SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

ITEM: 23.1
(ID # 28760)
MEETING DATE:
Tuesday, October 21, 2025

FROM : TLMA-PLANNING

SUBJECT: TRANSPORTATION AND LAND MANAGEMENT AGENCY/PLANNING: PUBLIC HEARING ON GENERAL PLAN AMENDMENT NO. 240005, CHANGE OF ZONE NO. 2200062, PLOT PLAN NO. 220050, TENTATIVE PARCEL MAP NO. 38601 – Intent to Certify an EIR (SCH 2023060799) – Applicant: Hillwood – Eng.: Albert A. Webb Associates – 1st Supervisorial District – Mead Valley Area Plan: Community Development: Commercial Retail (CD:CR) and Rural Community: Very Low Density Residential (RC:VLDR) – Location: south of Cajalco Rd, west of Seaton Ave, east of Decker Rd, north of Rider St – 58.0 Acres – North Perris Zoning Area – Zoning: Light Agriculture, one-acre minimum (A-1-1), Rural Residential, ½-acre minimum (R-R-1/2) – REQUEST: GPA No. 240005 is a proposal to: (1) in the northern portion of the project site, change the Foundation from Rural Community to Community Development and the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and (2) in the southern portion of the project site, change the Foundation from Rural Community to Open Space and the land use designation from Very Low Density Residential (VLDR) to Recreation (R). CZ No. 2200062 is a proposal to change the zoning in the northern portion of the site from Light Agriculture, one-acre minimum (A-1-1) and Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P). TPM No. 38601 is a Schedule E subdivision of 44.84 acres (net) to consolidate the existing 16 parcels generally located north of the MWD parcel into one parcel. PPT No. 220050 is a proposal for the construction and operation of a total of 1,003,510 square foot warehouse/distribution/manufacturing development on 44.66-acres and development of a community park on 13.33 acres. APNs: 317-080-003 through 317-080-008, 317-080-013, 317-080-014, 317-080-019 through 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 through 317-090-007 – District 1. [Applicant Fees 100%]

RECOMMENDED MOTION: That the Board of Supervisors:

1. **TENTATIVELY CERTIFY the ENVIRONMENTAL IMPACT REPORT (EIR) (SCH 2023060799)**, pending adoption of a resolution adopting environmental findings pursuant to the California Environmental Quality Act, and adopting a Mitigation Monitoring and Reporting Program;

Continued on Page 2

ACTION:Policy

John Hildebrand: Planning Director 10/15/2025

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Medina, seconded by Supervisor Gutierrez and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes:	Medina, Spiegel, Washington, Perez, and Gutierrez
Nays:	None
Absent:	None
Date:	October 21, 2025
xc:	Planning

Kimberly A. Rector
Clerk of the Board
By: _____ Deputy

RECOMMENDED MOTION: That the Board of Supervisors:

2. **TENTATIVELY APPROVE GENERAL PLAN AMENDMENT NO. 240005**, which changes the Foundation component from Rural Community to Community Development in the northern portion of the project site (APNs 317-080-003, -004, -005, -006, -007, -008, -013, -014, -019, -020, -021, -022, -023, -027, -028, -029) and change the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and change the Foundation from Rural Community to Open Space in the southern portion of the project site (APNs 317-090-002, -003, -004, -005, -007, -006, -008) and change the land use designation from Very Low Density Residential (VLDR) to Recreation (R) as shown on Figure 3 of the Mead Valley Area Plan and other related tables and figures, based on the findings and conclusions incorporated in the staff report, pending final adoption of the General Plan Cycle Resolution by the Board of Supervisors;

3. **TENTATIVELY APPROVE CHANGE OF ZONE NO. 2200062**, to amend the zoning classification of APNs 317-080-003, -004, -005, -006, -007, -008, -013, -014, -019, -020, -021, -022, -023, -027, -028, -029 from Light Agriculture, one-acre minimum (A-1-1), Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P) based upon the findings and conclusions incorporated in the staff report and Change of Zone Exhibit, pending final adoption of the General Plan Cycle Resolution and the Zoning Ordinance by the Board of Supervisors;

4. **TENTATIVELY APPROVE PLOT PLAN NO. 220050**, subject to the attached advisory notification document and conditions of approval, and based upon the findings and conclusions provided in this staff report and subject to the final adoption of the General Plan Cycle Resolution and Zoning Ordinance; and,

5. **TENTATIVELY APPROVE TENTATIVE PARCEL MAP NO. 38601**, subject to the attached advisory notification document and conditions of approval, and based upon the findings and conclusions provided in this staff report and subject to the final adoption of the General Plan Cycle Resolution and Zoning Ordinance.

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	$ N/A	$ N/A	$ N/A	$ N/A
NET COUNTY COST	$ N/A	$ N/A	$ N/A	$ N/A
SOURCE OF FUNDS: Applicant Fees 100%			**Budget Adjustment:** No	
			For Fiscal Year: N/A	

C.E.O. RECOMMENDATION: Approve

BACKGROUND:

Summary

Since the General Plan Amendment is categorized as a Regular Foundation General Plan Amendment, it is required to be initiated first by the Board of Supervisors pursuant to Ordinance No. 348 Section 2.5.C. Initiation of General Plan Amendment No. 240005 was heard by the General Plan Advisory Committee on July 29, 2024, the Planning Commission on November 6, 2024, and, ultimately, by the Board of Supervisors on July 29, 2025, which adopted an order to Initiate the General Plan Amendment.

On September 3, 2025, the Planning Commission recommended that the Board of Supervisors approve the project by a vote of 3-2. The day prior to the Planning Commission meeting a number of written public comments in opposition were received. These were provided to the Planning Commission via memo for their consideration. While many are general opposition, some include comments on the adequacy of the CEQA analysis through the EIR focusing primarily on air quality, traffic, and biology. Responses to these CEQA oriented comment letters have been provided and are included in the attachments.

Change of Zone No. 2200062, and Plot Plan No. 220050, Tentative Parcel Map No. 38601 were submitted to the County of Riverside on December 27, 2022. General Plan Amendment No. 240005 was submitted to the County of Riverside on February 7, 2024.

Updates from Planning Commission

Since the Planning Commissions action on the project there are some updates to conditions of approval agreed to by the applicant to highlight. First, additional conditions of approval have been added that require the applicant acquire an approximately 2.5 acre commercial site in the Mead Valley Core and a separate 2.5 acre park site in the Mead Valley Core and transfer both of those to the County prior to issuance of a final certificate of occupancy or any tenant improvement building permit.

Second, a condition of approval has been added to clarify the creation of a Community Facilities District (CFD) for the purposes of financing the ongoing operation, maintenance, and repair of the project 13.3 acre public park and associated improvements. The CFD would cover only the warehouse site as the property responsible for such financing and would not include other properties in the area so such maintenance is not an additional burden on the County or residents in the area.

Third, a condition of approval has been added that the multi-purpose building included in the 13.3 acre park to accommodate a workforce training facility that will be coordinated with Riverside County Workforce Development and the Mt. San Jacinto College District to administer classes.

Fourth, to supplement existing mitigation measures for facilitating electrical trucks, conduit shall be installed to either 50% of the dock doors and/or to other locations on the site such that the total number of truck parking spaces equipped with conduit equals at least 50% of the dock doors.

Impact on Residents and Businesses

All potential project impacts have been studied under CEQA and noticed to the public pursuant to the requirements of the County. The project as a warehouse and within an identified Environmental Justice Community was subject to the applicable board and General Plan policies. The project is consistent with the applicable policies as included in the respective checklists that are attached. Furthermore, although Assembly Bill 98 (AB 98) does not strictly apply to the project based on the legislation effective dates and application dates of this project, an AB 98 checklist is also provided for reference.

Additional Fiscal Information

All fees are paid by the applicant; there is no General Fund obligation.

ATTACHMENTS:

A. Responses to Planning Commission CEQA Comments
B. Planning Commission Report of Actions
C. Planning Commission Memos
D. Planning Commission Resolution No. 2025-004
E. Planning Commission Staff Report
F. Plot Plan Exhibits
G. Tentative Parcel Map Exhibits
H. Parking Demand Analysis
I. Draft EIR
J. Final EIR
K. Plot Plan Conditions of Approval
L. Tentative Parcel Map Conditions of Approval
M. Environmental Justice Policy Checklists
N. Good Neighbor Guidelines Checklists
O. AB 98 Checklist
P. ALUC Determination Letter
Q. Recent Public Comments

Jason Farin, Principal Policy Analyst 10/16/2025

THE PRESS-ENTERPRISE
KEEP YOUR EYES ON THE 'PRISE
pe.com

3512 14 Street
Riverside, California 92501
(951) 368-9229
cgonzales@scng.com

County of Riverside - Clerk of the Board
PO Box 1147
Riverside, California 92502

Account Number:	5209148
Ad Order Number:	0011757652
Customer's Reference/PO Number:	
Publication:	The Press-Enterprise
Publication Dates:	09/30/2025
Total Amount:	$1959.36
Payment Amount:	$0.00
Amount Due:	$1959.36
Notice ID:	rIXE4NnGPMBE0Bwsmz8R
Invoice Text:	NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A GENERAL PLAN AMENDMENT, CHANGE OF ZONE, PLOT PLAN, AND TENTATIVE PARCEL MAP IN THE FIRST SUPERVISORIAL DISTRICT NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on Tuesday, October 21, 2025 at 10:00 A.M. or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve General Plan Amendment No. 240005, Change of Zone No. 2200062, Plot Plan No. 220050, and Tentative Parcel Map No. 38601. GPA No. 240005 is a proposal to: (1) in the northern portion of the project site, change the Foundation from Rural Community to Community Development and the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and (2) in the southern portion of the project site, change the Foundation from Rural Community to Open Space and the land use designation from Very Low Density Residential (VLDR) to Recreation (R). CZ No. 2200062 is a proposal to change the zoning in the northern portion of the site from Light Agriculture, one-acre minimum (A-1-1) and Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P). TPM No. 38601 is a Schedule E subdivision of 44.84 acres (net) to consolidate the existing 16 parcels generally located north of the MWD parcel into one parcel. PPT No. 220050 is a proposal for the construction and operation of a total of 1,003,510 square foot warehouse/distribution/manufacturing development on 44.66-

Planning
10/21/2025
23.1

THE PRESS-ENTERPRISE
KEEP YOUR EYES ON THE 'PRISE
pe.com
The Press-Enterprise
3512 14 Street
Riverside, California 92501
(951) 368-9229

County of Riverside - Clerk of the Board
PO Box 1147
Riverside, California 92502

Publication: The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc: 0011757652

FILE NO. 0011757652

PROOF OF PUBLICATION

I am a citizen of the United States. I am over the age of eighteen years and not party to or interested in the above-entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper of general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

09/30/2025

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Date: September 30, 2025.
At: Riverside, California

Christine Gonzalez

Signature

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A GENERAL PLAN AMENDMENT, CHANGE OF ZONE, PLOT PLAN, AND TENTATIVE PARCEL MAP IN THE FIRST SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, October 21, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **General Plan Amendment No. 240005, Change of Zone No. 2200062, Plot Plan No. 220050, and Tentative Parcel Map No. 38601.** GPA No. 240005 is a proposal to: (1) in the northern portion of the project site, change the Foundation from Rural Community to Community Development and the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and (2) in the southern portion of the project site, change the Foundation from Rural Community to Open Space and the land use designation from Very Low Density Residential (VLDR) to Recreation (R). CZ No. 2200062 is a proposal to change the zoning in the northern portion of the site from Light Agriculture, one-acre minimum (A-1-1) and Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P). TPM No. 38601 is a Schedule E subdivision of 44.84 acres (net) to consolidate the existing 16 parcels generally located north of the MWD parcel into one parcel. PPT No. 220050 is a proposal for the construction and operation of a total of 1,003,510 square foot warehouse/distribution/manufacturing development on 44.66-acres and development of a community park on 13.33 acres. APN(s): 317-080-003 through 317-080-008, 317-080-013, 317-080-014, 317-080-019 through 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 through 317-090-007. This proposed project is located: south of Calaico Road, west of Seaton Avenue, east of Decker Road, north of Rider Street in the First Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **TENTATIVELY CERTIFY Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 240005, TENTATIVELY APPROVE Change of Zone No. 2200013, APPROVE Plot Plan No. 220050, and APPROVE Tentative Parcel Map No. 38601.**

On September 3, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-2. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: September 25, 2025
Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UNA ENMIENDA AL PLAN GENERAL, CAMBIO DE ZONA, PLANO DE PARCELA Y MAPA TENTATIVO DE PARCELAS EN EL PRIMER DISTRITO DE

SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se llevará a cabo una audiencia pública en la que se escuchará a todas las personas interesadas, ante la Junta de Supervisores del Condado de Riverside, California, en el 1.er piso de la Sala de la Junta, Centro Administrativo del Condado, 4080 Lemon Street, Riverside, **el martes 21 de octubre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de eso, para considerar la recomendación de la Comisión de Planificación para aprobar la **Enmienda al Plan General No. 240005, el Cambio de Zona No. 2200062, el Plano de Parcela No. 220050 y el Mapa de Parcela Tentativa No. 38601. GPA No. 240005** es una propuesta para: (1) en la parte norte del sitio del proyecto, cambiar la Fundación de Comunidad Rural a Desarrollo Comunitario y la designación del uso de la tierra de Minorista Comercial (CR) y Residencial de Muy Baja Densidad (VLDR) a Industrial Ligero (LI) y (2) En la parte sur del sitio del proyecto, cambiar la zonificación de la Comunidad Rural a Espacio Abierto y la designación del uso del suelo de Residencial de Muy Baja Densidad (VLDR) a Recreativo (R). La CZ n.° 2200062 propone cambiar la zonificación en la parte norte del sitio de Agricultura Ligera, mínimo de un acre (A-1-1) y Residencial Rural, mínimo de medio acre (R-R-1/2) a Parque Industrial (I-P). La TPM n.° 38601 es una subdivisión del Anexo E de 44,84 acres (netos) para consolidar las 16 parcelas existentes, generalmente ubicadas al norte de la parcela del MWD, en una sola. La PPT n.° 220050 es una propuesta para la construcción y operación de un complejo de almacén, distribución y fabricación de 1 003 510 pies cuadrados en un terreno de 44,66 acres, y la construcción de un parque comunitario en 13,33 acres. APN: 317-080-003 a 317-080-008, 317-080-013, 317-080-014, 317-080-019 a 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 a 317-090-007. Este proyecto propuesto está ubicado: al sur de Calaico Road, al oeste de Seaton Avenue, al este de Decker Road, al norte de Rider Street en el Primer Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **CERTIFICAR TENTATIVAMENTE el Informe de Impacto Ambiental, APRUEBE TENTATIVAMENTE la Enmienda al Plan General No. 240005, APRUEBE TENTATIVAMENTE el Cambio de Zona No. 2200013, APRUEBE el Plano de Parcela No. 220050 y APRUEBE el Mapa de Parcela Tentativa No. 38601.**

El 3 de septiembre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, por 3 votos a favor y 2 en contra. Los documentos de la reunión del Departamento de Planificación sobre el proyecto propuesto pueden consultarse en línea, con la fecha de la audiencia de la Comisión de Planificación, en la página de Audiencias Públicas del sitio web del Departamento de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DEL PROYECTO, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o podrá comparecer y ser escuchada en el lugar y hora indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, quien los considerará, además de cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante el tribunal, podrá limitarse a plantear únicamente las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores durante la audiencia pública o antes de ella. Tenga en cuenta que, como resultado de la audiencia pública y de la consideración de todos los comentarios públicos, escritos y orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental relacionado. En consecuencia, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrán modificarse de forma distinta a la propuesta específica.

Formatos alternativos disponibles a solicitud para personas con discapacidad. Si necesita adaptaciones razonables, comuníquese con la secretaría de la Junta al (951) 955-1069.

Envíe toda correspondencia escrita a: secretaría de la Junta, 4080 Lemon Street, 1er piso, apartado postal 1147, Riverside, CA 92502-1147 o envíe un correo electrónico a cob@rivco.org.

Fecha: 25 de septiembre de 2025
Kimberly A. Rector, secretaria de la Junta
Por: Naomy Sicra, asistente de secretaría de la Junta
The Press-Enterprise
Published: 9/30/25

77x2=154

RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

Hearing Date: October 21, 2025

To: Clerk of the Board of Supervisors

From: Planning Department – Riverside (Plan

for Naomy

MinuteTraq #: 28760

Project Description:

TRANSPORTATION AND LAND MANAGEMENT AGENCY/PLANNING: PUBLIC HEARING ON GENERAL PLAN AMENDMENT NO. 240005, CHANGE OF ZONE NO. 2200062, PLOT PLAN NO. 220050, TENTATIVE PARCEL MAP NO. 38601 – Intent to Certify an EIR – Applicant: Hillwood – Eng.: Albert A. Webb Associates – 1st Supervisorial District – Mead Valley Area Plan: Community Development: Commercial Retail (CD:CR) and Rural Community: Very Low Density Residential (RC:VLDR) – Location: south of Cajalco Road, west of Seaton Avenue, east of Decker Road, north of Rider Street – 58.0 Acres – North Perris Zoning Area – Zoning: Light Agriculture, one-acre minimum (A-1-1), Rural Residential, ½-acre minimum (R-R-1/2) – REQUEST: GPA No. 240005 is a proposal to: (1) in the northern portion of the project site, change the Foundation from Rural Community to Community Development and the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and (2) in the southern portion of the project site, change the Foundation from Rural Community to Open Space and the land use designation from Very Low Density Residential (VLDR) to Recreation (R). CZ No. 2200062 is a proposal to change the zoning in the northern portion of the site from Light Agriculture, one-acre minimum (A-1-1) and Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P). TPM No. 38601 is a Schedule E subdivision of 44.84 acres (net) to consolidate the existing 16 parcels generally located north of the MWD parcel into one parcel. PPT No. 220050 is a proposal for the construction and operation of a total of 1,003,510 square foot warehouse/distribution/manufacturing development on 44.66-acres and development of a community park on 13.33 acres. APNs: 317-080-003 through 317-080-008, 317-080-013, 317-080-014, 317-080-019 through 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 through 317-090-007. – Project Planner: Russell Brady at (951) 955-3025 or email at rbrady@rivco.org

RECEIVED RIVERSIDE COUNTY CLERK/BOARD OF SUPERVISORS
2025 SEP 23 AM 10: 33

The attached item(s) require the following action(s) by the Board of Supervisors:

- ☐ Place on Administrative Action
  - ☐ Receive & File
  - ☐ EOT
  - ☐ Labels provided If Set For Hearing
    - ☐ 10 Day ☐ 20 Day ☐ 30 day
- ☐ Place on Consent Calendar
- ☐ Place on Policy Calendar (Resolutions; Ordinances; PNC)
- ☐ Place on Section Initiation Proceeding (GPIP)
- ☒ Set for Hearing (Legislative Action Required; CZ, GPA, SP, SPA)
- ☒ Publish in Newspaper:
  (1st Dist) Press Enterprise
- ☒ Environmental Impact Report
  - ☐ 10 Day ☒ 20 Day ☐ 30 day
- ☒ Notify Property Owners (app/agencies/property owner labels provided)

Riverside Office · 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 · Fax (951) 955-1811

Desert Office · 77-588 Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7040

Designate Newspaper used by Planning Department for Notice of Hearing:
(1st Dist) Press Enterprise

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A GENERAL PLAN AMENDMENT, CHANGE OF ZONE, PLOT PLAN, AND TENTATIVE PARCEL MAP IN THE FIRST SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, October 21, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **General Plan Amendment No. 240005, Change of Zone No. 2200062, Plot Plan No. 220050, and Tentative Parcel Map No. 38601.** GPA No. 240005 is a proposal to: (1) in the northern portion of the project site, change the Foundation from Rural Community to Community Development and the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and (2) in the southern portion of the project site, change the Foundation from Rural Community to Open Space and the land use designation from Very Low Density Residential (VLDR) to Recreation (R). CZ No. 2200062 is a proposal to change the zoning in the northern portion of the site from Light Agriculture, one-acre minimum (A-1-1) and Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P). TPM No. 38601 is a Schedule E subdivision of 44.84 acres (net) to consolidate the existing 16 parcels generally located north of the MWD parcel into one parcel. PPT No. 220050 is a proposal for the construction and operation of a total of 1,003,510 square foot warehouse/distribution/manufacturing development on 44.66-acres and development of a community park on 13.33 acres. APN(s): 317-080-003 through 317-080-008, 317-080-013, 317-080-014, 317-080-019 through 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 through 317-090-007. This proposed project is located: south of Cajalco Road, west of Seaton Avenue, east of Decker Road, north of Rider Street in the First Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **TENTATIVELY CERTIFY Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 240005, TENTATIVELY APPROVE Change of Zone No. 2200013, APPROVE Plot Plan No. 220050, and APPROVE Tentative Parcel Map No. 38601**.

On September 3, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-2. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: September 25, 2025

Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UNA ENMIENDA AL PLAN GENERAL, CAMBIO DE ZONA, PLANO DE PARCELA Y MAPA TENTATIVO DE PARCELAS EN EL PRIMER DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se llevará a cabo una audiencia pública en la que se escuchará a todas las personas interesadas, ante la Junta de Supervisores del Condado de Riverside, California, en el 1.er piso de la Sala de la Junta, Centro Administrativo del Condado, 4080 Lemon Street, Riverside, **el martes 21 de octubre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de eso, para considerar la recomendación de la Comisión de Planificación para aprobar la **Enmienda al Plan General No. 240005, el Cambio de Zona No. 2200062, el Plano de Parcela No. 220050 y el Mapa de Parcela Tentativa No. 38601. GPA No. 240005** es una propuesta para: (1) en la parte norte del sitio del proyecto, cambiar la Fundación de Comunidad Rural a Desarrollo Comunitario y la designación del uso de la tierra de Minorista Comercial (CR) y Residencial de Muy Baja Densidad (VLDR) a Industrial Ligero (LI) y (2) En la parte sur del sitio del proyecto, cambiar la zonificación de la Comunidad Rural a Espacio Abierto y la designación del uso del suelo de Residencial de Muy Baja Densidad (VLDR) a Recreativo (R). La CZ n.° 2200062 propone cambiar la zonificación en la parte norte del sitio de Agricultura Ligera, mínimo de un acre (A-1-1) y Residencial Rural, mínimo de medio acre (R-R-1/2) a Parque Industrial (I-P). La TPM n.° 38601 es una subdivisión del Anexo E de 44,84 acres (netos) para consolidar las 16 parcelas existentes, generalmente ubicadas al norte de la parcela del MWD, en una sola. La PPT n.° 220050 es una propuesta para la construcción y operación de un complejo de almacén, distribución y fabricación de 1 003 510 pies cuadrados en un terreno de 44,66 acres, y la construcción de un parque comunitario en 13,33 acres. APN: 317-080-003 a 317-080-008, 317-080-013, 317-080-014, 317-080-019 a 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 a 317-090-007. Este proyecto propuesto está ubicado: al sur de Cajalco Road, al oeste de Seaton Avenue, al este de Decker Road, al norte de Rider Street en el Primer Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **CERTIFICAR TENTATIVAMENTE el Informe de Impacto Ambiental, APRUEBE TENTATIVAMENTE la Enmienda al Plan General No. 240005, APRUEBE TENTATIVAMENTE el Cambio de Zona No. 2200013, APRUEBE el Plano de Parcela No. 220050 y APRUEBE el Mapa de Parcela Tentativa No. 38601**.

El 3 de septiembre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, por 3 votos a favor y 2 en contra. Los documentos de la reunión del Departamento de Planificación sobre el proyecto propuesto pueden consultarse en línea, con la fecha de la audiencia de la Comisión de Planificación, en la página de Audiencias Públicas del sitio web del Departamento de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DEL PROYECTO, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o podrá comparecer y ser escuchada en el lugar y hora indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, quien los considerará, además de cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante el tribunal, podrá limitarse a plantear únicamente las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores durante la audiencia pública o antes de ella. Tenga en cuenta que, como resultado de la audiencia pública y de la consideración de todos los comentarios públicos, escritos y orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental relacionado. En consecuencia, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrán modificarse de forma distinta a la propuesta específica.

Formatos alternativos disponibles a solicitud para personas con discapacidad. Si necesita adaptaciones razonables, comuníquese con la secretaria de la Junta al (951) 955-1069.

Envíe toda correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, apartado postal 1147, Riverside, CA 92502-1147 o envíe un correo electrónico a cob@rivco.org.

Fecha: 25 de septiembre de 2025

Kimberly A. Rector, secretaria de la junta

Por: Naomy Sicra, asistente de secretaria de la junta

SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

ITEM:
(ID # 28760)
MEETING DATE:
Tuesday, October 28, 2025

FROM : TLMA-PLANNING

SUBJECT: TRANSPORTATION AND LAND MANAGEMENT AGENCY/PLANNING: PUBLIC HEARING ON GENERAL PLAN AMENDMENT NO. 240005, CHANGE OF ZONE NO. 2200062, PLOT PLAN NO. 220050, TENTATIVE PARCEL MAP NO. 38601 – Intent to Certify an EIR (SCH 2023060799) – Applicant: Hillwood – Eng.: Albert A. Webb Associates – 1st Supervisorial District – Mead Valley Area Plan: Community Development: Commercial Retail (CD:CR) and Rural Community: Very Low Density Residential (RC:VLDR) – Location: south of Cajalco Road, west of Seaton Avenue, east of Decker Road, north of Rider Street – 58.0 Acres – North Perris Zoning Area – Zoning: Light Agriculture, one-acre minimum (A-1-1), Rural Residential, ½-acre minimum (R-R-1/2) – REQUEST: GPA No. 240005 is a proposal to: (1) in the northern portion of the project site, change the Foundation from Rural Community to Community Development and the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and (2) in the southern portion of the project site, change the Foundation from Rural Community to Open Space and the land use designation from Very Low Density Residential (VLDR) to Recreation (R). CZ No. 2200062 is a proposal to change the zoning in the northern portion of the site from Light Agriculture, one-acre minimum (A-1-1) and Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P). TPM No. 38601 is a Schedule E subdivision of 44.84 acres (net) to consolidate the existing 16 parcels generally located north of the MWD parcel into one parcel. PPT No. 220050 is a proposal for the construction and operation of a total of 1,003,510 square foot warehouse/distribution/manufacturing development on 44.66-acres and development of a community park on 13.33 acres. APNs: 317-080-003 through 317-080-008, 317-080-013, 317-080-014, 317-080-019 through 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 through 317-090-007. – Project Planner: Russell Brady at (951) 955-3025 or email at rbrady@rivco.org.

RECOMMENDED MOTION: That the Board of Supervisors:

TENTATIVELY CERTIFY the ENVIRONMENTAL IMPACT REPORT (EIR) (SCH 2023060799), pending adoption of a resolution adopting environmental findings pursuant to the California Environmental Quality Act, and adopting a Mitigation Monitoring and Reporting Program;

TENTATIVELY APPROVE GENERAL PLAN AMENDMENT NO. 240005, which changes the Foundation component from Rural Community to Community Development in the northern portion of the project site (APNs 317-080-003, -004, -005, -006, -007, -008, -013, -014, -019, -020, -021, -022, -023, -027, -028, -029) and change the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and change the Foundation from Rural Community to Open Space in the southern portion of the project site

(APNs 317-090-002, -003, -004, -005, -007, -006, -008) and change the land use designation from Very Low Density Residential (VLDR) to Recreation (R) as shown on Figure 3 of the Mead Valley Area Plan and other related tables and figures, based on the findings and conclusions incorporated in the staff report, pending final adoption of the General Plan Cycle Resolution by the Board of Supervisors;

TENTATIVELY APPROVE CHANGE OF ZONE NO. 2200013, to amend the zoning classification of APNs 317-080-003, -004, -005, -006, -007, -008, -013, -014, -019, -020, -021, -022, -023, -027, -028, -029 from Light Agriculture, one-acre minimum (A-1-1), Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P) based upon the findings and conclusions incorporated in the staff report and Change of Zone Exhibit, pending final adoption of the General Plan Cycle Resolution and the Zoning Ordinance by the Board of Supervisors;

APPROVE PLOT PLAN NO. 220050, subject to the attached advisory notification document and conditions of approval, and based upon the findings and conclusions provided in this staff report and subject to the final adoption of the General Plan Cycle Resolution and Zoning Ordinance; and,

APPROVE TENTATIVE PARCEL MAP NO. 38601, subject to the attached advisory notification document and conditions of approval, and based upon the findings and conclusions provided in this staff report and subject to the final adoption of the General Plan Cycle Resolution and Zoning Ordinance.

ACTION:

MINUTES OF THE BOARD OF SUPERVISORS

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	$ N/A	$ N/A	$ N/A	$ N/A
NET COUNTY COST	$ N/A	$ N/A	$ N/A	$ N/A
SOURCE OF FUNDS: Applicant Fees 100%			**Budget Adjustment:** No	
			For Fiscal Year: N/A	

C.E.O. RECOMMENDATION: [CEO use]

BACKGROUND:

Summary

Since the General Plan Amendment is categorized as a Regular Foundation General Plan Amendment, it is required to be initiated first by the Board of Supervisors pursuant to Ordinance No. 348 Section 2.5.C. Initiation of General Plan Amendment No. 240005 was heard by the General Plan Advisory Committee on July 29, 2024, the Planning Commission on November 6, 2024, and, ultimately, by the Board of Supervisors on July 29, 2025, which adopted an order to Initiate the General Plan Amendment.

On September 3, 2025, the Planning Commission recommended that the Board of Supervisors approve the project by a vote of 3-2. The day prior to the Planning Commission meeting a number of written public comments in opposition were received. These were provided to the Planning Commission via memo for their consideration. While many are general opposition, some include comments on the adequacy of the CEQA analysis through the EIR focusing primarily on air quality, traffic, and biology. Responses to these CEQA oriented comment letters have been provided and are included in the attachments.

Change of Zone No. 2200062, and Plot Plan No. 220050, Tentative Parcel Map No. 38601 were submitted to the County of Riverside on December 27, 2022. General Plan Amendment No. 240005 was submitted to the County of Riverside on February 7, 2024.

Impact on Residents and Businesses

All potential project impacts have been studied under CEQA and noticed to the public pursuant to the requirements of the County. The project as a warehouse and within an identified Environmental Justice Community was subject to the applicable board and General Plan policies. The project is consistent with the applicable policies as included in the respective checklists that are attached. Furthermore, although Assembly Bill 98 (AB 98) does not strictly apply to the project based on the legislation effective dates and application dates of this project, an AB 98 checklist is also provided for reference.

Additional Fiscal Information

All fees are paid by the applicant; there is no General Fund obligation.

ATTACHMENTS:

A. Responses to Planning Commission CEQA Comments
B. Planning Commission Report of Actions
C. Planning Commission Memo
D. Planning Commission Resolution No. 2025-004
E. Planning Commission Staff Report
F. Plot Plan Exhibits
G. Tentative Parcel Map Exhibits
H. Parking Demand Analysis
I. Draft EIR
J. Final EIR
K. Plot Plan Conditions of Approval
L. Tentative Parcel Map Conditions of Approval
M. Environmental Justice Policy Checklists
N. Good Neighbor Guidelines Checklists
O. AB 98 Checklist
P. ALUC Determination Letter

PROPERTY OWNERS CERTIFICATION FORM
PPT220050

I, Russell Brady, certify that on
(Print Name)
7/16/2025 the attached property owners list
(Date)
was prepared by County of Riverside / GIS
(Print Company or Individual's Name)
Distance Buffered: 600'

Pursuant to application requirements furnished by the Riverside County Planning Department; Said list is a complete and true compilation of the owners of the subject property and all other property owners within 600 feet of the property involved, or if that area yields less than 25 different owners, all property owners within a notification area expanded to yield a minimum of 25 different owners, to a maximum notification area of 2,400 feet from the project boundaries, based upon the latest equalized assessment rolls. If the project is a subdivision with identified off-site access/improvements, said list includes a complete and true compilation of the names and mailing addresses of the owners of all property that is adjacent to the proposed off-site improvement/alignment.

I further certify that the information filed is true and correct to the best of my knowledge. I understand that incorrect or incomplete information may be grounds for rejection or denial of the application.

