

City of Menifee	
Motte Business Center Project Perris Appeal Comments and Responses	
Comment	Response
City of Perris Review Comments	
<p>1. Insufficient Analysis of Cumulative Impacts:</p> <p>a. The Project needs to address the cumulative impacts of all projects within a 1.5-mile radius of the proposed site to analyze, mitigate, and disclose all environmental impacts from the Project pursuant to the California Environmental Quality Act (“CEQA”).</p> <p>b. Traffic Study: Perris’ November 13 letter commented that the Project’s traffic consultant failed to contact the City of Perris to confirm which cumulative projects within Perris should be included in the Traffic Study. <i>Menifee Response F9 stated that Perris failed to provide comments in its initial January 13 letter with regard to the cumulative projects within the City of Perris to be included as part of the Project’s Traffic Study</i>; however, this does not relieve Menifee or the Project from any obligations arising from CEQA.</p>	<p>1.</p> <p>a. The cumulative projects included in the Project Traffic Study included all projects known to the City of Menifee at the time the Traffic Scoping Agreement and the EIR’s Notice of Preparation were prepared. The Traffic Study analyzed, mitigated, and disclosed all environmental impacts associated with the Project itself, as well as all cumulative projects identified in the Traffic Study pursuant to the CEQA Guidelines. Both project related and cumulative project impacts were fully disclosed throughout the Draft EIR. Refer to Chapters 4.1 through 4.15 of the Draft EIR. Chapters 4.1 through 4.15 of the Draft EIR fully analyze cumulative impacts in a separate sub-section of the analysis.</p> <p>b. The City of Menifee adhered to the City of Perris’s request to analyze all projects known to the City of Menifee at the time the Traffic Scoping Agreement was prepared at the requested radius of 1.5 miles. The City of Menifee fully met the requirements of CEQA and City of Menifee standards with respect to both the Draft EIR and the Project Traffic Study by fully analyzing and disclosing all project related impacts as well as all cumulative impacts associated with development of the Project based on the cumulative projects list prepared as part of the Traffic Study.</p> <p>The Traffic Scoping Agreement, including a list of Cumulative Projects (including development projects within the City of Perris) as noted on Table 6 of the Traffic Study for the Project, was sent to the City of Perris for review on January 13, 2023. The City of Perris did not provide comments on the Traffic Scoping Agreement. It should be noted that the City of Perris provided a NOP Comment Letter (dated January 13, 2023), which includes comments regarding transportation, but did not provide comments with regards to</p>

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	<p>specific Cumulative Projects within the City of Perris to be included as part of the Traffic Study.</p> <p>The City of Perris NOP Comment letter requested that the Traffic Study and EIR analyze impacts of all projects within a 1.5-mile radius of the proposed Project site. Both the Traffic Study and EIR analyzed the cumulative impacts of all known projects with this 1.5-mile radius. As such, the City of Menifee fully complied with the City of Perris's requests stated in their NOP comment letter.</p>
<p>2. Insufficient Analysis of Transportation Impacts:</p> <p>a. Perris raised multiple concerns in its November 13 letter regarding the insufficiency of the EIR's Traffic Study as the Project analyzes multiple intersections within the City of Perris. Further, a Traffic Impact Analysis prepared by RK Engineering, that is referenced in Perris' previous comment letters, demonstrates adverse environmental impacts caused by increased truck traffic along Ethanac Road that are not properly reflected in the Project Traffic Study.</p>	<p>2.</p> <p>a. No Traffic Impact Analysis prepared by RK Engineering demonstrating impacts caused by truck traffic along Ethanac Road was provided to the City of Menifee in the previous comment letters. The Traffic Study and EIR disclose the Project's truck traffic impacts along Ethanac Road. As such, no additional response can be provided.</p> <p>Additionally, the Project Traffic Study fully analyzed all impacted intersections within both the City of Menifee and City of Perris. The only intersections located entirely or a majority within the City of Perris are the following:</p> <ul style="list-style-type: none"> • Encanto Drive at Ethanac Road (City of Perris) • Trumble Road at Ethanac Road (City of Perris) <p>The Traffic Study fully analyzed all impacted intersections, including those located within or partially within the City of Perris.</p> <p>Under CEQA Guidelines section 15064.3, automobile delay no longer is considered an environmental impact. The Project's land use impacts are based in part upon determining compliance with the City's General Plan. The Project</p>

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b. Level of Service Standards and Measure of Significance: Perris understands that pursuant to Public Resources Code ("PRC"), section 21099(b)(2), automotive delay as measured by various factors including level of service, is no longer considered an environmental impact for purposes of CEQA. However, PRC, section 21099(c) states this fact does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety or any other impact associated with transportation. Level of Service remains a useful tool in determining whether automobile and truck trips generated by a project results in reasonable foreseeable direct or cumulatively significant traffic safety impacts. The EIR concludes the project will not result in any significant transportation impacts, without mitigation. For the reasons below, Perris does not believe those conclusions are supported with an adequate Traffic Impact Study, and therefore are not supported with substantial evidence.

Applicant is proposing to improve roadways along the Project's frontage per the City of Menifee General Plan. The Project Applicant will also improve Ethanac Road from I-215 to Dawson Road to increase the roadway's vehicle capacity to accommodate the Project and other nearby cumulative project traffic as forecasted in the Project Traffic Study. All roadway improvements associated with the proposed Project would be consistent with the City of Menifee General Plan Circulation Element. The Project improvements per the Draft EIR to portions of intersections or roadways shared with the City of Perris would be coordinated between the City of Menifee and City of Perris prior to final engineering for the Project.

b. The Draft EIR prepared for the Project fully disclosed all impacts associated with the Project itself, in addition to cumulative impacts. All air quality impacts (both Project-specific and cumulatively) were fully analyzed and disclosed in Chapter 4.2 of the Draft EIR. As identified in Chapter 4.2, no significant and unavoidable impacts would occur with mitigation. Similarly, all noise impacts (both Project-specific and cumulatively) were fully analyzed and disclosed in Chapter 4.11 of the Draft EIR. As identified in Chapter 4.11, no significant and unavoidable impacts would occur with mitigation. The Draft EIR also fully analyzed safety related impacts. Refer to Chapter 4.8 of the Draft EIR.

Additionally, while Level of Service is no longer considered an environmental impact under CEQA, the Project Traffic Study included a full analysis of Level of Service effects associated with development of the proposed Project. The Level of Service analysis was included as Appendix K of the Draft EIR. This information was made publicly available during the 45-day Draft EIR review period, which began on September 29, 2023, and concluded on November 13, 2023. Therefore, the Traffic Study prepared for the Project is adequate, and

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contains substantial evidence to conclude there are no Level of Service effects with the addition of recommended improvements, and fully adheres to CEQA.

The City of Perris *Transportation Impact Analysis Guidelines for CEQA* (May 2020) notes the following regarding safety:

“A significant impact occurs if the project conflicts with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreases the performance or safety of such facilities.”

The proposed project would not conflict with City of Perris adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. The project applicant shall construct sidewalks along the project frontage to enhance pedestrian safety in the area.

Although the City of Perris has no additional significance thresholds concerning transportation and safety, the Riverside County *Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled* (December 2020) includes the following safety criteria in the “Safety and Operational Analysis” section:

“The TA (Transportation Analysis) shall examine existing roadway conditions to determine if safety and/or operational improvements are necessary due to an increase in traffic from the project or cumulative conditions.”

