



# CITY OF PERRIS

## DEVELOPMENT SERVICES DEPARTMENT PLANNING DIVISION

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October 23, 2024

Honorable Chair LaDue and Members of the Planning Commission  
City of Menifee Planning Commission  
29844 Haun Road  
Menifee, CA 92585

**SUBJECT: PLANNING COMMISSION OCTOBER 23, 2024 MEETING  
AGENDA ITEM 9.3- MURRIETA ROAD WAREHOUSE PROJECT**

Honorable Chair and Commissioners:

The City of Perris ("Perris") submits this letter to object to this Commission certifying the Environmental Impact Report ("EIR") and approving Plot Plan No. PLN 22-0179 as Perris continues to believe the EIR prepared for this project has not adequately analyzed and mitigated the significant environmental impacts resulting from this Project as described, in part, in correspondence Perris submitted to comment on the Draft EIR dated July 8, 2024.

Perris has reviewed Menifee's responses to Perris' comments on the Draft EIR and do not believe they adequately address the City's concerns related to land use inconsistency, noise and traffic safety.

In addition, with regard to land use, the project site was previously approved to be developed with a residential subdivision under Tentative Parcel Map, No. 38469 (PLN22-0180), which has been recorded with the County Assessor's Office. The EIR fails to address the replacement of the residential units that would be lost as a result of the proposed industrial development for compliance with Government Code, section 66300(b)(1) (SB 330). Additionally, the Land Use section of the EIR needs to address consistency of the project with the Northern Gateway Subarea of the Menifee Economic Development Corridor found in the General Plan Land Use Element, which envisions 5 percent of land uses to consist of residential uses. Failure to ensure that 5 percent of the Northern Gateway Subarea is reserved for residential uses may also violate the no net loss requirements set forth Government Code, section 66300.

With regard to General Plan consistency as it relates to impacts related to noise and air quality, the project includes 45 dock high doors and 128 truck/trailer parking on the north side of the site, approximately 265 feet from the north property line shared with the seven (7) existing single-family residences in the City of Menifee. The only separation between the truck/trailers parked along the north side of the site and the single-family residences will be a 25-foot landscape setback and a 14-foot-high wall. Given the proximity of the proposed warehouse to the sensitive receptors, this project would be in direct conflict with the Menifee's General Plan Policy LU-1.10 which requires projects to buffer sensitive land uses, such as residences, schools, care facilities, and recreation areas from major air pollutant emission sources, including freeways, manufacturing, hazardous materials storage, and similar uses.

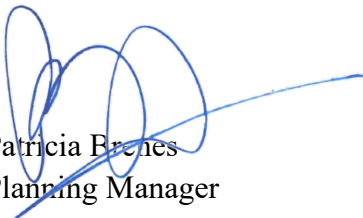
On September 29, 2024, Governor Newsom signed Assembly Bill 98 which establishes mandatory minimum development standards and setbacks for certain warehouse and distribution center projects. Perris recognizes that this Project is not required to comply with AB 98 pursuant to its terms. However, Perris strongly encourages the Menifee to separately include these new requirements as conditions of approval for the Project to mitigate the public health and safety issues at AB 98 is intended to address.

With regard to the Project's impacts related to traffic safety, Perris requested that RK Engineering review the Final EIR's responses to the City's comments related to traffic safety and the revised traffic study included with the Final EIR. Attached is correspondence from RK Engineering dated October 15, 2024, expressing continued concerns regarding how the project will deteriorate the operations of various intersections and street segments resulting in reasonably foreseeable impacts related to traffic safety.

As you may know, the cities of Perris and Menifee have commissioned a global traffic study to identify the traffic impacts associated with development within Perris and Menifee and to identify the necessary traffic infrastructure improvements to mitigate those impacts. Unfortunately, this traffic study will not be completed for another couple of months. Therefore, if you approve this Project tonight this Project will not be required to contribute toward the costs of any of the identified traffic infrastructure improvement despite its clear impacts related to traffic safety.

In conclusion, Perris respectfully requests that this Commission continue its consideration of this project for six (6) months to allow time for the Global Traffic Study to be complete so that this Project may participate in the costs of the identified traffic infrastructure improvements.