NAME: Russell Brady

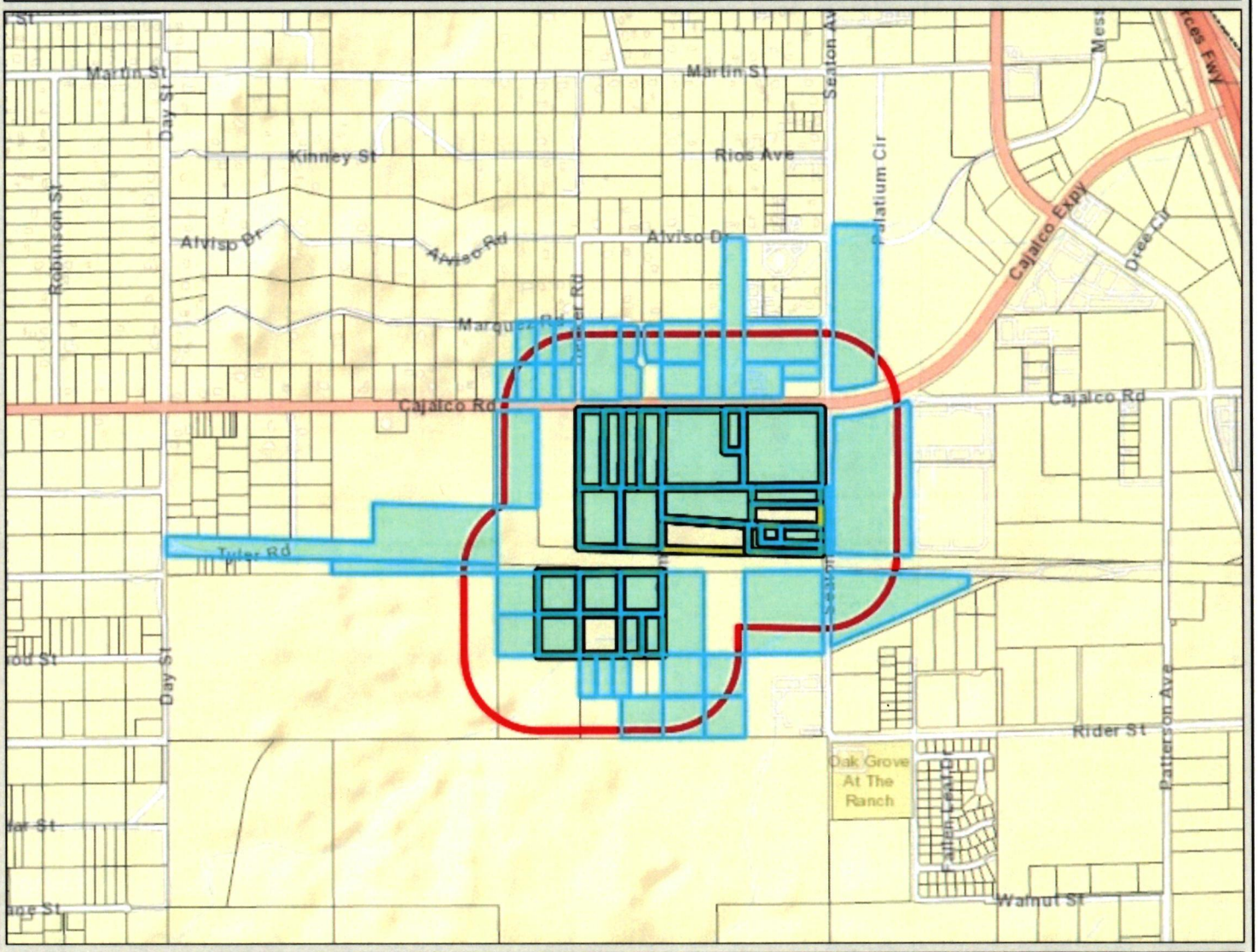
TITLE/REGISTRATION Project Planner

ADDRESS: 4080 Lemon Street, 12th Floor

Riverside, CA 92501

TELEPHONE (8 a.m. – 5 p.m.): (951) 955-3025

Riverside County GIS Mailing Labels





Legend

- County Boundary
- Cities
- Parcels
- World_Street_Map

Notes

0 1,505 3,009 Feet

IMPORTANT Maps and data are to be used for reference purposes only. Map features are approximate, and are not necessarily accurate to surveying or engineering standards. The County of Riverside makes no warranty or guarantee as to the content (the source is often third party), accuracy, timeliness, or completeness of any of the data provided, and assumes no legal responsibility for the information contained on this map. Any use of this product with respect to accuracy and precision shall be the sole responsibility of the user.

REPORT PRINTED ON... 7/16/2025 12:49:03 PM

© Riverside County RCIT

317050022
RIAD ABDALLAH JADALLAH
19383 ASPENLEAF DR
PERRIS CA 92570

317050023
GARZA ROD & BLANCA FAMILY TRUST
19679 ARROYO CROSSING DR
CITY INDUSTRY CA 91789

317050024
ESMERALDA AVALOS
27534 VAN BUREN AVE
MENIFEE CA 92585

317050025
COMMUNITY ASSN OF PERRIS CALIF INC
P O BOX 1659
PERRIS CA 92572

317050028
DAVID M. LITTLE
P O BOX 128
YERINGTON NV 89447

317050029
KYLE C. BROWN
22865 ALVISO DR
PERRIS CA 92570

317050034

19451 DECKER RD
PERRIS CA 92570

317050035
LUIS A. HAROS
15675 GRANADA DR
MORENO VALLEY CA 92551

317050036
MARIA FLORINDA HERRERA
21261 SALTER RD
PERRIS CA 92570

317050037
LEANNA KLUCK
22530 CAJALCO RD
PERRIS CA 92570

317050038
HSU PATRICK & WENSUNG LIVING TRUST
1996 DTD 7/1/96
12660 VALLEY VIEW LN
REDLANDS CA 92373

317050040
JORGE TAPIA
22920 CAJALCO RD
PERRIS CA 92570

317050041
KAREN ANN KELLEY
2555 ALPINE RD
UPLAND CA 91784

317050044
JOSE M. CASTANEDA
980 W 17TH ST STE A
SANTA ANA CA 92706

317050045
J GUADALUPE SANDOVAL
3096 KERRY ST
SAN BERNARDINO CA 92407

317050050
MARCO MORENO
15200 CARRETERA DR
WHITTIER CA 90605

317050051
MARCO MORENO
8301 MICHIGAN AVE
WHITTIER CA 90605

317050052
MARCO MORENO
15200 CARRETERA DV
WHITTIER CA 90605

317060038
RIVERSIDE LEGACY IV-MEAD VALLEY
PO BOX 130339
CARLSBAD CA 92013

317060042
MWD
P O BOX 54153
LOS ANGELES CA 90054

317080003
THAO N. HURTADO
8171 PICKENS LN
STANTON CA 90680

317080004
LEON BRUCE EVANS
966 W PINE ST APT B
UPLAND CA 91786

317080005
JO-LET PROP
776 HIGHRIDGE ST
RIVERSIDE CA 92506

317080006
DONAVON D. RITZ
480 E MAIN ST
RIVERSIDE CA 92507

317080007

22765 CAJALCO RD
PERRIS CA 92570

317080008
HENRIETTA L. STEPHENS
22775 CAJALCO RD
PERRIS CA 92570

317080013
DANIEL DUENAS
19655 CAMINO DEL SOL
PERRIS CA 92570

317080014
ELVA MARTINEZ
PO BOX 1651
RIVERSIDE CA 92502

317080019
MAN KAM CHOW
2181 TURNBULL CANYON RD
HACIENDA HEIGHTS CA 91745

317080021
PAZ TREVINO
19641 SEATON AVE
PERRIS CA 92570

317080023
VASILIOS RIGAS
30 POINT LOMA DR
CORONA DEL MAR CA 92625

317080027
DOROTHY ROQUE
3524 MYRTLE AVE
LONG BEACH CA 90807

317080028
CARLOS DANIEL SANCHEZ
19701 SEATON AVE
PERRIS CA 92570

317080029
JAMES C. PORRAS
20180 OLEANDER AVE
PERRIS CA 92570

317080031
FLOYD H. NORRIS
137 N LARCHMONT BLV
LOS ANGELES CA 90004

317080032
STEPHEN T. ADAMS
26 S ARCH ST
JANESVILLE WI 53548

317090001
HERIBERTO DOMINGUEZ
9440 LOST GROVE RD
RIVERSIDE CA 92508

317090002
DE LA CRUZ FAMILY TRUST DATED 9/24/2019
22655 CAJALCO RD
PERRIS CA 92570

317090003
FELIPE R. ALVAREZ
3708 W 118TH ST
HAWTHORNE CA 90250

317090004
JANET B. SMITH
112704 COBBLESTONE CREEK RD
POWAY CA 92064

317090005
MIRIAM IRIS CASTRO
720 E MARKET ST
LONG BEACH CA 90805

317090006
HOWE G WILLARD IRREVOCABLE TRUST
19135 CANDLETRAIL DR
SPRING TX 77388

317090008
DE LA CRUZ FAMILY TRUST DATED 9/24/2019
22655 CAJALCO RD
PERRIS CA 92570

317090009
YING YI SUN
3042 WALNUT GROVE AVE
ROSEMEAD CA 91770

317090012
IK INV INC
1511 W HOLT BLVD STE G
ONTARIO CA 91762

317090013
SHANOWA DE LA CRUZ
22683 CAJALCO RD
PERRIS CA 92570

317090014
REY GOMEZ
2734 HALL AVE
JURUPA VALLEY CA 92509

317090017
CESAR M. ALFARO
1109 ACACIA ST
CORONA CA 92879

317090018
RAMON ARECHIGA
PO BOX 933
PERRIS CA 92572

317090019
AOC
19991 SEATON AVE
PERRIS CA 92570

317090021
AOC
950 HIGHWAY 57 E
COLLIERVILLE TN 38017

317090022
GREGORY PATRICK BAKER
P O BOX 610
PERRIS CA 92572

317090023
BARRAGAN FAMILY REVOC LIVING TRUST
DTD 10/05/2018
PO BOX 33483
RIVERSIDE CA 92519

317090033
HUONG SEN BUDDHIST TEMPLE
19865 SEATON AVE
PERRIS CA 92570

317100061
KNOX LOGISTICS VII
2323 VICTORY AVE STE 1500
DALLAS TX 75219

317140057
SEATON CAJALCO LIT JP/KND2
450 NEWPORT CENTER DR STE 405
NEWPORT BEACH CA 92660

AVERY 5162 Easy Peel® Address Labels
Bend along line to expose Pop-up Edge
Go to avery.com/templates
Use Avery Template 5162

317150060
STORSTEEN OLIVER M & SUSAN FAMILY
TRUST 5/6/98
16815 S BROADWAY ST
GARDENA CA 90248

Étiquettes d'adresse Easy Peel®
Allez à avery.ca/gabarits

AVERY 5162 Easy Peel® Address Labels
Bend along line to expose Pop-up Edge
Go to avery.com/templates
Use Avery Template 5162

Applicant:
Industrial VI Enterprises, LLC
901 Via Piemonte, Unit 75
Ontario, CA 91764

Engineer:
Albert A. Webb Associates
3788 McCray Street
Riverside, CA 92506

Applicant:
Industrial VI Enterprises, LLC
901 Via Piemonte, Unit 75
Ontario, CA 91764

Engineer:
Albert A. Webb Associates
3788 McCray Street
Riverside, CA 92506

Applicant:
Industrial VI Enterprises, LLC
901 Via Piemonte, Unit 75
Ontario, CA 91764

Engineer:
Albert A. Webb Associates
3788 McCray Street
Riverside, CA 92506

Étiquettes d'adresse Easy Peel®
Pat: avery.com/patents Repliez à la hachure afin de révéler le rebord Pop-up
Allez à avery.ca/gabarits
Utilisez le Gabarit Avery 5162

AVERY 5162 Easy Peel® Address Labels
Bend along line to expose Pop-up Edge®
Go to avery.com/templates
Use Avery Template 5162

SCAQMD – Margaret Isied
21865 Copley Drive
Diamond Bar, CA 91765

SCAQMD – Margaret Isied
21865 Copley Drive
Diamond Bar, CA 91765

Riverside County Transit Agency
Mauricio Alvarez
1825 Third St.
Riverside, CA. 92517

Riverside County Transit Agency
Mauricio Alvarez
1825 Third St.
Riverside, CA. 92517

Val Verde Unified School District
975 West Morgan Street
Perris, CA 92571

Val Verde Unified School District
975 West Morgan Street
Perris, CA 92571

Eastern Municipal Water District
P.O. Box 8300
Perris CA. 92572-8300

Eastern Municipal Water District
P.O. Box 8300
Perris CA. 92572-8300

California Air Resources Board – Stanley Armstrong
1001 I Street
Sacramento, CA 95814

California Air Resources Board – Stanley Armstrong
1001 I Street
Sacramento, CA 95814

Southern California Edison
2244 Walnut Grove Ave. Room 312
PO. Box 600
Rosemead, CA. 91770

Southern California Edison
2244 Walnut Grove Ave. Room 312
PO. Box 600
Rosemead, CA. 91770

City of Perris
101 N. D Street
Perris, CA 92570

City of Perris
101 N. D Street
Perris, CA 92570

Étiquettes d'adresse Easy Peel®
Allez à avery.ca/gabarits

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A GENERAL PLAN AMENDMENT, CHANGE OF ZONE, PLOT PLAN, AND TENTATIVE PARCEL MAP IN THE FIRST SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, October 21, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **General Plan Amendment No. 240005, Change of Zone No. 2200062, Plot Plan No. 220050, and Tentative Parcel Map No. 38601.** GPA No. 240005 is a proposal to: (1) in the northern portion of the project site, change the Foundation from Rural Community to Community Development and the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and (2) in the southern portion of the project site, change the Foundation from Rural Community to Open Space and the land use designation from Very Low Density Residential (VLDR) to Recreation (R). CZ No. 2200062 is a proposal to change the zoning in the northern portion of the site from Light Agriculture, one-acre minimum (A-1-1) and Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P). TPM No. 38601 is a Schedule E subdivision of 44.84 acres (net) to consolidate the existing 16 parcels generally located north of the MWD parcel into one parcel. PPT No. 220050 is a proposal for the construction and operation of a total of 1,003,510 square foot warehouse/distribution/manufacturing development on 44.66-acres and development of a community park on 13.33 acres. APN(s): 317-080-003 through 317-080-008, 317-080-013, 317-080-014, 317-080-019 through 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 through 317-090-007. This proposed project is located: south of Cajalco Road, west of Seaton Avenue, east of Decker Road, north of Rider Street in the First Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **TENTATIVELY CERTIFY Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 240005, TENTATIVELY APPROVE Change of Zone No. 2200013, APPROVE Plot Plan No. 220050, and APPROVE Tentative Parcel Map No. 38601**.

On September 3, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-2. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: September 25, 2025

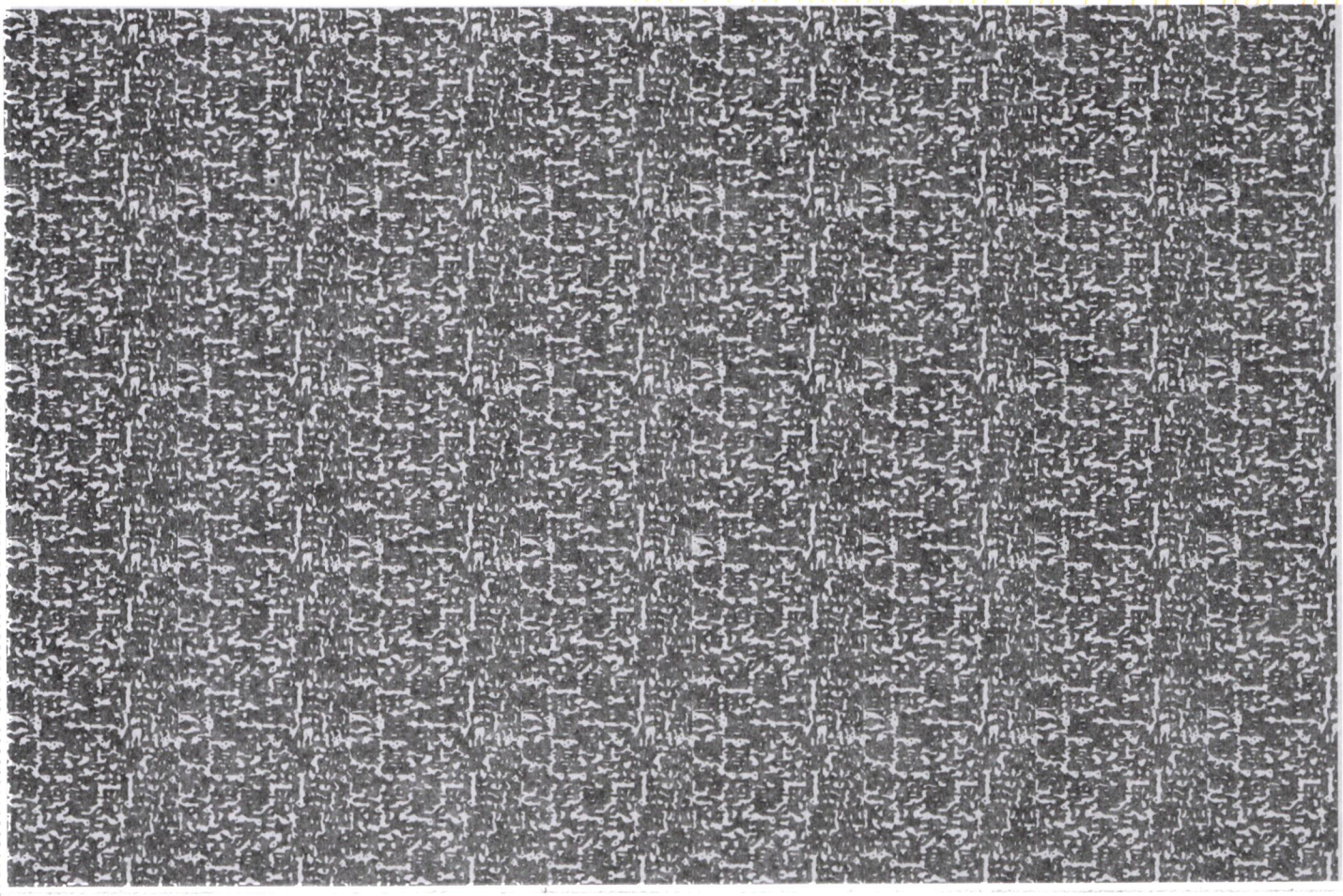
Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

8549033 8549080
PSEMPV

REMOVE SIDE EDGES FIRST
THEN FOLD AND TEAR THIS STUB ALONG PERFORATION

REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION

REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION



Riverside County Clerk of the Board
County Administrative Center
4080 Lemon Street, 1st Floor Annex
P. O. Box 1147
Riverside, CA 92502-1147

FIRST-CLASS
NONAUTO
PRSRT LTR

US POSTAGE PITNEY BOWES
ZIP 92504 $ 000.68⁶
02 7W
0008041311 SEP 26 2025

PUBLIC HEARING NOTICE

This may affect your property

RECEIVED RIVERSIDE COUNTY
CLERK/BOARD OF SUPERVISORS
2025 SEP 30 AM 10:57

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

317050035
LUIS A. HAROS
15675 GRANADA DR
MORENO VALLEY CA 92551

NIXIE 911 7E 1260 0009/28/25
RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

BC: 92502114747 *0852-00258-28

UTF
GYJ-9[illegible]

AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UNA ENMIENDA AL PLAN GENERAL, CAMBIO DE ZONA, PLANO DE PARCELA Y MAPA TENTATIVO DE PARCELAS EN EL PRIMER DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se llevará a cabo una audiencia pública en la que se escuchará a todas las personas interesadas, ante la Junta de Supervisores del Condado de Riverside, California, en el 1.er piso de la Sala de la Junta, Centro Administrativo del Condado, 4080 Lemon Street, Riverside, **el martes 21 de octubre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de eso, para considerar la recomendación de la Comisión de Planificación para aprobar la **Enmienda al Plan General No. 240005, el Cambio de Zona No. 2200062, el Plano de Parcela No. 220050 y el Mapa de Parcela Tentativa No. 38601. GPA No. 240005** es una propuesta para: (1) en la parte norte del sitio del proyecto, cambiar la Fundación de Comunidad Rural a Desarrollo Comunitario y la designación del uso de la tierra de Minorista Comercial (CR) y Residencial de Muy Baja Densidad (VLDR) a Industrial Ligero (LI) y (2) En la parte sur del sitio del proyecto, cambiar la zonificación de la Comunidad Rural a Espacio Abierto y la designación del uso del suelo de Residencial de Muy Baja Densidad (VLDR) a Recreativo (R). La CZ n.° 2200062 propone cambiar la zonificación en la parte norte del sitio de Agricultura Ligera, mínimo de un acre (A-1-1) y Residencial Rural, mínimo de medio acre (R-R-1/2) a Parque Industrial (I-P). La TPM n.° 38601 es una subdivisión del Anexo E de 44,84 acres (netos) para consolidar las 16 parcelas existentes, generalmente ubicadas al norte de la parcela del MWD, en una sola. La PPT n.° 220050 es una propuesta para la construcción y operación de un complejo de almacén, distribución y fabricación de 1 003 510 pies cuadrados en un terreno de 44,66 acres, y la construcción de un parque comunitario en 13,33 acres. APN: 317-080-003 a 317-080-008, 317-080-013, 317-080-014, 317-080-019 a 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 a 317-090-007. Este proyecto propuesto está ubicado: al sur de Cajalco Road, al oeste de Seaton Avenue, al este de Decker Road, al norte de Rider Street en el Primer Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **CERTIFICAR TENTATIVAMENTE el Informe de Impacto Ambiental, APRUEBE TENTATIVAMENTE la Enmienda al Plan General No. 240005, APRUEBE TENTATIVAMENTE el Cambio de Zona No. 2200013, APRUEBE el Plano de Parcela No. 220050 y APRUEBE el Mapa de Parcela Tentativa No. 38601**.

El 3 de septiembre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, por 3 votos a favor y 2 en contra. Los documentos de la reunión del Departamento de Planificación sobre el proyecto propuesto pueden consultarse en línea, con la fecha de la audiencia de la Comisión de Planificación, en la página de Audiencias Públicas del sitio web del Departamento de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DEL PROYECTO, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o podrá comparecer y ser escuchada en el lugar y hora indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, quien los considerará, además de cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante el tribunal, podrá limitarse a plantear únicamente las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores durante la audiencia pública o antes de ella. Tenga en cuenta que, como resultado de la audiencia pública y de la consideración de todos los comentarios públicos, escritos y orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental relacionado. En consecuencia, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrán modificarse de forma distinta a la propuesta específica.

Formatos alternativos disponibles a solicitud para personas con discapacidad. Si necesita adaptaciones razonables, comuníquese con la secretaria de la Junta al (951) 955-1069.

Envíe toda correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, apartado postal 1147, Riverside, CA 92502-1147 o envíe un correo electrónico a cob@rivco.org.

Fecha: 25 de septiembre de 2025

Kimberly A. Rector, secretaria de la junta

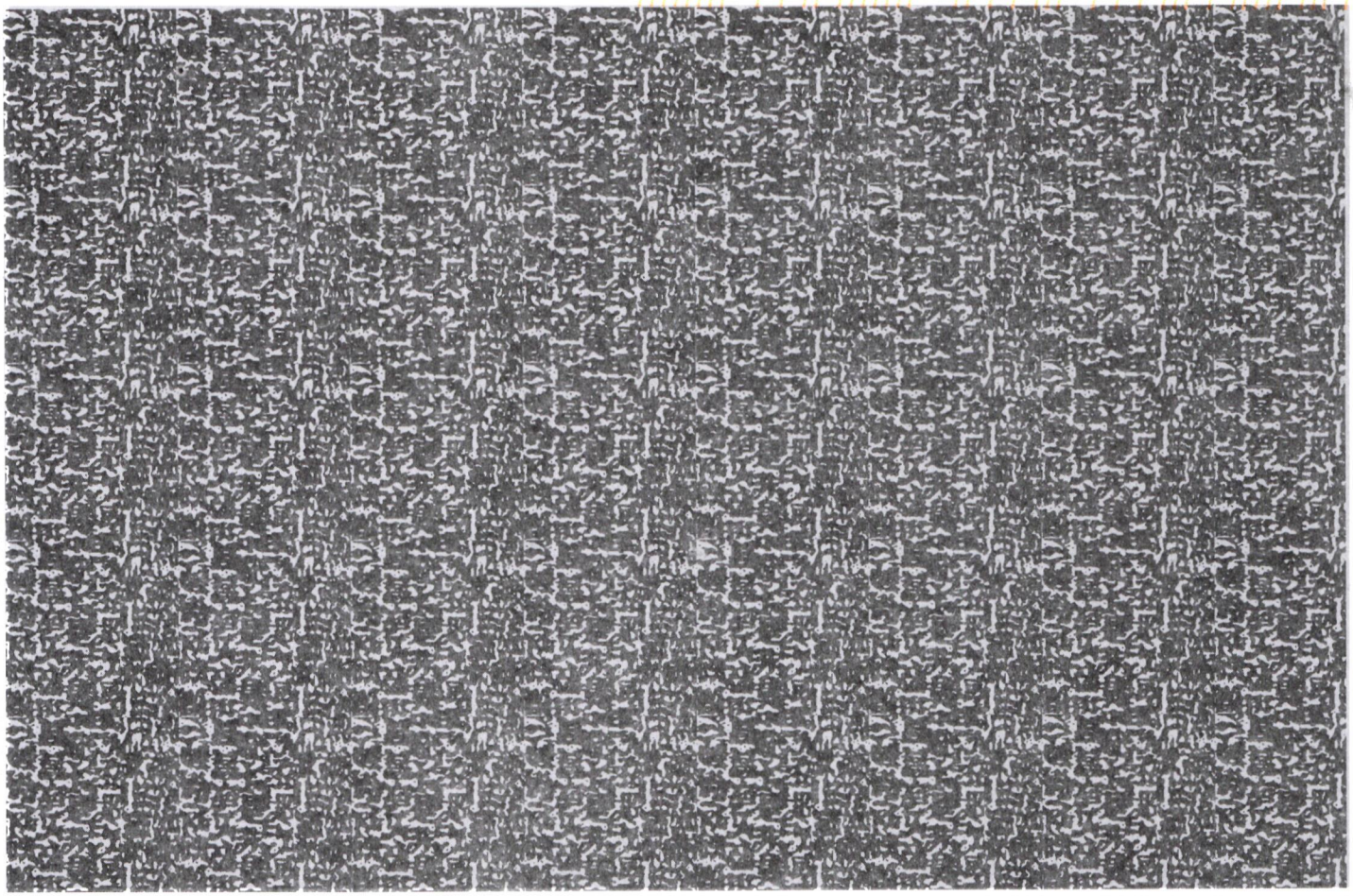
Por: Naomy Sicra, asistente de secretaria de la junta

8549033 8549080 PSEMPV

REMOVE SIDE EDGES FIRST
THEN FOLD AND TEAR THIS STUB ALONG PERFORATION

REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION

REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION



Riverside County Clerk of the Board
County Administrative Center
4080 Lemon Street, 1st Floor Annex
P. O. Box 1147
Riverside, CA 92502-1147

FIRST-CLASS
NONAUTO
PRSRT LTR

US POSTAGE PITNEY BOWES
ZIP 92504 $ 000.68⁶
02 7W
0008041311 SEP 26 2025

PUBLIC HEARING NOTICE

This may affect your property

RECEIVED RIVERSIDE COUNTY
CLERK/BOARD OF SUPERVISORS
2025 SEP 30 AM 10:57

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

317050035
LUIS A. HAROS
15675 GRANADA DR
MORENO VALLEY CA 92551

NIXIE 911 7E 1260 0009/28/25
RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

BC: 92502114747 *0852-00260-28-23

UTF
CYJ-[illegible]

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A GENERAL PLAN AMENDMENT, CHANGE OF ZONE, PLOT PLAN, AND TENTATIVE PARCEL MAP IN THE FIRST SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, October 21, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **General Plan Amendment No. 240005, Change of Zone No. 2200062, Plot Plan No. 220050, and Tentative Parcel Map No. 38601.** GPA No. 240005 is a proposal to: (1) in the northern portion of the project site, change the Foundation from Rural Community to Community Development and the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and (2) in the southern portion of the project site, change the Foundation from Rural Community to Open Space and the land use designation from Very Low Density Residential (VLDR) to Recreation (R). CZ No. 2200062 is a proposal to change the zoning in the northern portion of the site from Light Agriculture, one-acre minimum (A-1-1) and Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P). TPM No. 38601 is a Schedule E subdivision of 44.84 acres (net) to consolidate the existing 16 parcels generally located north of the MWD parcel into one parcel. PPT No. 220050 is a proposal for the construction and operation of a total of 1,003,510 square foot warehouse/distribution/manufacturing development on 44.66-acres and development of a community park on 13.33 acres. APN(s): 317-080-003 through 317-080-008, 317-080-013, 317-080-014, 317-080-019 through 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 through 317-090-007. This proposed project is located: south of Cajalco Road, west of Seaton Avenue, east of Decker Road, north of Rider Street in the First Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **TENTATIVELY CERTIFY Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 240005, TENTATIVELY APPROVE Change of Zone No. 2200013, APPROVE Plot Plan No. 220050, and APPROVE Tentative Parcel Map No. 38601**.

On September 3, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-2. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

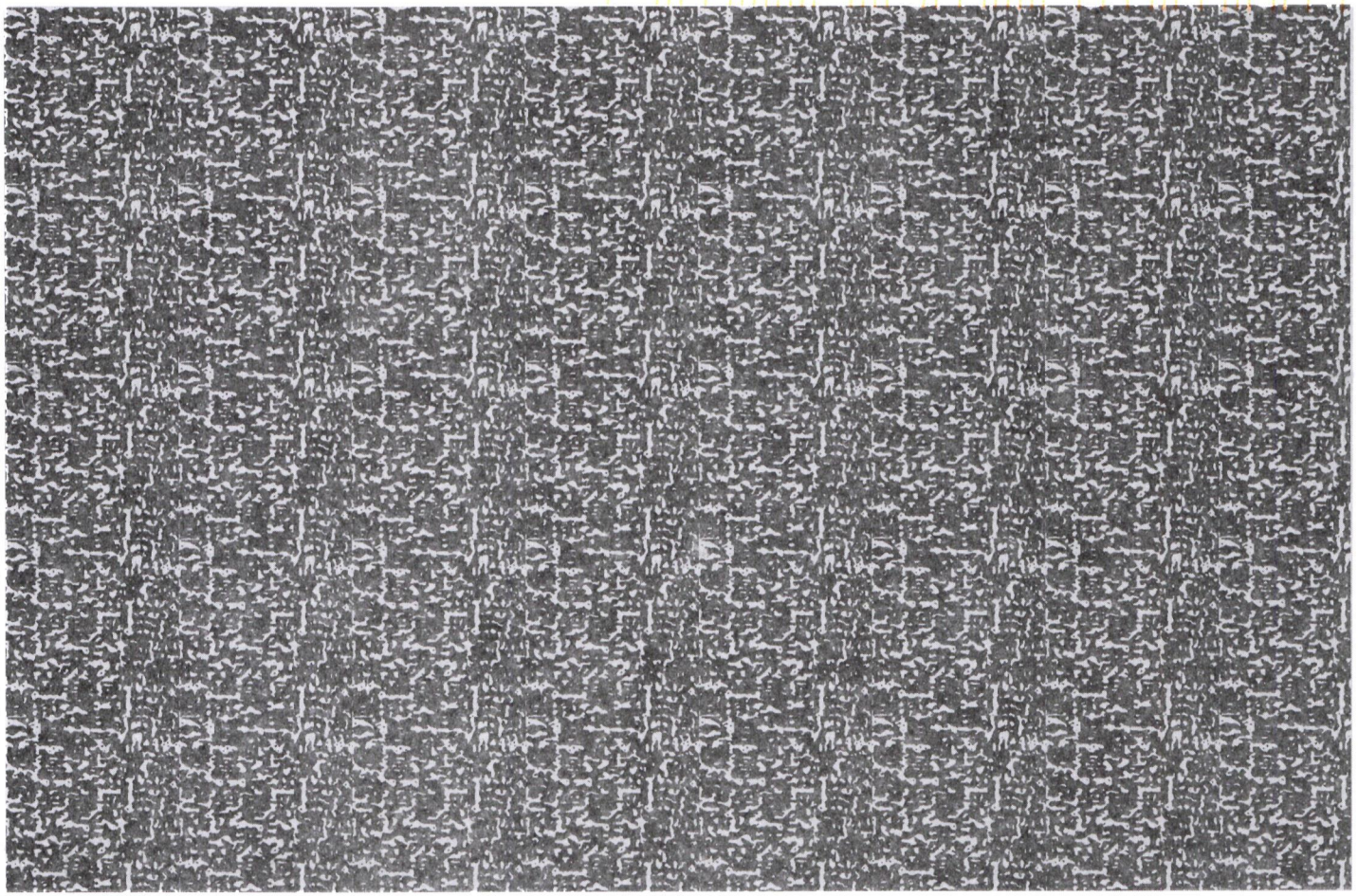
Dated: September 25, 2025

Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

8549033 8549080
PSEMPV

REMOVE SIDE EDGES FIRST
THEN FOLD AND TEAR THIS STUB ALONG PERFORATION

REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION



REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION

B
B

Riverside County Clerk of the Board
County Administrative Center
4080 Lemon Street, 1st Floor Annex
P. O. Box 1147
Riverside, CA 92502-1147

FIRST-CLASS
NONAUTO
PRSRT LTR

US POSTAGE PITNEY BOWES
ZIP 92504 $ 000.68⁶
02 7W
0008041311 SEP 26 2025

PUBLIC HEARING NOTICE

This may affect your property

RECEIVED RIVERSIDE COUNTY
CLERK/BOARD OF SUPERVISORS
2025 SEP 30 AM 10:57

317090018
RAMON ARECHIGA
PO BOX 933
PERRIS CA 92572

VAC

NIXIE 911 DE 1269 0000/28/25
RETURN TO SENDER
VACANT
UNABLE TO FORWARD
BC: 92502114747 *2252-06053-28-19

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UNA ENMIENDA AL PLAN GENERAL, CAMBIO DE ZONA, PLANO DE PARCELA Y MAPA TENTATIVO DE PARCELAS EN EL PRIMER DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se llevará a cabo una audiencia pública en la que se escuchará a todas las personas interesadas, ante la Junta de Supervisores del Condado de Riverside, California, en el 1.er piso de la Sala de la Junta, Centro Administrativo del Condado, 4080 Lemon Street, Riverside, **el martes 21 de octubre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de eso, para considerar la recomendación de la Comisión de Planificación para aprobar la **Enmienda al Plan General No. 240005, el Cambio de Zona No. 2200062, el Plano de Parcela No. 220050 y el Mapa de Parcela Tentativa No. 38601. GPA No. 240005** es una propuesta para: (1) en la parte norte del sitio del proyecto, cambiar la Fundación de Comunidad Rural a Desarrollo Comunitario y la designación del uso de la tierra de Minorista Comercial (CR) y Residencial de Muy Baja Densidad (VLDR) a Industrial Ligero (LI) y (2) En la parte sur del sitio del proyecto, cambiar la zonificación de la Comunidad Rural a Espacio Abierto y la designación del uso del suelo de Residencial de Muy Baja Densidad (VLDR) a Recreativo (R). La CZ n.° 2200062 propone cambiar la zonificación en la parte norte del sitio de Agricultura Ligera, mínimo de un acre (A-1-1) y Residencial Rural, mínimo de medio acre (R-R-1/2) a Parque Industrial (I-P). La TPM n.° 38601 es una subdivisión del Anexo E de 44,84 acres (netos) para consolidar las 16 parcelas existentes, generalmente ubicadas al norte de la parcela del MWD, en una sola. La PPT n.° 220050 es una propuesta para la construcción y operación de un complejo de almacén, distribución y fabricación de 1 003 510 pies cuadrados en un terreno de 44,66 acres, y la construcción de un parque comunitario en 13,33 acres. APN: 317-080-003 a 317-080-008, 317-080-013, 317-080-014, 317-080-019 a 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 a 317-090-007. Este proyecto propuesto está ubicado: al sur de Cajalco Road, al oeste de Seaton Avenue, al este de Decker Road, al norte de Rider Street en el Primer Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **CERTIFICAR TENTATIVAMENTE el Informe de Impacto Ambiental, APRUEBE TENTATIVAMENTE la Enmienda al Plan General No. 240005, APRUEBE TENTATIVAMENTE el Cambio de Zona No. 2200013, APRUEBE el Plano de Parcela No. 220050 y APRUEBE el Mapa de Parcela Tentativa No. 38601**.

