distribution by both agencies. If they downloaded and analyzed the dataset available to the general public, records for these species would not have been included.

### Rare Plants

The reviewers argue that no additional analysis or field surveys are necessary. They state that their assessments of Low probability of occurrence are correct because they considered a range of environmental factors, historical land use, biogeography, etc. when making their assessments. However, they don't document any of this, so their conclusions can't be independently verified. It appears to me that their assessments are based on the personal knowledge of Jim Rocks who supposedly lead the general search survey (the two-day survey of the project site). They make broad statements about rare plants being unable to persist in non-native grasslands degraded by human disturbance (such as dirt roads), but do not cite any studies pertaining to the individual species considered. I would argue that such generalities are not sufficient for an environmental assessment like this. In fact, very little is known about the requirements of most of these species. I have personally observed San Jacinto Valley crownscale growing on the edges of heavily used dirt roads in the San Jacinto Wildlife Area, and Thread-leaf brodiaea growing in non-native grassland frequently mowed with large tractors. With respect to the project site specifically, Aaron Echols of the California Native Plant Society discovered a population of Long-spined spineflower last year in what was an extra-limital occurrence, along with a unique association of native forbs. Recently, he found 1,000 more specimens of the spineflower near The Grove. When it comes to rare plants, I think it's true that we rarely find what we're not looking for. The consultants made the assumption that the site had low suitability for 27 of the 28 plant species assessed and therefore did not look for them. Maybe that is all they are required to do. I'm not sure. But, it stands in stark contrast to the rigorous surveys that are conducted for every rare plant species covered by the MSHCP.

Thank you,

Rosamonde Cook

## Cindy Camargo

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**From:** Juan Carrillo-Dominguez <juancarrillodominguez05@gmail.com>  
**Sent:** Tuesday, June 11, 2024 6:09 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.

As a current four-year warehouse employee and resident of Moreno Valley living with my family in a neighborhood surrounded by warehouses, I have personally seen the negative impacts logistics has on our communities, environment, pay, and health. Pollutants have been discovered in our air, lowering its quality, getting into our lungs, and affecting our health, causing higher rates of respiratory illnesses. If this continues, the environment and future generations will suffer detrimental damage that can last for generations to come. Seeing a P&G warehouse situated across March Middle School and Rainbow Ridge Elementary, schools both my siblings have attended, is an example of how no sense of care for the community is received. Our pay is affected because most, if not all, of these jobs don't pay enough to have a livable wage, and it's unjust to use 'more employment opportunities' when the majority of us workers scramble to get a livable wage. It's backbreaking work and an unfair use of our labor. Having to see my 57-year-old father go through body aches and pains, specifically sciatica, after arriving from his warehouse job working 50 hours or more is hard for me.

We deserve better.

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

Sincerely,

Juan  
92551

## Cindy Camargo

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**From:** Andrea Tercero <actrcr@gmail.com>  
**Sent:** Tuesday, June 11, 2024 4:32 PM  
**To:** Cindy Camargo  
**Cc:** Dan Fairbanks; edd@moval.org; district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; district1@rivco.org; jperry@riversideca.gov; mayor@moval.org  
**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 someone who commutes daily, I am concerned that the traffic would get worse with the new warehouses being built and make commuting more difficult. I am also concerned how the construction of these warehouses will overall impact the environment and our health.

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

-Andrea Tercero

## **Cindy Camargo**

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**From:** Kurt Anderson <anderson.kurt@sbcglobal.net>  
**Sent:** Tuesday, June 11, 2024 4:47 PM  
**To:** district5@rivco.org; Conder, Chuck; rrogers@cityofperris.org; mvargas@cityofperris.org; Supervisor Jeffries - 1st District; Perry, Jim; 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 live in the immediate vicinity of the proposed warehouses, and therefore am not writing to simply defend my property. Rather, I am frustrated by the continual transformation of every parcel of open space in our county into warehouses. Open space is needed for our communities and for maintenance of healthy ecosystems that provide many social benefits. Warehousing is not the direction needed for a sustainable economy in the IE and we need to cease doubling down on them.

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

Sincerely,

Kurt anderson  
Riverside, 92501



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**From:** Dan Fairbanks <fairbanks@marchjpa.com>  
**Sent:** Wednesday, June 12, 2024 4:26 PM  
**To:** Nicole Cobleigh  
**Cc:** Cindy Camargo; Dr. Grace Martin  
**Subject:** Prehearing comment

Pre-hearing comment

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**From:** Jillian GMAIL <jillian.c.kerst@gmail.com>  
**Sent:** Wednesday, June 12, 2024 4:08 PM  
**To:** Dan Fairbanks <fairbanks@marchjpa.com>  
**Subject:** Warehouse

Hello,

I am not able to attend the meeting tonight and am willing to sign any petition opposing this