The types of improvements to be identified may include, but are not limited to:

- Need for turning lanes.
- Intersections needing future sight distance studies.
- Parking restrictions.

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- Measures to reduce cut-through traffic in adjacent residential areas and/or assessment of needed traffic calming measures.
- Potential impacts to adjacent schools, parks, and/or trails.
- Queue lengths and deficiencies to adjacent intersections.
- Need for signal interconnect systems.

The recommended improvements noted in the Project Traffic Study would improve safety conditions in the study area, including the City of Perris study intersections. The recommended improvements include the addition of turn lanes, traffic signalization, and the widening of Ethanac Road, which would reduce queue lengths and provide adequate sight distance along Ethanac Road and adjacent intersections. It should be noted that the recommended improvement at the intersection of Encanto Drive at Ethanac Road would restrict left turns out of the minor street approach (Encanto Drive), which improves overall safety by reducing the amount of conflict points at this intersection. It should be noted that the Project itself is designed to provide adequate sight distance at the project driveways, as well as insure free-flowing and safe circulation on site, including no sharp turns for trucks.

The Caltrans *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (May 20, 2020) includes the following safety criteria:

“For the State Highway System and connections with the State Highway System, Caltrans may request a targeted operational and safety analysis to address a specific geometric or operational issue, particularly issues that impact multimodal access or conflicts between modes. Improvements requested by Caltrans should avoid increases in VMT and should avoid degrading or adding stressors to pedestrians, bicyclists, and transit users.”

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It should be noted that Caltrans responded to the Notice of Preparation (NOP) for the Project on December 7, 2022 (see *Attachment C*) stating the following:

“We do not anticipate a significant amount of traffic to be generated from this site to adversely impact the nearest SHS facilities. We therefore have no comments to offer currently.”

The project applicant is required to construct sidewalks along the project frontage to enhance pedestrian safety in the area. The recommended improvements noted in the Project Traffic Study, would improve safety conditions in the study area, including the City of Perris study intersections. The recommended improvements include the addition of turn lanes, traffic signalization, and the widening of Ethanac Road, which would not impact multimodal access or conflicts between modes.

The City of Menifee *LOS Traffic Study Guidelines* (October 2020) includes the following safety criteria in the “Safety and Operational Improvements” section and the “Special Uses” section of the guidelines:

“The TS (Traffic Study) shall examine existing roadway conditions to determine if safety and operational improvements are necessary due to an increase in traffic from the project or cumulative projects.”

“In addition to the standard TS requirements, projects which are “truck intensive” (distribution centers, warehousing, etc.) may be required to submit a study addressing the truck access routes, adequacy of the existing streets to be used (in terms of geometry and structural section), safety issues relating to the truck traffic, and the impacts of the truck traffic on existing residences or businesses.”

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As noted earlier, the recommended improvements noted in the Project Traffic Study would improve safety conditions in the study area, including the City of Perris study intersections. The recommended improvements include the addition of turn lanes, traffic signalization, and the widening of Ethanac Road, which would reduce queue lengths and provide adequate sight distance along Ethanac Road and adjacent intersections. It should be noted that the recommended improvement at the intersection of Encanto Drive at Ethanac Road would restrict left turns out of the minor street approach (Encanto Drive), which improves overall safety by reducing the amount of conflict points at this intersection. It should be noted that the Project itself is designed to provide adequate sight distance at the project driveways, as well as to insure free-flowing and safe circulation on site, including no sharp turns for trucks.

Based on the aforementioned information, the Draft EIR and its technical appendices fully analyzed, disclosed, and provided mitigation for all project related impacts as well as cumulative impacts, including traffic, safety, air quality, noise, and greenhouse gas emissions impacts.

c. Perris' November 13 letter commented that as the traffic study analyzes City of Perris intersections, the City of Perris significance criteria thresholds should also be included and used to evaluate impacts at City of Perris intersections. *Menifee Response F4 asserted that, based on a review of Perris' significance criteria and applicable intersections located within the City of Perris, the Project's recommended improvements included in the Traffic Study would cause the intersections to operate at an acceptable Level of Service ("LOS").*

However, Perris noted in its December 13 letter that Response F4 references outdated City of Perris LOS standards for the Proposed

c. The Project Traffic Study included an analysis of both City of Menifee intersections as well as intersections within the City of Perris. Because the Project is located within the City of Menifee, standards developed by the City of Menifee were utilized to analyze impacts. This is common practice in CEQA documents throughout California so that all roadway segments and intersection improvements are analyzed similarly and against the same baseline. Utilizing this methodology does not invalidate the Traffic Study nor does it make the traffic analysis flawed. The existing Traffic Study prepared for the Project was prepared by credible technical experts using standards recognized in the industry and was provided as part of the CEQA process as substantial evidence that the Project would not create Level of Service effects

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Project. The most current version of Perris' LOS standards, which are the appropriate standards of review, could cause changes to the results of the analyses. The City of Perris intersections should be reviewed using the most current Perris LOS standards. Because Menifee failed to utilize Perris' current LOS standards, the traffic analysis is flawed, not credible and therefore does not constitute substantial evidence.

with the addition of recommended improvement as noted in the Project Traffic Study.

Although LOS analysis is not considered a significant impact under CEQA, the following response is provided for informational and disclosure purposes and utilizes the most current Perris LOS standards. Based on the *City of Perris LOS Standards and Traffic Criteria for Traffic Studies* (not dated), below are the current City of Perris LOS standards and criteria:

Level of Service Standards

The City of Perris has established the following standards regarding minimum acceptable level of service (LOS):

- LOS "D" along all City maintained roads (including intersections) and LOS "D" along I-215 and SR-74 (including intersections with local streets and roads). An exception to the local road standard is LOS "E", at intersections of any Arterials and Expressways with SR-74, the Ramona-Cajalco Expressway, or at I-215 freeway ramps.
- LOS "E" may be allowed within the boundaries of the Downtown Specific Plan Area to the extent that it would support transit-oriented development and walkable communities. Increased congestion in this area will facilitate an increase in transit ridership and encourage development of a complementary mix of land uses within a comfortable walking distance from light rail stations.

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Thresholds of a Traffic Impact

The City of Perris standards also provide that a project would be considered to have a project-related effect based on the following criteria:

- A project-related traffic effect is considered direct when a study intersection operates at an acceptable Level of Service for existing conditions (without the project) and the addition of 50 or more AM or PM peak hour project trips causes the intersection delay to increase by 2 seconds or more and causes the intersection to operate at an unacceptable Level of Service for existing plus project conditions.
- A project-related traffic effect is considered direct when a study intersection operates at an unacceptable Level of Service for existing conditions (without the project) and the addition of 50 or more AM or PM peak hour project trips causes the intersection delay to increase by 2 seconds or more.
- A cumulative effect is considered direct when a study intersection is forecast to operate at an acceptable Level of Service without the project and with the addition of 50 or more AM or PM peak hour project trips causes the intersection delay to increase by 2 seconds or more and causes the intersection to operate at an unacceptable Level of Service.
- A cumulative effect is considered an indirect traffic effect when a study intersection is forecast to operate at an unacceptable Level of Service with the addition of cumulative/background traffic and the

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project contributes 50 or more AM or PM peak hour project trips and causes the intersection delay to increase by 2 seconds or more.