El 3 de septiembre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, por 3 votos a favor y 2 en contra. Los documentos de la reunión del Departamento de Planificación sobre el proyecto propuesto pueden consultarse en línea, con la fecha de la audiencia de la Comisión de Planificación, en la página de Audiencias Públicas del sitio web del Departamento de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DEL PROYECTO, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o podrá comparecer y ser escuchada en el lugar y hora indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, quien los considerará, además de cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante el tribunal, podrá limitarse a plantear únicamente las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores durante la audiencia pública o antes de ella. Tenga en cuenta que, como resultado de la audiencia pública y de la consideración de todos los comentarios públicos, escritos y orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental relacionado. En consecuencia, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrán modificarse de forma distinta a la propuesta específica.

Formatos alternativos disponibles a solicitud para personas con discapacidad. Si necesita adaptaciones razonables, comuníquese con la secretaria de la Junta al (951) 955-1069.

Envíe toda correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, apartado postal 1147, Riverside, CA 92502-1147 o envíe un correo electrónico a cob@rivco.org.

Fecha: 25 de septiembre de 2025

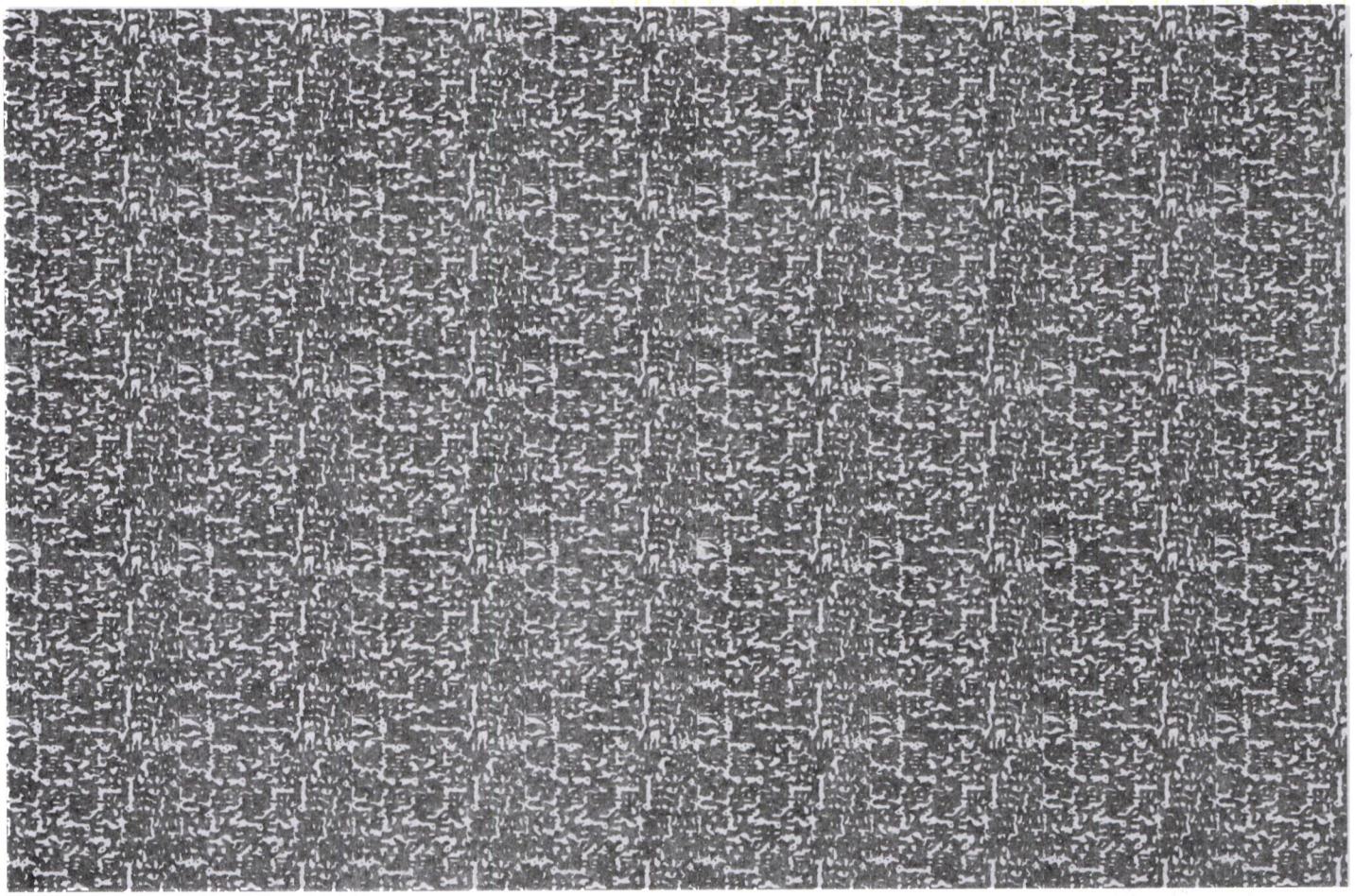
Kimberly A. Rector, secretaria de la junta

Por: Naomy Sicra, asistente de secretaria de la junta

8549033 8549080 PSEMPV

REMOVE SIDE EDGES FIRST
THEN FOLD AND TEAR THIS STUB ALONG PERFORATION

REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION



REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION

Riverside County Clerk of the Board
County Administrative Center
4080 Lemon Street, 1st Floor Annex
P. O. Box 1147
Riverside, CA 92502-1147

FIRST-CLASS
NONAUTO
PRSRT LTR

US POSTAGE IMI PITNEY BOWES
ZIP 92504 $ 000.68[6]
02 7W
0008041311 SEP 26 2025

PUBLIC HEARING NOTICE
This may affect your property

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

RECEIVED RIVERSIDE COUNTY
CLERK/BOARD OF SUPERVISORS
2025 SEP 30 AM 10: 57

317090018
RAMON ARECHIGA
PO BOX 933
PERRIS CA 92572

VAC

NIXIE 911 SE 1260 0009/28/25
RETURN TO SENDER
VACANT
UNABLE TO FORWARD
BC: 92502114747 *2252-06054-28-19

VAC
92502-1147
GYJ-SMT 92572

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A GENERAL PLAN AMENDMENT, CHANGE OF ZONE, PLOT PLAN, AND TENTATIVE PARCEL MAP IN THE FIRST SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, October 21, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **General Plan Amendment No. 240005, Change of Zone No. 2200062, Plot Plan No. 220050, and Tentative Parcel Map No. 38601.** GPA No. 240005 is a proposal to: (1) in the northern portion of the project site, change the Foundation from Rural Community to Community Development and the land use designation from Commercial Retail (CR) and Very Low Density Residential (VLDR) to Light Industrial (LI) and (2) in the southern portion of the project site, change the Foundation from Rural Community to Open Space and the land use designation from Very Low Density Residential (VLDR) to Recreation (R). CZ No. 2200062 is a proposal to change the zoning in the northern portion of the site from Light Agriculture, one-acre minimum (A-1-1) and Rural Residential, ½-acre minimum (R-R-1/2) to Industrial Park (I-P). TPM No. 38601 is a Schedule E subdivision of 44.84 acres (net) to consolidate the existing 16 parcels generally located north of the MWD parcel into one parcel. PPT No. 220050 is a proposal for the construction and operation of a total of 1,003,510 square foot warehouse/distribution/manufacturing development on 44.66-acres and development of a community park on 13.33 acres. APN(s): 317-080-003 through 317-080-008, 317-080-013, 317-080-014, 317-080-019 through 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 through 317-090-007. This proposed project is located: south of Cajalco Road, west of Seaton Avenue, east of Decker Road, north of Rider Street in the First Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **TENTATIVELY CERTIFY Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 240005, TENTATIVELY APPROVE Change of Zone No. 2200013, APPROVE Plot Plan No. 220050, and APPROVE Tentative Parcel Map No. 38601**.

On September 3, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-2. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

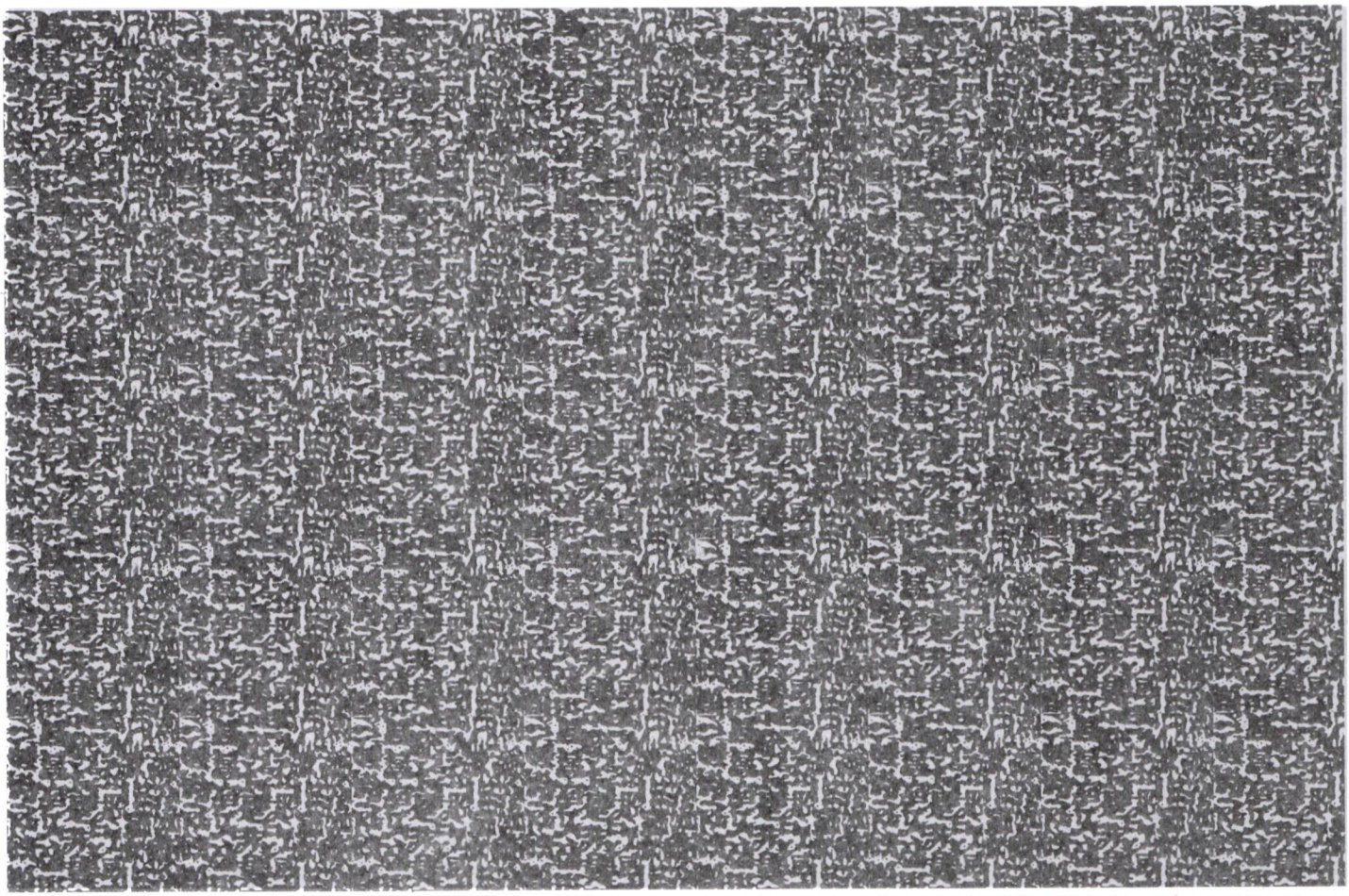
Dated: September 25, 2025

Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

8549033 8549080
PSEMPV

REMOVE SIDE EDGES FIRST
THEN FOLD AND TEAR THIS STUB ALONG PERFORATION

REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION



REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION

B
B

Riverside County Clerk of the Board
County Administrative Center
4080 Lemon Street, 1st Floor Annex
P. O. Box 1147
Riverside, CA 92502-1147

FIRST-CLASS
NONAUTO
PRSRT LTR

US POSTAGE PITNEY BOWES
ZIP 92504 $ 000.68⁶
02 7W
0008041311 SEP 26 2025

PUBLIC HEARING NOTICE

This may affect your property

RECEIVED RIVERSIDE COUNTY
CLERK/BOARD OF SUPERVISORS
2025 OCT -6 AM 10:57

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

317090023
BARRAGAN FAMILY REVOC LIVING TRUST
DTD 10/05/2018
PO BOX 33483
RIVERSIDE CA 92519

NIXIE 910 FE 1260 0010/01/25
RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD
BC: 92502114747 *2952-01018-28-31

FWD
ANK
92519>0483
92502>1147
GYJ-SNM 925

AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UNA ENMIENDA AL PLAN GENERAL, CAMBIO DE ZONA, PLANO DE PARCELA Y MAPA TENTATIVO DE PARCELAS EN EL PRIMER DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se llevará a cabo una audiencia pública en la que se escuchará a todas las personas interesadas, ante la Junta de Supervisores del Condado de Riverside, California, en el 1.er piso de la Sala de la Junta, Centro Administrativo del Condado, 4080 Lemon Street, Riverside, **el martes 21 de octubre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de eso, para considerar la recomendación de la Comisión de Planificación para aprobar la **Enmienda al Plan General No. 240005, el Cambio de Zona No. 2200062, el Plano de Parcela No. 220050 y el Mapa de Parcela Tentativa No. 38601. GPA No. 240005** es una propuesta para: (1) en la parte norte del sitio del proyecto, cambiar la Fundación de Comunidad Rural a Desarrollo Comunitario y la designación del uso de la tierra de Minorista Comercial (CR) y Residencial de Muy Baja Densidad (VLDR) a Industrial Ligero (LI) y (2) En la parte sur del sitio del proyecto, cambiar la zonificación de la Comunidad Rural a Espacio Abierto y la designación del uso del suelo de Residencial de Muy Baja Densidad (VLDR) a Recreativo (R). La CZ n.° 2200062 propone cambiar la zonificación en la parte norte del sitio de Agricultura Ligera, mínimo de un acre (A-1-1) y Residencial Rural, mínimo de medio acre (R-R-1/2) a Parque Industrial (I-P). La TPM n.° 38601 es una subdivisión del Anexo E de 44,84 acres (netos) para consolidar las 16 parcelas existentes, generalmente ubicadas al norte de la parcela del MWD, en una sola. La PPT n.° 220050 es una propuesta para la construcción y operación de un complejo de almacén, distribución y fabricación de 1 003 510 pies cuadrados en un terreno de 44,66 acres, y la construcción de un parque comunitario en 13,33 acres. APN: 317-080-003 a 317-080-008, 317-080-013, 317-080-014, 317-080-019 a 317-080-023, 317-080-027, 317-080-028, 317-080-029, 317-090-003 a 317-090-007. Este proyecto propuesto está ubicado: al sur de Cajalco Road, al oeste de Seaton Avenue, al este de Decker Road, al norte de Rider Street en el Primer Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **CERTIFICAR TENTATIVAMENTE el Informe de Impacto Ambiental, APRUEBE TENTATIVAMENTE la Enmienda al Plan General No. 240005, APRUEBE TENTATIVAMENTE el Cambio de Zona No. 2200013, APRUEBE el Plano de Parcela No. 220050 y APRUEBE el Mapa de Parcela Tentativa No. 38601**.

El 3 de septiembre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, por 3 votos a favor y 2 en contra. Los documentos de la reunión del Departamento de Planificación sobre el proyecto propuesto pueden consultarse en línea, con la fecha de la audiencia de la Comisión de Planificación, en la página de Audiencias Públicas del sitio web del Departamento de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DEL PROYECTO, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o podrá comparecer y ser escuchada en el lugar y hora indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, quien los considerará, además de cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante el tribunal, podrá limitarse a plantear únicamente las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores durante la audiencia pública o antes de ella. Tenga en cuenta que, como resultado de la audiencia pública y de la consideración de todos los comentarios públicos, escritos y orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental relacionado. En consecuencia, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrán modificarse de forma distinta a la propuesta específica.

Formatos alternativos disponibles a solicitud para personas con discapacidad. Si necesita adaptaciones razonables, comuníquese con la secretaria de la Junta al (951) 955-1069.

Envíe toda correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, apartado postal 1147, Riverside, CA 92502-1147 o envíe un correo electrónico a cob@rivco.org.

Fecha: 25 de septiembre de 2025

Kimberly A. Rector, secretaria de la junta

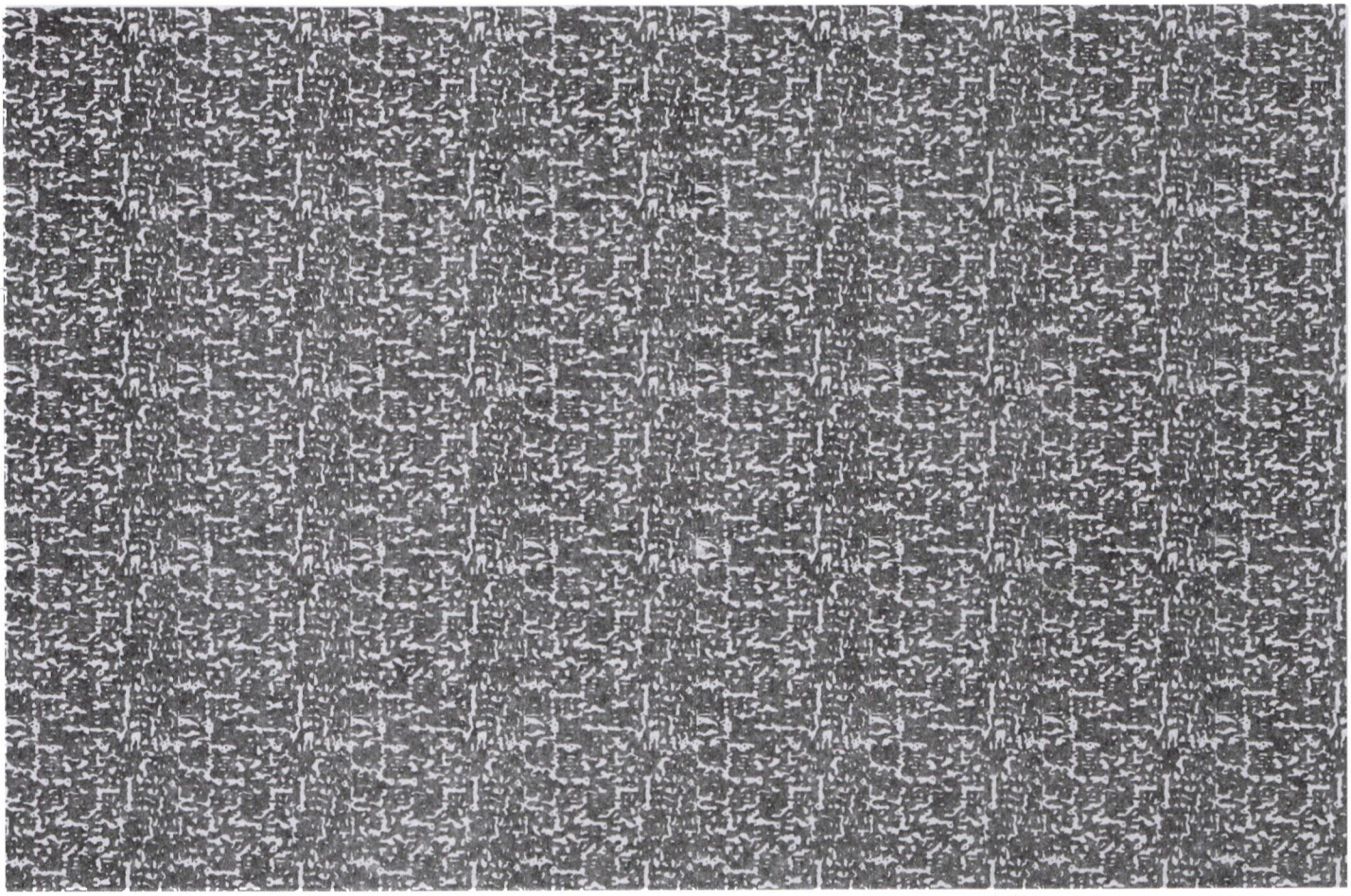
Por: Naomy Sicra, asistente de secretaria de la junta

8549033 8549080 PSEMPV

REMOVE SIDE EDGES FIRST
THEN FOLD AND TEAR THIS STUB ALONG PERFORATION

REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION

REMOVE THESE EDGES FIRST
FOLD, CREASE AND TEAR ALONG PERFORATION



Riverside County Clerk of the Board
County Administrative Center
4080 Lemon Street, 1st Floor Annex
P. O. Box 1147
Riverside, CA 92502-1147

FIRST-CLASS
NONAUTO
PRSRT LTR

US POSTAGE PITNEY BOWES
ZIP 92504 $ 000.68⁶
02 7W
0008041311 SEP 26 2025

PUBLIC HEARING NOTICE

This may affect your property

RECEIVED RIVERSIDE COUNTY
CLERK/BOARD OF SUPERVISORS
2025 OCT -6 AM 10: 57

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

SEE OTHER SIDE FOR
OPENING INSTRUCTIONS

317090023
BARRAGAN FAMILY REVOC LIVING TRUST
DTD 10/05/2018
PO BOX 33483
RIVERSIDE CA 92519

NIXIE 910 5E 1260 0010/01/25
RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD
BC: 92502114747 *2952-01019-28-31

FWD
ANK
GY

RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

Memorandum

DATE: **October 21, 2025**

TO: **Board of Supervisors**

FROM: **Russell Brady, Project Planner**

RE: **Item 23.1 – Additional Public Comments**

Attached are additional public comments received since yesterday for consideration by the Board of Supervisors and for inclusion in the record for the project.

Riverside Office · 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 · Fax (951) 955-1811

Desert Office · 77588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7040

Brady, Russell

From: Alan Sun <alansun89@gmail.com>
Sent: Monday, October 20, 2025 10:49 PM
To: Brady, Russell
Subject: Re: PPT220050/Cajalco Commerce Center - Board of Supervisors Hearing Notice

Hello,

No questions beyond reiterating opposition and skepticism to this project based on previously submitted comments. A dense and technical environmental report does not give an average person any peace of mind.

There's no shortage of existing warehouse sites along 215 freeway from Perris up to Riverside and the obvious positive impact from dropping yet another warehouse complex would be for parties that stand to make direct gains/profits from construction process and supplies.

The construction of an auxiliary local park would be a major nuisance on my property and my neighbor's. Beyond that, ongoing park maintenance is also dubious as it would depend on local government oversight and tax funding. Not a promising outlook when a local park would never have crossed the minds of local leaders if it was not "gifted" by a private developer.

While Hillwood (Texas based real estate conglomerate/private equity) might've played a role in urbanizing and developing its own local state communities, I have little faith its interest in California inland rural real estate extends beyond squeezing out profits for investors.

Regards,

Ying (Alan) Sun
alansun89@gmail.com
626-679-5129

On Tue, Sep 30, 2025 at 8:53 AM Brady, Russell <rbrady@rivco.org> wrote:

> Due to your request to receive notifications on this project and/or comments previously on the Draft EIR, see attached public hearing notice for this project that is scheduled to be considered by the Board of Supervisors on October 21st. Let me know if you have any questions or comments.
>
> Thanks

Russell Brady

Riverside County Planning

4080 Lemon Street 12th Floor

Riverside, CA 92501

951-955-3025



How are we doing? Click the Link and tell us

Confidentiality Disclaimer

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure.
If you are not the author's intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error please delete all copies, both electronic and printed, and contact the author immediately.

County of Riverside California

RAMV
Debbie Walsh
PO Box 2244
Perris, CA 92572

October 20, 2025

Riverside County Board of Supervisors
P.O. Box 1409
Riverside, CA 92502-1409
rbrady@rivco.org

Riverside County Board of Supervisors
4080 Lemon Street
Riverside, CA 92501

***Re: Agenda Item** 23.1* **GENERAL PLAN AMENDMENT NO. 240005 (Foundation Component)**
Cajalco Commerce Center (Mead Valley Commerce Center)

Greeting Supervisors:

On behalf of concerned residents throughout the region, the Residents Association of Greater Lake Mathews (RAGLM) and the Rural Association of Mead Valley (RAMV) representing over 35,000 residents, please accept these comments in opposition to the Cajalco Commerce Center (Warehouse).

"Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts.
However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse." **(Rob Bonta, Department of Justice, July 19, 2023).**

A 1.2 million sq ft. warehouse just feet from this Project in the Industrial Corridor is sitting empty and cannot be subleased. Numerous other warehouses have been built on speculation and are empty within the Industrial Corridor already zoned for warehouses.

1. This warehouse project zoning is residential and commercial and located at Seaton and Cajalco. This project will remove valuable revenue and job creating commercial land depriving the residents of real job opportunities, not low income temporary warehouse jobs. The location of this commercial land is critical to the residents of Mead Valley. Types of business include: restaurants, strip malls and grocery stores. The EIR has not adequately addressed the removal of commercial property and replacing this with an Industrial warehouse.
2. This warehouse is outside of the current Industrial Corridor, in the residential community and required a Foundation General Plan Amendment. The EIR has not addressed the sprawl of Industrial warehouses into the residential community and effects on the entire community of pollution, truck traffic and Rancho lifestyle.

3. There is no significant justification to change the zoning from commercial and residential to Industrial. The EIR fails to justify the need and reasoning for changing the zoning from residential and commercial to Industrial especially when so many warehouses are now empty in Mead Valley.
4. The proposed warehouse requires 26 homes and families to be displaced. There is no justification in the EIR to remove 26 Ranch homes from the community.
5. This warehouse will open the door to numerous additional warehouses on 1100 acres nearby. Piece mealing is not allowed under CEQA. The EIR does not evaluate the additional warehouses within the 1100 acres nearby.
6. The County has been working on a **"NEW" Mead Valley Area Plan since February, 2023** and yet this "NEW" Mead Valley Area plan was not included in the EIR for the Mead Valley Commerce Center or the Cajalco Commerce Center. Even though this plan has been in the works for almost 2 years the Plan was first brought to the attention of the Mead Valley Community at the recent "Town Hall Meeting" on October 15, 2025.
   Exhibit A: Mead Valley Area Plan Map. The Town Hall consisted of a simple Power Point presentation on the Area Plan. No questions were allowed and no information was given.
7. The land for this project and thousands of acres nearby is prime habitat land for endangered and threatened animals such as the Burrowing Owl. The EIR does not include the cumulative impacts of this warehouse and the numerous other warehouses in the "new" Mead Valley Area Plan area.
8. This Property is near the Mott Rimrock Reserve and UCR Research Facility. Pollution, noise and lighting from this warehouse and nearby warehouses will impact the habitat living in the area. The additional impacts to habitat and destruction of habitat has not been adequately addressed in the EIR.
9. Mead Valley leads the list for the highest warehouses in the area per resident. How many more warehouses must this poor area of color endure? The Environmental Justice report has not adequately addressed this concern. The heath impacts to the Mead Valley residents and school children have not been adequately addressed.
10. This warehouse project is yet another warehouse with no tenant. Built on speculation while the industry continues to take a nose dive and empty warehouses explode. The EIR has not addressed the need for warehouses as so many are vacant.
11. Project is adjacent to the Colorado Aqueduct which is drinking water for Southern California. Blasting will need to take place near the aqueduct. Impacts from vibration from the trucks near the aqueduct over time have not been addressed in the EIR. The Colorado Aqueduct provides about 20% of the region's water supply and serves millions of people in Los Angeles and Orange County. Can we afford to risk the Aqueduct being damaged?
12. The EIR did not adequately analyze the truck routes and impacts from this warehouse. The EJ document States:
    "The Project is designed to route all truck traffic to driveways proposed along Seaton Avenue and along Cajalco Road/Cajalco Expressway to access Interstate 215 (I-215), and there are no existing or planned sensitive receptors along these segments of Seaton Avenue and Cajalco Road/Cajalco Expressway."
    The EIR does not property analyze truck traffic from this Project.
    (a) the project cannot route ALL truck traffic to the I-215 Freeway. That is impossible.
    (b) The current warehouses in Mead Valley along Harvill Ave. route trucks using Cajalco going west to the I-91 and back from the ports using Cajalco east.
    "There are no existing or planned sensitive receptors" is inaccurate. There are a number of sensitive receptors along Cajalco where the trucks will pass. This Project will route a substantial number of trucks onto Cajalco road going west past two elementary schools, a middle school and community library.

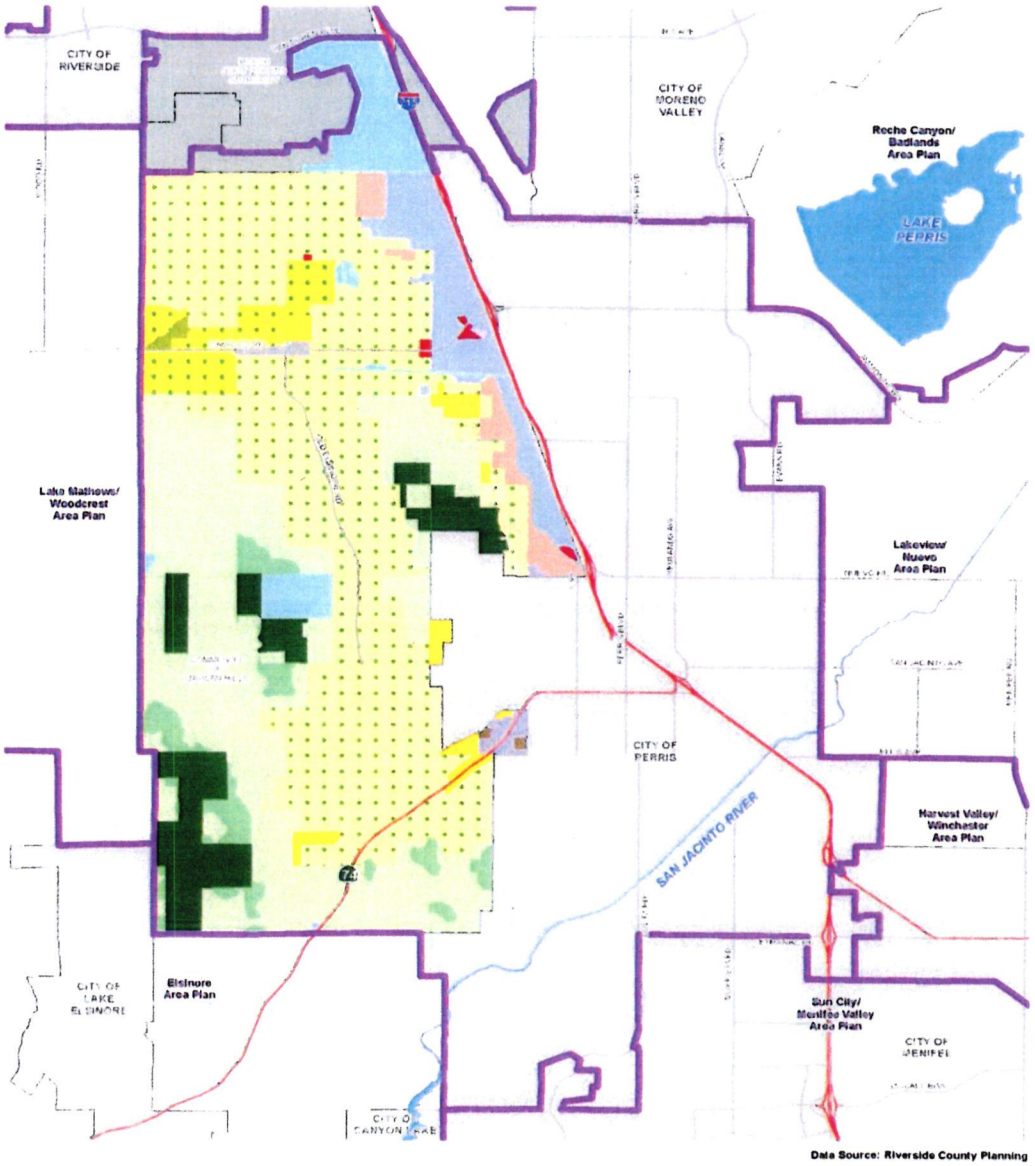
13. We do not need to add additional land to the current Industrial Corridor with so much land now empty and warehouses setting empty.

14. Mead Valley is an Environmental Justice Community similar to Bloomington where the majority of poor Hispanic families were uprooted, schools bulldozed and community destroyed in order to build massive warehouses under speculation. We do not need to repeat what happened in Bloomington.
15. The park may or may not be built. The warehouse is being built of speculation. The Park is a sensitive receptor. Plans for a "Park" just feet from the dock doors, next to the Colorado Aqueduct, at the end of the road is open to homeless camps and drug dealers. Hidden from view. This will not benefit the community, but the developer. There is a nice park located at the Mead Valley Community Center with a 24-7 security officer. That park needs to be expanded.
16. Cajalco Road will widen at Decker to add one more lane and then narrow at Seaton to one lane causing a bottleneck. The majority of the trucks from this project will use Cajalco West to the I-15. Few warehouse trucks access the I-215 from Cajalco going east.
17. This project is part of a large number of other Foundation GPS's getting ready for approval. Piecemealing these projects to get millions of square feet of warehouses approved.
18. This project and others that are part of the FGPA's will destroy valuable habitat land next to the Mott Rimrock Reserve.
19. The numerous Projects are being piecemealed instead of being considered as one project. The impacts to the community of Mead Valley cannot be evaluated as these projects come up individually.