Jillian Kerstetter  
Sent from my iPhone

RAMV Rural Association of Mead Valley  
PO Box 2244  
Perris, CA 92572

Abilene149@gmail.com

March Joint Powers Authority (“MJPA”)

Ed Delgado, Chair  
Michael Vargas, Vice Chair  
Ulises Cabrera, Member  
Jim Perry, Member  
Chuck Conder, Member  
Rita Rogers, Member  
Kevin Jeffries, Member  
Dr. Yxstian Gutierrez, Member

Submitted to:

Cindy Camargo, Clerk - [camargo@marchjpa.com](mailto:camargo@marchjpa.com)  
Dan Fairbanks - [Fairbanks@marchjpa.com](mailto:Fairbanks@marchjpa.com)  
14205 Meridian Parkway, Suite 140  
Riverside, CA 92518

**Re: West March Upper Plateau Project Final EIR (SCH#2021110304)**

Dear Chairman Delgado, Members of the Commission of the March Joint Powers Authority:

The Rural Association of Mead Valley is opposed to the West March Upper Plateau Project that consists of proposed 1.84 million-square-foot warehouse project, located north of Orangecrest, east of Mission Grove, and west of the I-215 Freeway, that was used by the Air Force for over 100 years as a dumping ground for hazardous materials of all types and storage of nuclear weapons. The entire site is contaminated and must be tested and cleaned up before any construction can take place. March JPA has not analyzed the soil of the 252 site for contamination. During construction the soil can enter the air and travel for miles. During the Santa Ana winds with speeds over 70 miles per hour and the off shore breezes the contaminated soil can travel throughout the nearby neighborhoods and land on the Church, Pre School, Sports Park nearby and thousands of homes in the Orangecrest and Mission Grove Neighborhoods causing untold health and safety concerns to thousands of residents living nearby.

The County has a history of ignoring contaminated and polluted areas. Today the March JPA is set to vote on 252 acres of land that has toxic and polluted water and soil from over 100 years that this land was part of the March Air Force Base. The CEQA for this Project is deficient in the analysis of the soil and water and no indication that the contamination will be cleaned up before construction will take place.

The March JPA did not do a thorough analysis and testing of the soil and water for this project site for contamination, even though it was used by the military for over 100 years. The EIR is deficient.

“As the oldest operational Air Force base on the west coast, personnel at March engaged in a wide variety of operations dealing with toxic and hazardous substances as early as 1918. Hazardous wastes were generated primarily from industrial operations such as aircraft cleaning and vehicle maintenance, fire protection training, and fuels storage and use. Historically, wastes were disposed of using incinerators, discharging them into sanitary sewer systems and storm drains, and placing them in unlined pits and landfills. Accidental spills of fuels and chemicals such as cleaning solvents also occurred”.

<https://www.afcec.af.mil/Home/BRAC/March/Cleanup/>

<https://marchjpa.com/mjpa-meridian-west-campus/>

Two Examples of contamination that the County ignored are the Stringfellow Acid Pits in Jurupa and the Autumn Wood Housing Project in Wildomar.

<https://truthout.org/articles/autumnwood-a-community-living-in-toxic-fear-and-uncertainty/>

Autumnwood: A Community Living in Toxic Fear and Uncertainty

Since the first tenants moved into Autumnwood a little over eight years ago, a rash of serious illnesses, sometimes fatal, have pockmarked the community. Take Amaryllis Court – an eleven-home cul-de-sac bookending one corner of Autumnwood. In those eight years at Amaryllis Court alone, two women in their thirties have died from complications arising from pneumonia, while a number of families have fled their homes and many of their belongings after suffering for years with chronic illnesses.

There’s the Muniz family: Jennifer, Javier and their four children. Jennifer and Javier Muniz moved into their home on Amaryllis Court in 2006. Since then, the Muniz’s three eldest children have suffered a laundry list of illnesses, including gastrointestinal and respiratory problems, rashes and pneumonia. Doctors have toyed with a number of prognoses specific to the intestine, including Crohn’s and Celiac disease. After falling sick with flu, Jennifer had her gall bladder removed. It was diseased, almost completely black. She was 29 at the time. The Muniz’s abandoned their home in 2012 after doctors warned Jennifer that she could endanger her unborn child if she remained in her home. During Jennifer’s previous pregnancy, formaldehyde was found in her breast milk.

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Stringfellow is one of the most toxic places in the United States, and of an epic legal battle to clean up the site and hold those responsible accountable. More than 34 million gallons of liquid industrial waste were dumped in the acid pits during its years of operation. Contamination from the site leached into groundwater and spread for miles through the Jurupa Valley, forcing closure of private drinking water wells.