Based on review and comparison of the City of Perris significance criteria and applicable intersections located within or adjacent to the City of Perris, the recommended improvements noted in the Project Traffic Study at deficient study intersections and roadway segments would cause the study locations to operate at an acceptable Level of Service (LOS), would more than offset the project-related additional delay to such intersections, and would address the City of Perris significance criteria. As such, the conclusions of the LOS analysis using both City of Perris standards and City of Menifee standards would result in similar conclusions, although the methodology is somewhat different. Recommended improvements would remain the same using both methodologies. Therefore, the Traffic Study prepared for the Project fully and adequately disclosed all improvements needed to both City of Menifee and City of Perris intersections.

- d. Project Trip Generation: Perris' November 13 comment letter recommended that the traffic study utilize the latest ITE and SCAQMD editions when analyzing passenger car and truck splits for project trip generations, rather than the outdated City of Fontana Truck Trip Generation Study utilized by the Traffic Study. This would impact the level of service at study area intersections, especially during the AM peak hour.

Menifee Response F7 stated that difference in the Proposed Project's trip generation may be considered nominal when analyzed under the latest ITE and SCAQMD editions, rather than the outdated City of Fontana Truck Trip Generation Study utilized by the Traffic Study. However, Perris noted in its December 13 letter that Menifee should show the project trip

- d. The City of Fontana Truck Trip Generation Study is not considered outdated in the industry, and is widely accepted and used by many cities in the Inland Empire, including as noted in the City of Menifee *LOS Traffic Study Guidelines* (October 2020), as a method for obtaining truck trips and truck splits. The truck mix in the Fontana Truck Trip Generation Study is comparable to the SCAQMD truck mix recommendations. Also, as noted in the Project Traffic Study, the passenger car/truck splits are based on the ITE Trip Generation Manual (10th Edition Supplement), which is comparable to the passenger car/truck splits in the ITE Trip Generation Manual (11th Edition), as requested by the City of Perris. Nevertheless, in order to address this comment, as suggested by the City of Perris, the passenger car/truck split and truck mix for the proposed project have

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generation calculation based on ITE 11th Edition/SCAQMD, and compares these two different volume forecasts to determine if different results may occur using the more recent truck percentage information. Because Menifee failed to utilize the most current information available, again, the traffic analysis is flawed, not credible and therefore does not constitute substantial evidence

been reviewed based on the ITE Trip Generation Manual (11th Edition) for the passenger car/truck splits and the SCAQMD Warehouse Truck Trip Study Data Results and Usage (dated July 17, 2014) for the truck mix (i.e. 2-axle, 3-axle, 4+axle trucks) . A copy of the noted resources is provided in *Attachment A* (Passenger Car/Truck Splits and Truck Mix Information) to this response matrix.

The passenger car equivalent (PCE) factors as noted in the Traffic Study were also applied to these trip generation estimates. Based on the methodology noted above, the project is estimated to generate approximately 2,466 daily PCE trips, with 209 PCE trips (169 inbound and 40 outbound) in the morning peak hour and 201 PCE trips (78 inbound and 123 outbound) in the evening peak hour. The trip generation rates, PCE factors, and the resulting trip generation estimates for the project are summarized in *Attachment A*.

Compared to the trip estimates in the approved Traffic Study, the trip estimates based on the SCAQMD methodology (inclusive of ITE 11th Edition for the passenger car/truck splits) is estimated to generate 158 additional daily PCE trips, with 16 additional PCE trips in the morning peak hour and 3 fewer PCE trips in the evening peak hour.

A supplemental traffic analysis was conducted with the proposed project trip generation based on the SCAQMD methodology at study locations entirely or a majority within the City of Perris. A summary table of the LOS results are provided in *Attachment B* to this response matrix. Based on review of the tables, with proposed project trip generation estimated based on the SCAQMD methodology and the recommended improvements noted in the Project Traffic Study, the study locations entirely or a majority within the City of Perris would operate at an acceptable Level of

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Service. Therefore, the recommended improvements would remain the same.

Additionally, the air quality emissions associated with the suggested passenger car/truck split and truck mix percentage (ITE 155 trip rates, ITE 11th Edition passenger car/truck split and the SCAQMD truck mix percentages) have been modeled for informational purposes. The table below shows that air quality emissions would not exceed the SCAQMD's thresholds with the Draft EIR mitigation applied. Therefore, the use of ITE 11th Edition passenger car/truck splits and SCAQMD truck mix percentages would not change the significance determinations in the Draft EIR, would not require new or modified mitigation measures, and would not trigger the need to recirculate the EIR.

SCAQMD Truck Mix Scenario – Mitigated Operational Emissions						
Source	Maximum Pounds Per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area Source Emissions	35.48	0.42	49.52	0.00	0.07	0.09
Energy Emissions ¹	0.15	2.69	2.26	0.02	0.20	0.20
Mobile – Trucks	0.34	23.28	5.23	0.19	5.93	1.84
Mobile – Passenger Cars	3.71	2.99	71.03	0.21	23.82	6.07
Off-Road – Yard Truck ²	0.00	0.00	0.00	0.00	0.00	0.00
Back-up Generators	0.90	2.51	2.29	0.00	0.13	0.13
Total Emissions	40.58	31.89	130.33	0.42	30.15	8.33
<i>SCAQMD Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Exceeds Threshold?	No	No	No	No	No	No
ROG = Reactive Organic Gases; NO _x = Nitrogen Oxides; CO = Carbon Monoxide; SO ₂ = Sulfur Dioxide; PM ₁₀ = Particulate Matter 10 microns in diameter or less; PM _{2.5} = Particulate Matter 2.5 microns in diameter or less Notes: 1. MM GHG-8 limits Project natural gas consumption to less than 10 million kBtu/year. 2. Per MM AQ-3, operational cargo handling equipment would be zero emission. Source: CalEEMod version 2022.1. Refer to Appendix A for model outputs.						

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The Draft EIR determined that health risk impacts would be less than significant (see Draft EIR pages 4.2-34 and 4.2-35). Additionally, the Draft EIR requires zero emission cargo handling equipment (MM AQ-3), which would further reduce health risk impacts. As described above, the trip generation suggested in the comment would result in more passenger car trips, but fewer truck trips than what was analyzed in the Draft EIR. The Draft EIR assumed 526 daily truck trips (1,947 total vehicle trips), while the methodology suggested in the comment would result in 261 daily truck trips (2,061 total vehicle trips), which is a truck trip reduction of approximately 50 percent. The reduction of daily truck trips would reduce health risk impacts from what is included in the Draft EIR. Therefore, the Draft EIR shows a worst-case health risk scenario and the conclusions in the Draft EIR would not change.

The Draft EIR determined that GHG emissions would be significant and unavoidable despite the implementation of numerous mitigation measures. As described above, the use of ITE 11th Edition passenger car/truck splits and SCAQMD truck mix percentages would reduce truck trips and increase passenger trips from what was analyzed in the Draft EIR. Based on the modeling prepared for informational purposes using ITE 155 trip rates (11th Edition) ITE 11th Edition passenger car/truck splits and SCAQMD truck mix percentages, mobile source GHG emissions would decrease by approximately 432 MTCO_{2e} per year. Therefore, the Draft EIR shows a worst-case health risk scenario and additional GHG impacts would not occur and the conclusions in the Draft EIR would not change.