"NEW" Proposed Mead Valley Area Plan



Current Adopted Mead Valley Area Plan Map



COMMUNITY DEVELOPMENT
- Very Low Density Residential
- Low Density Residential
- Medium Density Residential
- Medium High Density Residential
- Very High Density Residential
- Highest Density Residential
- Commercial Retail
- Commercial Office
- Light Industrial
- Business Park
- Public Facilities
- Community Center
- Mixed-Use Area

RURAL COMMUNITY
- Rural Community - Estate Density Residential
- Rural Community - Very Low Density Residential
- Rural Community - Low Density Residential

RURAL
- Rural Residential
- Rural Mountainous

AGRICULTURE
- Agriculture

OPEN SPACE
- Conservation
- Conservation Habitat
- Open Space Recreation
- Water

- March Joint Powers Authority
- Highways
- Area Plan Boundary
- Waterbodies
- City Boundary

Figure 3

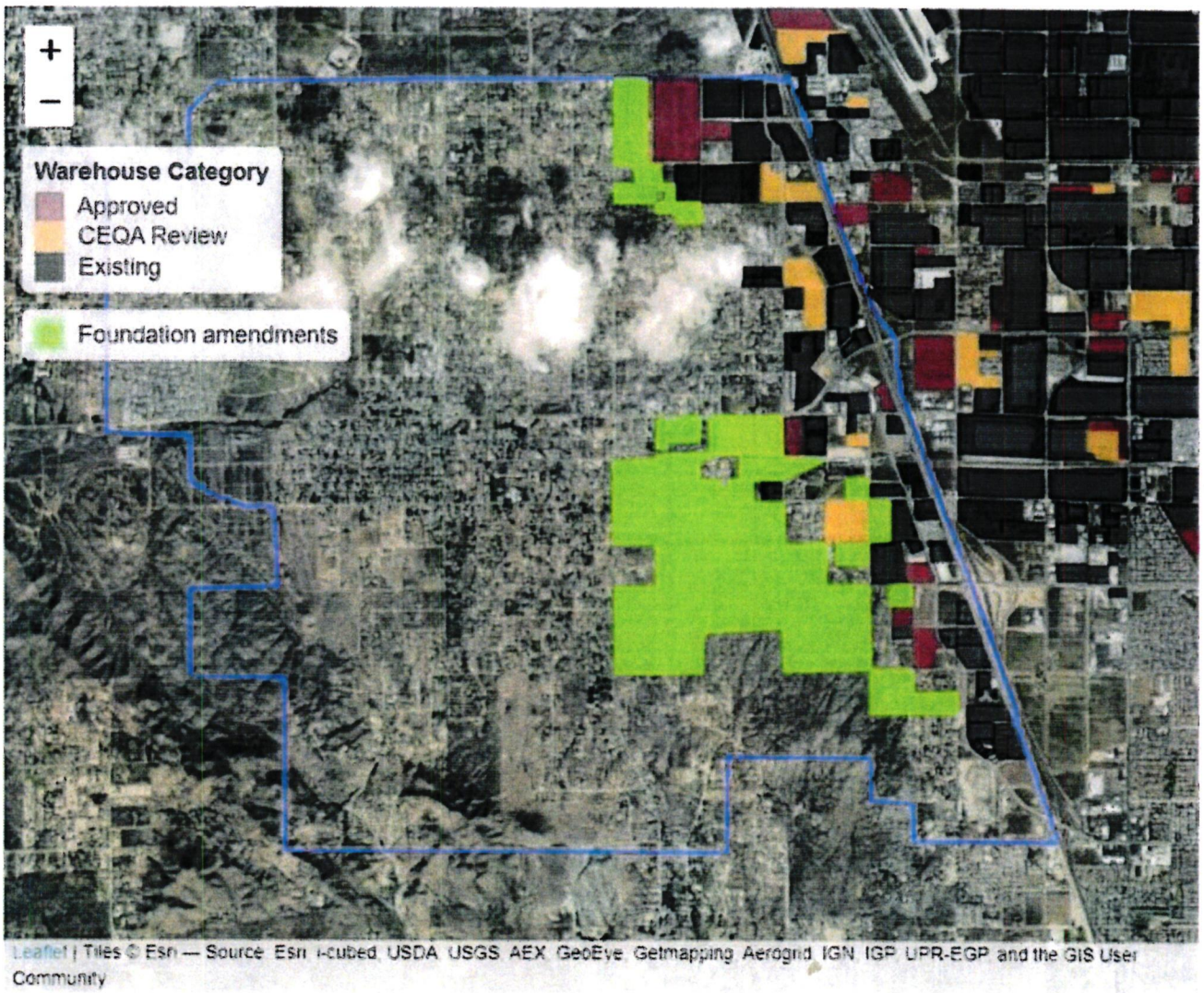
June 26, 2018

0 1 2 Miles

MEAD VALLEY AREA PLAN
LAND USE PLAN

10.3.4 Planned Warehouses map for Mead Valley Foundation plan amendments

Figure 10.5



This Project did not provide the required findings necessary to change from rural and agriculture land uses to Industrial land use.

I. FINDINGS FOR FOUNDATION COMPONENT GENERAL PLAN AMENDMENT CANNOT BE MADE

No. 220003 should not be approved as the required findings for approving such an amendment are unsupported by substantial evidence and cannot be made. Zone change 220003 does not allow for a Foundation Component General Plan Amendment that is required by this Project. Foundation General Plan

Amendments are subject to an eight-year approval cycle. (Ord. 348 § 2.5 (B).) Pursuant to Ordinance 348 Section 2.5.

(1) That new conditions or circumstances disclosed during the review process justify modifying the General Plan;

(2) That the modifications do not conflict with the overall Riverside County Vision, and

(3) That they would not create an internal inconsistency among the elements of the General Plan.

These findings cannot be made for the site

A. No New Conditions or Circumstances Justify Modifying the General Plan

There is no support for the first required finding for approving a Foundation Component Amendment to the General Plan as there is no evidence of new circumstances or conditions relative to this site. The Foundation or any GPA should not be initiated.

B. The Modifications Conflict with the Overall Riverside County Vision, Mead Valley Area Plan, and General Plan

According the General Plan, "The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area."

The Rural Community Foundation Component is intended to identify communities and neighborhoods having a rural lifestyle, where animal-keeping uses and limited infrastructure (compared with Community Development areas) are prevalent. Rural Community areas will serve as transition areas between Community Development and Rural Foundation Components. Along these lines, the Very Low Density Residential land use designation provides for the development of detached single- family residential dwelling units and ancillary structures on large parcels, and the Rural Community Foundation Component encourages equestrian and other animal-keeping uses.

Hence, the area targeted for land use change is an area intended to act as a gradual transition between Community Development and Rural Foundation components of the General Plan. This would diminish Rural Community Foundation Component of the General Plan and degrade its application in this area. Zone Change 220003 would also permit Light Industrial uses to encroach further west to develop adjacent to higher density residential uses. In this way, this conflicts with the overall purpose of these Foundation Components and the General Plan.

- *"Is flexible so that it can be adjusted to accommodate future circumstances, yet provides a solid foundation of stability so that basic ingredients in the plan are not sacrificed."* Again, no new "future circumstances" justify undermining GP stability.
- *"Protects high-value environmental resources and private property rights - and develops the complex tools needed to do so."* Private property rights surrounding, and environmental resources on and surrounding, the Zone Change 220003 site (and entire Project site) are not being protected by this proposed amendment. Residences nearby the site will be harmed by intensified land uses, increased air pollutant emissions, traffic, noise, aesthetic, and other impacts that will harm both the environment and property values.
- *"Provides a long-term means for economic stability to be achieved through investment by a variety of interests: residential, agricultural, property owner, environmental, institutional, business community, labor, and others."* Zone Change 220003 would prefer the interests of the property owner over neighboring residential uses and agricultural zoning.
- *"Preserve crucial open space and transportation corridors, resulting in more compact and efficient development than would otherwise happen."* Zone Change 220003 would promote further sprawl west away from the I-215 transportation corridor.
- *"Provide a range of community design options to respond to varied lifestyle choices."* Zone Change 220003 would delete the adopted range of design options seeking to maintain rural uses in this area of the County.
- *"Put a focus on high quality, efficient growth that uses land resources efficiently."* Zone Change 220003 would promote further sprawl and inefficient growth.
- *"Provide a process for adjustment through General Plan reviews, in accordance with state law, at regular intervals or when triggered by key events."* No "new" condition or event has occurred justifying adjustment at this site.
- *"Corridors and areas are preserved for distinctive purposes: ...economic development, including agriculture; residences..."* Zone Change 220003 would blur distinct lines and fail to preserve residential and agricultural purposes. Furthermore, if agricultural uses would occur in areas zoned for agriculture near the site, County Ordinance 625.1 (right-to-farm ordinance) would not protect such uses unless they were in operation for at least 3 years before the proposed project is developed, potentially precluding agricultural activities on surrounding properties with agricultural zoning.
- *"The rich diversity of Riverside County's environmental resources; even those modified by human activities; is preserved and enhanced for the enjoyment of present and future generations."* Zone Change 220003 would not preserve blue line streams or rural uses at the site.
- *"New growth patterns no longer reflect a pattern of random sprawl. Rather, they follow a framework of transportation and open space corridors, with concentrations of development that fit into that framework. In other words, important open space and transportation corridors define growth areas."* Zone Change 220003 promotes growth of industrial warehouse uses outside the designated transportation corridor, to where such growth was planned to be limited.

- *"The extensive heritage of rural living conditions continues to be accommodated in areas committed to that lifestyle and its sustainability is reinforced by the strong open space and urban development commitments provide for elsewhere in the RCIP."* Zone Change 220003 would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Each of our rural areas and communities has a special character that distinguishes them from urban areas and from each other. They benefit from some conveniences such as small-scale local commercial services and all-weather access roads, yet maintain an unhurried, uncrowded life style. Rural residents accept the fact that they must travel some distance for more complete services and facilities."* Zone Change 220003 would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Land use and transportation decisions are made with an understanding of their impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes."* Zone Change 220003 and the Project proposed would locate high cube warehouses adjacent to low density and very low density residential uses without concern for the health and safety of residents, as discussed further below.
- *"Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan's performance."* Zone Change 220003 would permit the locating of significant additional diesel trucks and associated localized diesel PM emissions adjacent to residences.
- *"Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations."* Zone change 220003 would permit further westerly sprawl and development intensity away from infrastructure, increasing carbon emissions and reducing energy efficiency.
- *"Along with its emphasis on achieving community desires, Riverside County remains highly respected for its sensitivity to private property rights."* Approval of Zone Change 220003 would be insensitive to the private property rights of neighboring residents who relied on the GP stability, absent important changed circumstances, when deciding to invest in their properties.

A GPA and zone change from rural to Industrial for this Project conflicts with the General Plan Vision, any Foundation GPA should not be initiated.

II. THE PROJECT SHOULD BE DENIED WHERE IT WILL RESULT IN SIGNIFICANT ENVIRONMENTAL IMPACTS, INCLUDING SIGNIFICANT HEALTH RISKS FROM DEVELOPING DISTRIBUTION WAREHOUSES ADJACENT TO RESIDENTIAL USES

The "Project" necessitating zone change 220003 is a proposal to develop a industrial high-cube warehouse/ distribution centers totaling over 1 million square feet.

This Foundation Component General Plan Amendment application is thus just one part of a larger proposal to decimate land use planning in this area, and to develop a project which is completely contrary to adopted General Plan and Zoning designations..

The Commission has the opportunity to encourage upholding the General Plan by recommending this environmentally harmful and inconsistent Project not move forward as planned. Thorough consideration should be given to the following potentially significant environment impacts that will be caused by allowing the Project to move forward:

A. Health Risk Impacts from Light Industrial Land Use adjacent to Residential Uses.

The health risk impacts from initiating zone change 220003 and the proposed Project are of particular concern and provide a strong reason to deny initiation of zone change 220003. Because of the cancer risk and other impacts of diesel emissions on human health, SCAQMD, CARB, WRCOG, and others have recommending siting warehouses at least 1000 feet from residences and other sensitive receptors. ("Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning: a Reference for Local Governments within the South Coast Air Quality Management District," May 6, 2005, "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities," WRCOG Regional Air Quality Task Force, September 12, 2005.) This Project proposes to site warehouses adjacent to homes is inconsistent with this clear guidance.

The scope and breadth of health effects of diesel PM emissions are the subject of ongoing study. At present, diesel PM is known to cause cancer; immune system effects; reproductive, developmental, and endocrine effects; nervous system effects; and lung health problems, as recognized by the County in the General Plan. Immune system effects include increased allergic inflammatory responses and suppression of infection fighting ability. Diesel PM's reproductive effects include decreased sperm production, changes in fetal development, low birth weight and other harms. Diesel PM exposure may also cause impairment to the central nervous system.
(*See, The Health Effects of Air Pollution on Children*, Michael T. Kleinman, Ph.D, Fall 2000, < http://www.aqmd.gov/docs/default-source/students/health-effects.pdf >[1]; *Diesel and Health in America: the Lingering Threat*, Clean Air Task Force, February 2005, <http://www.catf.us/resources/publications/files/Diesel_Health_in_America.pdf>, *"Dirty Air Triggers More Heart Attacks than Cocaine,"* Kate Kelland, Reuters 2011, and *"Air Pollution Worse than Cocaine for Triggering Heart Attacks, says study,"* Press Association 2011.)

---

[1] Please consider electronic citations as though they were set forth in full herein. We are happy to provide hard copies of any document upon request.

SCAQMD has stated with regards to the health effects from diesel PM:

> "Diesel particles consist mainly of elemental carbon and other carbon-containing compounds... Diesel particles are microscopic...Due to their minute size, diesel particles can penetrate deeply into the lung. There is evidence that once in the lung, diesel particles may stay there for a long time.
>
> In addition to particles, diesel exhaust contains several gaseous compounds including carbon monoxide, nitrogen oxides, sulfur dioxide and organic vapors, for example formaldehyde and 1,3-butadiene. Formaldehyde and 1,3-butadiene have been classified as toxic and hazardous air pollutants. Both have been shown to cause tumors in animal studies and there is evidence that exposure to high levels of 1,3-butadiene can cause cancer in humans...
>
> Diesel emissions may also be a problem for asthmatics. Some studies suggest that children with asthma who live near roadways with high amounts of diesel truck traffic have more asthma attacks and use more asthma medication.
>
> Some human volunteers, exposed to diesel exhaust in carefully controlled laboratory studies, reported symptoms such as eye and throat irritation, coughing, phlegm production, difficulty breathing, headache, lightheadedness, nausea and perception of unpleasant odors. Another laboratory study, in which volunteers were exposed to relatively high levels of diesel particles for about an hour, showed that such exposures could cause lung inflammation." (*The Health Effects of Air Pollution on Children, supra.*)

Furthermore, infants, children, and the elderly are more susceptible to diesel PM and its associated health impacts. ("Studies Link Fine Particulate Exposure to Children's and Seniors' Health," July/August 2015 < http://www.aqmd.gov/docs/default-source/publications/aqmd- advisor/july-advisor-2015.pdf?sfvrsn=6 >) Recent studies have linked exposure to childhood allergies, aging of the brain, and higher death rates, among other things. (*Id.*) Other recognized effects of diesel PM on children include slowed lung function and growth, increased emergency room visits, increased incidences of asthma and bronchitis, crib death, asthma respiratory infections, allergic symptoms, and asthma hospitalizations. (*Diesel and Health in America: the Lingering Threat, supra.*) Importantly, this exposure to high pollutant levels in children occurs while their lungs are still developing, and therefore has more severe impacts on this sensitive group. (*The Health Effects of Air Pollution on Children, supra.*)

This increased susceptibility to air pollutant emissions for children has resulted in the California EPA Office of Environmental Health Hazard Assessment ("OEHHA") weighting cancer risk by a factor of 10 for exposures to carcinogens from birth to two years old, and by a factor of 3 for exposures from 2 years old to 15 years old. (*Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures*, California EPA OEHHA Air Toxicology and Epidemiology Branch, April 2009, p. 3. http://oehha.ca.gov/media/downloads/crnr/tsdcancerpotency.pdf)

This Project is proposed to be developed directly adjacent to residential uses in total disregard of good neighbor policies for land use siting and appropriate residential setbacks.

C. GHG Emissions

The proposed zone change intensifies the use of the site from very low density residential to light industrial. Increased intensity of site development from potentially 2 homes (1 acre minimum for VLDR) as currently planned to an additional 152 truck loading bays if zone change 220003 is approved (not even considering the whole Project) will significantly increase mobile GHG emissions.

D. Noise

The County's General Plan recognizes that mobile noise sources may be the most annoying noise producers in the community. (*See General Plan Noise Element)* Noise from traffic and truck trips will increase noise to adjacent residences with increased trip generation and truck use. (U.S. Department of Housing and Urban Development. (March 1985) The Noise Guidebook. https://.hudexchange.info/resource/313/hud-noise-guidebook/. [Noise level a function of distance, among other factors].)The reduced setback achieved by Zone Change 220003 of residential uses from industrial uses will significantly impact noise experienced by residents.

The health impacts of noise to area residents from this Project may also be significant. Suter, Dr. Alice H., Administrative Conference of the United States. (November 1991) Noise and Its Effects. http://www.northfriends.org/images/WLCcomments/Johnson%20and%20Sedlack%20Attachment%203.pdf.

E. Traffic/ Transportation

The Project would significantly increase local traffic in a residential area. The Project would also increase regional traffic on area freeways including I-215, SR-60, etc. where distribution warehouses in the Inland Empire regularly travel to/ from the ports of Los Angeles and Long Beach.

In addition, the conversion of minimal passenger vehicle trips to passenger vehicle and heavy- duty truck trips adds significantly to the need and cost of road repair. According to one study, a 40-ton truck does as much damage to the road as 9,600 passenger cars. (*"Overweight trucks damage infrastructure"* April Castro, USA Today, 2007 http://usatoday30.usatoday.com/news/nation/2007-09-10-3878428638_x.htm) Impacts to transportation infrastructure will be significantly increased by this Project.

Warehouses within 1000 feet of a sports park or school significantly harms people living near warehouses, children who may be using this proposed sports park, harming their environmental and quality of life and harming the entire community. **This will bring thousands of children to a place that causes serious harm such as asthma, lung and heart disease.**

The Riverside County General Plan is required and must protect the children under its jurisdiction. Forcing Mead Valley children to use this park because you have failed to build your own park is a disgrace to everyone who lives in Riverside County. Mead Valley is an Environmental Justice community and one of the poorest communities in the County. Mead Valley receives millions of dollars in EJ funding every year, but instead of building a nice park, money was spent on hundreds of trees. With the cost of water who can afford water for those trees. **What real benefit is this to the community? A real sports park closer to the local schools would be beneficial to the residents of our community.**

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per CARB guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[14]
- Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

B. The Modifications Conflict with the Overall Riverside County Vision, Mead Valley Area Plan and General Plan

According to the General Plan, "The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and

Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area."

Along these lines, the Very Low Density Residential land use designation provides for the development of detached single- family residential dwelling units and ancillary structures on large parcels, and the Rural Community Foundation Component encourages equestrian and other animal- keeping uses.

AIR QUALITY, ENERGY, GREENHOUSE GAS EMISSIONS AND HEALTH RISK ASSESSMENT IMPACT ANALYSIS.

In accordance with the CEQA requirements, the County does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the County and region will meet federal and state standards. Instead, the County relies on the expertise of the SCAQMD and utilizes the SCAQMD CEQA Handbook as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

The Environmental Justice Element of the General Plan:
Policies:
HC 14.1 When feasible, avoid siting homes and other sensitive receptors near known or anticipated sources of air pollution.
HC 14.2 When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors.

Health Risk Reduction
This category includes policies that work towards reducing unique and compounded health risks. The following policies address pollution exposure and access to food and encourages safe and sanitary homes and an environment conducive to engaging in physical activity.
Pollution Exposure Policies:
HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the Salton Sea and other bodies of water that impact air quality and water quality and seek and pursue opportunities to address impacts to the maximum extent possible, and make public the data and other information related to the status of the effort.
HC 16.2 Pursue funding and other opportunities from state, federal, and local government and non-government sources and allocate county general funds to improve public health and limit pollution exposure and promote efforts to ameliorate environmental justice constraints in environmental justice communities.
HC 16.3 Assist communities in seeking funding for community initiated clean air projects including the installation of on-site air monitoring equipment in areas of high exposure to air contaminants.
HC 16.4 Pursue funding to connect low-income residents and communities to municipal water and wastewater services. In the interim, seek financial assistance for septic system repair in order to limit groundwater contamination by poorly maintained septic systems or to provide for connections to wastewater systems as a viable alternative if such systems can be made readily available.
HC 16.5* Evaluate the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. Similarly, encourage sensitive receptors, such as housing, schools, hospitals, clinics, and childcare facilities to be located away from uses that pose potential hazards to human health and safety.
HC 16.6* When developing and siting large scale logistics, warehouse and distribution projects, address

the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019 and as may be subsequently amended.
HC 16.7 Evaluate public and private facilities for health hazards or major sources of contamination, identify, and implement alternatives for removal of contamination.
HC 16.8 Evaluate creating a cap or threshold on the number of pollution sources within EJ communities and make recommendations thereon.
HC 16.9 Explore the feasibility of creating a partnership with the South Coast Air Quality Management District (SCAQMD) to establish a mitigation program to reduce the impact of air pollution as well as assist with the implementation of air quality programs.
HC 16.10* Plan for compact development projects in appropriate locations, including in existing communities and the clustering of affordable and mixed income housing therein, that make the most efficient use of land and concentrate complementary uses in close proximity to transit or non-transit mobility options and advocate for expanded transit and non-transit mobility options to serve such areas.
HC 16.11 Implement development of bicycle and pedestrian facilities to reduce dependency on fossil fuel based transportation and pursue funding to implement mobility plans and projects.
HC 16.12 Plan and implement complete streets which include sidewalks, greenbelts, and trails to facilitate use by pedestrians and bicyclists where such facilities are well separated from parallel or cross through traffic to ensure pedestrian and cyclist safety and rehabilitate/expand existing to achieve same or similar design features.

HC 16.13 Provide buffer spaces and vegetative barriers between high-volume roadways/ transportation and train track corridors and sensitive land uses.

HC 16.14* Assure that sensitive receptors are separated and protected from polluting point sources, as feasible, including agricultural businesses that produce or use pesticides and chemical fertilizers.
HC 16.15* Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development through the use of barriers, distance, or similar solutions or measures from emission sources when possible.

HC 16.22* Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum County of Riverside General Plan.

HC 16.23* Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.

HC 16.24* Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria addressing noise, land, traffic and greenhouse gas emissions to avoid or minimize creating adverse conditions for adjacent communities.

HC 18.7* Discourage industrial, agricultural and other land uses that may pollute and cause health conflicts with residential land uses either directly or indirectly. Ensure that community members are properly notified and involved in the decision-making process for new land use proposals.

HC 18.8* Work with the development community including small property and mobile home park owners so new residential development, particularly for low income households, is designed to limit their exposure to high noise levels, pesticide and fertilizer exposure, dust pollution, and other potential impacts associated with adjacent industrial and agricultural uses.
HC 18.9* Encourage the location and design of new developments to visually enhance and not degrade the character of the surrounding area through consideration of the following concepts.

Riverside County General Plan Vision statements and concepts
CHANGE OF ZONE NO. 2200062 would permit Light Industrial uses to encroach west into the established rural residential developed community. In this way, this Project conflicts with the overall purpose of these Foundation Components and the General Plan.

This Project also conflicts with the following County Vision statements and Vision concepts:

- ***"Is flexible so that it can be adjusted to accommodate future circumstances, yet provides a solid foundation of stability so that basic ingredients in the plan are not sacrificed."*** **Again, no new "future circumstances" justify undermining GP stability.**
- ***"Protects high-value environmental resources and private property rights - and develops the complex tools needed to do so."*** Private property rights surrounding, and environmental resources on and surrounding, the Project site are not being protected by this proposed zone change. Residences nearby the site will be harmed by intensified land uses, increased air pollutant emissions, traffic, noise, aesthetic, and other impacts that will harm both the environment and property values.
- ***"Provides a long-term means for economic stability to be achieved through investment by a variety of interests: residential, agricultural, property owner, environmental, institutional, business community, labor, and others."*** The project would prefer the interests of the property owner over neighboring residential uses and agricultural zoning.
- ***"Provide a range of community design options to respond to varied lifestyle choices."*** The Project would delete the adopted range of design options seeking to maintain rural uses in this area of the County.
- ***"The rich diversity of Riverside County's environmental resources; even those modified by human activities; is preserved and enhanced for the enjoyment of present and future generations."*** The Project would not preserve blue line streams or rural uses at the site.
- ***"New growth patterns no longer reflect a pattern of random sprawl. Rather, they follow a framework of transportation and open space corridors, with concentrations of development that fit into that framework. In other words, important open space and transportation corridors define growth areas."***

"The extensive heritage of rural living conditions continues to be accommodated in areas committed to that lifestyle and its sustainability is reinforced by the strong open space and urban development commitments provide for elsewhere in the RCIP." The Project would permit industrial development to encroach upon rural living areas and agricultural zoning.

- ***"Each of our rural areas and communities has a special character that distinguishes them from urban areas and from each other. They benefit from some conveniences such as small-scale local commercial services and all-weather access roads, yet maintain an unhurried, uncrowded life style. Rural residents accept the fact that they must travel some distance for more complete services and facilities."*** The Project would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Land use and transportation decisions are made with an understanding of their*

impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes." The Project proposed would locate high cube warehouses adjacent to low density and very low density residential uses without concern for the health and safety of residents, as discussed further below.

- ***"Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan's performance."*** The Project would permit the locating of significant additional diesel trucks and associated localized diesel PM emissions adjacent to residences.
- ***"Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations."*** The Project would permit further westerly sprawl and development intensity away from infrastructure, increasing carbon emissions and reducing energy efficiency.
- ***"Along with its emphasis on achieving community desires, Riverside County remains highly respected for its sensitivity to private property rights." Change of Zone no.*** *2200062* (would be insensitive to the private property rights of neighboring residents who relied on the GP stability, absent important changed circumstances, when deciding to invest in their properties.

The Mead Valley Community Plan requires that this type of Project create an EIR to thoroughly mitigate all environmental elements for this type of industrial development.

General Plan Environmental Justice Element cannot be met with a Foundation GPA. A massive warehouse directly adjacent to hundreds ranch homes, which are north and south of the Project site.

II. THE PROJECT SHOULD BE DENIED WHERE IT WILL RESULT IN SIGNIFICANT ENVIRONMENTAL IMPACTS, INCLUDING SIGNIFICANT HEALTH RISKS FROM DEVELOPING DISTRIBUTION WAREHOUSES ADJACENT TO RESIDENTIAL USES AND A BUDDIST TEMPLE.

This Project application is thus just one part of a larger proposal to decimate land use planning in this area, and to develop a project, which is completely contrary to adopted General Plan and Zoning designations.

A. Health Risk Impacts from Light Industrial Land Use adjacent to Residential Uses.

The health risk impacts from initiating this Project and the proposed Project are of particular concern and provide a strong reason to deny this zone change. Because of the cancer risk and other impacts of diesel emissions on human health, **SCAQMD, CARB, WRCOG, and others have recommending siting warehouses at least 1000 feet from residences and other sensitive receptors.** ("Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning: a Reference for Local Governments within the South Coast Air Quality Management District," May 6, 2005, "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities," WRCOG Regional Air Quality Task Force, September 12, 2005.) This Project proposes to site warehouses adjacent to homes and a Buddhist Church. This is inconsistent with this clear guidance. This warehouse is proposed directly across the street from numerous homes. SCAQMD recommends all warehouses be sited 1000 feet from sensitive receptors.

E. Traffic/ Transportation

The Project would significantly increase local traffic in our rural community. The Project would also increase regional traffic on area freeways including I-215, SR-60, etc. where distribution warehouses in

the Inland Empire regularly travel to/ from the ports of Los Angeles and Long Beach. It would also increase traffic substantially on Cajalco Road that is already rated a transportation F and used by numerous Harvill and gridlocked most of the day.
In addition, the conversion of minimal passenger vehicle trips to passenger vehicle and heavy-duty truck trips adds significantly to the need and cost of road repair. According to one study, a 40-ton truck does **as much damage to the road as 9,600 passenger cars. ("*Overweight trucks damage infrastructure*" April** Castro, USA Today, 2007
http://usatoday30.usatoday.com/news/nation/2007-09-10-3878428638_x.htm) Impacts to transportation infrastructure will be significantly increased by this Project.

III. CONCLUSION

When taken as a whole, the significant environmental and human costs of considering approval of the proposed Project warrant its immediate denial. The Project does not meet the requirements for Environmental Justice, or a Zone Change. All of the trucks will NOT be going east on Cajalco from this project. The entire intersection at Seaton and Cajalco will need to be improved. Denial is especially deserved as little to no benefit to Mead Valley Residents would result-- distribution warehouse projects are notorious for under-delivering on job promises, particularly as automation of such facilities occurs. (*See, e.g.,* The Press Enterprise, Jack Katzanek (February 1, 2012)***"Moreno Valley: Sketchers' warehouse has caused net job loss,"***
http://www.pe.com/business/business-headlines/20120201-moreno-valley-skecherswarehouse-has-caused-net-job-loss.ece.)

The impacts of this project will be felt much further than Mead Valley. The entire region will be impacted. Truck traffic will be using Cajalco to El Sobrante, La Sierra, Washington, Wood, Markham, Clark and neighborhood streets.

For each of these reasons detailed herein, I respectfully ask the Supervisors to deny this Project.