Respectfully,



Patricia Brenes  
Planning Manager

Enclosure: RK Engineering Letter – Dated October 15, 2024

cc: Clara Miramontes, City Manager  
Wendell Bugtai, Assistant City Manager  
Robert Khuu, City Attorney  
John Pourkazemi, City Engineer  
Kenneth Phung, Director of Development Services

**OCTOBER 15, 2024**

Mr. John Pourkazemi  
City of Perris  
24 South "D" Street, Suite 100  
Perris, CA 92570

**SUBJECT: MURRIETA ROAD WAREHOUSE PROJECT FINAL ENVIRONMENTAL IMPACT  
REPORT (FEIR) REVIEW - TRAFFIC ANALYSIS, CITY OF MENIFEE**

Dear Mr. Pourkazemi:

**INTRODUCTION**

Pursuant to your request, RK Engineering Group Inc. (RK) is pleased to provide this additional review of the Final Environmental Impact Report (FEIR), dated September 2024, prepared by EPD Solutions, Inc., and most notably the responses regarding the City of Perris's DEIR traffic-related comments contained within Section 2.6 of the FEIR (Response to Letter A3: City of Perris, Dated July 8, 2024) and Appendix B: Revised Traffic Impact Analysis (dated January 30, 2024, same date as FEIR traffic study).

The Murietta Road Warehouse project includes development of an approximately 517,720 square foot (SF) warehouse building measuring a maximum of 55 feet in height. To provide a conservative analysis, a three percent buffer in building square footage has been included, which would equal 533,252 SF of building area. The proposed warehouse building would include a mezzanine, loading docks, and associated vehicle and truck trailer parking spaces. The warehouse building including the three percent buffer would include approximately 20,320 SF of ground floor office space, 7,000 SF of mezzanine office space, and 505,932 SF of warehouse space.

The Project site will have five driveways. The warehouse building is expected to have 90 dock-high doors and four grade level doors for trucks, 194 truck trailer stalls, and 409 passenger vehicle parking spaces, nine of which are accessible. The project is expected to have an opening year of 2026.

RK has completed this additional review regarding the responses to the City of Perris's DEIR traffic-related comments contained within Section 2.6 of the FEIR. As a result, RK has the following comments.

1. General: As part of the FEIR, a general response was provided addressing many of the DEIR traffic-related comments which states that "per CEQA Guidelines Section 15064.3, automobile delay is no longer considered an environmental impact under CEQA, and therefore this comment does not raise concerns within the scope of CEQA. The discussion included in the DEIR concerning Level of Service (LOS) was provided for informational purposes only for the City's use in evaluating the proposed Project and considering conditions of approval outside

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of CEQA's framework." **While RK agrees that VMT is now the primary metric under CEQA, CEQA still requires consideration of transportation safety, assessing the likelihood of accidents or hazards for drivers, pedestrians, and cyclists due to a project. As such, the traffic study needs to be significantly revised to ensure the project does not impact traffic safety.**

2. General. The preparation of the site-specific traffic study for this project is premature in that the overall traffic study for the Meniffee Economic Development Corridor (MEDC) needs to be completed first in order to master plan the entire MEDC area which encompasses this Murietta Road Warehouse Project. A more comprehensive review of the entire area along Ethanac Road needs to be completed before site-specific studies can be prepared for individual projects.

Several of the FEIR responses acknowledge that a global Traffic Study for the Meniffee Economic Development Corridor (MEDC) area is being prepared. The responses go on to explain that the traffic study analyzes a "worst-case" scenario assuming 100% of truck traffic entering/exiting the site from Ethanac Road. Assuming this is a worst-case scenario is not necessarily correct and additional analysis would be needed to verify this. While the addition of a truck corridor may improve the overall traffic flow in the area, individual movements at certain intersections will be more heavily impacted, possibly causing new safety issues. Under CEQA, a significant impact can occur if a project substantially increases hazards due to a geometric design feature (e.g., intersection queuing). Since the traffic study only analyzes truck traffic entering/exiting from Ethanac Road, certain safety considerations have been underestimated, or not analyzed entirely. The transportation analysis needs to be consistent with the analysis in the forthcoming MEDC global study, otherwise the project may contribute towards safety issues that are not currently analyzed.

3. Page 1, Study Intersections. The traffic study does not analyze the future intersection of Green Valley Parkway and Ethanac Road. This intersection is anticipated to have deficiencies in the future due to the large amount of traffic it is anticipated to serve. As such, the traffic study needs to analyze this intersection and determine what fair share contribution will be needed.
4. Page 11, Figures 2.6 & 2.7: Lane Geometrics and Traffic Control. Study Intersection #8 actually consists of two separate (offset) intersections (Barnett Road & Case Road). Both of these intersections should be analyzed separately (from a LOS and queuing standpoint). As currently analyzed, the results for these two intersections are significantly underestimated.