The SCAQMD truck mix percentage assumption (with ITE 11th Edition passenger car/truck splits) would also affect traffic noise modeling in the Draft EIR. The Draft EIR determined that Project traffic noise impacts would be less than significant and noise levels would be below the City of Menifee's 70 dBA Normally Acceptable noise standard (see Draft EIR pages 4.11-18 and

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<p>e. <i>Additionally, the City of Menifee also stated that they had submitted a scoping agreement to the City of Perris for review on January 13, 2023. Even if Perris did not initially respond with comments on the scoping agreement, there is no evidence that Menifee followed up with Perris even once to seek Perris' input.</i></p>	<p>4.11-19). As described above, the use of ITE 11th Edition passenger car/truck splits and SCAQMD truck mix percentages would reduce truck trips and increase passenger trips from what was analyzed in the Draft EIR. The decrease in truck trips (due to the use of the ITE 11th Edition passenger car/truck splits and SCAQMD truck mix percentages) would offset the increase in car trips because trucks generate more noise than cars¹. Therefore, the Draft EIR shows a worst-case traffic noise scenario and additional noise impacts would not occur and the conclusions in the Draft EIR would not change.</p> <p>As described above, the use of ITE 11th Edition passenger car/truck splits and SCAQMD truck mix percentages would not change the significance determinations in the Draft EIR and would not require new or modified mitigation measures.</p> <p>e. As previously stated, the Traffic Scoping Agreement with trip generation assumptions as noted in Table 3 of the Traffic Study for the proposed Project was sent to the City of Perris for review and input on January 13, 2023. Planning Manager Patricia Brenes acknowledged receipt of the Traffic Scoping Agreement on January 13, 2023 .(see <i>Attachment D</i>) However, besides acknowledging receipt of the Traffic Scoping Agreement, the City of Perris did not provide comments on the Traffic Scoping Agreement. Because no comments were provided by the City of Perris, the City of Menifee elected to proceed with the Traffic Study for the Project based on the assumptions in the Traffic Scoping Agreement. The City of Perris asserts that the City of Menifee should have followed up with the City of Perris to confirm that they did not have any comments on the</p>

¹ American Association of State Highway and Transportation Officials (AASHTO), *Traffic Noise and Transportation*, 2023. Available at: <http://environment.transportation.org/education/environmental-topics/traffic-noise/traffic-noise-overview/>

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f. Summary of Intersection Operations: As noted in the Perris November 13 letter, the Project directly impacts intersection #7 (Encanto Drive at Ethanac Road) and intersection #9 (Sherman Road at Ethanac Road) in the City of Perris. A direct impact implies that the project shall be 100% responsible that all necessary improvements are installed to mitigate these impacts (or via some other defined improvement program) prior to project occupancy. *However, Menifee Response F8 notes that both Intersections #7 and #9 were considered to have a cumulative effect, as opposed to a direct project effect. Any improvements to portions of intersections shared with the City of Perris would be coordinated between the City of Menifee and City of Perris prior to final engineering for the Project.*

The Perris December 13 letter noted that in determining the cumulative impact of the two intersections, the Traffic Study's use of overall intersection delay for an unsignalized intersection is not appropriate and against traffic engineering practices. Perris again asserts that the Project directly impacts the intersections, and a direct impact implies that the project shall be 100% responsible that all necessary improvements are installed to mitigate these impacts (or via some other defined improvement program) prior to project occupancy.

Traffic Scoping Agreement. Similar to the City of Perris, City of Menifee staff constantly coordinate with dozens of other agencies on a daily basis, and as such, once the initial request for comments on the Traffic Scoping Agreement was sent, the City of Menifee expects that the City of Perris would provide any comments they may have. Nevertheless, the City of Perris' comment does not raise any substantial evidence of any new or more severe environmental impacts.

f. Based on the Project Traffic Study and the City of Menifee significance criteria, the Project-related effect at intersection #7 (Encanto Drive at Ethanac Road) and intersection #9 (Sherman Road at Ethanac Road) is considered a cumulative effect.

Based on the City of Perris significance criteria, a direct effect would occur when "a study intersection operates at an unacceptable Level of Service for existing conditions (without the project) and the addition of 50 or more AM or PM peak hour project trips causes the intersection delay to increase by 2 seconds or more."

The reported delay value (the value noted on the LOS Summary tables in the Traffic Study) for unsignalized intersections is based on the single approach movement with the highest delay, which in this case would be the northbound left-turn movement for both intersections #7 and #9 as the northbound left-turning vehicles have to wait for an acceptable gap in traffic on Ethanac Road. Reference to the overall intersection delay was to note that while the side street approaches operate at a deficient Level of Service based on the highest delay approach, the overall intersection delay would be acceptable. Any queuing that occurs on the side streets are contained on the minor intersection approaches and do not impact the progression of traffic on the main arterials.

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Furthermore, these impacts to intersections create potential traffic safety issues associated with the interface between vehicles and trucks. As such, this should have been identified as a potentially significant traffic safety impact for which mitigation was required.

Based on the City of Perris significance criteria, the information noted above regarding delay for unsignalized intersections, and review of the analysis worksheets for intersections #7 and #9 under Existing and Existing Plus Project conditions, as provided in the appendices to the Project Traffic Study, only intersection #9 (Sherman Road at Ethanac Road) would cause a direct project-related effect based on the City of Perris significance criteria as the overall intersection delay would increase by more than 2 seconds with the addition of project traffic. However, as noted previously, the single-approach movement with the highest delay that causes intersection #9 to operate at an unacceptable Level of Service under Existing Conditions is the northbound left-turn movement, which is located entirely within the City of Menifee. As such, the City of Menifee significance criteria should be applied to intersection #9. Therefore, the Project-related effect at intersection #9 is considered a cumulative effect.

Intersection #7 (Encanto Drive at Ethanac Road) would be considered a cumulative effect based on the City of Perris significance criteria as the overall intersection delay would not increase by 2 or more seconds with the addition of project traffic under Existing Plus Project conditions.

With regards to construction of recommended improvements at intersections #7 and #9 (as noted in the Project Traffic Study), the City of Menifee typically conditions a project to construct the recommended improvements noted in a traffic study. However, in the case that another development project, whether in the City of Menifee or the City of Perris, is constructed first and also constructs the same off-site traffic improvements noted in the original project's traffic study, the development projects' developers can enter into an agreement based on fair-share towards the construction of the off-site improvements.

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g. Summary of Intersection Operation Opening Year 2025 Cumulative Plus Project: Perris' November 13 comment letter noted that the Traffic Study indicates that several intersections in the vicinity of the City of Perris, including intersections #5, #6, #7, #8 and #9, are not meeting level service standards and indicates that the project has a cumulative impact at these locations. The study further indicated what improvements are needed at those intersections and an accompanying project fair-share cost percentage. However, it is unclear how these improvements would be implemented and who would be responsible for providing the required improvements. Additional detail is needed on the funding mechanisms that will be utilized to make these required improvements.

Menifee Response F10 stated that the implementation of improvements is based on direct discussion between City staff and the Applicant via the Conditions of Approval process. Further, the project is conditioned on traffic-related improvement requirements, including those related to the intersections, prior to Certificate of Occupancy. Further, the response states that any improvements to portions of intersections or roadways shared with the City of Perris would be coordinated between the City of Menifee and City of Perris prior to final engineering for the Project.

