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March JPA Commission
March JPA Clerk
Planner Mr. Tomich
March Joint Powers Authority (MJPA)

Re: Unstable Project Description for SCH #2021110304 - West Campus Upper Plateau

Honorable Commissioners, Clerk, and Lead Planner,

R-NOW thanks you for the opportunity to provide comments on the MJPA Revised Final Environmental Impact Report on the West Campus Upper Plateau Project (the Project). R-NOW has opposed the proposed high-cube mega-warehouse project since February 2022 due to its incompatibility with surrounding open space and residential land-uses.

This comment letter focuses on the instability of the Final EIR project description. Our comments reflect the documents duly noticed and agendized in the packet for the Special Meeting of March Joint Powers Commission on May 12, 2025¹, the West Campus Upper Plateau project website hosted by the March JPA², comments made by multiple March JPA representatives to community stakeholders at meetings the week of April 27, 2025, community advertising via texts, emails, and other social media by the project applicant, and the withdrawal of the two speculative warehouse plot plans in item 10(1) of the May 12 public hearing. Community stakeholders are being told that this is the "March Innovation Hub" and that it will be a 'Medical manufacturing facility' or 'Aerospace Manufacturing Facility' or 'Manufacturing training facility'.

The Revised Final EIR Executive Summary Project Description (April, 2025) specifically lists an assumed project buildout of over 2.56 million square feet of **'high-cube fulfillment center warehouses'** and 0.5 million square feet of **'high-cube cold storage warehouse use'**. That is the project description that has been analyzed and community members have commented on in the draft EIR in January 2023, the revised draft EIR in December 2023, and the initial Final EIR in June, 2024. It is still the project description in May 2025.

¹ <https://marchjpa.com/wp-content/uploads/2025/05/05-12-2025-JPC-Packet.pdf>

² <https://marchjpa.com/mjpa-meridian-west-campus/>

5/6/2025
Public Comments
Andrew Silva

Additional documentation provided in Appendix R-7 as the Modified Alternative 2 Impact Comparison³ shows that the project is still analyzed with all warehouses as an assumed buildout for the preferred Modified Alternative 2 scenario.

TABLE 1: COMPARISON OF LAND USE SUMMARY

Land Uses	Modified Alternative 2		2024 DEIR-Project	
	Quantity	Units ¹	Quantity	Units ¹
High-Cube Fulfillment Center Warehouse	2,561.689	TSF	2,562.561	TSF
High-Cube Cold Storage Warehouse	500.000	TSF	500.000	TSF
Business Park				
Office	168.000	TSF	384.121	TSF
Warehouse	392.000	TSF	862.282	TSF
Mixed Use				
Business Park - Office	81.299	TSF	144.830	TSF
Business Park - Warehouse	189.698	TSF	337.936	TSF
Retail	90.333	TSF	160.921	TSF
Active Park	42.20	AC	42.20	AC
Public Park	18.08	AC	18.08	AC

¹ TSF = thousand square feet; AC = Acres

R-NOW opposes high-cube mega-warehouses near our homes, open space, and parks. The project document analyzes a buildout of high-cube warehouse land use for the industrial portion of the project, and business-enterprise warehouses for the Business Park and Mixed-use. Entitlement of industrial land-use near our homes will allow high-cube warehouses as a 'by right' approval - as they will conform to the approved zoning and development standards. Business-enterprise warehouses will also be allowed 'by right' in the Business Park and Mixed-Use parcels. There is no restriction in the Specific Plan that prohibits warehouses as an allowed use within the West Campus Upper Plateau.

The West Campus Upper Plateau no longer has any proposed buildings as part of its entitlement, due to the surprising withdrawal of Building B and C plot plans. As a result, it is no longer clear what the project will look like as these buildings have been a stable feature of the project since February, 2022.

Any representation by the project applicant or March JPA as the lead agency that the West Campus is no longer a high-cube warehouse project should be construed as an unstable project description. Established case law indicates that an unstable project description undermines CEQA's purpose of ensuring informed decision-making, public participation, and protecting the environment. If warehouses are no longer the intended buildout of this project, then the EIR project description is no longer valid and requires recirculation.

³ <https://marchjpa.com/wp-content/uploads/2025/04/R-7.-Modified-Alternative-2-Impact-Comparison.pdf>

Non-warehouse land-uses are not analyzed in the Final EIR Executive Summary or Appendix R-7 Modified Alternative 2 Impact Comparison. Aerospace, education, and manufacturing land-uses have unique environmental impacts that need to be analyzed if that is the proposed project buildout; they need to be shown via analysis to be less environmentally impactful than high-cube warehouses for all environmental areas of concern.

Section 15088.5(b) of CEQA Guidance indicates that '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 draft EIR for public review...but before certification.' A change in the project description is significant new information.

We urge the commission to not be duped by the pinky promise of the developer to make this a manufacturing hub. The promise isn't enforceable without written restrictions on high-cube warehouses in the Specific Plan and this project is still going to result in high-cube warehouses. If a manufacturing project or innovation hub is now proposed, the environmental documentation needs to reflect the proposed buildout of a manufacturing and innovation hub, not a high-cube warehouse industrial park.

Sincerely,

Jennifer Larratt-Smith - Chair

Mike McCarthy - Vice-Chair

R-NOW