Sincerely,

Debbie Walsh

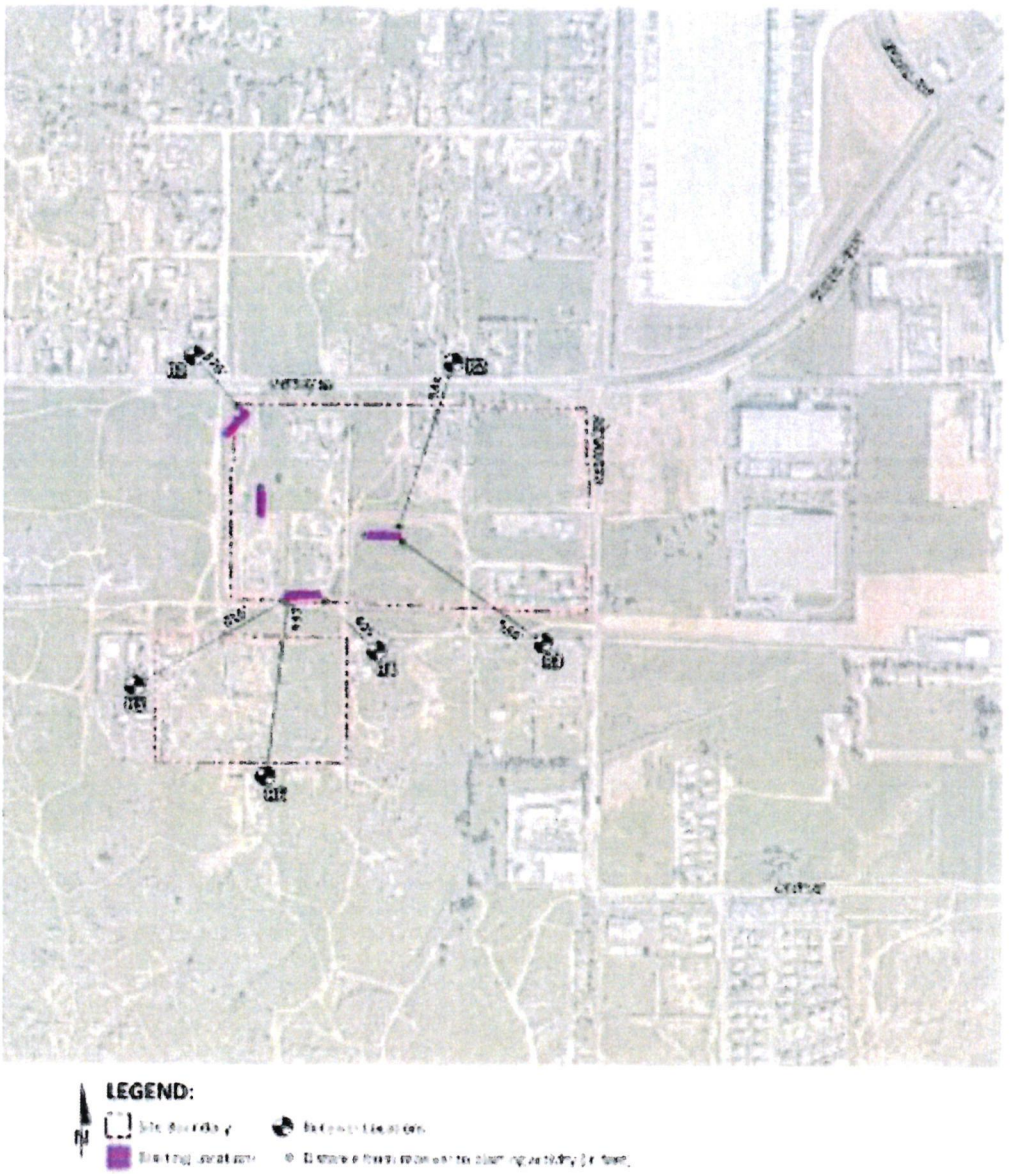
RAMV

Exhibit A

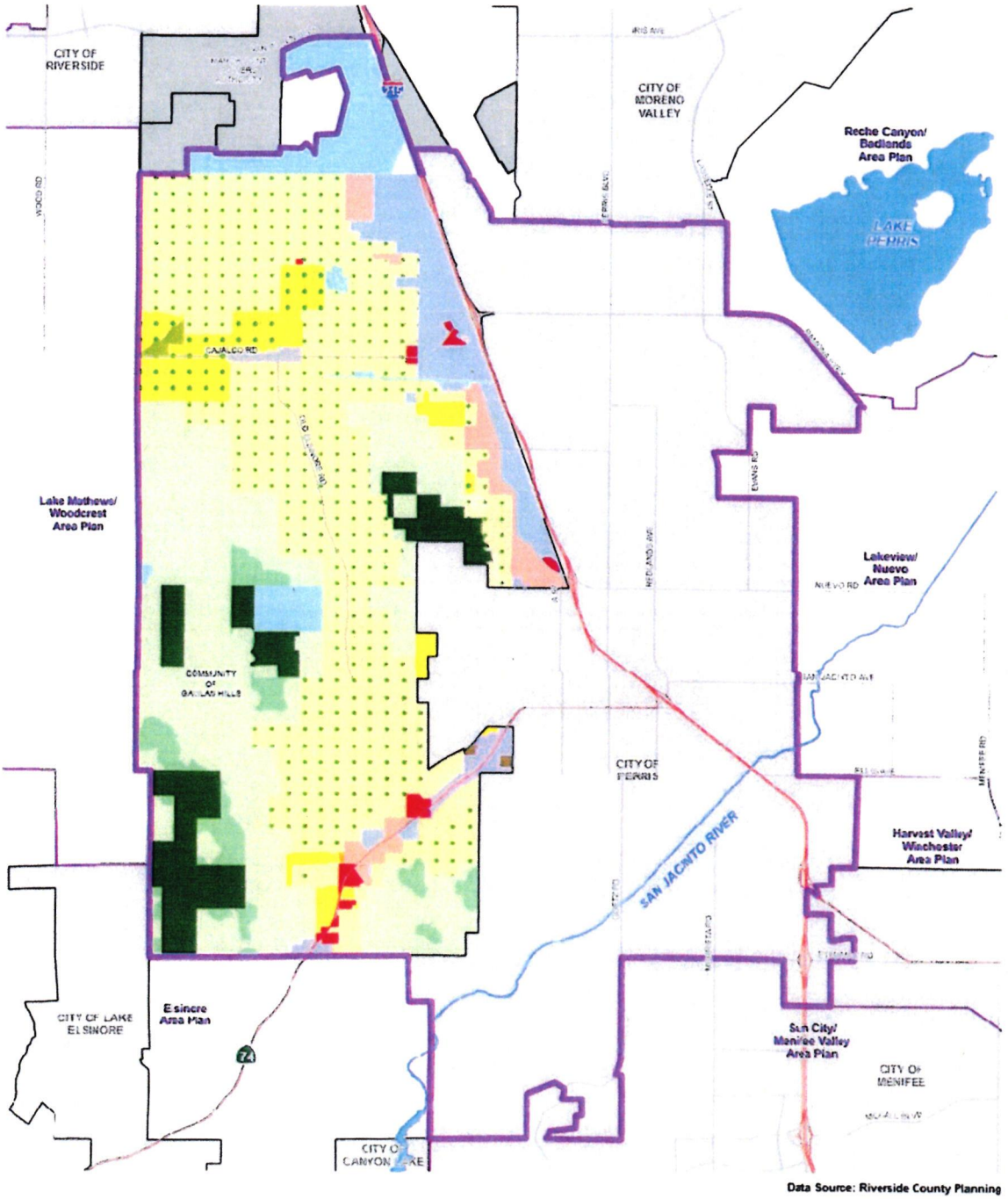


"New" Proposed Mead Valley Area Plan

Figure 4.13-6 Blasting Activity and Receiver Locations



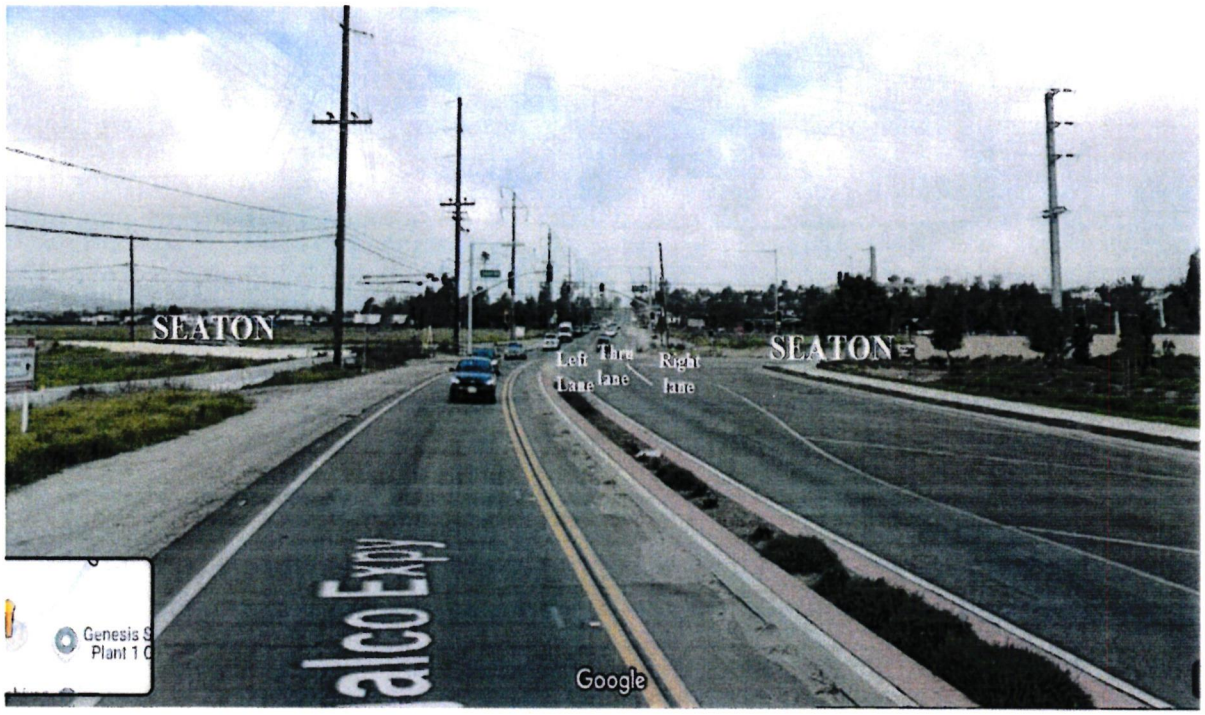
(Urban Crossroads, 2024a, Exhibit 10-C)



Data Source: Riverside County Planning

Figure 3

Land Use Map at Cajalco x Seaton showing the commercial land in red





No Trucks sign on Seaton.

Boydd, April

From: Acquia Mail
Sent: Tuesday, October 21, 2025 7:34 AM
To: JcPorras@aol.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 21, 2025

Submitted values are:

First Name
James

Last Name
Porras

Address (Street, City and Zip)
20180 Oleander Ave, Perris Ca 92570

Phone
9513470878

Email
JcPorras@aol.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below

10/21/25
23.1

Support

Do you need a Spanish translator?
No

Comments
As a lifelong member of the Mead Valley community I support Hillwood to build this project. a warehouse and park are needed in the specific area.

Boydd, April

From: James Castrejon <seahawktoon@gmail.com>
Sent: Tuesday, October 21, 2025 6:59 AM
To: Clerk of the Board
Subject: Vote No on Cajalco Commerce Center

Dear Board Members,

I urge you to **vote NO** on the Cajalco Commerce Center project.

Approving another warehouse project sends the message that Mead Valley is only suitable for industrial use, when in reality, it could be so much more. If we continue down this path, all companies will see that our area is an over-saturated warehouse zone, not a community worth investing in long-term.

Instead of filling valuable land with more warehouses, we should be encouraging development that brings lasting value — **offices, local businesses, mixed-use spaces, housing, and recreational areas** that serve residents and attract a broader range of industries.

Allowing this project to move forward as-is risks setting a precedent that limits our community's future potential.

If the warehouse component were removed and replaced with developments that truly benefit the people who live here, I would be much more supportive.

Please help us preserve and elevate Mead Valley's future, not limit it to warehouse waste.

Sincerely,

James Castrejon

Flores, Kate

From: Acquia Mail
Sent: Monday, October 20, 2025 12:35 PM
To: dominguezreina113@yahoo.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 20, 2025

Submitted values are:

First Name
Reina

Last Name
Dominguez

Phone
3239215118

Email
dominguezreina113@yahoo.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

23.1

Do you need a Spanish translator?
No

Flores, Kate

From:	Acquia Mail
Sent:	Monday, October 20, 2025 12:36 PM
To:	andradesilvia877@gmail.com
Cc:	Clerk of the Board
Subject:	Request to Speak Web Submission

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 20, 2025

Submitted values are:

First Name
Silvia

Last Name
Andrade

Phone
3239943832

Email
andradesilvia877@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

23.1

Do you need a Spanish translator?
Yes

Flores, Kate

From: Acquia Mail
Sent: Monday, October 20, 2025 2:04 PM
To: CBFCentury@aol.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 20, 2025

Submitted values are:

First Name
Catherine

Last Name
Barrett-Fischer

Address (Street, City and Zip)
24871 APPIAN WAY

Phone
9514619443

Email
CBFCentury@aol.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1 Comments to BOS Item 23.1 Calajco Commerce Center Warehouse Proposed Project

State your position below

Oppose

Do you need a Spanish translator?
No

Comments
Good morning Honorable Chairman and Supervisors.

My name is Catherine Barrett-Fischer representing Community Alliance for Riverside's Economy & Environment (CAREE). We are strongly opposed to the proposed Cajalco Commerce Center Warehouse Project.

Western Riverside County has an overabundance of industrial warehouses and the majority of these warehouses employ more robots than humans. The number of robots will increase in the coming years as the technology improves. This means fewer local jobs for our residents who will have to join our neighbors commuting to LA, Orange and San Diego County for good quality high paying jobs.

It almost seems that Riverside County doesn't understand economic development. I invite you to take a road trip to our neighboring counties to see how they manage to have a vibrant economy and healthy environment without the burden of excessive warehouses in their counties.

The overabundance of warehouses in the IE means more negative health impacts from air pollution, traffic congestion, heat, noise,and loss of open space, and rural residential areas. It also means long, arduous commutes to have a decent job.

The housing and homelessness crisis continues to be exacerbated not just because of the amount of land
taken up by warehouses, but by rezoning from residential to industrial and the active demolition of housing for warehouse development, particularly in low-income environmental justice communities of color. Mead Valley is predominately Hispanic and losing way too many rural homes and a place for the Rancho way of life.

The only sensible and moral vote is NO on this ill conceived project.
Thank you for the opportunity to address you today and share our concerns. Please protect Mead Valley.
Thank you.

Flores, Kate

From: Acquia Mail
Sent: Monday, October 20, 2025 2:38 PM
To: Clerk of the Board
Subject: Public Comments Web Submission



The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on October 20, 2025

Submitted values are:

First Name
Yesenia

Last Name
Contreras

Phone
951-497-9708

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Oppose

Flores, Kate

From: Acquia Mail
Sent: Monday, October 20, 2025 2:38 PM
Cc: Clerk of the Board
Subject: Request to Speak Web Submission

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 20, 2025

Submitted values are:

First Name
Yesenia

Last Name
Contreras

Phone
951-497-9708

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Oppose

Do you need a Spanish translator?
No

Flores, Kate

From:	Mindy Jian <mjian@smwlaw.com>
Sent:	Monday, October 20, 2025 1:16 PM
To:	Clerk of the Board; Supervisor Medina - 1st District; Office of 2nd District Supervisor; District3 Information; District 4 Supervisor V. Manuel Perez; District 5
Cc:	Edward T. Schexnayder; George Hague; Debbie Walsh; Michael McCarthy
Subject:	Letter to Board of Supervisors (October 21, 2025 meeting) re Agenda Item 23.1 - Cajalco Commerce Center
Attachments:	Oct. 20 2025 SMW Letter to Board re Cajalco Commerce Center (Agenda Item 23.1).pdf

Hello,

Please find attached a letter from this office for submission to the Board of Supervisors regarding Item 23.1 (Cajalco Commerce Center) on the October 21, 2025 meeting agenda. Please let me know if you have any difficulty accessing the document.

Best,
Mindy Jian

Mindy Jian
Attorney
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421
p: 415/552-7272 x |
www.smwlaw.com | A San Francisco Green Business

SHUTE, MIHALY & WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

MINDY K. JIAN
Attorney
mjian@smwlaw.com

October 20, 2025

Via Electronic Mail Only

Riverside County Board of Supervisors
Attn: Clerk of the Board
Riverside County Administrative Center
4080 Lemon Street, 1st Floor
Riverside, CA 92501
E-Mail: cob@rivco.org

Re: Comments to the Board of Supervisor on the Cajalco Commerce Center Draft Final Environmental Impact Report (SCH No. 2023060799) – Item 23.1

Dear Chair Perez and Members of the Board of Supervisors:

On behalf of the Sierra Club and Rural Association of Mead Valley ("RAMV"), we submit these comments regarding the Final Environmental Impact Report ("EIR") for the Cajalco Commerce Center project, which includes proposed General Plan Amendment ("GPA") No. 240005, Change of Zone No. 2200062, Tentative Parcel Map No. 38601, and Plot Plan No. 220050 (together, "Project"). We ask that the Board deny approval of this Project. At a minimum, the County should continue consideration of this Project until it revises the EIR to comprehensively address the many issues we and other commenters have raised and recirculates the EIR for public comment and review.

As several comments have highlighted, Mead Valley already houses much more than its fair share of warehouses, many of which continue to sit vacant to this day. *See* **Attachment B**. Though the developer promises that this Project will bring jobs and a public park to this area, such "benefits" are conditioned on the continued and disproportionate harm to local residents. Nor is there any guarantee that the Project will actually bring long-term jobs or a functioning public park. Though the staff report indicates that the park will be financed through the creation of a Community Facilities District that includes only the Project site, the developer admits that it has not found a tenant for the project. EIR at 3-33. Without a tenant, the developer cannot guarantee that the Project will bring jobs or fund the proposed park. *See also* **Attachments C, D**

(discussing concerns about the low-skill, low-pay jobs at warehouses). In fact, the Project's serious environmental impacts will impede the community's use and enjoyment of any public park in the area in addition to negatively impacting other community benefits, such as the forthcoming MetroLink improvements. Residents should not be required to choose between safe, healthy neighborhoods and access to community-serving public spaces.

Additionally, the EIR's numerous inadequacies in its analysis and mitigation of environmental impacts precludes any meaningful review of the Project. For example, the EIR omits several pending industrial projects and the pending Cajalco Road Widening Project from its cumulative impacts analyses. The EIR's failure to consider these projects overlooks the incredible environmental burdens being placed on Mead Valley and this Project's contribution to those burdens. Furthermore, the EIR's analysis relies on unsupported assumptions about both current and Project-impacted traffic circulation and intensity in the area.

We previously submitted comments to the Planning Commission detailing the myriad issues with the EIR and Project as proposed. *See* **Attachment A** (September 2, 2025 SMW Letter to Planning Commission). On October 16, 2025, we received a document from the County purporting to respond to comments submitted to the Planning Commission, including our September 2, 2025 letter. However, these comments do not meaningfully address the serious concerns raised in our prior correspondence. This letter therefore also reiterates the importance of revising the EIR to fix those deficiencies before the County can even consider moving forward with this Project.

I. The EIR Still Fails to Adequately Disclose, Analyze, and Identify Mitigation for the Project's Environmental Impacts.

A. The EIR's Cumulative Impacts Analyses Overlook Several Existing and Pending Developments.

CEQA requires that EIRs analyze the Project's environmental impacts, both direct and indirect, in combination with all "closely related past, present and reasonably foreseeable probable future projects." California Code of Regulations, title 14 ("CEQA Guidelines"), §§ 15065(a)(3), 15355(b). *see also* Pub. Res. Code § 21083(b); CEQA Guidelines §§ 15021(a)(2), 15130(a), 15358. This cumulative impacts discussion must "reflect the severity of the impacts and the likelihood of their occurrence (CEQA Guidelines § 15130(b)) and must document its analysis with references to specific scientific and empirical evidence. *Mountain Lion Coalition v. Cal. Fish & Game Comm'n* (1989) 214 Cal.App.3d 1043, 1047, 1052. The CEQA Guidelines require that, at a

minimum, an EIR's cumulative impacts analysis must include either (1) "[a] list of past, present, and probable future projects producing related or cumulative impacts," or (2) "[a] summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect." CEQA Guidelines § 15130(b).

The EIR claims to use the "summary of projections" approach, except for the evaluation of certain vehicular traffic-related noise impacts, which instead relies on the "list of projects" approach. Thus, for most of the EIR's cumulative impacts analyses, the EIR purports to rely on projections and conclusions found in the EIRs prepared for the Riverside County General Plan (2015), City of Perris General Plan (2005), and City of Moreno Valley General Plan (2021). *See* EIR at 4.0-2, 8.[1]

This approach to assessing the Project's cumulative impacts is deeply flawed. First, the EIR does not comply with requirements for a summary of projections approach because it relies on an invalid EIR and provides only cursory impact-specific analyses. Second, the EIR's sole reliance on these outdated General Plan EIRs for much of its cumulative impacts analyses is untenable because it ignores impacts from several recent projects.

1. The EIR's approach to analyzing cumulative impacts does not comply with CEQA requirements for a "summary of projections" approach.

To begin, CEQA allows an agency to rely on a "summary of projections contained in an *adopted* local, regional or statewide plan, or related planning document" CEQA Guidelines § 15130(b) (emphasis added). Last year, Riverside Superior Court ordered the City of Moreno Valley to set aside all approvals for its General Plan, including certification of the General Plan EIR. *See* **Attachment A** at 21. Thus, the City of Moreno Valley General Plan EIR no longer qualifies as an "adopted" document and the County cannot rely on its projections for the cumulative impacts analysis here. *See also* Pub. Resources Code § 21094(a) (subsequent EIRs may only "tier" from prior certified EIRs).

Next, the EIR's discussion of cumulative impacts within each impact area is too cursory to provide meaningful disclosure of the cumulative impacts of the Project combined with other planned growth. When an agency relies on a summary of projections to assess cumulative impacts, CEQA requires the lead agency to (1) "define

[1] For some of the noise impacts analyses, the EIR considers a list of projects. *See* EIR, Table 4.0-1.

the geographic scope of the area affected by the cumulative effect" and explain the choice of geographic area, (2) provide "[a] summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available," and (3) produce "[a] reasonable analysis of the cumulative impacts of the relevant projects." CEQA Guidelines § 15130(b). The cumulative impacts analysis may not be conclusory. *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 397, 411.

The EIR fails to follow this mandatory approach. It repeatedly contains only cursory sections on cumulative impacts that largely summarizes the Project-specific analysis for each impact area. These discussions do not provide any meaningful information about the "expected environmental effects" of other cumulative projects nor does the EIR include "specific reference to additional information stating where that information is available." *See* CEQA Guidelines § 15130(b). Rather, the EIR includes only vague references to "other cumulative developments" and conclusory statements about whether their impacts will exceed any one threshold. *See, e.g.*, EIR at 4.4-39 (discussing impacts to biological resources, the EIR states, "[a]s other cumulative developments similarly would have the potential to conflict with the MSHCP UWIG requirements, Project impacts would be cumulatively considerable"); 4.18-18 (discussing transportation impacts, the EIR states, "[a]s other projects within the cumulative study area also have the potential to result in significant impacts due to VMT, the Project's impacts . . . would be cumulatively considerable"). These assertions do not actually disclose any information about the other developments being considered with this Project, much less provide a "reasonable analysis" of how the cumulative impacts from other growth combine with this Project. *See City of Long Beach v. City of Los Angeles*, 19 Cal.App.5th 465, 490 (analysis cannot be "in such general terms" such that it omits "all meaningful information on a subject").

2. The EIR's rote reliance on the summary of projections approach ignores cumulative impacts not accounted for in planning projections, including several recent industrial projects.

The EIR's almost entirely cursory cumulative impact analysis is further compounded by the fact that it ignores more recent pending and existing development projects that are not anticipated by prior planning documents. The EIR's reliance on preexisting planning documents "does not preclude challenge to the accuracy or sufficiency of the cumulative impacts analysis." *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1216-17. An EIR must still consider all sources of related impacts. *See* CEQA Guidelines § 15130(a)(1). Thus, where analyses and projections from plans exclude more recent projects that can cause related cumulative

impacts, the EIR must still incorporate those more recent projects into its cumulative impacts analysis. *See Bakersfield Citizens for Local Control*, 124 Cal.App.4th at 1261-17 (summary of projections approach inadequate where it ignored two projects requiring general plan amendments); *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 529-33 (cumulative impacts analysis must include in-process projects that would require general plan amendments); *Citizens to Preserve the Ojai v. County of Ventura* (1985) 176 Cal.App.3d 421, 430 (analysis inadequate where EIR failed to provide "reasoned analysis" justifying complete reliance on prior planning document which excluded analysis of certain impacts).

The cumulative impact analysis does not meet this standard. The primary planning documents it purportedly relies upon are either 20 years old (City of Perris), 10 years old (Riverside County), or decertified (Moreno Valley). These plans do not adequately account for cumulative growth in the region over the last two decades, most notably the dramatic growth in the logistics industry.

Significantly, the EIR's cumulative impacts analyses (under both the summary of projections approach and list of projects approach used in the noise impacts analysis) ignore several large, nearby projects, many of which could not have been accounted for in the County's existing General Plan because they will require a General Plan amendment. Omitted projects include 12 proposed General Plan amendments in the First Supervisorial District which all ask the County to allow light industrial and manufacturing projects on land currently zoned for agricultural or low density residential uses.[2] These amendments would pave way for construction of even more warehouse complexes, totaling at least another 1.5 million square feet, all within a 2-mile radius of this Project. Together with this Project, these amendments would have a footprint of 1,147 acres, or over 9% of Mead Valley, and would nearly double the size of industrial land in Mead Valley.[3] And County-generated mapping shows a "Proposed Mead Valley

[2] The County's October 16, 2025 responses claim that the September 2, 2025 letter failed to identify specific projects which the EIR omits. This claim is incorrect; the September 2, 2025 letter included both a list and map of the 12 General Plan amendments as Attachment S.

[3] Mead Valley has an area of approximately 19.1 square miles, or 12,224 acres. *See* Census Reporter, "Mead Valley, CA," last accessed (Oct. 14, 2025), https://censusreporter.org/profiles/16000US0646646-mead-valley-ca/.

Industrial Policy Area" which would realize all of these developments.[4] *See* **Attachment E**.

The EIR's analyses also omit other significant existing and pending projects. For example, it entirely omits the Cajalco Road Widening Project, which would straighten and, in some stretches, triple the width of the existing road, substantially increasing the capacity for truck traffic between I-215 and I-15.[5] Furthermore, reliance on the 20-year old City of Perris General Plan EIR appears to ignore several significant developments from the past two decades, including the Perris Valley Commerce Center Specific Plan (2,244 acres of industrial development), South Perris Industrial project (7.4 million square feet of warehousing), and the Stratford Ranch Industrial Project (1,725,411 square-foot high cube logistics warehouse). A list of recently approved and pending projects in the surrounding area (Mead Valley, Moreno Valley, Perris, and the March JPA area) is attached hereto as **Attachment G**. This list includes 11 more projects requiring a General Plan Amendment which total 23,597,000 million square feet of additional warehouse development. **Attachment H** includes (1) a map showing all of the warehouses listed in **Attachment G**, existing warehouses, and this Project (highlighted in blue) and (2) a map showing all approved, pending (including this Project), and existing warehouses in Mead Valley.[6]

---

[4] **Attachment F** shows the proposed industrial policy area in relation to the 12 pending General Plan amendments and existing residential properties.

[5] The website for the Cajalco Road Widening Project specifies that "[t]he project would widen the roadway to four lanes between Harvill Avenue and Temescal Canyon Road, and to six lanes between the I-215 southbound ramps and Harvill Avenue." *See* "Project Overview," Cajalco Road Widening and Safety Enhancement Project (last accessed Oct. 16, 2025) https://rcprojects.org/cajalco-road-widening.

[6] The County's October 16, 2025 responses argue that many developments were proposed after the draft EIR was published for public review on June 30, 2023. Aside from underscoring the absurdity of the County proceeding with the Project's draft EIR before even initiating the corresponding General Plan amendment process, this response also fails to excuse the EIR's glaring omissions. First, not all of the projects listed in **Attachment G** post-date this Project's draft EIR and the County's response does not account for the several existing industrial developments that are not anticipated by prior General Plan EIRs and therefore have been omitted from the cumulative impacts analyses. Second, the addition of millions of square feet of new warehouse development near the Project, including over a million square feet just within two miles of the Project

Without consideration of these projects, the EIR is severely understating many of the Project's impacts. All of these industrial projects will, like the Project, have significant air quality, greenhouse gas, transportation, noise, and biological impacts. As the Office of the Attorney General has reiterated, "warehouse development can harm local communities and the environment" by emitting toxic pollutants that contribute to chronic health problems and causing "disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure." **Attachment I** at 2-3; EIR at F-5 (warehouses can "emit toxic diesel emissions"); *see also* EIR at F-112 (Center for Biological Diversity comment letter describing air pollution from Project and other warehouse developments); **Attachment B** at 5-6 (discussing health risks of warehouse developments). Any incremental increase in the air quality and greenhouse gas impacts to the region is particularly concerning given Mead Valley's already incredible air pollution burden and the chronic health risks associated with such impacts.[7]

Each project will also bring substantial amounts of truck traffic, much of it likely traveling along Cajalco Road towards I-215 and I-15. *See* **Attachment I** at 2 (warehouses generate "hundreds, and sometimes thousands" of vehicle trips that increase congestion and adversely impact road conditions and safety), 11 ("Warehouse facilities inevitably bring truck and passenger car traffic" and "can present substantial safety issues"); EIR at F-5 (CARB comments noting that facilities like the Project "can result in high volumes of heavy-duty truck traffic"). Indeed, the aim of the Cajalco Road Widening Project is to facilitate more traffic along that road, growing the connection between I-215 and I-15, and further impacting residential areas in Mead Valley with truck traffic from industrial facilities in the I-15 corridor.

Additionally, the footprint of all of the pending and approved General Plan Amendments would expand industrial uses to the edge of the Motte Rimrock Reserve area, and much farther into land currently designated as agricultural and open space. *Compare* **Attachment E** *with* Mead Valley Area Plan at Figure 3. This area protects critical habitat for a variety of protected and rare species. The EIR must analyze how this Project will exacerbate the cumulative biological impacts to those species.

---

site constitutes "significant new information" warranting revision and recirculation of the draft EIR. *See* CEQA Guidelines § 15088.5; *see also* **Attachment A** at 26.

[7] Riverside County ranks as the second most polluted county to live in based on ozone pollution and fifteenth most polluted county based on particulate matter pollution. **Attachment J** (State of the Air 2025 Report) at 23; *see also* 25-31 (discussing health impacts of air pollution).

By omitting consideration of these projects, the EIR is also underestimating the severity of the Project's cumulative impacts on housing in Mead Valley. On its own, the Project would demolish 26 single-family homes and displace an estimated 99 residents. EIR at 4.15-5. The EIR concludes that population and housing impacts are cumulatively less-than-significant, but does not provide any information about the overall impacts of all the pending and approved industrial projects in Mead Valley. It does not, for example, provide any information about whether other pending and approved projects will similarly demolish residences and displace residents. In fact, several of the proposed warehouse projects requiring General Plan amendments are sited on existing residential lots. *See* **Attachment F** (showing proposed General Plan amendments in red and residential structures in green). And the EIR has not shown that adequate replacement housing will be available in Mead Valley, much less conducted that analysis while also factoring in the hundreds of additional Mead Valley residents who would be displaced through these additional projects. Without disclosing any information about these impacts, the EIR has not cited any substantial evidence to support its conclusion that the cumulative impacts of this Project, considered in the context of the numerous other industrial developments, are less-than-significant. The County must revise the EIR to discuss the cumulative impacts on housing in the area, including showing that the Project does not thereby conflict with General Plan policies regarding affordable housing. *See, e.g.*, Riverside County General Plan at H-30 (Policy H-32 requiring replacement of affordable housing); *see also* Gov't Code § 65098.6 ("A city, county, or city and county shall condition approval of a logistics use on the following: (a) Two-to-one replacement of any demolished housing unit that was occupied within the last 10 years").

The County must revise the EIR's cumulative impacts analyses to include consideration of existing, approved, and pending projects that are not included in the Mead Valley and City of Perris General Plan EIRs (i.e. any such projects that post-date certification of the respective EIRs).

B. The EIR's Impacts Analyses Rely on Unsupported Assumptions About Traffic Patterns in the Project Area.

The EIR repeatedly states that "all Project-related truck trips would be routed directly to the north via Seaton Avenue and to the east via Cajalco Road/Cajalco Expressway to access the I-215" and "away from residential uses in the area." *See, e.g.*, EIR at F-67, S-73, 2-19, 3-2, 3-13, 4.18-17-18, 20. This assumption about the Project is expressly cited as support for the EIR's conclusion that transportation hazards, such as collisions with pedestrians and other motorists, will be less-than-significant. *See id.* at 4.18-20. Contrary to the EIR's assertion, however, the Traffic Analysis in EIR Appendix N2 shows that both existing and projected traffic volumes involve substantial traffic

westward from the Project site. *See* Appendix N2 at 36-37, 44. Specifically, according to the EIR's appendix, 15% of Project-related truck traffic will move westward along Cajalco Road, away from I-215 and deeper into neighboring residential areas. Westward truck traffic is to be expected given that Cajalco Road directly connects the Project area to I-15, which is only 16 miles west of the Project site. And, indeed, there is already substantial traffic on Cajalco Road west of the Project site. *See also* **Attachment K** at 6-7 (using Cajalco Road and I-15 is a more direct route for trucks traveling between the Project site and the Ports of Los Angeles and Long Beach). The Traffic Analysis shows tens of thousands of daily trips traveling west from the Project site towards sensitive receptors such as elementary schools. *See* Appendix N2 at 36 (counting a combined 38,850 trips at the Clark Street and Cajalco Road intersection). The EIR does not acknowledge this westward traffic in its various impacts analyses. In fact, it entirely omits any discussion of traffic movement between I-15 and the Project site.

An independent review of the Traffic Analysis also shows that the analysis may be severely underestimating the Project's impacts by underestimating truck trips generated by the Project and the percentage of traffic surrounding the Project site that is currently made up of truck traffic. *See* **Attachment K** at 2 (actual truck trips may be up to 180 percent higher than the Traffic Analysis's projections), 2-3 (the Traffic Analysis's calculations do not factor in existing truck traffic). By ignoring westward traffic and underestimating truck traffic, the EIR is likely understating many of the Project's impacts.

For example, if the EIR accounted for this westward traffic, the significance of the Project's air quality impacts would likely increase because of harmful pollutant exposure to the many sensitive receptors located west of the Project site. *See* EIR at 2-5-6 (describing and mapping "numerous rural residential homes" and open space west of the Project site); **Attachment K** at 3 (independent traffic analysis noting noise pollution and safety impacts to residential areas west of the Project site), 6-7 (road widening and straightening is shown to lead to more congestion, worse air quality, and increased safety risks). Sensitive receptors near the Project site include two elementary schools and one middle school, which are located approximately one mile west of the Project site. EIR at 2-22. Yet, the EIR's current residential exposure focuses only on one residence located 167 feet south of the Project site. *See id.* at 4.3-57-58. Likewise westward truck traffic will increase the Project's noise impacts from heavy duty trucks traveling near these sensitive receptors and through residential areas to the west. *See* **Attachment K** at 3.

These deficiencies will certainly affect the EIR's transportation impacts analysis because one of the significance conclusions explicitly relies on the assumption that "all Project-related truck trips would be routed directly to the north via Seaton Avenue and to

the east via Cajalco Road/Cajalco Expressway to access the I-215." EIR at 4.18-17. Furthermore, because the Project will direct traffic to nearby undeveloped streets and the narrower western stretches of Cajalco Road, underestimating the volume of trucks means that the EIR is also underestimating impacts to congestion, road conditions, and safety concerns. *See* **Attachment K** at 3-4. In fact, it is clear that the Cajalco Road and Seaton Avenue intersection, cannot accommodate the additional traffic that will result from the Project. The left-turn lane on the southern portion of Seaton Avenue at that intersection would need to be ten times longer in order to accommodate the level of truck queuing anticipated by the Project. *See id.* at 5.

Any additional impacts resulting from this overlooked truck traffic would be further compounded by the cumulative impact of the other industrial projects in the surrounding area and the Cajalco Road Widening Project, which will increase westward truck traffic by both requiring more trucks to service the additional projects and expand Cajalco Road's capacity to accommodate these trucks between I-215 and I-15.

C. The EIR Fails to Properly Analyze and Mitigate the Project's Energy Impacts.

The EIR's conclusion that the Project would not result in any potentially significant energy impacts is not supported by adequate analysis or evidence. An EIR must contain a detailed statement describing "measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." Pub. Resources Code § 21100(b)(3); CEQA Guidelines, Appx. F. Appendix F to the CEQA Guidelines provides a list of potential energy use impacts and mitigation measures to guide that analysis. *See* CEQA Guidelines, Appx. F §§ II.C-II.D. It states that EIRs should consider (1) a project's "energy requirements and . . . energy use efficiencies by amount and fuel type for each stage of the project," (2) the project's "effects . . . on . . . demands for electricity," and (3) the project's "projected transportation energy use requirements." *See id.*, § II.C. Local agencies should also consider mitigation measures such as "siting, orientation, and design to minimize energy consumption," "reducing peak energy demand," and use of renewable fuels and energy systems, among others. *Id.* § II.D; *see also* CEQA Guidelines § 15126.2(b) (EIR must mitigate wasteful, inefficient, or unnecessary energy use). But the EIR's energy impacts analysis falls short of evaluating the standards outlined in Appendix F as CEQA requires. *See id.*, Appx. F §§ II ("Where items listed [in Appendix F]. . . are applicable or relevant to the project, they should be considered in the EIR."); *see also Cal. Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211 ("*Clean Energy*") (EIRs must address applicable considerations from Appendix F); *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 265 ("*Ukiah Citizens*") (same).

Regarding whether the Project would "[r]esult in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation," the EIR concludes that this impact would be less-than-significant. It reaches this conclusion by simply stating, without further explanation, that "the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems" and relying on "future building permit applications" to comply with applicable building standards. EIR at 4.6-24. The EIR thereby assumes that the Project's energy consumption will not have a significant impact because it will be more energy efficient compared to older warehouses by virtue of compliance with the State's current minimum building code requirements. *See id.* The EIR fails to describe what these efficiency gains will be and jumps straight to concluding that there is a less-than-significant impact. But simply achieving greater efficiency than older warehouses does not demonstrate that the Project's energy consumption is not wasteful, inefficient, or unnecessary. The EIR must provide evidence to support this conclusion, such as by considering the breakdown of the Project's energy sources, its effect on demands for electricity, and projected transportation energy use requirements. *See* CEQA Guidelines, Appx. F, § II.D. If impacts are significant, the EIR must then also identify and describe energy-conserving measures, like those outlined in Appendix F, that would be implemented during operation of the Project to reduce the energy use.