However, the Perris December 13 letter re-iterated that the Project Traffic Study must show how these improvements will improve delays at the City of Perris previously identified intersections, which Menifee

See Response to Comment 2b regarding evaluation of safety impacts. The proposed project would not create significant traffic safety impacts and the recommended improvements in the Project Traffic Study would help improve traffic safety, as noted in Response to Comment 2b.

g. The Traffic Study fully analyzed impacts to all study intersections, whether they are located within the City of Menifee, City of Perris, or a combination of both. All required improvements located within the City of Menifee would be coordinated and approved by the City of Menifee. Similarly, any improvements located within the City of Perris would be coordinated and approved directly with the City of Perris staff. For those intersections in both Menifee and Perris, coordination and approval of improvements would be obtained by both agencies. The funding mechanism for the recommended improvements for intersections within the jurisdiction in the City of Perris would be fair-share payments to be coordinated with the City of Menifee and the City of Perris.

Improvements in delay with the recommended improvements at study intersections are provided in Table 11 "Summary of Intersection Operation – Recommended Improvements" of the Project Traffic Study. The recommended improvements noted in the MBC Traffic Study at deficient study intersections and roadway segments would cause the study locations to operate at an acceptable Level of Service (LOS), would more than offset the project-related effect, and would address the City of Perris significance criteria (see Response to Comment 2c.).

See Response to Comment 2f regarding improvements to intersections #7 and #9.

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Response F10 does not address. Further, the Project shall be 100% responsible for all necessary improvements to mitigate the impacts at any directly impacted study intersections, such as intersections #7 and #9 as discussed in further detail above.

h. In summary, the purpose of an environmental impact report is to disclose to the public and decision makers the significant environmental impacts of a Project and mitigation measures and alternatives to the project that would avoid or substantially lessen those impacts. Unfortunately, the traffic analysis in this EIR fails as a disclosure document for the reasons set forth above. Therefore, the traffic analysis should be revised in light of Perris' comments and recirculated for public review.

h. The Draft EIR prepared for the proposed Project fully discloses to the public and decision makers all environmental impacts, as required by CEQA. The Draft EIR provides mitigation measures and alternatives that avoid and/or reduce impacts, as noted throughout the Draft EIR. As previously discussed, the Traffic Study, attached to the Draft EIR as Appendix K, fully discloses all impacts of the Project and recommended improvements needed for both Vehicle Miles Travelled and Level of Service. Based on the City of Perris's concerns, as noted above, additional Level of Service analysis was conducted using City of Perris standards (refer to *Attachment B*). Based on review of the tables, with proposed project trip generation estimated based on the SCAQMD methodology and the recommended improvements noted in the Project Traffic Study, the study intersections within or adjacent to the City of Perris would operate at an acceptable Level of Service. Therefore, the recommended improvements would remain the same.

As noted earlier, automobile delay no longer is considered an environmental impact. A VMT Study was prepared for the proposed project, which noted that the proposed project would cause a less-than-significant VMT/transportation impact. Therefore, no mitigation measures are required for the proposed project. With regards to traffic safety impacts, the proposed project would not create significant traffic safety impacts and the recommended improvements in the MBC Traffic Study would help improve traffic safety, as noted in Response to Comment 2b.

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The Traffic Study prepared for the Project fully meets the requirements of CEQA and the City guidelines for traffic studies. The Traffic Study does not need to be revised based on the aforementioned information. The City of Perris's comments have been fully addressed within this Response Matrix and with the additional information provided in Attachments A through D of this document. As previously stated, even utilizing the City of Perris's Level of Service methodology, the improvements needed to both Perris facilities and Menifee facilities would remain the same. As such, the Traffic Study included as Appendix K to the Draft EIR is fully sufficient as a disclosure document.

Pursuant to CEQA Guidelines Section 15088.5, a Lead Agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. None of the information provided by the City of Perris identify a new significant environmental impact, a substantial increase in the severity of an environmental impact for which mitigation is not proposed, or a new feasible alternative or mitigation measure that would clearly lessen significant environmental impacts but is not adopted. As such, recirculation is not warranted.

3. Insufficient Analysis of Air Quality Impacts:

- a. In its correspondent dated November 9, 2023 the South Coast Air Quality Management District identifies numerous deficiencies in the EIR's air quality analysis including inconsistent use of trip generation rates and vehicle fleet mix between the air quality studies and the traffic studies. Perris echoes these concerns. In its responses to the Air District's comments, Menifee explains away the discrepancies claiming they were done in order to ensure a conservative "worst case" analysis

3.

- a. The comment incorrectly states that the SCAQMD found numerous deficiencies in the Draft EIR's air quality analysis. The SCAQMD incorrectly identified a discrepancy between the truck trips reported on page 19 of the Air Quality Assessment. As described in the Final EIR, Air Quality assessment page 19 correctly notes that 526 truck trips were modeled, which is consistent with the number of truck trips modeled and shown in the CalEEMod outputs. The Draft EIR and supporting Air Quality Assessment do not use 562 trips, as

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for both traffic and air quality impacts. However, relegating this explanation to a footnote does not engender great confidence in the rationale for utilizing different assumptions for the traffic study and air quality studies.

suggested by the SCAQMD comment. The Final EIR responses explained that a conservative truck percentage and trip generation rate was used so that emissions would not be underestimated. Additionally, implementation of the SCAQMD suggested mitigation measures were not required because the Draft EIR did not identify a significant impact; therefore, no mitigation is required for the Project. Furthermore, the Final EIR explains that many of the suggested mitigation measures are already required by existing regulation, including the City of Menifee building code and the City's Good Neighbor Policies.

As discussed in the Draft EIR and the Final EIR, different trip generation rates were intentionally selected for the Air Quality Assessment and the Traffic Study to conservatively capture a worst-case scenario for each study. Truck emissions are a greater contributor to air quality emissions than passenger cars. Therefore, the Air Quality Assessment used a trip generation with a higher number of daily truck trips, while the Traffic Study used a trip generation with a higher number of total daily vehicles.

The comment expresses an opinion about explaining the discrepancy in a footnote. However, the Traffic Study (Draft EIR Appendix K) clearly explains the trip generation used (see page 17 and Table 3 of the Traffic Study). The Air Quality Assessment (Draft EIR Appendix B) methodology discussion clearly explains the trip generation rate that was modeled for the project emissions analysis (see page 19 in the Air Quality Assessment). Furthermore, footnote 4 (page 19) of the Air Quality Assessment mobile source emissions methodology discussion clearly explains the trip generation difference and also explains this approach was intentionally selected to provide a conservative, worst-case, analysis. As described above, the use of the suggested trip generation and SCAQMD truck trips would not change the significance determinations in the Draft EIR and would not require new or modified mitigation measures.

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4. Inadequate Alternatives Analysis:

- a. An EIR is required to describe a range of reasonable alternatives to the project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. (CEQA Guidelines, section 15126.6(a)) The EIR identified significant an unavoidable impacts related Air Quality and GHG according to the discussion of Alternatives 2 and 3. However, the Table ES-1 states that all Air Quality Impacts are less than significant. Be that as it may, in addition to the required “No Project” alternative, the EIR contains only two other alternatives, Alternative 2 – the Reduced Building Alternative (15 Percent Reduction) and Alternative 3 – Building Square Footage Reduction with Additional Trailer Parking.