California officials approached rancher James Stringfellow about using his land in Riverside County, east of Los Angeles, as a hazardous dump site. Officials claimed it was a natural waste disposal site because of the impermeable rocks that underlay the surface. They were gravely mistaken. Over 55 million gallons of industrial chemicals from more than a dozen of the nation’s most prominent companies poured into the

site's unlined ponds. Heavy rains forced surges of chemical- laden water into Pyrite Creek and the nearby town of Glen Avon. Children played in the froth, making fake beards with the chemical foam. The liquid waste contaminated the groundwater, threatening the drinking water for hundreds of thousands of California residents. Penny Newman, a special education teacher and mother, led a grassroots army of so-called "hysterical housewives" who demanded answers and fought to clean up the toxic dump.

The Stringfellow Acid Pits is now a superfund site:  
<https://www.jurupavalley.org/311/Stringfellow-Acid-Pits-Superfund-Project>

The project area currently contains fourteen munitions bunkers used in the past to store munitions and nuclear weapons. These bunkers are currently used to store commercial fireworks. The health and welfare for over 20,000 residents living nearby this Project is in jeopardy during and after the construction phase of the project because of the risk of contaminated soil and water on site. Residents feel the land must remain open space as it is too contaminated to risk the health of over 20,000 people living nearby if they do otherwise.

REIR (Recirculated EIR) indicates there are multiple uninvestigated areas that may have exploded or unexploded munitions. This is certainly cause for alarm as the community is very close to the site and a large 30 foot gas line travels across the Project.

PFAS/PFOS/PFOA compounds are present in munitions. The site was not tested for Perchlorate contamination and yet was exposed to rocket fuel, fireworks and munitions for years. The site was used for storage of nuclear weapons for over 30 years and must be tested for radioactive materials levels.

This is more than just another massive warehouse project next to homes. Over 20,000 people live close to this proposed project. Some of the homes, Grove Community Preschool, and a Community After-School Day Care Center are just 300 feet from the project site. The project will bring more logistics trucks into their residential neighborhoods and increase air pollution in an area that has the second-worst air pollution in the nation.

The communities surrounding this site are concerned about the contaminated soil being disturbed during construction and traveling throughout the area, affecting their health for years to come. There is a large sports park just 1300 feet from the project where thousands of children play each week.

The March JPA did not do a thorough analysis and testing of the soil and water for this project site for contamination, even though it was used by the military for over 100 years.

"As the oldest operational Air Force base on the west coast, personnel at March engaged in a wide variety of operations dealing with toxic and hazardous substances as early as 1918. Hazardous wastes were generated primarily from industrial operations such as aircraft cleaning and vehicle maintenance, fire protection training, and fuels storage and use. Historically, wastes were disposed of using incinerators, discharging them into sanitary sewer systems and storm drains, and placing them in unlined pits and landfills. Accidental spills of fuels and chemicals such as cleaning solvents also occurred".  
<https://www.afcec.af.mil/Home/BRAC/March/Cleanup/>

This property is public land that must be used to benefit the Public at large. The best use would be Veterans Housing. The County has a huge need for Veteran housing in the area.

<https://usvets.org/march-veterans-village/>

## MARCH VETERANS VILLAGE

U.S.VETS — Inland Empire is proud to introduce March Veterans Village, a community dedicated to supporting low income veterans and their families with affordable housing and supportive services conveniently located next to March Air Reserve Base in Riverside County, CA. Once all phases are completed, March Veterans Village will consist of seven apartment buildings and be home to more than 400 veterans and their families.

Housing	Community Amenities and Spaces	Project Highlights
Phase 1 116 Studios 6 One-bedrooms 16 Two-bedrooms	<ul style="list-style-type: none"><li>• Career Center</li><li>• Computer Lab</li><li>• Community and Multi-Purpose Rooms</li><li>• Residents Lounges</li><li>• Fitness Center</li><li>• Conference Rooms</li><li>• Library</li><li>• BBQ Areas</li><li>• Basketball Court and Children's Play Areas</li><li>• Community Green Space</li></ul>	<ul style="list-style-type: none"><li>• Grand opening date: Summer 2021</li><li>• Target population: Low income, homeless and at-risk veterans</li><li>• Site size: 3.43 acres</li><li>• Total Cost: \$11 million</li></ul>
Phase 2 1 One-Bedroom 15 Two-Bedrooms		

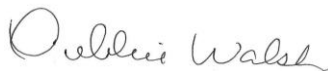
Other concerns are the hundreds of logistics trucks that will be added to the area, additional air pollution and noise. Trucks are currently using Van Buren, Alessandro and neighborhood streets to travel to the ports of LA. The majority avoid the freeways that are congested and use the local roads that are faster. This is much more dangerous and increases air pollution for an area that has the worst smog in the nation. They travel by sensitive receptors such as our schools.

The area is an Environmental Justice Community with the majority of the residents living nearby falling into the poverty rate.

The Rural Association of Mead Valley urges the March JPA to deny the EIR and Upper Plateau Project and vote NO.

Please consider this Public land and the uses for this should be given to our Veterans in need of housing. We should not have homeless veterans walking the streets of Riverside. I see them frequently and there is no excuse for this.

Sincerely,



Debbie Walsh

President RAMV