The EIR also concludes that the Project will "not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California." *See* EIR at 4.6-24. This conclusion assumes that because the Project will not require the construction of new energy-generating facilities to serve its energy needs, the Project is therefore not wasteful or inefficient. But, there is no supporting evidence or data for this claim. For example, even if a new energy-generating facility is not needed, the Project may still place such a high burden on existing facilities that the Project's energy use will be wasteful or inefficient. In fact, here, the Project site has the capacity to generate enough renewable power to supply the equivalent of 100% of the Project's electricity needs,[8] but meets only minimum standards for sourcing renewable energy. Sourcing a greater share of its electricity from renewable energy would both reduce the Project's energy consumption from the grid and decrease its associated GHG emissions. It would also aide in demonstrating consistency with the

[8] Assuming that only 60% of the rooftop area can be used for solar panels, a rooftop solar system would conservatively generate 9.3 million kWh/year, which is nearly three times the Project's estimated electricity demand. *See* **Attachment A** at 14.

CARB 2022 Scoping Plan and Assembly Bill 1279 by making the Project net neutral in terms of energy demand and on-site production. Thus, the mere fact that the Project still draws from grid power can be considered inefficient and wasteful, resulting in significant energy impacts. The EIR must explain why anything short of 100% renewable energy is not wasteful or inefficient.

The EIR also concludes that the Project "would not result in the inefficient, wasteful, or unnecessary consumption of energy" because "the Project's proximity to the Interstate freeway system would reduce VMT and therefore decrease reliance on fossil fuels." *See* EIR at 4.6-24. But, again, the EIR fails to explain how a decrease in fossil fuel use based on proximity to the freeway necessarily means that the Project's energy consumption meets efficiency standards. To the contrary, the Project's continued reliance solely on fossil fuels for transportation suggests inefficiency and waste in the Project's energy consumption. The Project could demonstrate energy efficiency and a decreased reliance on fossil fuels by requiring some portion of on-site vehicles to be electric or utilize alternative fuels, and by revising Mitigation Measure 4.18-2 to *mandate* a measurable and enforceable Transportation Demand Management (TDM) program. As currently written, MM 4.18-2 contains no actual requirements that will result in reducing VMT – only suggestions, and does not establish any thresholds to be met that will help determine whether the measure is being effectively implemented.

Next, the EIR concludes that the Project would not "[c]onflict with or obstruct a state or local plan for renewable energy or energy efficiency" because the Project is consistent with the Riverside County CAP and "would be required to comply with the Title 24 standards" *See* EIR at 4.6-25. The EIR also relies on the assumption that state and federal regulation of vehicle emissions and building energy efficiency will become increasingly stringent. *See id.* at 4.6-22. However, once again the EIR does not explain its conclusion that meeting minimum building requirements demonstrates that the Project would not conflict with state or local energy plans. Indeed, courts have rejected EIRs that rely merely on compliance with building codes to address project impacts without a more detailed analysis of the considerations outlined in the Appendix F. *See Clean Energy*, 225 Cal.App.4th at 211 ("Although the Building Code addresses energy savings for components of new commercial construction, it does not address many of the considerations required under [A]ppendix F"); *Ukiah Citizens*, 248 Cal.App.4th at 265 (EIR "improperly relie[d] on compliance with the building code to mitigate operational and construction energy impacts, without further discussion of the . . . [A]ppendix F criteria"); *see also* CEQA Guidelines § 15126.2(b) (discussing other relevant considerations in addition to compliance with the building code). The EIR should engage

in a serious discussion of the considerations and mitigation measures listed in Appendix F.

Here, the EIR should have discussed the considerations and explored the applicable mitigation measures identified in Appendix F—for example, how siting decisions under the General Plan Update or policies to encourage renewable energy systems could mitigate the Project's energy use impacts. *See* CEQA Guidelines, Appx. F § II.D.2, II.D.4. Without this additional analysis, the conclusions that the Project's energy impacts are less than significant are not supported by substantial evidence. The facts suggest that the Project's energy use in construction, transportation, and ongoing operation impacts are indeed significant and that mitigation is required.

D. The EIR Fails to Address the Issues Raised Before the Planning Commission.

In our September 2, 2025 letter to the Planning Commission, we identified several issues with the FEIR which the County must address before proceeding any further with the Project. In its October 16, 2025 responses to comments to the Planning Commission, the County largely denies and disagrees with our September 2, 2025 letter, it has still failed to address or meaningfully respond to those concerns. Below are brief summaries of the issues raised in our September 2, 2025 letter and clarifications in response to some of the County's corresponding arguments:

- The EIR's analysis and mitigation of air quality and greenhouse gas emissions impacts are inadequate. Deficiencies in the EIR include underestimating haul truck trips and resulting impacts, relying on an inaccurate construction timeframe, underestimating average truck trip length and resulting mobile source emissions, and omitting consideration of westward traffic along Cajalco Road.

- The EIR's mitigation of significant impacts to Burrowing Owls is inadequate because the proposed measures fail to comply with the requirements in the Western Riverside Multiple Species Habitat Conservation Plan (WR-MSHCP). In response, the County baldly states that the EIR complies with the MSHCP's surveying requirements, but fails to explain on which "accepted protocols" the mitigation measures rely on and explain how the Project will comply with the WR-MSHCP's requirement to avoid take of active nests.

- The EIR's analysis and mitigation of VMT impacts are inadequate. Deficiencies in the EIR include failing to include specific and enforceable performance standards in proposed mitigation measures.

- The EIR's analysis and mitigation of transportation impacts are inadequate. Deficiencies in the EIR include failing to fully analyze circulation impacts during construction and understating the Project's impacts to the need for road maintenance.

- The EIR's analysis and mitigation of housing impacts are inadequate. Deficiencies in the EIR include understating the impact of demolishing 26 single-family homes and failing to explain whether replacement units will be available when needed or suitable for those displaced by the project. The County's response argues that "anticipated residential growth" in Mead Valley can accommodate the new homes needed for those displaced by the Project. However, the County still fails to demonstrate that the necessary replacement housing will be available in time and serve as adequate and affordable replacement residences. The County also continues to fail to disclose whether the households being displaced are low-income.

- The EIR's analysis of impacts to agricultural land is inadequate. Deficiencies in the EIR include failing to analyze impacts to off-site disturbance and relying on the unsupported conclusion that no properties within the Project's 772-acre zone of influence are considered active agricultural production land.

- The EIR fails to update mitigation measures consistent with the County's representations in its responses to comments on the draft EIR. The County's October 16, 2025 responses state that the "Final EIR that is being considered by the Riverside County Board of Supervisors" will reflect the omitted updates. However, none of the agenda materials reflects these updates. Accordingly, no publicly-available version of the EIR reflects these promised changes.

- The EIR's alternatives analysis is inadequate. Deficiencies include failing to adequately support the conclusion that no sufficient alternative sites exist and recommending approval of an environmentally inferior alternative. The County's argues that the Small Project Alternative is less effective at meeting the Project's objectives. However, the EIR itself states that this alternative "generally would meet the Project's objective." EIR at 6-54-55.

Additionally, the September 2, 2025 comment letter discussed how the Project conflicts with several General Plan policies, including those prioritizing balanced and diverse land uses and establishing a preference for preserving agricultural lands and the region's rural character. The comment letter also reiterated our previous concerns about improper use of public resources and influence of private interests in the decision-making process.[9]

The County has not meaningfully addressed any of these deficiencies. Therefore, the EIR and Project remain deficient for all of the reasons outlined in the September 2, 2025 comment letter (see **Attachment A**).

II. Very Recent, New Additions to the Project Scope Have Not Been Studied.

The staff report, which was posted on October 16, 2025, just five days before the Board hearing on October 21, 2025, discloses that the Plot Plan conditions of approval now require the developer to acquire and transfer to the County 2.5 acres of commercial property and 2.5 acres of property "suitable for construction of a small passive park." The construction and operation of this additional 5 acres of development will undoubtedly result in additional impacts. For example, construction activity will likely increase noise and air pollution in surrounding areas. And new commercial retail spaces will increase traffic in the area and thereby increase the Project's transportation impacts. However, the EIR's project description does not reflect this expansion of the Project scope. And the impact analysis likewise does not discuss the impacts of these newly proposed developments, much less analyze how they effect the EIR's significance conclusions. The County must revise the EIR to reflect this new information and analyze the full scope of the Project's impacts, including this additional 5 acres of development. *See* CEQA Guidelines § 15088.5.

III. Conclusion

It is abundantly clear that Mead Valley does not need another warehouse development, and certainly not one that spans 1,003,510 square feet and requires the destruction of 26 homes and 44.66 acres of agricultural land. Furthermore, it is evident that the developer's empty promises about employment and a public park are weak

[9] The County has continued to allow the developer to use the County-owned Mead Valley Community Center to further the developer's private interests in Project's approval. Attached here to as **Attachment L** is a photo of a flyer posted in the Community Center that asks for support for the Project, advertises free food for "all attendees in support of this vital project," and offers transportation from the Community Center to the October 21, 2025 Board of Supervisors meeting.

attempts to mask this Project's disastrous impacts on the surrounding community. And the developer's late promises of a commercial area and public park similarly cannot outweigh the extreme harms that the Project will introduce. The Project has no tenant and no guarantee that the park will ultimately be built or maintained without any financial impact on community members. On the other hand, the Project will have serious air quality, traffic, greenhouse gas emissions, housing, noise, biological, and agricultural impacts. And the EIR's impacts analyses overlooks the cumulative impacts of the dozens of other existing and pending industrial projects in the surrounding area as well as the pending Cajalco Road Widening Project.

Rural Association of Mead Valley and Sierra Club respectfully urge the County to deny certification of this EIR and reject this Project. At the very least, the County must address the several fatal defects in the EIR and recirculate the EIR for further public review and comment. If these defects are not remedied, certification of the EIR and approval of the Project as proposed will result in violations of state law. Mead Valley needs more clean community resources. It cannot continue to bear the County's pollution and industrial burdens while hundreds of residents are displaced with each new and unnecessary warehouse. We thank you for considering and addressing these comments and urge the County to decline any further action on this Project.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Mindy K. Jian, Attorney

Attachments:

A. September 2, 2025 SMW Letter to Planning Commission
B. Inland Empire Industrial Real Estate Report (2025 Q2)
C. The State of Work (Feb. 2024)
D. Jeff Horseman, "*Report: warehouse wages trail inland average*," The Press-Enterprise, las accessed Oct. 16, 2025
E. County Map of "Proposed Mead Valley Industrial Policy Area"

F. Map of proposed industrial policy area overlay on pending GPAs and residential lots
G. List of Pending and Approved Warehouses
H. Maps of Pending and Approved Warehouses
I. Office of the Attorney General, Warehouse Projects: Best Practices and Mitigation Measures to comply with the California Environmental Quality Act
J. Excerpts from State of the Air 2025 Report
K. Cajalco Commerce Center Review Traffic Memorandum
L. Community Center Flyer

cc: Debbie Walsh, Rural Association of Mead Valley
George Hague, Sierra Club
Mike McCarthy, Sierra Club

Attachment A

SHUTE, MIHALY & WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

MINDY K. JIAN
Attorney
mjian@smwlaw.com

September 2, 2025

Via Electronic Mail Only

Riverside County
Planning Commission
Attn: Hearing Secretary
Riverside County Administrative Center
4080 Lemon Street, 1st Floor Board Chambers
Riverside, CA 92501
E-Mail: planninghearings@rivco.org

Re: Comments to the Planning Commission on the Cajalco Commerce Center Draft Final Environmental Impact Report (SCH No. 2023060799) – Item 3.2

Dear Planning Commissioners:

On behalf of the Sierra Club and Rural Association of Mead Valley ("RAMV"), we submit these comments regarding the Draft Final Environmental Impact Report ("FEIR") for the Cajalco Commerce Center project, which includes proposed General Plan Amendment ("GPA") No. 240005, Change of Zone No. 2200062, Tentative Parcel Map No. 38601, and Plot Plan No. 220050 (together, "Project"). This Project proposes to demolish 26 single-family homes, displace existing residents, and create numerous environmental impacts, all for another warehouse that the region does not need.

Not only would this set horrible precedent for the remaining rural-residential areas of Mead Valley, but the County's FEIR is deficient for multiple reasons. Specifically, as discussed below, the FEIR fails to adequately analyze or mitigate the Project's air quality impacts, impacts to protected species, greenhouse gas ("GHG") emissions, housing impacts, and transportation impacts. The FEIR further fails to consider feasible alternatives, or even incorporate mitigation changes that the County promised in responses to comments. In short, the FEIR is inadequate as an informational document and violates the California Environmental Quality Act ("CEQA") (Public Resources Code §§ 21000 et seq., and the CEQA "Guidelines," California Code of Regulations, title

14, §§ 15000 et seq). In addition, the Project conflicts with the County's General Plan, in violation of state Planning and Zoning Law (Government Code §§ 65000 et seq.).

Adding warehouse and other industrial development in Mead Valley will further harm the area's already-overburdened environmental justice communities. If the County chooses to move forward with this misguided proposal, it must address the FEIR's fundamental flaws and recirculate the EIR for public review and comment. The Planning Commission should not recommend adoption or approval of GPA 240005, certification of the EIR, approval of Change of Zone No. 2200062, approval of Plot Plan No. 220050, or approval of Tentative Parcel Map No. 38601.[1]

I. The Operator of the Mead Valley Community Center has Improperly Used Public Property to Further Private Interests.

The Project applicant has been working with The Grove Community Church ("Church"), which operates the Mead Valley Community Center under a contract with the County (see **Attachment A**), to manufacture support for the Project at public meetings. The Project applicant worked with the Church to transport people from the Community Center to the November 6, 2024 Planning Commission and July 29, 2025 Board meetings to consider GPA 240005. *See* **Attachment B** (pictures of buses transporting people from Community Center ahead of November 6, 2024 and July 29, 2025 meetings). Furthermore, the Community Center Director spoke in favor of the Project in his capacity as director and while wearing a shirt with Church branding. In his remarks, the director also noted that the Project applicant has sponsored many of the Community Center's events. Thus, the Church and director have used public property and their public roles as operator and director of the Community Center to further the Project applicant's private interests in this Project. This violates the Church's license and operating agreement with the County, which authorizes operation of the Community Center only for the residents' public benefit. *See* **Attachment A** ¶ 6. Additionally, this conflict of interest may violate Government Code section 1090. *See Hub City Solid Waste Services, Inc. v. City of Compton* (2013) 186 Cal.App.4th 1114, 1124-25 (Section 1090's prohibition can apply to independent contractors).

We have also previously raised concerns about the administrative process surrounding initiation of GPA 240005, a component of this Project. *See* **Attachment C**.

[1] The Staff Report appears to erroneously refer to Change of Zone No. 2200013, but the Change of Zone pertaining to this Project, and which is evaluated by the EIR, is Change of Zone No. 2200062.

II. The FEIR Fails to Adequately Disclose, Analyze, and Identify Mitigation for the Project's Environmental Impacts.

A. The FEIR Fails to Adequately Analyze and Mitigate the Project's Air Quality Impacts.

Numerous articles in recent years have pointed out that California's Inland Empire—which includes the Project site—already hosts more than 4,000 warehouses and roughly 600,000 daily truck trips which produce 50 million pounds of carbon dioxide.[2] Together these facilities result massive quantities of air pollution and substantial truck traffic noise. Neighborhoods in the area are already overburdened with impacts from warehouse facilities, which are having devastating human health and climate change impacts on the region. The County should avoid any development that would exacerbate the issue—especially short term warehouse projects, which are quite likely to be replaced by future automation. The FEIR analysis for this warehouse Project is flawed in three key ways: 1) the analysis of air quality construction impacts is based on underestimated values; 2) the analysis of air quality impacts generated by mobile sources is based on underestimated values; and 3) the mitigation measures identified to reduce NOx operational emissions are insufficient. Each deficiency is explained in more detail below.

1. The Analysis of Air Quality Construction Impacts Is Based on Underestimated Values.

First, the FEIR understates the number of construction haul truck trips for the Project. It states that, per an unspecified source, 200 haul truck trips per day will be expected to remove the excess dirt ("cut") from the Project site. *See* FEIR at 4.3-38-39. However, the FEIR Project Description states that "approximately 3,462 [cubic yards] of dirt is anticipated to be exported from the Project site to the Perris site per day. At this

---

[2] *See* Rebecca Pelvin, '*Where does it stop?' Warehouse advance in Riverside County threatens rural lifestyle*, L.A. Times, Oct. 16, 2024 (attached as **Attachment D**); Jim Newton, *California warehouse boom comes with health, environmental costs for Inland Empire residents*, Cal Matters, Jan. 26, 2023, available at https://calmatters.org/commentary/2023/01/inland-empire-california-warehouse-development/ (attached as **Attachment E**); Rachel Uranga, *Warehouse boom transformed Inland Empire. Are jobs worth the environmental degradation?*, Los Angeles Times, Feb. 5, 2023, available at https://www.latimes.com/california/story/2023-02-05/warehouses-big-rigs-fill-inland-empire-streets (last accessed Aug. 27, 2025) (attached as **Attachment F**); Ryan Fonseca, *Inland Empire residents are fighting warehouse sprawl*, Los Angeles Times, Feb. 7, 2023, available at https://www.latimes.com/california/newsletter/2023-02-07/essential-california-warehouses-inland-empire-essential-california (last accessed Aug. 27, 2025) (attached as **Attachment G**).

rate, it would take 63 business days or approximately 3.2 months to complete the exporting of soils." *See* FEIR at 3-13.

The FEIR does not identify the capacity of the hauling trucks to be used, but at the standard capacity of between 10 and 16 cubic yards per truck,[3] moving 3,462 cubic yards of dirt per day would require between 216 and 346 truck trips per day, not 200. The FEIR lacks substantial evidence supporting its lower estimate of 200 truck trips. *Laurel Heights Improvement Assn. v. Regents of the University of California* ("*Laurel Heights I*") (1988) 47 Cal.3d 376, 409; Pub. Resources Code §§ 21080(e) ("substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact"), 21082.2(c). The County must update all FEIR analyses that are based on the number of construction hauling truck trips per day with the correct data. Additionally, the County must provide evidence that the dump truck capacity will remain constant for all 63 days during which dirt is removed from the site. At a minimum, the FEIR's underestimate of daily haul truck trips impacts the air quality (toxic air contaminants generated), GHG emissions generated, and transportation impact (construction truck traffic impacts to the project vicinity) analyses.

Second, the expected construction timeframe is incorrect, which could affect seasonal assumptions and does not accurately reflect tightening regulations. Table 3-1 (Construction Duration) states that site demolition would begin on September 2, 2024. That was one year ago. The FEIR frames this schedule as representing "a 'worst-case' analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent." *See* FEIR at 3-29. While the emission regulations may become more stringent, so may the emissions thresholds become more strict as California enforces clean air mandates at the statewide level. Therefore, a project that is under a particular threshold today may not reliably be so in the future.

Furthermore, the construction schedule is broken into various activities including demolition, site preparation, grading, building construction, paving, and architectural coating. Since CalEEMod calculates maximum daily emissions differently for summer and winter periods, if the timing of the construction activity is seasonally different than that assumed in the CalEEMod modeling, the resulting emissions impacts during construction may be worse than the modeling suggests. CalEEMod applies winter

---

[3] Dustin Hawley, *How Many Cubic Yards Are in a Dump Truck*, J.D. Power, Feb. 4, 2021, https://www.jdpower.com/cars/shopping-guides/how-many-cubic-yards-are-in-a-dump-truck (last accessed Aug. 27, 2025) (attached as **Attachment H**).

emission factors to vehicle trips made during phases that occur between October and March, and summer emission factors to vehicle trips made during phases that occur between April through September. *See* **Attachment I** (CalEE Mod Emission Calculation Details) at C-21. The season in which emissions are generated plays a significant role in accurately calculating the severity of GHG and air quality impacts. The County had ample opportunity to correct the FEIR's construction duration timelines to more accurately reflect actual conditions, but it failed to do so. The FEIR must include an analysis based in reality, not based on an impossible project start date.

For the above reasons, the construction air quality analyses should be redone to use accurate and current information about the Project. NOx is created from any source that burns fuel, including as automobiles, trucks, heavy construction equipment, farming equipment and residential heating. Table 4.3-11 in the FEIR (Overall Construction Emissions Summary) indicates that emissions for VOCs and NO_x are already close to the SCAQMD Regional Thresholds so that slight increases in emissions could cause significant construction-related impacts. The CalEEMod analysis should be re-run with the correct number of daily hauling trucks (between 216 and 346) and a realistic construction schedule to determine if the construction emissions are indeed below the SCAQMD Regional Thresholds. If the construction impacts to air quality are significant under the updated analysis, then the FEIR must also include feasible mitigation measures that minimize the Project's impacts.

2. The Analysis of Air Quality Impacts Generated by Mobile Sources Is Based on Underestimated Values.

One of the most environmentally harmful aspects of warehouse facilities is their reliance on heavy-duty trucks to transport goods and materials. Heavy-duty trucks are key sources of diesel pollution and toxic air contaminants ("TACs") and are therefore key contributors to air quality impacts. Diesel trucks emit large volumes of particulate matter (i.e. diesel particulate matter, or DPM) and NO_x, thereby contributing to health problems that include cardiovascular issues, cancer, asthma, decreased lung function and capacity, reproductive health problems, and premature death.[4] Diesel generators are another source of DPM and NO_x.

[4] *Storing Harm: the Health and Community Impacts of Goods Movement Warehousing and Logistics* (Jan. 2012), available at: https://envhealthcenters.usc.edu/wp-content/uploads/2016/11/Storing-Harm.pdf (last accessed Aug. 27, 2025) (attached as **Attachment J**).

The trip generation used in the Project's Traffic Analysis ("TA"; Technical Appendix N2), which provides the inputs into the FEIR's air quality analysis, results in values that are unexpectedly low. The FEIR models the Project's mobile air quality impacts assuming trucks would travel a distance of up to 36 miles. The FEIR states that this distance "was developed for this specific Project and is based on accepted traffic/transportation engineering protocols, the Institute of Transportation Engineers (ITE) Trip Generation Manual trip generation rates, and data gathered from local sources." *See* FEIR at F-13. It states that the modeling was developed, in part, based on "professional and practical experience of the County, the Project's air quality experts, and the Project's traffic engineers, and reflect their best judgment based on evaluations of similar developments within the County's jurisdiction." *See* FEIR at F-14. However, the FEIR does not identify from which "similar developments" it obtained truck trip length data, or provide other factual information to support this truck trip assumption. Such information is necessary to support the truck trip length data used in this analysis and demonstrate to the public how the EIR arrived at its conclusions. Pub. Resources Code § 21080(e) ("substantial evidence includes . . . expert opinion supported by fact . . . [s]ubstantial evidence is not . . . unsubstantiated opinion or narrative"). In fact, the available evidence demonstrates that the FEIR is likely severely underestimating truck trip length.

Trucks will likely be travelling to the project site from the Ports of Long Beach and Los Angeles, which are more than 70 miles away. The analysis should be based on real-life, locally-relevant sources for truck trip length, not generic high-cube fulfillment center truck trip lengths which have been averaged across the entire South Coast Air Basin. The FEIR fails to adequately support the assumptions underlying its projections.

Additionally, the FEIR assumes that all traffic from the Project will be directed eastward towards the I-215 and fails to consider any truck traffic westward, through Mead Valley, towards the I-15. *See* FEIR at 3-13, 4.3-56, 4.3-63. This is a considerable omission in the FEIR that ignores existing traffic conditions and the likely increase in westward traffic that will result from the Project. The FEIR thereby fails to analyze resulting air quality impacts, such as increased pollutants coming from trucks moving through Mead Valley and passing closer to sensitive receptors and protected habitat.

Correcting the assumed truck trip length and accounting for westward truck traffic would dramatically increase the Project's vehicle miles travelled ("VMT"), which in turn would increase the GHG emissions calculations, and the calculation of the Project's toxic air contaminants. If an updated analysis concludes that the Project's air quality impacts to sensitive receptors are significant, it must propose feasible mitigation measures to address those impacts. And although the Project's long-term emissions of NO_X already exceed

the SCAQMD regional thresholds, it is imperative that the FEIR describe the full extent of the Project's impacts so that the County can develop mitigation measures that will address the full scale of those impacts, and decisionmakers can make an informed decision about whether to approve the Project. *See* CEQA Guidelines § 15126.2(c) (requiring an EIR to discuss "any significant impacts, *including those which can be mitigated but not reduced to a level of insignificance*" (emphasis added); *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 518-20, 524-25 (EIR inadequate where agency failed to fully disclose significant and unavoidable impacts or consider all feasible mitigation). Currently, the County cannot rely on the FEIR for either determination.

3. The Mitigation Measures Identified to Reduce NOx Operational Emissions Are Insufficient.

One of CEQA's basic purposes is to "prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible." CEQA Guidelines § 15002(a)(3). On page 4.3-52, the FEIR states the Project's long-term operational emissions of NO_x would represent a significant impact which requires mitigation. Although the FEIR proposes mitigation measures to address that impact, it nonetheless concludes that NO_x operation emissions remain significant, or exceed the threshold of significance, even after mitigation (i.e. are a "Significant and Unavoidable Impact"). *See* FEIR at S-16. However, the FEIR fails to incorporate additional feasible mitigation measures that could further reduce the Project's NO_x emissions.

CEQA mandates that an agency adopt the most effective and feasible measures to reduce a project's impacts, even if they do not fully reduce the impacts to a less than significant level. *See* Pub. Res. Code § 21002 (CEQA mitigation includes measures that would "*substantially lessen* the significant environmental effects" of a project); *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-25 ("Even when a project's benefits outweigh its unmitigated effects, agencies are still required to implement *all* mitigation measures unless those measures are truly infeasible.") (emphasis added). The County's own General Plan policies also require the County to do more. General Plan Policy AQ 4.7 states that, "[t]o the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SCAB, the Environmental Protection Agency and the California Air Resources Board." *See* FEIR at 4.3-32.

There are examples throughout California of warehouse and fulfillment center projects that have been approved and constructed with feasible, effective, and robust measures that can reduce air pollutant emissions and which go beyond what the Project

currently proposes. Feasible mitigation measures that have been proposed for other large-scale warehouse facilities and which should be incorporated as mitigation for this Project include:

- Electric Charging: Beyond mandating the minimum number of electric vehicle (EV) chargers required by Title 24 of the Building Code, the Project shall install conduit infrastructure for electric vehicle charging stations onsite to allow the Project to serve electric trucks in the future. Such conduits shall be provided onsite to serve 50% of the number of truck docking stations, with the location of conduits at the discretion of the developer (e.g., truck trailer parking spaces or other locations). The Project Applicant shall ensure that sufficient electric vehicle charging stations are installed when necessary to serve the charging demands of electric trucks and vehicles domiciled at the Project site. This same mitigation measure was adopted as part of Costco Depot Annexation Project in the City of Tracy and approved by the City Council on March 4, 2025. *See* **Attachment K** (Tracy Costco Depot Annexation Project EIR Errata) at PDF p. 2.
- Truck Refrigeration Units (TRUs): Response to Comment A-10 in the FEIR states that "[a]s required by DEIR Mitigation Measure MM 4.3-1, the proposed Project would be required to provide plug-ins for TRUs at the building loading docks, allowing the TRU to be operated without using the diesel engine." There, however, is no such language in MM 4.3-1 requiring plug-ins for TRUs at the building loading docks. In fact, there is no mention of TRUs or electrification at any of the truck docks at all in MM 4.3-1 or any other mitigation measure. *See* FEIR at S-14-15. The County should revise MM 4.3-1 to not only require the provision of electrical connections for TRUs at every truck dock that could receive a TRU-enabled truck, but also to establish a site-wide prohibition on allowing trucks to power a TRU with a diesel engine while on the Project site. TRU-enabled trucks should be required to connect to electric power at the truck dock in order to power a TRU. In fact, Riverside County's own "Good Neighbor" Policy for Logistics and Warehouse/Distribution Uses includes a measure to "eliminate idling of main and auxiliary engines during the loading and unloading process" and requiring that, "[a]t all cold storage facilities, electrical connections shall be provided to each dock." *See* **Attachment M** at p. 5. That measure should be added as mitigation for this project.
- On-Site Renewable Power: Supply 100% of Project electricity demand from onsite solar generation. Such facilities may include solar photovoltaic panels

on the roofs of the buildings or elsewhere on site (e.g., awnings, canopies or "solar trees" in parking area). The Project shall be designed and constructed to allow future expansion of solar facilities on site as electricity demand increases. The Project Applicant shall, as part of the solar microgrid, install a battery storage system with enough capacity to power the Project's basic building functions for 48 hours. This measure is being implemented in the Tracy Costco Depot project. *See* **Attachment L**.

- Diesel Generators: The Project Applicant shall ensure that diesel generators are not used on site during Project operations, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's final Tier IV emission standards.
- Air Quality Monitoring Stations. Installing and maintaining, at the manufacturer's recommended maintenance intervals, air monitoring station(s) 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.
- Truck Idling Restrictions: Owners, operators, or tenants (as relevant) shall be required to make their good faith and diligent best effort to restrict truck idling onsite to a maximum of three minutes, subject to any exceptions defined by CARB. For purposes of this obligation, "good faith and diligent best effort" shall include, at a minimum, (1) encouraging compliance with idling restrictions by posting highly visible signage at the project site entry as well as at other onsite locations frequented by truck drivers, (2) conspicuous inclusion in employee training and guidance material, and (3) owner/operator/tenant direct requests of the driver, as needed.

In other cases, the proposed mitigation measures simply do not go far enough or describe how it is feasible to implement the proposed mitigation. For example, MM 4.3-6(d) requires facility operators to maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks ("MHDT") and Heavy-Heavy Duty Trucks ("HHD") accessing the site use year CARB 2010 or newer engines. But the FEIR does not describe how this measure will be enforced. The method of ensuring compliance with this mitigation measure must be detailed in order to guarantee successful implementation. Additionally, any proposed mitigation should ensure that truck requirements progress as technology improves. The FEIR cannot indefinitely rely on

technology that is even now 15 years old as the County's best effort to mitigate the Project's significant toxic air quality impacts.

Both CARB and SCAQMD provided comments on the DEIR that identified flaws in the DEIR's air quality assessments as well as deficiencies in identifying suitable mitigation measures to reduce harmful emissions. Both agencies suggested that the Project should be required to commit to a transition to zero-emissions heavy-duty trucks over time. The FEIR's entire justification for why the Project does not include mitigation to compel the transition to electric trucks was based on a singular blog post published by the American Trucking Associations, an industry group.[5] *See* FEIR at F-17. The blog post describes difficulties in sourcing electrical power from the grid as one reason that committing to electric trucks is difficult. However, as described below in this letter (*see infra*, Section C.2.), this Project site and building size have the capacity to generate a substantial amount of electrical energy on site that would allow trucks to charge at the dock during loading/unloading. The evidence cited as to why electrical heavy duty trucks should not be mandated as mitigation for the Project's air quality impacts is not persuasive or compelling. As such, the clean fleet mitigation measures suggested by CARB should be included in the FEIR.

The FEIR has failed to properly quantify the construction-related and mobile source air quality impacts from the Project and has failed to provide measures that properly mitigate the operational air quality impacts from NO_x emissions. All of these issues must be addressed in a recirculated EIR.

B. The FEIR Fails to Adequately Mitigate Significant Impacts to Burrowing Owls.

Additionally, the FEIR concludes that the Project's impacts on the burrowing owl are significant and cumulatively-considerable. FEIR at 4.4-41. However, proposed mitigation measure MM 4.4-3 is inadequate because it fails to meet the conservation requirements established by the Western Riverside Multiple Species Habitat Conservation Plan ("WR-MSHCP"). For sites located within the Burrowing Owl Criteria Area, such as this Project site, the WR-MSHCP requires:

> Objective 6: Pre-construction presence/absence surveys for burrowing owl within the survey area where suitable Habitat is present will be conducted for all Covered Activities through the life of the permit. Surveys will be conducted within 30 days prior to disturbance. Take of active nests will be avoided. Passive relocation (use

[5] *See* https://www.trucking.org/news-insights/heavy-dose-reality-electric-truck-mandates

> of one way doors and collapse of burrows) will occur when owls are present outside the nesting season.
>
> Objective 7: Translocation sites for the burrowing owl will be created in the MSHCP Conservation Area for the establishment of new colonies. Translocation sites will be identified, taking into consideration unoccupied Habitat areas, presence of burrowing mammals to provide suitable burrow sites, existing colonies and effects to other Covered Species. Reserve Managers will consult with the Wildlife Agencies regarding site selection prior to translocation site development.

See **Attachment N**. However, MM 4.4-3 allows for the use of active relocation methods. FEIR at 4.4-45. This directly contradicts the WR-MSHCP, which requires that "[t]ake of active nests will be avoided. Passive relocation (use of one way doors and collapse of burrows) will occur when owls are present outside the nesting season." MM 4.4-3 also fails to provide for the creation of translocation sites as required by the WR-MSHCP.

MM 4.4-3 is also improperly vague and unlawfully defers mitigation. It vaguely states that burrowing owls will be relocated "following accepted protocols," but does not state or reference what constitutes "accepted protocols." This violates CEQA. *See San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 669-70; *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 280-81. Additionally, it states that if burrowing owls are later determined or assumed to be present on the Project Site, "a burrowing owl management plan shall be prepared . . . that shall detail the relocation of owls." FEIR at 4.4-45. But the FEIR does not provide any objective, enforceable standards or requirements for such a management plan, thus impermissibly deferring mitigation until some undefined future date when such a plan is developed. The FEIR's vague promise of a management plan does not ensure adequate mitigation of impacts to the burrowing owl and its habitat, and is expressly prohibited by CEQA. *See* CEQA Guidelines § 15126.4(a)(1)(B); *Golden Door Properties, LLC*, 50 Cal.App.5th at 518-25; *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 862.