The analysis of Alternative 2 states that it would lessen the Air Quality and GHG impacts but not to levels of less than significant. However, there is no discussion that this alternative “substantially lessens” either the Air Quality or the GHG significant impacts. Furthermore, the analysis then utilizes a standard different that that set forth in CEQA Guidelines, section 15126.6 regarding meeting project objectives. The standard is “feasibly attain most of the basic objectives of the project.” However, the analysis states Alternative 2 does not maximize the City’s benefits realized or achievement of the Project Objectives when compared to the proposed Project. This is not the standard for determining the adequacy of an alternative and represents procedural error.

The analysis of Alternative 3 suffers from the same defects as the analysis of Alternative 2.

The EIR is required to contains alternatives that “avoid or substantially lessen” a project’s significant impacts. The EIR fails in this regard and

4.

- a. The reference to significant and unavoidable air quality impacts within Chapter 6, *Alternatives*, was in error. As identified in in Table ES-1 of the Executive Summary Chapter of the Draft EIR, as well as Chapter 4.7, the Project has one significant and unavoidable impact, as noted below, and does not have any significant and unavoidable air quality impacts:

- i. Greenhouse Gas Emissions

- a. Despite consistency with the City’s General Plan, California Air Resources Board’s 2022 Scoping Plan, and Southern California Association of Government’s Connect SoCal, incorporation of all feasible mitigation measures and compliance with all applicable local, state, or federal regulations or laws, the Project’s operational mitigated mobile source emissions would continue to exceed the SCAQMD MTCO_{2e} threshold.

Further, while there was a minor typographical error in the alternatives chapter, this does not warrant recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5, as this error does not identify a new significant environmental impact, a substantial increase in the severity of an environmental impact for which mitigation is not proposed, or a new feasible alternative or mitigation measure that would clearly lessen significant environmental impacts but is not adopted. In addition, the changes do not reflect a fundamentally flawed or conclusory DEIR.

Additionally, the alternatives analyzed in the Draft EIR were chosen to avoid and/or reduce the proposed Project’s impacts. Both Alternative 2 and Alternative 3 reduce many impacts when compared to the Project (refer to Table 6-3 in Chapter 6, *Alternatives*, of the EIR). Neither the Public Resources

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also fails to explain why it is unable to provide such alternatives. The alternatives analysis is also defective as it fails to consider alternatives that would avoid or substantially lessen the other significant impacts of the project, without mitigation, as required by CEQA. As such, the alternatives analysis fails to comply with CEQA.

Code nor the State CEQA Guidelines require a specific number of alternatives be evaluated, rather only those alternatives necessary to foster informed decision-making. As defined in CEQA Guidelines Section 15126.6(f), the rule of reason limits alternatives analyzed to those that would avoid or substantially lessen one or more of the significant effects of a project. Of those alternatives, an EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. As such, the alternatives analysis contained within the Draft EIR fully comply with CEQA.

Pursuant to PRC 21100 and in accordance with the guidance in CEQA Guidelines §15126.6, the City conducted an alternatives analysis that includes a range of reasonable alternatives that would feasibly attain most of the basic objectives of the Project consistent with CEQA §15124(b), while avoiding or lessening impacts. See DEIR Section 6 for a discussion of alternatives considered.

Alternative 2 would likely reduce emissions impacts through a reduction in energy use in a smaller space. However, the energy usage rate of the Project site would remain similar. Even with a reduction in energy use emissions, the mobile source emissions associated with vehicular travel would not be largely reduced. Therefore, Alternative 2 would likely remain in excess of the City's GHG emissions thresholds. This is considered a conservative determination because GHG emissions were not modeled for the alternatives analysis. CEQA Guidelines Section 15126.6(d) states that alternatives do not need to be described or analyzed at the same level of detail as the Project, and as such, modeling for the alternatives was not conducted. Therefore, the assumption that Alternative 2 would likely remain in excess of the City's thresholds is conservative. The impact would be expected to remain a significant and unavoidable impact.

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Alternative 2 would meet all of the Project Objectives. However, Alternative 2 does not maximize the City's benefits realized or achievement of the Project Objectives when compared to the proposed Project due to the reduced building square footage (200,000 SF) of interior mezzanine.

Alternative 3 would result in less intensive impacts concerning air quality, energy, greenhouse gas emissions, noise, and transportation impacts than the proposed Project due to shorter construction timeline and a smaller building footprint. Additionally, Alternative 3 would meet all of the Project Objectives. However, Alternative 3 does not maximize the City's benefits realized or achievement of the Project Objectives when compared to the proposed Project due to the 38.5 percent reduction in building size (700,000 SF remaining) with the excess land for trailer/auto parking lot consisting of 616 automobile parking stalls and 684 trailer parking stalls. Specifically, Alternative 3 would not generate as many job opportunities within the City when compared to the proposed Project. It would also not maximize the development potential of the Project site as the building footprint would be smaller.

Additionally, pursuant to CEQA Guidelines Section 15126.6(d), alternatives do not need to be described or analyzed at the same level of detail as the Project. Sufficient detail and analysis have been provided in Chapter 6, *Alternatives*, of the Draft EIR, such that the Lead Agency can differentiate the impacts between the alternatives to select the Environmentally Preferred Alternative.

ATTACHMENT A

PASSENGER CAR/TRUCK SPLITS AND
TRUCK MIX INFORMATION

ITE Truck Trip Generation

Land Use	Truck Percentage		
	AM	PM	Daily
ITE 110 - General Light Industrial ¹	1.4%	1.5%	5.1%
ITE 140 - Manufacturing ¹	4.4%	4.1%	9.5%
ITE 150 - Warehouse ¹	11.8%	16.7%	35.1%
ITE 154 - High-Cube Transload and Short Term ¹	25.0%	10.0%	15.7%
ITE 155 - High-Cube Fulfillment Center ¹	13.3%	6.3%	12.7%
ITE 156 - High-Cube Parcel Hub ¹	12.9%	9.4%	12.5%
ITE 157 - High-Cube Cold Storage ¹	27.3%	25.0%	35.4%

¹ ITE Trip Generation Manual, 11th Edition, 2021.