Several of the FEIR responses state that queuing analysis is outside the scope of the EIR. This is not correct as under CEQA, a significant impact can occur if a project substantially increases hazards due to a geometric design feature (e.g., intersection queuing). The response also states that the intersection of Barnett Road/Case Road at Ethanac Road operates as one intersection and should be analyzed as one for analysis purposes. This is also not correct. These are two separate intersections and need to be analyzed as such. The offset nature of these two

intersections presents several geometric design issues of concern, especially given the high amount of truck traffic planning to pass through these intersections.

As detailed in the *City of Perris Complete Streets Safety Assessment (CSSA)*, dated August 2018, prepared by the ITS Technology Transfer Program, 13 collisions occurred at these two offset intersections between the years of 2015-2017. Accident data was obtained through SWITRS. Additionally, based on a recent review of the Transportation Injury Mapping System (TIMS), an additional 5 accidents resulting in possible injury occurred between the years 2020-2023. Based on this accident history, it is imperative that the traffic study analyze these two intersections accurately (i.e., as two offset intersections) to ensure the addition of project traffic will not increase serious collisions.

A letter was previously prepared in June 2023 providing supplemental comments in support of the City of Perris' appeal of Plot Plan No. PLN 21-0290 (Ethanac and Barnett Speculative Warehouses), located south of Ethanac Road and west of Barnett Road. This letter raised several concerns relating to the current design of the intersections of Case Road/Ethanac Road & Barnett Road/Ethanac Road and the fundamental flaws of the accompanying traffic analysis (which also analyzed these offset intersections as one aligned intersection). The comments made in this letter also apply directly to this project as well.

The traffic study needs to be updated to appropriately analyze these offset intersections from an overall traffic safety perspective. Recommended improvements should be made involving realigning Barnett Road with Case Road (and other associated intersection improvements if necessary). The project shall pay a fair share contribution towards this realignment, or 100% of the cost if the project directly impacts these intersection(s).

5. Page 47, Storage Capacity at Left-Turn Pockets. The City of Perris is concerned about the project's impact to queuing/progression along Ethanac Road at the I-215 interchange. A simulation analysis should be conducted to identify any queuing deficiencies, and if applicable, improvements should be identified.

Several of the FEIR responses state that queuing analysis is outside the scope of the EIR. This is not correct as under CEQA, a significant impact can occur if a project substantially increases hazards due to a geometric design feature (e.g., intersection queuing). The FEIR fails to analyze the queuing/progression along Ethanac Road at the I-215 interchange. Due to these closely-spaced intersections, queuing issues exist and the FEIR needs to address how the project contributes to these traffic safety issues.

6. Page 54, Site Access and Circulation. This analysis lacks the minimum analysis needed to ensure adequate project ingress/egress. The site access/circulation analysis should, at a minimum, include the following: LOS analysis at the project driveways; Queuing analysis at the project driveways; Truck turning movements entering/exiting the driveways; Internal truck

circulation throughout the site; and Gate stacking analysis. Inadequate queue storage and/or turning area for trucks could cause potential safety concerns.

7. Appendix C, Intersection Analysis Worksheets. Intersection #8: As previously mentioned, it is incorrect and significantly underestimates the results by analyzing Barnett Road and Case Road as one intersection. Furthermore, a "no right-turn on red" sign is present for the southbound approach along Case Road and the analysis should account for this accordingly.

## CONCLUSIONS

RK Engineering Group Inc. has completed this additional review of the Final Environmental Impact Report (FEIR), dated September 2024, prepared by EPD Solutions, Inc., and most notably their responses regarding the City of Perris's DEIR traffic-related comments contained within Section 2.6 of the FEIR (Response to Letter A3: City of Perris, Dated July 8, 2024) and Appendix B: Revised Traffic Impact Analysis (dated January 30, 2024, same date as FEIR traffic study). Based on this review, RK recommends that the traffic study be significantly revised to ensure the project does not impact traffic safety.

RK appreciates this opportunity to work with the City of Perris on this project and if you have any questions, please contact us at (949) 474-0809.

Sincerely,

**RK ENGINEERING GROUP, INC.**



Justin Tucker, P.E., T.E.  
Associate Principal

Registered Civil Engineer 92866  
Registered Traffic Engineer 3055

Attachment

XC: Kenneth Phung, City of Perris  
XC: Patricia Brenes, City of Perris  
XC: Brad Brophy, City of Perris



Robert Kahn, P.E., T.E.  
Founding Principal

Registered Civil Engineer 20285  
Registered Traffic Engineer 0555