The County should revise the EIR to ensure that it meets the WR-MSHCP's conservation requirements and sufficiently mitigates significant impacts to the burrowing owl and its habitat. Additionally, the County should correct any erroneous references to a 2025 biological assessment or publish the updated assessment for public comment.

C. The FEIR Fails to Adequately Analyze and Mitigate the Project's Greenhouse Gas Emissions and Climate Change Impacts.

1. The Project Conflicts With Plans to Reduce GHG Emissions (Threshold b).

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality ("2022 Scoping Plan"). The 2022 Scoping Plan builds on CARB's 2017 Scoping Plan as well as the requirements set forth by Assembly Bill 1279 (signed into law on September 16, 2022), which directs the State to become carbon neutral no later than 2045 and reduce GHG emissions by 85% below 1990 levels. The 2022 Scoping Plan lays out how California can reduce GHG emissions to achieve AB 1279's objectives. Consequently, the 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world.

When AB 1279 and the 2022 Scoping Plan were adopted, Riverside County's 2019 Climate Action Plan ("CAP") was already a few years old. The FEIR concedes that "[t]he Riverside County 2019 CAP Update" was meant to implement the State's 2017 Scoping Plan and earlier GHG reduction goals, "consistent with the SB 32 2030 GHG reduction target and Statewide post-2030 reduction goals." *See* FEIR at 4.8-27. The FEIR then claims that "[t]he 2019 CAP establishes GHG emission reduction programs and regulations that correlate with and support evolving State GHG emissions reduction goals and strategies." *See* FEIR at 4.8-23. But while this statement may have been true at the time the CAP was adopted in 2019, it was no longer true when the 2022 Scoping Plan was released and AB 1279 was passed, and it is not true today. The 2019 CAP no longer supports current State GHG emissions reduction goals, which have surpassed SB 32's requirements.

The 2019 CAP states that "[t]his CAP Update sets a target to reduce community-wide GHG emission emissions by 15 percent from 2008 levels by 2020, 49 percent by 2030, and 83 percent by 2050." *See* 2019 CAP at 6-2. These target GHG reductions are different than those established by the 2022 Scoping Plan. The 2022 Scoping Plan is far more aggressive, aiming for net zero GHG emissions by 2045 (the 2019 CAP targets a reduction of only 83 percent below 2008 levels by 2050). Because the 2019 CAP seeks compliance with outdated and less-stringent thresholds, the County cannot rely on it to show that the Project is consistent with "an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases." Any such conclusion lacks substantial evidence and renders the FEIR invalid as an informational document.

The FEIR states that, with implementation of Mitigation Measures MM 4.8-1 and 4.8-2, the Project would be fully consistent with the 2019 CAP Update, which in turn also would ensure Project consistency with the CARB 2022 Scoping Plan. *See* FEIR at 4.8-38. For the reasons described above, this conclusion is completely unsupported and without evidence. While the 2022 Scoping Plan supports project compliance with a local GHG reduction strategy, the 2019 CAP is no longer keeping pace with the 2022 Scoping Plan and the State's effort to achieve carbon neutrality.

The insufficiency of merely requiring consistency with the 2019 CAP is further evidence by the County's own pending efforts to update the CAP. The Draft 2025 CAP Update assesses the previous GHG reduction targets identified in the 2019 CAP and proposes new targets that are consistent with the State policies to meet SB 32requirements. The Draft 2025 CAP states:

> The State has set goals for reducing GHG emissions by 2030 and 2045 through AB 32, EO B-30-15, and AB 1279. Stated most recently in the 2022 Scoping Plan, these goals include a Statewide emission reduction target of 40 percent below 1990 levels by 2030 (49 percent below 2008 baseline levels), and a reduction target of 85 percent below 1990 levels of anthropogenic emissions by 2045 (87 percent below 2008 baseline levels). To continue reductions consistent with the State's long-term emissions reduction goals, the County would need to reduce emissions in 2030 by 211,910 MTCO2e from an ABAU forecast and by 2,564,723 MTCO2e from an ABAU forecast by 2045. 2025 Draft CAP (attached as **Attachment O**) at 7.

The FEIR must demonstrate how a project that will *add* GHG emissions of 12,477.48 MTCO2 every year assists the State and County in meeting their *current* GHG emissions reduction goals. It defies reason that a Project with this magnitude of emissions will help the State achieve net neutral carbon emissions by 2045 in compliance with CARB and SCAQMD guidance. Instead, the FEIR should conclude that the Project cannot meet GHG threshold b because "the Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases" even if it could be considered consistent with the 2019 CAP. Accordingly, even with the proposed mitigation, the Project's GHG emissions impacts remain significant because they conflict with the State's ambitious GHG reduction goals. The County must also identify measures that will mitigate these impacts.

2. The Project Will Generate GHG Emissions That Will Have a Significant Impact On the Environment (Threshold a).

The Project's GHG emissions are significant: 12,477.48 metric tons of CO_2 equivalent ("MTCO2e") per year. This figure is likely understated for the same reasons that the FEIR's air quality analysis is flawed: the FEIR underestimates the number of heavy-duty haul trucks, relies on an impossible construction timeframe, improperly circumscribes the expected trip length for trucks operating at the Project site, and omits any analysis of westward truck movement. The County must correct these fatal flaws and re-model GHG emissions with the correct data.

In response to public comments, the County added MM 4.8-2 to the FEIR, which states that "prior to the issuance of building permits . . . the plans require the provision of the minimum number of solar panels on the roof of the proposed warehouse building as necessary to generate 0.5 Megawatts of power." *See* FEIR at S-39. However, this mitigation measure does not go far enough. The FEIR should require that 100% of the energy for the building and site be supplied by onsite solar generation. This will help reduce the Project's energy consumption from the grid and its associated GHG emissions. It also aides in demonstrating consistency with the 2022 Scoping Plan and AB 1279 by making the Project net neutral in terms of energy demand and production. In sunny Southern California, a 1,003,510 square foot building, like the proposed warehouse, can easily meet 100% of the Project's electricity needs through a rooftop solar system. Assuming that 60% of the rooftop area can be used for solar panels, a rooftop solar system would generate, conservatively, 9,300,000 kWh/year.[6] This is nearly three times the Project's estimated electricity demand. *See* FEIR at 4.6-23, Table 4.6-11 (estimating annual operational energy demand to be 3,225,232 kWh/year).

[6] In warmer climates such as southern California, flat roofs have an access factor (percentage area of roof available to accommodate solar systems) of 60%. *See* **Attachment P** (Lado Kurdgelashvili et al., *Estimating Technical Potential for Rooftop Photovoltaics in California, Arizona and New Jersey*, Center for Energy and Environmental Policy (CEEP), 2016) at 28. Thus, a 1,000,000 square foot building can allocate 600,000 square feet to a solar system (1,000,000 sq ft. × 60% access factor = 600,000 sq. ft.). Assuming that 100 square feet of rooftop can accommodate 1 kW of rooftop solar and assuming an annual solar energy yield of 1,550 hours per kW, 600,000 square feet of rooftop solar can produce approximately 9,300,000 kWh/year (600,000 square feet of rooftop = 6,000 kW of rooftop solar. 6,000 kW × 1,550 hour annual solar energy yield = 9,300,000 kWh/year). *See* **Attachment Q** (Los Angeles County Public Works Renewable Energy Master Plan (Jan. 2020)) at 30.

D. The FEIR Improperly Concludes that the Impact of Demolishing 26 Single-Family Homes Is Less-Than-Significant.

The FEIR states that the Project will require demolition of 26 single family homes, 13 of which are known to be occupied. FEIR at 4.15-5-6. Thus, it estimates that construction of the Project would displace 99 people. *Id.* at 4.15-5. The FEIR concludes that this would not displace substantial numbers of people or housing because a total of 60,423 housing units have already been approved in the County. However, the FEIR does not state whether there are any units located in or near Mead Valley, much less whether they would be affordable to the displaced residents, or available by the time the current residences will be demolished. It notes only that the housing has not yet been approved and that they constitute part of the County's RHNA obligations through 2029. *Id.* at 4.15-5. Thus, the FEIR does not provide any evidence to show the "approved (but not constructed)" units will actually accommodate the people that the Project will displace. Nor does the FEIR demonstrate that the Project complies with the County's Housing Element, which requires that replacement of affordable housing. General Plan, Ch. 8, p. H-30. Therefore, the FEIR's conclusion that the Project will not displace a substantial number of people or housing necessitating the construction of replacement housing is unsupported.

E. Transportation Impacts Are Improperly Analyzed and the Proposed Mitigation Is Insufficient to Adequately Reduce the Impact.

1. The Proposed Transportation Demand Management Mitigation Measure Lacks Performance Standards and Is Ineffective.

The FEIR concludes that the Project-generated work VMT per employee would exceed the County's adopted threshold by 22.5%, thereby creating a significant transportation impact related to vehicle miles travelled. In response, the DEIR identifies mitigation measure MM 4.18-2, which states:

> MM 4.18-2: Feasible Transportation demand management ("TDM") strategies that will contribute to reducing Project generated VMT shall be developed and implemented. Features to promote the use of alternative transportation modes such as sidewalks, bicycle lanes, and bicycle racks are included as part of the Project's design. Property owner associations and/or building occupants shall be required as a condition of final building inspection for tenant improvements to prepare and implement a TDM Plan to discourage single-occupancy vehicle trips for employees and encourage alternative modes of transportation such as carpooling,

transit, walking, and biking. Trip reduction strategies applicable to the Project may include but are not limited to the following:

- Implement local hiring programs.
- Mark preferred parking spaces for vanpools and carpools.
- Provide on-site secured bike parking facilities.
- Provide information on carpooling and vanpooling opportunities to employees.
- Provide an on-site message board in each building or other comparable system to encourage and provide information about public transit, carpooling, and vanpooling, and carpool and vanpool ride-matching services.

The TDM plan shall include an estimate of the vehicle trip reduction anticipated for each strategy proposed based on published research such as California Air Pollution Control Officers Association (CAPCOA), *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (December 2021) (CAPCOA Handbook). For TDM measures that require ongoing operational strategies, the TDM plan shall include an ongoing monitoring program to ensure the plan is implemented on an ongoing basis. FEIR at 4.18-21-22.

This mitigation measure is weak and unenforceable. It does not include any metrics for evaluating the measure's effectiveness or any means to assess compliance. Here, the FEIR has identified a quantitative impact (22.5% over the threshold) but is proposing a deferred mitigation measure with no performance standard tied to reducing the impact below that threshold. Additionally, although the measure includes vague suggestions for potential future requirements (e.g. " Features to promote the use of alternative transportation modes," reduction strategies "may include"), MM 4.18-2 does not require implementation of any particular strategy or mandate that any amount of VMT actually be reduced. This kind of empty promise cannot constitute adequate mitigation under CEQA. If the FEIR proposes to defer mitigation, it must still establish objective, enforceable performance standards to ensure that specific TDM measures will actually reduce VMT. *See Golden Door Properties, LLC*, 50 Cal.App.5th at 518-25. This is true even if feasible mitigation will not bring the project below the threshold of significance. *Sierra Club*, 6 Cal.5th at 524-25.

The FEIR states that because the Project does not have a known tenant, any VMT reductions that require participation by the building tenant or occupant are speculative.

However, this does not excuse the FEIR's failure to ensure that any future tenant implement appropriate mitigation measures. The FEIR can require that future tenant lease agreements include provisions containing mandatory TDM actions and reporting/compliance procedures. If the mitigation measure will defer any commitment to specific TDM actions, it must nonetheless identify specific, measurable standards to ensure that the mitigation goal will be achieved.

Furthermore, as discussed above (*see supra*, Section A.2.), the FEIR must analyze and mitigate any VMT impacts caused by westward truck traffic. The Project will likely increase the number of trucks and small vehicles driving westward on Cajalco Road due to the increased traffic around I-215. The FEIR must analyze the impact that this westward traffic has on VMTs and propose feasible mitigation for resulting impacts.

2. The Project Would Cause an Effect Upon, or a Need for, New or Altered Maintenance of Roads (Threshold d).

The FEIR states:

> Implementation of the proposed Project would generate traffic along local roadways, and therefore would incrementally increase the need for maintenance of local roadway facilities. Although the Project would result in the increased maintenance of roadways and would increase traffic on existing and planned roadways, any incremental increase in the need to maintain public roadway facilities would be offset by tax revenue generated by the Project's proposed land uses. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant. FEIR at 4.18-17.

However, the FEIR does not distinguish between the amount of passenger vehicle traffic expected to be generated by the Project and the amount of heavy-duty truck trips that will traverse Seaton Avenue and Cajalco Expressway. Its failure to break down the analysis is notable because, as discussed above, the FEIR is likely underestimating the number of heavy duty truck trips caused by removing dirt from the Project site, truck trip lengths during Project operations, and the amount of traffic traveling west on Cajalco Road. Accordingly, the VMT analysis is inaccurate and the conclusion that these vehicle trips will not have a significant impact on road maintenance is unsupported.

Additionally, the FEIR concludes that impacts under this threshold are less than significant because the tax revenue generated by the Project's land uses will offset the

additional costs involved in maintaining and repairing the roadways. But whether generated tax revenue can offset costs associated with road maintenance necessitated by the Project is a mitigation measure. This should be analyzed separately from the impact analysis, which asks whether the Project will "increase the need for maintenance of local roadway facilities." *See* Pub. Res. Code § 21100(b); *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656 ("By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA"). Indeed, the FEIR seems to suggest, by noting the need for offsets to road maintenance costs, that the Project will increase the need for local road and facilities maintenance.

The County must therefore revise this analysis to reflect an accurate estimate of haul trucks and vehicle traffic, and analyze the Project's impact on the need for road maintenance separately from whether the resulting increase in costs could be offset by the Project's tax revenue. If the County concludes that the Project's impacts under this threshold are significant, which they likely are, then it must propose mitigation measures—such as use of tax revenues to maintain roadways—to address those impacts to the roadways.

3. The Project Would Cause an Effect Upon Circulation During the Project's Construction (Threshold e).

The FEIR states that, as part of the Project:

> Improvements would be made to roadways abutting the Project site, including Cajalco Road, Seaton Avenue, and Decker Road. Decker Road exists as an unimproved roadway under existing conditions, while Seaton Avenue and Decker Road [sic] are partially improved under existing conditions. During construction of improvements to these roadways, there is a potential for the Project to cause a temporary effect on local circulation in the area. This is conservatively evaluated as a potentially significant impact prior to mitigation. FEIR at 4.18-17.

Dirt export from site grading alone is expected to be 216 to 346 haul truck trips per day (more than the 200 stated in the FEIR), depending on the capacity of the haul trucks. This will have an immediate and detrimental temporary impact on local traffic and circulation in the project vicinity. The FEIR must update its analysis to reflect these more accurate assumptions of truck trip volume.

Furthermore, Mitigation Measure 4.18-1 requires that a temporary traffic control plan be submitted and approved by the County, but there are no specifics as to what the

traffic control plan should address. Without any enforceable, objective standards, this proposed measure improperly defers mitigation. *See Golden Door Properties, LLC*, 50 Cal.App.5th at 518-25. The mitigation measure should be updated to specify that any future traffic control plan require, at a minimum, the following:

- Haul trucks shall take roadways that have the least impact on rural residents.
- Emergency vehicles will not have a more circuitous (i.e. longer) route to access existing rural residential uses during the construction period.
- Provisions to minimize impact on local traffic during peak traffic hours
- Provisions aimed at ensuring the safety of bicyclists and pedestrians during project construction

To comply with CEQA, the County must recirculate an EIR with an updated circulation analysis and corresponding mitigation measures that are measurable, enforceable, and effective.

F. The FEIR's Conclusion that Impacts to Agricultural Resources are Less Than Significant is Unsupported.

The Project site contains 60.2 acres of land with a current zoning designation of Light Agriculture (A-1-1). Agricultural lands provide visual relief from urban and suburban development, and they help to define the character of a region. But once agricultural lands are developed, they are lost forever. Here, the Project would replace agricultural land with an over-1-million square foot warehouse. Specifically, 19.84 acres of the Project Site are designated "Farmland of Local Importance," which includes:

- Soils that would be classified as Prime and Statewide but lack available irrigation water;
- Lands planted to dryland crops of barley, oats, and wheat;
- Lands producing major crops for Riverside County but that are not listed as Unique crops. Crops identified are permanent pasture (irrigated), summer squash, okra, eggplant, radishes, and watermelons;
- Dairylands, including corrals, pasture, milking facilities, hay and manure storage areas if accompanied with permanent pasture or hayland of 10 acres or more;

- Lands identified by city or county ordinance as Agricultural Zones or Contracts, which includes Riverside City "Proposition R" lands; and

- Lands planted to jojoba which are under cultivation and are of producing age.[7]

This loss of agricultural lands from the Project contributes to the cumulative loss of agricultural lands in Riverside County, the region, and the state. Developing agricultural land also has an adverse cumulative impact on a region's visual character. However, the FEIR erroneously concludes that impacts to both Agricultural and Aesthetic Resources are less than significant.

The FEIR relies on a Land Evaluation and Site Assessment (LESA) to provide a quantitative assessment of the Project's agricultural impacts. The LESA concludes that the final score for the project site is 28.1, which is under the threshold score of 39. However, this conclusion is unsupported in two key ways. First, the LESA assessed only the 64.97-acre project site when it should have also analyzed impacts to the 19.78 acres of off-site disturbance areas that will be required for Project implementation. *See* FEIR at 2-1. The County may require the Applicant to install roadway and infrastructure improvements over these additional 19.78 acres of land, which abut Cajalco Road/Cajalco Expressway, Seaton Avenue, Decker Road, and Rider Street. These improvements would, at a minimum, disturb, and more likely replace, the 19.78 acres of agricultural land that the FEIR ignores. Any corresponding impacts must be disclosed and analyzed in the FEIR.

Second, two of the categories assessed in a LESA are the quantity of Surrounding Agricultural Lands and the quantity of Protected Resource Lands within the Project's Zone of Influence (a buffer area around the Project site). This LESA concluded that there were no properties within the Project's 772-acre Zone of Influence that are active agricultural production land, and therefore the LESA scored impacts to Surrounding Agricultural Lands and Protected Resource Lands at zero. However, neither the LESA nor the FEIR offer any explanation or evidence of how the County determined that there is no active agricultural production land in the Zone of Influence. A review of publicly-available aerial imagery on Google shows that there are rural residential areas and potential agricultural activity in this area. The FEIR should include a list of Riverside County Assessor Parcel Numbers and corresponding current uses of those parcels to

[7] State Department of Conservation, *Farmland of Local Importance* (2018), https://www.conservation.ca.gov/dlrp/fmmp/Documents/Farmland_of_Local_Importance_2018.pdf (last accessed Aug. 28, 2025).

support the LESA conclusion that there is no active agricultural land at all in the 772-acre Zone of Influence.

The FEIR should be revised to analyze impacts to off-site agricultural land resulting from the Project and explain the LESA's conclusions regarding impacts to Surrounding Agricultural Lands and Protected Resource Lands. If the updated analysis shows that the Project will have significant impacts to agricultural resources, the County must also propose feasible mitigation measures in a Recirculated EIR.

G. The FEIR's Cumulative Impacts Analysis Is Severely Flawed..

To analyze cumulative impacts, the FEIR relies on projections in the County, City of Perris, and City of Moreno Valley General Plans, incorporating the impacts resulting from the presumed buildout under those plans. FEIR at 4.0-2-3. The noise impacts analysis also considers the cumulative impacts of other projects, predominantly warehouse projects, in the area. *Id.* at 4.0-4, Table 4.0-1. However, the FEIR entirely omits the Cajalco Road Widening Project (SCH #2011091015) and other pending General Plan Amendments in the surrounding area from its analysis.

As an initial matter, the FEIR cannot rely on the analyses in the City of Moreno Valley's General Plan EIR. Last year, a judge ordered that the City of Moreno Valley set aside all approvals for its General Plan, including certification of the General Plan EIR. The City is currently in the process of revising its General Plan EIR. *See* **Attachment R**. Accordingly, the County cannot rely on the inadequate and outdated environmental analyses in that General Plan EIR to support its conclusions in the FEIR.

The FEIR must also incorporate the Cajalco Road Widening Project into its cumulative impacts analysis. The Cajalco Road Widening Project would straighten and double the width of the 15.7 miles of Cajalco Road between I-215 and I-15.[8] This road widening includes the portion of Cajalco Road just north of the Project site. The Cajalco Road Widening Project would result in increased truck traffic west of I-215 and have significant impacts throughout Mead Valley. Widening Cajalco Road would, at least, exacerbate this Project's air quality, GHG emissions, noise, and traffic safety impacts by facilitating truck movement two and from the Project site, utilizing Cajalco Road to directly access I-15. This would also contribute to more westward traffic through Mead Valley, which the FEIR has entirely failed to analyze, heightening any impacts resulting from the increase in vehicles along Cajalco Road. Traffic from the Proposed Project will

[8] Cajalco Road Widening project documents: https://rcprojects.org/cajalco-road-widening

foreseeably use an improved Cajalco Road to travel west to I-15, thereby increasing noise, air quality, and traffic impacts in the western portions of Mead Valley.

Additionally, the "Summary of Projections" approach to analyzing cumulative impacts ignores any projects not covered by the County's, City of Perris's, or City of Moreno Valley's General Plans. Thus, the EIR improperly omits several pending and approved projects from its cumulative impacts analyses. For example, there are 12 other GPAs in the Project's immediate area that are currently pending before the County and similarly ask the County to rezone agricultural and low density residential land to allow light industrial and manufacturing uses.[9] *See* **Attachment S** (list and map of pending GPAs in First Supervisorial District). Just these 12 GPAs would convert an additional 1,081 acres for industrial use, including areas just north of the Motte Rimrock Reserve. Many of the amendments would also propose additional warehouse complexes (totaling at least another 1.5 million square feet) in the area, each of which would further exacerbate this Project's air quality, GHG emissions, noise, traffic safety impacts, and biological resources impacts.

The FEIR must analyze the cumulative impacts of the Cajalco Road Widening Project, including the increase in westward traffic between I-215 and I-15, and any pending or approved projects not covered by the three General Plans cited by the FEIR, such as the 12 other pending GPAs in the area. *See* CEQA Guidelines § 15355; *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 529-33 (cumulative impacts analysis must include in-process projects that would require general plan amendments). The County must revise its cumulative impacts analysis accordingly and recirculate the EIR for public review and comment.

H. The FEIR's Alternatives Analysis Is Inadequate.

1. The FEIR Prematurely Dismissed Locating the Project on a Different Site.

The FEIR fails to undertake a legally sufficient study of alternatives to the Project. A proper analysis of alternatives is essential to comply with CEQA's mandate that significant environmental damage be avoided. Pub. Resources Code § 21002 (projects should not be approved if there are feasible alternatives that would substantially lessen environmental impacts); CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(f).

---

[9] *See* the County's GPA tracker at: *https://planning.rctlma.org/2024-general-plan-foundation-amendment-cycle#2741959481-4202596112*

The FEIR states that the County considered, but dismissed, the option of siting the Project in a different area. However, that alternative was not fully considered because there were no alternate sites under the same ownership that (1) are the same size as the current project site, (2) are entitled for light industrial development, and (3) would reduce the Project's environmental impacts. However, these qualifications are unnecessarily restrictive. To begin, the FEIR does not explain why alternative sites must already be zoned or entitled for light industrial development when the Project currently does not have industrial entitlements and requires a General Plan amendment. There is no reason to hold alternative sites to a higher standard than the Project. Furthermore, the EIR does not explain why smaller sites would not be appropriate alternatives, particularly given that the Project does not yet have a tenant, and can be altered to fit within a smaller footprint without compromising on specific needs. An alternative site, particularly one located closer to I-215 and away from sensitive receptors, would significantly reduce air quality, GHG, transportation, and noise impacts. The FEIR's conclusion that an alternative site would not lessen any environmental impacts is unsupported.

The FEIR's failure to seriously consider these other, less destructive alternatives undermines the primary purpose of CEQA's alternatives requirement, which is to explore options that will reduce or avoid adverse impacts on the environment. Pub. Res. Code § 21002; CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d); *Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089.

2. Approval of the Project as Proposed Violates CEQA.

CEQA prohibits approval of a project where there are feasible alternatives that would substantially lessen environmental impacts. Pub. Resources Code § 21002. Here, the FEIR identifies the Small Project Alternative ("SPA") as the environmentally superior alternative and concludes that this alternative "generally would meet the Project's objectives," even if to a lesser extent than the proposed Project. FEIR at 6-54-55. Implementation of this alternative would still result in the full buildout of the proposed public park across 14.93 acres in a manner similar to what is currently proposed as part of the Project. *Id.* at 6-52. However, it would reduce the footprint of the warehousing complex by 79.3% and result in significantly fewer environmental impacts. Id. at 6-46, 6-54-58. Not only does the SPA alternative still meet all of the Project's objectives and goals, but it actually better serves many of them compared to the Project as proposed. For example, the SPA alternative still provides the recreation in favor of which so many community members have spoken. And this alternative is more likely to diversify the mix of uses in the Mead Valley Community by minimizing the footprint of

yet another warehouse and thereby leaving open the possibility of other, actually diverse uses for the project site.[10]

Despite this, the Staff Report still recommends that the Board move forward with approving a General Plan amendment and change of zone for the entire 50+ acre warehouse site. But such a large-scale zoning change is not necessary for the SPA alternative, which would only require a zoning change over a much smaller area. The County cannot move forward with the Project as proposed and open up over 50 acres of agricultural land to industrial uses. Doing so would violate CEQA in light of the FEIR's conclusion that the smaller footprint SPA is both environmentally superior and meets the Project's objectives and goals.

I. Mitigation Measures Must Be Updated as Indicated in the Responses to Comments and Require Compliance from Future Occupants.

The FEIR's responses to comments concede that revisions to the EIR's mitigation measures are necessary. *See* FEIR at F-17, F-19, and F-57. However, the Mitigation Monitoring and Reporting Program (MMRP) in Section S.0 was not revised from the draft EIR. The omitted revisions include:

- Revisions to MM 4.3-1 to require the installation of electrical connection points for TRUs at truck docks serving TRU-enabled trucks. *See* FEIR at S-14 and S-15.

- Revisions to MM 4.3-4 to require the Project Applicant to provide future tenants/owners with information regarding CARB's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), thereby promoting zero-emissions technologies. *See* FEIR at S-16.

- Revisions to MM 4.3-6.e to require posting of signage restricting the operation of Transport Refrigeration Units (TRUs) to a maximum of 30 minutes and

[10] In the vicinity of the Project site, there are 33 warehousing/truck trailer storage projects that total a combined 9,170,805 square feet of warehousing. FEIR at 4.0-4, Table 4.0-1; *see also* Jeff Horseman, *1 million square foot warehouse and 15 acre park could be coming to Mead Valley*, The Press-Enterprise, Aug. 12, 2025 (attached as **Attachment T**) ("Mead Valley leads the Inland Empire in the amount of warehouse to square footage per resident . . . There are 365 warehouses totaling 125 million square feet within a 10-mile corridor . . . [and] another 44 warehouses—worth 25 million square feet—have been approved").

reducing the maximum idling time of trucks that do not include TRUs from five to three minutes. *See* FEIR at S-18.

The FEIR must revise these mitigation measures as the FEIR conceded was necessary.

The Mitigation Monitoring and Reporting Program must also require that any tenant lease agreements for the Project site shall include a provision requiring the tenant/lessee to comply with all applicable requirements of the MMRP. Additionally, the MMRP should provide that a copy of the MMRP shall be attached to each tenant/lease agreement. This will ensure that all obligations of the Project Applicant in MMRP shall apply to any future owner(s) or operator(s) of the Project.

III. The Project Is Inconsistent with the General Plan.

The General Plan establishes equity, balance, and a diversified job base as important County values. *See* General Plan for the County of Riverside, Ch. 2, pp. V-4-V-6. However, the proposed Project would demolish 26 single-family homes and an existing commercial structure to construct yet another industrial warehouse. *See* FEIR at 3-10. The Project conflicts with the General Plan's core values of balance and diversity by converting these 65+ acres of rural land that currently serve a diversity of uses to industrial development. It would destroy existing residences and businesses to pave way for an industrial warehouse with a 1,003,510 sq. ft. (44.74 acre) footprint. FEIR at S-3, 3-7. The addition of another warehouse complex, particularly one of this size, would not diversify financial or employment opportunities in this area.

The General Plan also underscores the importance of preserving rural areas within the County. It states the importance of "preserving rural open space areas, and scenic resources" and "preserving the economic value of agricultural and open space lands," and requires the County to "prevent[] inappropriate development in" environmentally sensitive areas. General Plan, Ch. 10, p. HC-5. Additionally, the General Plan acknowledges that "[t]he major challenges for these areas . . . include maintaining their rural character even as other areas in the County of Riverside experience rapid urban development, . . . and ensuring that buffers are provided between these areas and other uses that could be incompatible with their animal-keeping and agricultural nature." *Id.*, Ch. 3, p. LU-50. Indeed, several policies require concentrating development away from rural areas. For example, Policy LU 2.1 requires that growth be concentrated "near or within existing urban and suburban areas to maintain the rural and open space character of Riverside County to the greatest extent possible." Policies LU 21.3 and 22.3 require the County to "[e]nsure that development does not adversely impact the open space and

rural character of the surrounding area." General Plan, LU-49-50. And Policies LU 21.6 and 22.6 require provision of "programs and incentives that allow rural areas to maintain and enhance their existing and desired character." *Id.* The Project clearly conflicts with the General Plan's express mandate to preserve the area's rural and open space lands "to the greatest extent possible." It will rezone over 50 acres of agricultural-zoned land to construct a redundant warehouse complex that does not yet have an occupant. The Project will also have indirect impacts to the areas, including environmentally sensitive areas, surrounding the Project site by increasing truck traffic and emissions as well as disrupting sight lines to the open space areas south of the Project.

IV. The FEIR Must Be Revised and Recirculated.

The FEIR cannot properly be used to approve the Project. CEQA requires recirculation of a draft EIR where: (1) the addition of significant new information to the EIR after public notice is given of the availability of the draft EIR but before certification, or (2) the draft EIR is so "fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." CEQA Guidelines § 15088.5.

Here, the FEIR fails to adequately reveal or describe the true extent of numerous significant environmental impacts, which clearly require extensive new information and analysis. This analysis will likely result in the identification of new, substantial environmental impacts or substantial increases in the severity of significant environmental impacts. Once the EIR reveals the full extent of the Project's impacts, the County should must consider alternatives that serve the actual needs of the community and lessen the Project's impacts.

Additionally, the Planning Commission should not ignore the serious concerns about the decision-making process related to this Project and FEIR. It has misled the public about the Project's progress at each stage, most notably by publishing the draft EIR before the County had even considered initiating proceedings on GPA 240005. This confused process led many to believe that they would have further opportunity to provide input and shape the contours of the Project, when in reality the Project was already much further along. Indeed, many residents and members of the public commented on this Project in hearings on the County's initiation of GPA 240005 with the expectation that these comments would be addressed by the County in the FEIR's responses to comments. The apparent conflicts of interest and lack of effective notice of the proposed warehouse and GPA cast doubt on whether the public had a chance to meaningfully evaluate the Project and submit comments.

V. Conclusion

There is no need to expand industrial land uses any further into agricultural communities beyond the current I-215 and Highway 74 corridors. Harvill Avenue, located within this industrial corridor, currently contains at least six empty warehouses, indicating that the existing zoning sufficiently accommodates the County's needs for warehousing and shipping sites. Furthermore, significantly fewer goods have been passing through California, with some reports measuring a 44% drop in docked ships at the Ports of Los Angeles and Long Beach.[11] Therefore, fewer goods are the coming into Mead Valley, which will only continue to increase the number of vacant warehouses within the industrial corridor. In short, the existing warehouse capacity can more than accommodate industrial activity in the area. And, if ultimately constructed, the proposed warehouse project may very well sit vacant too.

And as discussed above, some of the County's most vulnerable communities will feel the brunt of this misguided project. If not remedied, this disproportionate impact on Mead Valley residents will result in violations of state law.

Rural Association of Mead Valley and Sierra Club respectfully urge the County to defer further consideration of this Project until the County fully analyzes the Project's numerous significant impacts, develops adequate and enforceable mitigation measures, proposes and considers feasible alternatives, and revises and recirculates the EIR for public comment. We thank you for the opportunity to review the FEIR, and thank you for considering and addressing these comments before taking further action.

---

[11] Mekahlo Medina and Helen Jong, *Ports of LA, Long Beach already seeing 44% drop in docked vessels*, NBC L.A., May 7, 2025 at https://www.nbclosangeles.com/news/local/ports-of-los-angeles-long-beach-44-percent-drop-in-docked-vessels/3694112/ (last accessed Jun. 9, 2025) (attached as **Attachment U**); Caroline Petrow-Cohen, *Jobs at the Port of Los Angeles are down by half, executive director says*, L.A. Times, Jun. 7, 2025 at https://www.latimes.com/business/story/2025-06-07/port-of-los-angeles-job-orders-down-by-half?_gl=1*18jzd9w*_gcl_au*MTU5MjQzMjIzNC4xNzQ5MjUxODMy (last accessed Jun. 9, 2025) (attached as **Attachment V**).