SCAQMD Warehouse Truck Study Truck Fleet Mix

Grouping	All Trucks	Actual %		
		2-Axle	3-Axle	4+ Axle
SCAQMD Composite	31.0%	6.8%	5.5%	18.7%
With Cold Storage	44.7%	15.5%	4.9%	24.3%
Without Cold Storage	27.5%	4.6%	5.7%	17.2%
Fontana Study	20.4%	3.5%	4.6%	12.3%

Grouping	All Trucks	Normalized %		
		2-Axle	3-Axle	4+ Axle
SCAQMD Composite	31.0%	21.9%	17.7%	60.3%
With Cold Storage	44.7%	34.7%	11.0%	54.4%
Without Cold Storage	27.5%	16.7%	20.7%	62.5%
Fontana Study	20.4%	17.2%	22.5%	60.3%

TABLE A
SUMMARY OF PROJECT TRIP GENERATION - BASED ON SCAQMD METHODOLOGY
MOTTE BUSINESS CENTER PROJECT

TRIP GENERATION RATES ¹

ITE Land Use	ITE Code	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
High-Cube Fulfillment Center Warehouse - Non-Sort	155	KSF	1,810	0.122	0.029	0.150	0.062	0.098	0.160
Passenger Vehicles (87.3% Daily, 86.7% AM, 93.7% PM)			1,580	0.106	0.025	0.131	0.058	0.092	0.150
Trucks (12.7% Daily, 13.3% AM, 6.3% PM)			0.230	0.016	0.004	0.020	0.004	0.006	0.010

PROJECT TRIP GENERATION

Project Land Use	Quantity	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
High-Cube Fulfillment Center Warehouse - Non-Sort	1,138,638	KSF	2,061	139	33	172	71	112	183
Passenger Vehicles			1,800	121	29	150	67	105	172
Trucks			261	18	4	22	4	7	11

PROJECT TRIPS - PASSENGER CAR EQUIVALENTS (PCE)

Vehicle Type	Truck Mix ²	Daily Vehicles	PCE Factor	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
Passenger Vehicles	--	1,800	1.0	1,800	121	29	150	67	105	172
2-Axle Trucks	16.7%	44	1.5	66	5	1	6	1	2	3
3-Axle Trucks	20.7%	54	2.0	108	8	2	10	2	3	5
4+ Axle Trucks	62.6%	164	3.0	492	35	8	43	8	13	21
Total Truck PCE Trips				666	48	11	59	11	18	29
Total Project PCE Trips				2,466	169	40	209	78	123	201
Total Project PCE Trips from Approved MBC Traffic Study				2,308	156	37	193	79	125	204
Net Trip Difference (SCAQMD Trips - Approved Trips)				158	13	3	16	-1	-2	-3

¹ Source: Institute of Transportation Engineers (ITE) [Trip Generation Manual](#), 11th Edition

² Truck mix percentages based on the SCAQMD Warehouse Truck Study Truck Fleet Mix for "Without Cold Storage" Warehouse.

PCE = Passenger Car Equivalent

KSF = Thousand Square Feet

ATTACHMENT B

**INTERSECTION AND ROADWAY
LEVEL OF SERVICE RESULTS**

TABLE 1
SUMMARY OF INTERSECTION OPERATION
EXISTING CONDITIONS

Int. #	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
7	Encanto Drive at Ethanac Road	U	38.3	E	41.8	E
8	Trumble Road at Ethanac Road	S	22.5	C	21.0	C

Notes:

- Bold values indicate intersections operating at an unacceptable Level of Service
- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

S = Signalized
U = Unsignalized

TABLE 4
SUMMARY OF INTERSECTION OPERATION
EXISTING PLUS PROJECT

Int. #	Intersection	Traffic Control	AM Peak Hour						PM Peak Hour					
			Without Project		With Project		Change in Delay	Project-Related Effect?	Without Project		With Project		Change in Delay	Project-Related Effect?
			Delay	LOS	Delay	LOS			Delay	LOS	Delay	LOS		
7	Encanto Drive at Ethanac Road	U	38.3	E	51.0	F	12.7	Yes	41.8	E	55.7	F	13.9	Yes
8	Trumble Road at Ethanac Road	S	22.5	C	21.9	C	-0.6	No	21.0	C	20.2	C	-0.8	No

Notes:

- Bold values indicate intersections operating at an unacceptable Level of Service
- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

S = Signalized
U = Unsignalized

TABLE 7
SUMMARY OF INTERSECTION OPERATION
OPENING YEAR 2025 CUMULATIVE

Int. #	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
7	Encanto Drive at Ethanac Road	U	>180	F	>180	F
8	Trumble Road at Ethanac Road	S	101.3	F	124.8	F

Notes:

- Bold values indicate intersections operating at an unacceptable Level of Service
- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

S = Signalized
U = Unsignalized

TABLE 9
SUMMARY OF INTERSECTION OPERATION
OPENING YEAR 2025 CUMULATIVE PLUS PROJECT

Int. #	Intersection	Traffic Control	AM Peak Hour						PM Peak Hour					
			Without Project		With Project		Change in Delay	Project-Related Effect?	Without Project		With Project		Change in Delay	Project-Related Effect?
			Delay	LOS	Delay	LOS			Delay	LOS	Delay	LOS		
7	Encanto Drive at Ethanac Road	U	>180	F	>180	F	-	Yes	>180	F	>180	F	-	Yes
8	Trumble Road at Ethanac Road	S	101.3	F	126.8	F	25.5	Yes	124.8	F	152.8	F	28.0	Yes

Notes:

- Bold values indicate intersections operating at an unacceptable Level of Service
- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

S = Signalized
U = Unsignalized

TABLE 11
SUMMARY OF INTERSECTION OPERATION
RECOMMENDED IMPROVEMENTS

Int. #	Intersection	Improvements	Peak Hour	Proposed Traffic Control	OPENING YEAR 2025 CUMULATIVE PLUS PROJECT					
					Without Project		With Project		With Improvements	
					Delay	LOS	Delay	LOS	Delay	LOS
7	Encanto Drive at Ethanac Road	<ul style="list-style-type: none"> •Add 2nd eastbound through lane •Add 2nd westbound through lane •Modify the northbound shared left-turn/right-lane to a dedicated right-turn lane only 	AM	U	>180	F	>180	F	27.3	D
			PM		>180	F	>180	F	24.9	C
8	Trumble Road at Ethanac Road	<ul style="list-style-type: none"> •Add 2nd eastbound through lane •Add 2nd westbound through lane 	AM	S	101.3	F	126.8	F	32.4	C
			PM		124.8	F	152.8	F	43.8	D

Notes:

- Bold values indicate intersections operating at an unacceptable Level of Service
- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

S = Signalized
U = Unsignalized

TABLE 2
SUMMARY OF ROADWAY SEGMENT ANALYSIS
EXISTING CONDITIONS

Roadway	Segment	Existing Configuration	Existing ADT	LOS E Capacity ¹	V/C	LOS
Ethanac Road	I-215 NB Ramps to Encanto Drive	2-Lane Arterial	15,813	13,000	1.216	F
	Trumble Road to Sherman Road	2-Lane Arterial	12,086	13,000	0.930	E

Notes: ¹ Source: City of Menifee Engineering Department, LOS Traffic Study Guidelines, October 2020
LOS = Level of Service
ADT = Average Daily Traffic
V / C = Volume to Capacity

TABLE 5
SUMMARY OF ROADWAY SEGMENT ANALYSIS
EXISTING PLUS PROJECT

Roadway	Segment	Existing Configuration	Existing ADT	Project ADT	Existing Plus Project ADT	LOS E Capacity ¹	V/C	LOS
Ethanac Road	I-215 NB Ramps to Encanto Drive	2-Lane Arterial	15,813	1,584	17,397	13,000	1.338	F
	Trumble Road to Sherman Road	2-Lane Arterial	12,086	1,584	13,670	13,000	1.052	F

Notes: 1 Source: City of Menifee Engineering Department, LOS Traffic Study Guidelines, October 2020
 ADT = Average Daily Traffic
 V / C = Volume to Capacity
 LOS = Level of Service

TABLE 8
SUMMARY OF ROADWAY SEGMENT ANALYSIS
OPENING YEAR 2025 CUMULATIVE

Roadway	Segment	Existing ADT	Opening Year 2025 Base ADT	Cumulative Projects	Opening Year 2025 Cumulative ADT	LOS E Capacity ¹	V/C	LOS
Ethanac Road	I-215 NB Ramps to Encanto Drive	15,813	16,762	8,620	25,382	13,000	1.952	F
	Trumble Road to Sherman Road	12,086	12,811	6,660	19,471	13,000	1.498	F

Notes: 1 Source: City of Menifee Engineering Department, LOS Traffic Study Guidelines, October 2020
 ADT = Average Daily Traffic
 V / C = Volume to Capacity
 LOS = Level of Service

TABLE 10
SUMMARY OF ROADWAY SEGMENT ANALYSIS
OPENING YEAR 2025 CUMULATIVE PLUS PROJECT

Roadway	Segment	Opening Year 2025 Cumulative ADT	Project ADT	Opening Year 2025 Cumulative Plus Project ADT	LOS E Capacity ¹	V/C	LOS
Ethanac Road	I-215 NB Ramps to Encanto Drive	25,382	1,584	26,966	13,000	2.074	F
	Trumble Road to Sherman Road	19,471	1,584	21,055	13,000	1.620	F

Notes: 1 Source: City of Menifee Engineering Department, LOS Traffic Study Guidelines, October 2020
 ADT = Average Daily Traffic
 V / C = Volume to Capacity
 LOS = Level of Service

TABLE 12
SUMMARY OF ROADWAY SEGMENT ANALYSIS WITH IMPROVEMENTS
OPENING YEAR 2025 CUMULATIVE PLUS PROJECT

Roadway	Segment	Existing Configuration	Recommended Configuration	Opening Year 2025 Cumulative ADT	Project ADT	Opening Year 2025 Plus Project ADT	Recommended LOS & Capacity ¹	V/C	LOS
Ethanac Road	I-215 NB Ramps to Encanto Drive	2-Lane Arterial	4-Lane Arterial	25,382	1,584	26,966	37,000	0.729	C
	Trumble Road to Sherman Road	2-Lane Arterial	4-Lane Arterial	19,471	1,584	21,055	37,000	0.569	A

Notes: ¹ Source: City of Menifee Engineering Department, LOS Traffic Study Guidelines, October 2020
 ADT = Average Daily Traffic
 V / C = Volume to Capacity
 LOS = Level of Service

ATTACHMENT C

CALTRANS NOP RESPONSE LETTER

DEPARTMENT OF TRANSPORTATION

DISTRICT 8

PLANNING

464 WEST 4th STREET, 6th Floor MS 725

SAN BERNARDINO, CA 92401-1400

PHONE (909) 383-4557

FAX (909) 383-6890

TTY (909) 383-6300

*Flex your power!
Be energy efficient!*

December 7, 2022

City of Menifee
Brett Hamilton
29844 Haun Road
Menifee, California 92586

Motte Business Center NOP (PLN22-0114). Riv-215-PM 22.754

Mr. Hamilton,

We have completed our review for the above notification for the project located east of Interstate 215 (I-215) in the City of Menifee south of Ethanac Road, west of Antelope Road and east of Dawson Road. This project calls for the construction of a concrete tilt-up building totaling 1,138,638 square-feet. Site development also includes 610 automobile parking spaces, and 282 truck trailer parking spaces.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act (CEQA), it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the City of Menifee due to the Project's potential impact to State facilities it is also subject to the policies and regulations that govern the SHS.

We do not anticipate a significant amount of traffic to be generated from this site to adversely impact the nearest SHS facilities. We therefore have no comments to offer currently.

However, if this development proposal is later modified in any way, the above comment may become invalid. Please forward copies of revised plans as necessary so that we may reevaluate all proposed changes for possible impact to the nearby State Highways.

When development does occur, any work performed within the SHS will require review and issuance of a Caltrans Encroachment Permit. As part of the encroachment permit process, the developer must provide evidence of City entitlement along with appropriate environmental approval for potential environmental impacts to State Highway R/W. Additional information will be provided in the event encroachment is later determined necessary.

Mr. Hamilton
December 7, 2022
Page 2

If you have any questions regarding this letter, please contact Talvin Dennis at (909) 963-9608 for assistance.

Sincerely,

Rosa F. Clark

ROSA F. CLARK
Office Chief
Land Development Review

ATTACHMENT D

**CITY OF PERRIS TRAFFIC SCOPING
RECEIPT EMAIL**

From: Patricia Brenes <pbrenes@CityofPerris.org>
Sent: Friday, January 13, 2023 6:05 PM
To: Brett Hamilton
Cc: Kenneth Phung; Stuart McKibbin
Subject: RE: Motte Business Center Traffic Scoping

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you Brett! Have a nice weekend.

Please be informed that the Development Services Department is temporarily relocating to the following location:

- Front Counter staff consisting of building, planning, housing, and business license has relocated temporarily to **11 S. D Street** effective Tuesday, September 6th. Please mail and submit plans to the new location.
- The balance of the Planning and Housing staff will be relocating temporarily to **1093 Harley Knox Boulevard**. Due to limited office areas, staff will be available to meet via zoom until further notice by emailing dsplanning@cityofperris.org or the assigned planner. Special arraignment can be made to meet in person by request.

Thank you,

Patricia Brenes
PlanningManager
City of Perris
Development Services Department | Planning Division
101 N. D Street
Perris, CA 92570
951-943-5003 Ext 355
pbrenes@cityofperris.org

Below are helpful links:

Link for City applications: <https://www.cityofperris.org/our-city/city-hall/city-forms/-folder-155>
Link for City cannabis applications: <https://www.cityofperris.org/our-city/city-hall/city-forms/-folder-147>
Link for City fee schedule: <https://www.cityofperris.org/home/showpublisheddocument/2537/637217201195900000>
Link for City Development Impact Fees: <https://www.cityofperris.org/home/showpublisheddocument/13652/637775940661530000>
Link for City GIS / Zoning Information: <https://www.cityofperris.org/our-city/about-perris/maps>
Link for City Municipal Code: https://library.municode.com/ca/perris/codes/code_of_ordinances
Link for City Specific Plans: <https://www.cityofperris.org/departments/development-services/specific-plans>
Link for City General Plan, Special Studies, and Policy Documents: <https://www.cityofperris.org/departments/development-services/general-plan>
Link for CEQA Documents in Public Review: <https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review>

From: Brett Hamilton <bhamilton@cityofmenifee.us>
Sent: Friday, January 13, 2023 4:52 PM
To: Patricia Brenes <pbrenes@CityofPerris.org>
Cc: Kenneth Phung <kphung@cityofperris.org>; Stuart McKibbin <stuart@trilakeconsultants.com>
Subject: Motte Business Center Traffic Scoping

Patricia,

Please see the attached traffic scoping forms for Motte Business Center. Please let us know if you have any comments in addition to the NOP response sent today.

Best,

Brett Hamilton, AICP | Senior Planner
Community Development Department – Planning Division
"Creating a **HEALTHY**, **VIBRANT**, and **CONNECTED** community for everyone."
City of Menifee | 29844 Haun Road | Menifee, CA 92586
Direct: (951) 723-3747 | City Hall: (951) 672-6777 | Fax: (951) 723-2579
bhamilton@cityofmenifee.us | www.cityofmenifee.us



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