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Mindy K. Jian, Attorney

Attachments:

A. Board approval of agreement with The Grove Community Church
B. Pictures of buses transporting people from Community Center ahead of November 6, 2024 Planning Commission and July 29, 2025 Board of Supervisors meetings
C. July 29, 2025 SMW Letter to Board of Supervisors
D. Rebecca Plevin, '*Where does it stop?' Warehouse advance in Riverside County threatens rural lifestyle*, L.A. Times, Oct. 16, 2024
E. Jim Newton, *California warehouse boom comes with health, environmental costs for Inland Empire residents*, Cal Matters, Jan. 26, 2023
F. Rachel Uranga, *Warehouse boom transformed Inland Empire. Are jobs worth the environmental degradation?*, Los Angeles Times, Feb. 5, 2023
G. Ryan Fonseca, *Inland Empire residents are fighting warehouse sprawl*, L.A. Times, Feb. 7, 2023
H. Dustin Hawley, *How Many Cubic Yards Are in a Dump Truck*, J.D. Power, Feb. 4, 2021
I. Excerpts from CalEE Mod Emission Calculation Details
J. *Storing Harm: the Health and Community Impacts of Goods Movement Warehousing and Logistics* (Jan. 2012)
K. Excerpts from Tracy Costco Depot Annexation Project EIR Errata
L. November 27, 2024 Costco Letter to City of Tracy
M. Riverside County "Good Neighbor" Policy for Logistics and Warehouse/Distribution Uses
N. Excerpts from Western Riverside Multiple Species Habitat Conservation Plan
O. Excerpts from Draft Riverside County 2025 Climate Action Plan Update (Mar. 2025)
P. Lado Kurdgelashvili et al., *Estimating Technical Potential for Rooftop Photovoltaics in California, Arizona and New Jersey*, Center for Energy and Environmental Policy (CEEP), 2016

Q. Los Angeles County Public Works Renewable Energy Master Plan (Jan. 2020)
R. Peremptory Writ of Mandate in *Sierra Club v. City of Moreno Valley* (Case No. CVRI2103300) and City of Moreno Valley July 30, 2024 Notice of Preparation of Revised EIR
S. List and Map of Pending GPAs in First Supervisorial District
T. Jeff Horseman, *1 million-square-foot warehouse and 15-acre park could be coming to Mead Valley*, The Press-Enterprise, Aug. 12, 2025
U. Mekahlo Medina and Helen Jeong, *Ports of LA, Long Beach already seeing 44% drop in docked vessels*, NBC L.A., May 7, 2025
V. Caroline Petrow-Cohen, *Jobs at the Port of Los Angeles are down by half, executive director says*, L.A. Times, Jun. 7, 2025

cc: Debbie Walsh, Rural Association of Mead Valley
George Hague, Sierra Club
Frances Tinney, Center for Biological Diversity

1958431.9

Attachment B

Colliers

Industrial | Inland Empire 25Q2

Key Takeaways

- Vacancy climbs 50 basis points to 6.8%.
- Construction activity remains at lowest level since 2013.
- Average asking rent continues to pull back, down $0.02 QOQ; $0.23 YOY.
- Leasing activity falls short of 10M SF.
- Availability jumps to 10.8% after three quarters of decline.

Vacancy Rate	Net Absorption	Under Construction	Average Asking Lease Rates (NNN)
6.8%	-1.9M SF	10.7M SF	$1.08/SF
YOY ▲	YOY ▼	YOY ▼	YOY ▼
FORECAST ▲	FORECAST —	FORECAST ▼	FORECAST ▼

Uncertainty Stalls Recovery As Leasing Activity Pulls Back

After a strong start to 2025, activity came to a screeching halt in Q2, as tariff and economic uncertainty kept tenants from making long-term decisions. Leasing activity totaled 9.5M SF, following four consecutive quarters of 11M SF+ volume. Net absorption was negative across the board, with the West recording -1.2M SF and the East totaling -660K SF. With negative absorption and 1.6M SF of new supply, vacancy rose 50 basis points to 6.8%. In the East, vacancy surpassed 9% for the first time since Q3 2011. After three quarters of decline, availability jumped 90 basis points to 10.8%, a level not seen since 2011. Asking rents continued to fall for the eighth consecutive quarter, with the West down $0.03 (2.5%) quarter-over-quarter and the East declining $0.04 (3.9%). In late June, the U.S. and China reached a preliminary trade agreement, but the long-term impact remains unclear, adding to near-term uncertainty. Until the outlook improves, activity will likely remain muted as tenants delay long-term commitments.

Market Indicators

4.8%	2.44%	4.22%
Unemployment Rate	GDP - Quarterly % Change YOY	U.S. 10-Year Treasury Note

Historic Comparison

	Q2 2024	Q1 2025	Q2 2025
Total Inventory (SF)	642,652,125	649,515,513	651,516,417
New Supply (SF)	8,962,976	1,964,007	1,549,053
Net Absorption (SF)	6,457,669	4,767,673	-1,898,994
Overall Vacancy	6.6%	6.3%	6.8%
Under Construction (SF)	16,057,150	10,776,883	10,669,105
Overall Asking Lease Rates (NNN)	$1.31	$1.10	$1.08

Market Graph



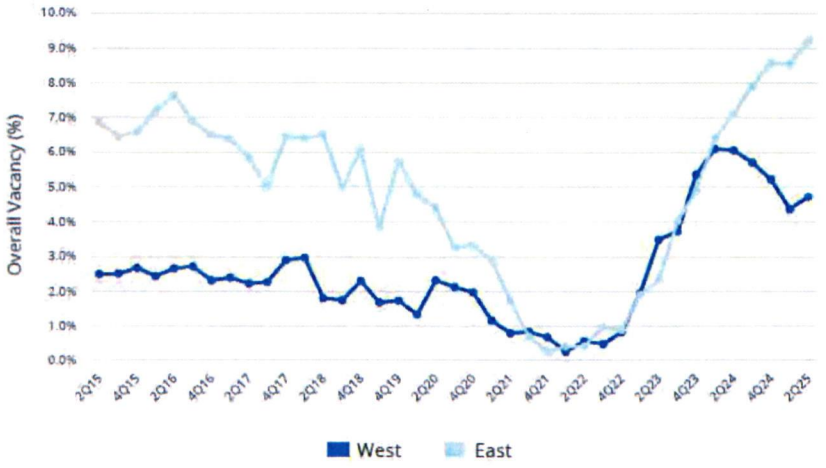
After four straight quarters of positive absorption, the market took a hit in Q2 2025, giving back 1.9M SF of space. Vacancy ticked up 50 basis points to 6.8%, the same level recorded at the end of 2024. With 6.8M SF of speculative construction set to deliver over the next six months, leasing activity will need to rebound quickly for vacancy to have any chance of going down.

Labor Force

	Construction	Manufacturing	Transportation, Trade & Utilities
12-Mo Employment Growth (%)	-5.3%	-3.1%	0.5%
12-Mo Actual Employment Change	-6,200	-3,000	2,200

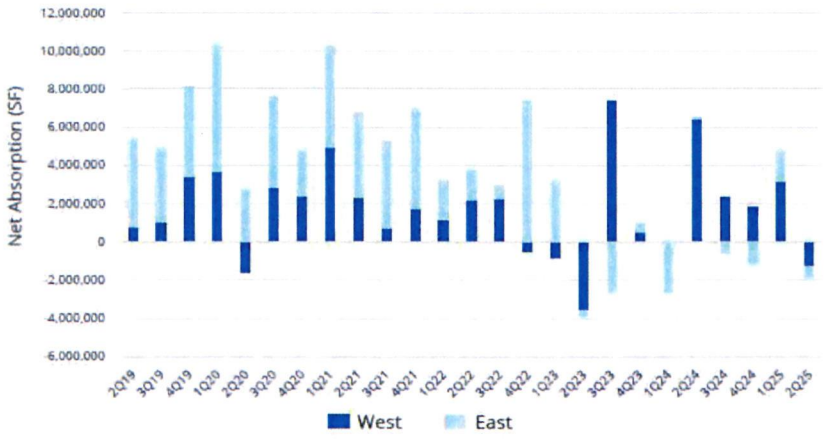
Vacancy

Vacancy in the Inland Empire increased 50 basis points to 6.8%, following a 50-point drop in the previous quarter. With negative absorption in both submarkets, 1.5M SF of new supply, and leasing activity falling short of 10M SF, the market gave back all of Q1 momentum. Availability mirrored this trend, climbing 60 basis points in the West and 80 basis points in the East. Sublease availability edged up slightly after four consecutive quarters of decline, totaling 15.1M SF, an increase of 77K SF quarter-over-quarter. The number of large vacant blocks over 200,000 SF rose from 65 to 74, now totaling 30.6M SF. Vacancy remains elevated in the 100,000–249,999 SF and 250,000–499,999 SF size ranges, at 8.0% and 10.7%, respectively, indicating continued softness in the lower tranches of the big-box segment.



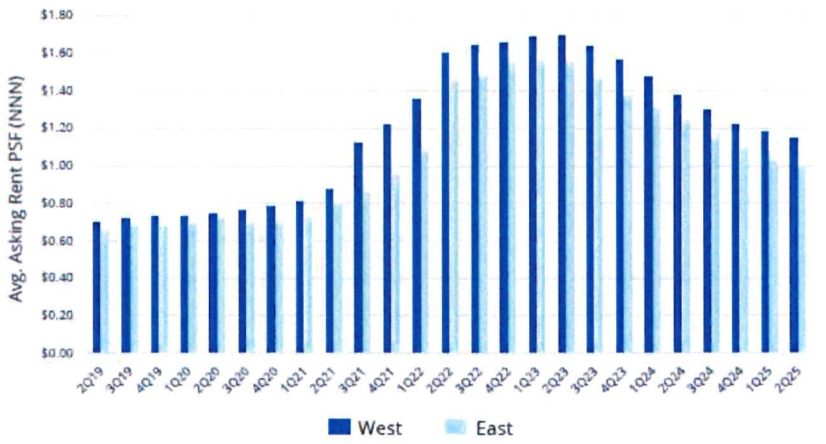
Absorption & Leasing Activity

After four consecutive quarters of positive net absorption, demand retreated in Q2, posting a total of -1,898,994 SF. The East, at -659,802 SF, has returned more than 5.5M SF of space to the market over the past eight quarters. The West, by contrast, recorded -1,239,192 SF in Q2 but has absorbed 20.3M SF of positive demand over the same period. The 500,000 SF+ size range saw the largest concentration of negative demand, accounting for -2.1M SF, while the 40,000–69,999 SF range was a bright spot, recording 277,774 SF of positive demand. Leasing activity totaled 9.5M SF, breaking a four-quarter streak of 11M SF+ performance. Once economic pressures ease, leasing activity, and with it, positive demand, will return.



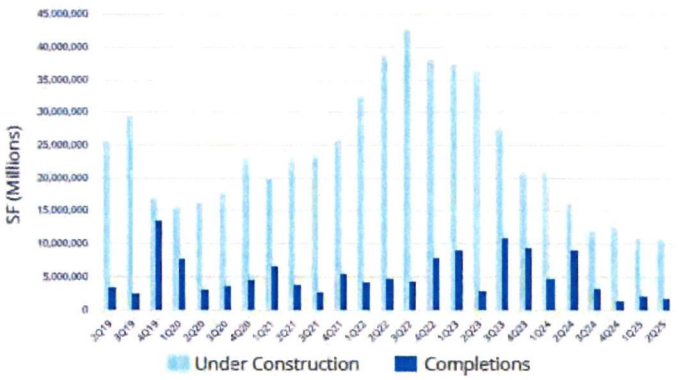
Rental Rates

Average asking rents in the Inland Empire declined for the eighth consecutive quarter, falling to $1.08 NNN per square foot in Q2 2025. Rents are now down 34% from the peak of $1.64 in Q2 2023. The West dropped $0.03 to $1.15, while the East slid $0.04 to $0.99, marking the first time it has fallen below the one-dollar mark since Q4 2021. This correction reflects a market still normalizing after the pandemic-era surge, with rising availability and tenant caution continuing to temper rent growth. Despite two years of declines, asking rents remain 50 percent above pre-pandemic levels, highlighting the market's long-term strength even as current conditions favor occupiers. With a vacancy rate of 6.8%, the Inland Empire remains several quarters away from any potential rent growth.



Construction

Developers remain cautious, as construction starts have declined significantly since the midpoint of 2024. Currently, 10.7M SF is under development, with 8.9M SF, or 84%, expected to be delivered in the next six months. There are 21 buildings over 100,000 SF under construction, four of which are preleased, totaling 2.7M SF. McLane Company broke ground on a build-to-suit project with Clarion/REDA in Ontario, with Skechers, Komar Distribution, and Otto International rounding out the preleased projects. Since 2019, the Inland Empire has constructed 133.6M SF of warehouse and distribution space and remains the premier distribution market in the nation.



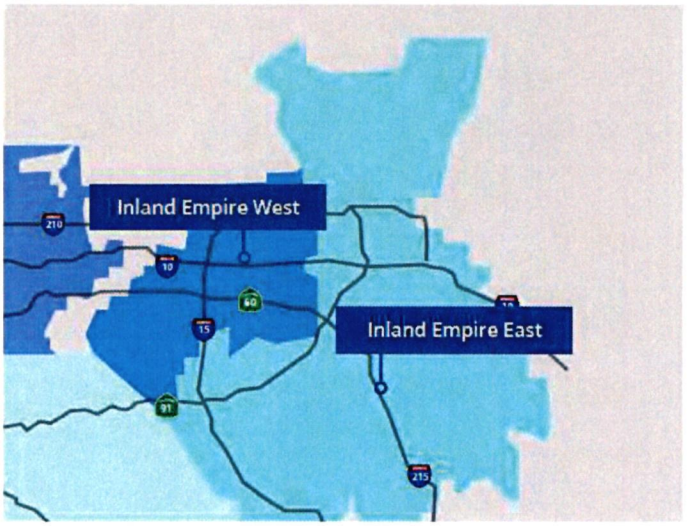
Investment Trends

Investors across Southern California's industrial market remain cautious as high interest rates and inflation concerns persist. The Federal Reserve held rates steady in June and signaled a slower path for rate cuts this year, largely due to ongoing inflationary pressures and uncertainty surrounding tariffs. As a result, financing remains expensive, and the bid-ask spread continues to widen, with many buyers and sellers hesitant to transact until there is more economic clarity. Despite this slowdown, Greater Los Angeles continues to draw investor interest, supported by some of the highest industrial rents in the country and a lack of available land. While deal volume remains below historical levels, the region's strong fundamentals position it well for a rebound once borrowing costs begin to ease and confidence returns to the market.



Market Description

The Inland Empire comprises 651.5M SF and represents 37% of the total industrial space in greater Los Angeles for buildings 10,000 SF and greater. Considered the premier big-box market in Southern California, approximately 78% of the space in this market is in buildings 100,000 SF and greater. The vast majority of its space was built in the past 23 years. The Inland Empire continues to attract large distributors, warehousers, e-commerce companies and logistics firms seeking to consolidate their operations into large, state-of-the-art facilities.



Sales Activity

Address	Size SF	Sale Price	Price PSF	Buyer	Seller
21800 Authority Way, Riverside	620,000 SF	$132.1 Million	$213.10 PSF	Morgan Stanley	Nissan North America
11296 Harrell St, Jurupa Valley	353,361 SF	$90.5 Million	$256.00 PSF	LBA Logistics	STRS Ohio
1930 Rochester Ave, Ontario	144,591 SF	$43.3 Million	$299.40 PSF	Faropoint	Link Logistics
1990 Renaissance Pkwy, Rialto	134,256 SF	$38.5 Million	$286.80 PSF	DHG	Link Logistics
2688 Baseline Ave, Rialto	90,726 SF	$26.6 Million	$293.00 PSF	Winix America	Link Logistics

Leasing Activity

Address	Size SF	Lease Type	Submarket	Lessee	Lessor
570 Mill St, San Bernardino	758,180 SF	Renewal	East	Burlington Coat Factory	Prologis
15207 Flight Ave, Chino	600,140 SF	Sublease	West	Logistics Plus	UMA Enterprises
15097 Van Vliet Ave, Chino	505,735 SF	New	West	US Elogistics	Watson Land Company
6509 Kimball Ave, Chino	410,260 SF	New	West	JD Logistics	Watson Land Company
5200 Airport Rd, Ontario	404,543 SF	New	West	Parker House Manufacturing	Nuveen

Major Developments

Project	Developer	Size SF	Submarket	Status	Estimated Completion
Speedway Commerce Center, Bldg 1	Hillwood	1,286,550 SF	West	Under Construction	Q3 2025
World Logistics Center	Highland Fairview	950,530 SF	East	BTS	Q1 2026
The Hub, Bldg 2	McDonald Property Group	926,100 SF	West	Under Construction	Q3 2025
3690 Webster Ave, Perris	DECA	855,330 SF	East	Preleased	Q4 2025
South Ontario Logistics Center	Clarion Partners/ REDA	681,223 SF	West	BTS	Q2 2026
Harvill Business Center	Ares Management	429,823 SF	East	Under Construction	Q3 2025

Inland Empire | Q2 2025 | Industrial | Market Statistics

Existing Properties		Construction		Vacancy		Availability	Activity				Absorption		Rents
Submarket/ Bldg Size	Total Inventory SF	Completions Current Qtr SF	Under Construction SF	Vacancy Rate	Vacancy Prior Qtr	Availability Rate	Sales Activity SF	Lease Activity SF	Total Gross Activity Current	Total Gross Activity YTD	Net Absorption Current	Net Absorption YTD	Avg Direct Asking Rate (NNN)
West Inland Empire													
Chino	56,342,303	0	0	2.5%	3.2%	5.0%	55,958	2,125,988	2,181,946	3,367,989	289,265	523,981	$1.20
Fontana	70,874,159	0	2,163,258	4.8%	4.3%	6.4%	66,007	982,650	1,048,657	2,163,390	-359,788	538,258	$1.13
Jurupa Valley / Eastvale	53,273,657	0	0	5.0%	3.9%	12.5%	0	188,230	188,230	1,080,292	-576,814	-151,871	$1.14
Ontario	123,546,061	38,502	3,904,767	5.0%	5.0%	8.9%	0	2,304,586	2,304,586	7,564,787	42,504	1,526,003	$1.14
Rancho Cucamonga	43,384,873	0	151,455	6.4%	4.9%	11.4%	15,262	952,397	967,659	1,411,492	-634,359	-534,888	$1.16
Subtotal	347,421,053	38,502	6,219,480	4.7%	4.4%	8.6%	137,227	6,553,851	6,691,078	15,587,950	-1,239,192	1,901,483	$1.15
East Inland Empire													
Banning / Beaumont	12,456,395	0	0	8.1%	8.1%	16.6%	0	0	0	0	0	1,017,845	$0.85
Colton	7,677,343	0	599,932	2.5%	2.0%	4.5%	0	13,500	13,500	464,743	-39,500	420,023	$0.90
Corona	31,566,594	157,920	0	4.7%	4.1%	6.6%	17,192	364,506	381,698	982,435	-53,042	393,815	$1.03
Moreno Valley	32,734,099	38,820	983,040	9.9%	6.0%	13.4%	0	49,000	49,000	310,257	-1,226,439	-1,455,360	$0.97
Perris	46,188,827	347,672	1,285,153	11.0%	10.3%	16.6%	0	244,662	244,662	2,868,234	-2,281	2,412,652	$1.02
Redlands / Loma Linda	30,260,751	363,039	564,791	9.8%	10.2%	13.6%	0	1,015,562	1,015,562	1,065,445	504,935	-397,130	$0.93
Rialto	43,250,443	0	772,603	9.0%	9.7%	13.9%	224,982	397,208	622,190	860,188	264,033	-430,175	$1.08
Riverside	56,283,860	603,100	215,426	7.6%	6.5%	13.0%	11,420	134,032	145,452	647,403	-54,478	134,442	$1.04
San Bernardino	43,677,052	0	28,680	13.5%	13.4%	14.9%	66,662	708,061	774,723	1,570,515	-53,030	-1,128,916	$0.94
Subtotal	304,095,364	1,510,551	4,449,625	9.2%	8.5%	13.3%	320,256	2,926,531	3,246,787	8,769,220	-659,802	967,196	$0.99
West Inland Empire													
10,000 - 19,999	15,455,685	0	33,248	2.0%	1.5%	2.5%	15,262	120,648	135,910	290,412	-75,837	-53,600	$1.35
20,000 - 39,999	22,651,792	38,502	39,628	3.1%	2.8%	5.1%	121,965	205,816	327,781	887,081	-35,970	118,942	$1.23
40,000 - 69,999	25,031,711	0	170,216	3.7%	3.9%	6.8%	0	442,539	442,539	693,877	5,387	-82,494	$1.21
70,000 - 99,999	17,893,385	0	73,509	5.1%	5.0%	9.9%	0	267,553	267,553	741,465	59,410	219,748	$1.10
100,000 - 249,999	74,189,979	0	508,908	6.0%	5.6%	10.7%	0	1,889,473	1,889,473	4,588,906	-336,886	1,668,315	$1.14
250,000 - 499,999	85,753,923	0	890,197	4.7%	4.3%	9.3%	0	1,921,032	1,921,032	4,732,869	-370,653	295,573	$1.09
500,000 +	106,444,578	0	4,503,774	4.8%	4.3%	8.5%	0	1,706,790	1,706,790	3,653,340	-484,643	-265,001	$1.18
Subtotal	347,421,053	38,502	6,219,480	4.7%	4.4%	8.6%	137,227	6,553,851	6,691,078	15,587,950	-1,239,192	1,901,483	$1.15
East Inland Empire													
10,000 - 19,999	12,689,897	0	0	2.4%	2.1%	4.3%	56,090	83,104	139,194	218,327	-31,540	-28,227	$1.01
20,000 - 39,999	16,800,560	38,820	140,090	3.2%	3.2%	5.4%	39,184	216,033	255,217	355,280	38,879	10,341	$1.01
40,000 - 69,999	18,125,193	0	245,581	6.4%	7.9%	9.9%	0	399,315	399,315	635,967	272,387	303,312	$1.04
70,000 - 99,999	13,128,839	0	0	8.1%	9.2%	12.0%	90,726	284,230	374,956	687,680	144,705	358,729	$0.91
100,000 - 249,999	45,543,750	361,020	323,476	11.5%	11.5%	14.7%	134,256	533,434	667,690	1,805,413	336,716	684,542	$0.97
250,000 - 499,999	54,012,466	1,110,711	1,934,618	20.3%	18.9%	22.9%	0	676,463	676,463	2,258,408	218,963	-202,673	$0.99
500,000 +	143,794,659	0	1,805,860	6.1%	5.0%	11.6%	0	733,952	733,952	2,808,145	-1,639,912	-158,828	$1.03
Subtotal	304,095,364	1,510,551	4,449,625	9.2%	8.5%	13.3%	320,256	2,926,531	3,246,787	8,769,220	-659,802	967,196	$0.99
Inland Empire Overall													
10,000 - 19,999	28,145,582	0	33,248	2.2%	1.8%	3.3%	71,352	203,752	275,104	508,739	-107,377	-81,827	$1.05
20,000 - 39,999	39,452,352	77,322	179,718	3.2%	3.0%	5.2%	161,149	421,849	582,998	1,242,361	2,909	129,283	$1.16
40,000 - 69,999	43,156,904	0	415,797	4.9%	5.6%	8.1%	0	841,854	841,854	1,329,844	277,774	220,818	$1.09
70,000 - 99,999	31,022,224	0	73,509	6.4%	6.8%	10.8%	90,726	551,783	642,509	1,429,145	204,115	578,477	$0.94
100,000 - 249,999	119,733,729	361,020	832,384	8.0%	7.9%	12.2%	134,256	2,422,907	2,557,163	6,394,319	-170	2,352,857	$1.07
250,000 - 499,999	139,766,389	1,110,711	2,824,815	10.7%	9.9%	14.6%	0	2,597,495	2,597,495	6,991,277	-151,690	92,900	$1.03
500,000 +	250,239,237	0	6,309,634	5.6%	4.7%	10.2%	0	2,440,742	2,440,742	6,461,485	-2,124,555	-423,829	$1.13
Total	651,516,417	1,549,053	10,669,105	6.8%	6.3%	10.8%	457,483	9,480,382	9,937,865	24,357,170	-1,898,994	2,868,679	$1.08

FOR MORE INFORMATION

Matt Nelson
Senior Research Director
Greater Los Angeles
+1 949 724 5519
matt.nelson@colliers.com

Amanda Spangler
Managing Director
Orange County/Inland Empire
+1 949 724 5513
amanda.spangler@colliers.com

Copyright © 2025 Colliers International Greater Los Angeles, Inc. The information contained herein has been obtained from sources deemed reliable. While every reasonable effort has been made to ensure its accuracy, we cannot guarantee it. No responsibility is assumed for any inaccuracies. Readers are encouraged to consult their professional advisors prior to acting on any of the material contained in this report.

Attachment C

The State of Work



Transportation, Distribution, and Logistics in the Inland Empire

FEBRUARY 2024

UC RIVERSIDE | Inland Empire Labor and Community Center

CSIUCR CENTER FOR SOCIAL INNOVATION

Plug In IE

Inland Empire LABOR INSTITUTE

TABLE OF CONTENTS

Introduction 2

The TDL Sector in the Inland Empire 3

Quantitative Research Findings 6

Job Quality 12

The Future of TDL Work in the IE 26

Worker Well-Being as Community Well-Being 35

Conclusion 42

References 43

WORKER PROFILES

John 13

Prabh 18

Xavier 19

Sahib 22

Mateo 23

Doug 23

Melissa 26

Tabitha 27

Sophia 30

Karla 31

Jack 31

FIGURES

Employment 6

Occupational Segregation 7

Median Real Annual Earnings 8

What's Left After Rent 9

Health Insurance Coverage 9

Job Posting Ratios 11

Employed Workers: Union Membership 24

EXECUTIVE SUMMARY

"The State of Work: Transportation, Distribution, and Logistics in the Inland Empire" offers a comprehensive exploration of the Transportation, Distribution, and Logistics (TDL) sector in Southern California's Inland Empire. This pivotal sector, integral to both national and global economies, includes transportation services, warehousing, and logistics services. Despite recent size decline, the TDL sector has shown rapid expansion over the last five years, particularly in warehousing and transportation, significantly impacting the region's employment landscape.

This report delves into the various challenges and opportunities presented by the TDL sector. Notably, the concentration of warehouses and distribution centers has sparked concerns about environmental impacts, traffic congestion, and job quality. The authors also examine the geographic spread of warehouse developments and their community and environmental ramifications, highlighting the complex balance between economic growth and maintaining quality of life.

A key focus of this report is the detailed occupational and industry analyses, underpinned by both quantitative and qualitative research. This includes insights from interviews with warehouse workers and truck drivers, offering a closer look at the realities of working conditions in the sector. The findings reveal disparities in wages, job security, and working conditions, particularly for blue-collar roles, and discusses the implications of automation and technological advancements in the TDL sector.

This report emphasizes the need for policy interventions to enhance labor standards, enforce labor laws, and integrate labor considerations into climate policies, drawing inspiration from recent legislation like the temporary agency workers' bill of rights. It also highlights future research directions, focusing on the sector's continuous evolution and ensuring that the voices of those most affected remain central. The report advocates for a balanced approach, prioritizing both economic growth and the well-being of workers and the community.

The report concludes with a call to address the multifaceted impacts of the TDL sector. It underscores the importance of informed policymaking and strategic planning to harness the sector's economic potential while mitigating its challenges. By providing a nuanced view of the TDL sector, the report aims to guide decision-makers, employers, workers, and community activists towards a sustainable and equitable economic future in the Inland Empire.

INTRODUCTION

The Inland Empire (IE), consisting of Riverside and San Bernardino Counties in Southern California, has emerged as a critical nexus for the Transportation, Distribution, and Logistics (TDL) or goods movement sector. The TDL sector, pivotal to the functioning of both the national and global economy, encompasses a wide range of jobs or activities involved in the movement of retail and wholesale goods and business supplies from producers to consumers and businesses. It includes transportation services (via road, rail, air, and water), warehousing and storage facilities, and logistics services that coordinate and manage the flow of consumer products, manufacturing parts, and other goods from manufacturing sites and the Ports of Los Angeles and Long Beach to retail stores, businesses, and, increasingly to consumers' homes.

This sector is very large and, although its growth has stalled over the past year (Southern California Association of Governments 2023), it grew significantly over the past five or more years (CSI and IELCC at UCR 2023; Emmons Allison and Reese 2023). As a result, the "transportation and warehousing" industry was the second largest employing industry in the IE, providing 13 percent of all jobs in 2021–2022 (see Table 1 in Appendix 1). By 2023, it was the largest employing industry, employing 16.4 percent of payroll jobs (Southern California Association of Governments 2023). Within the IE, most Transportation and Warehousing jobs are located within San Bernardino County. In fact, Transportation and Warehousing provides the largest percentage of all jobs (16.2%) in San Bernardino County and the fourth highest percentage of jobs in Riverside County (9.7%). Moreover, we find that employment in Transportation and Warehousing grew rapidly (84%) over the five year period between 2016–17 and 2021–22 (see Tables 1 and 2 in Appendix 1).

The extent and growth of employment in the TDL sector is likely to be even larger than these statistics suggest since workers involved in the movement and storage of goods, or logistics, are commonly employed by other industries, such as employment services (temporary agencies), wholesale trade, and retail.

When we consider whether the TDL industry has had a "positive" or "negative" impact for IE workers, we must consider the sector holistically, from the bottom-up, from the perspective of local residents, many of whom are workers who make our economy run.

Our approach is guided by the following three assumptions:

- Environmental impacts are worker impacts since many workers both work and live in the IE.
- When assessing the impacts of TDL on workers, we need to examine the conditions of blue-collar, non-supervisory workers, and not just focus on higher-paying occupations.
- Both quantitative data and worker experiences (as workers themselves understand them) matter.

DEFINING THE TDL SECTOR

At its core, the TDL sector is characterized by its focus on the efficient and effective transportation and storage of physical goods. This encompasses everything from the management of supply chains to the actual physical movement of products, and sometimes their final assembly for preparation for consumers and retail stores. The sector is broad, covering a range of sub-sectors such as trucking, warehousing, freight rail, air cargo, and logistics services. The occupational landscape of the TDL sector within the IE is diverse, ranging from airline pilots, blue collar truck drivers and warehouse workers, to white collar logistics analysts and supply chain managers and supervisors.

The broader goods movement sector involves at least 30 industries, among which the warehousing, delivery, and trucking industries are the largest. Most of the job growth in this sector in Southern California over the next decade is expected to be among heavy tractor-trailer truck drivers and laborers and freight, stock, and material movers within warehouses. While most (60%) of Southern California's trucking and freight transportation companies are located in Los Angeles County, Riverside and San Bernardino are home to about 69% of the warehousing and storage facilities. Warehouse and storage facilities and jobs within them are expected to further increase in the IE over the next decade due to their proximity to freeways and the relatively lower cost of land compared to coastal counties (ICF Incorporated, LLC 2019).

This report examines the state of work in the IE's TDL sector, particularly the most common blue-collar occupations that serve commercial goods movement: long-haul and local delivery truck drivers and warehouse

workers, including those employed in large distribution centers as well as small delivery stations. Among blue-collar warehouse workers, we focus on 5 common non-supervisory occupations: laborers, forklift drivers, packagers, order fillers, and inventory clerks.[1] We also examine the state of work among the supervisors and managers of truck drivers and blue-collar warehouse workers. Our research combines information from previous studies as well as presenting new findings from both quantitative and qualitative data.

Our quantitative analyses focus on the extent of full-year and full-time employment, earnings, and access to employment benefits among workers employed within key occupations and industries within the TDL sector. For these analyses, we use public data from government surveys, including the American Community Survey (ACS), Current Population Survey (CPS), and Quarterly Workforce Indicators (QWI). In addition, we report findings from an analysis of Burning Glass data on job advertisements from the most recent year available to our research team (November 2020 through October 2021).

Our qualitative analysis draws on in-depth interviews collected by our research team with current and former workers employed within trucking and warehousing in the IE as well as several key informants that were representatives of organized labor and/or involved in workforce development. Our research team interviewed a total of 32 workers currently or formerly employed in the TDL sector. Of these, 12 were blue-collar warehouse workers, 15 were truck drivers, 1 provided administration and business support for a family member's independent trucking operation, 2 owned a small logistics company, and 2 were warehouse managers. Our truck driver interview sample included both short-haul and long-haul truck drivers and drivers that were owner operators as well as employees. Our warehouse worker interview sample was mostly direct hires, but at least two were hired through temporary agencies. Interviewees' ages ranged from early twenties to mid-fifties. Seven were women and 25 were men. In terms of race and ethnicity, 14 identified as Latino only,[2] 7 identified as Black only, 1 as white only, 9 as Asian only (1 Thai and 8 Punjabi/Sikh), and 1 as mixed race (Mexican and Cambodian). Interviews were transcribed and then analyzed in terms of common themes. We also summarized our interview findings through worker profiles. Throughout this report, we put our research findings into context by reviewing previous research findings on working and employment conditions of the TDL sector both in the region and the United States.

THE TDL SECTOR IN THE INLAND EMPIRE: CHALLENGES AND OPPORTUNITIES

The TDL sector's impact on the region is multifaceted. While it offers significant economic opportunities for the IE, it also presents challenges.

For example, the geographical expanse of the IE, with its proximity to major ports like Los Angeles and Long Beach and its extensive transportation infrastructure, makes it an ideal location for TDL activities. The region's vast network of highways, such as the I-10, I-15, and I-215, rail lines, and intermodal yards (Union Pacific and BNSF) facilitate the movement of goods, connecting the area to other parts of California and other states.

However, the concentration of warehouses and distribution centers has raised concerns about environmental impacts, traffic congestion, and the quality of jobs available to local residents. Although most IE residents experience increased traffic and air pollution associated with the rise of the TDL sector in the region, some IE communities are more heavily impacted by its growth than others since warehouses are more densely concentrated within particular cities than others. Work in the TDL sector, particularly for truck drivers and warehouse workers, is often marked by demanding physical labor, long hours, and, in many cases, precarious employment conditions. The recent surge in e-commerce has further intensified the pressure on these workers, with higher demands for rapid order fulfillment.

Research also finds that only a small fraction of warehouse owners are located in the region. As a result, the profits from the logistics industry seem to be leaving the region rather than benefiting it, and most warehouse owners do not experience their negative impacts on local communities (Horseman 2023).

Understanding the occupational composition, geographical qualifications, and the realities of work within this sector is essential for policymakers, employers, workers, and community and labor activists. As the IE continues to evolve as a key hub in the national and global supply chain, addressing these challenges and leveraging opportunities will be crucial for sustainable and equitable economic growth.

KEY AREAS WITH DENSE WAREHOUSE DEVELOPMENTS

Certain areas within the IE have become hotspots for warehouse developments, driven by the burgeoning demand for storage and distribution centers. These cities have witnessed rapid growth of warehouses and distribution centers given their strategic locations along major highways, railroads, and/or airports, as well as having large tracts of land suitable for such developments.

Research on the amount of land in the region being developed for warehousing and logistics uses finds that 2,275 warehouses were built in the IE region between 2005 and 2021 (Robert Redford Conservancy 2024). The warehouses also account for a significant portion of the region's developable land. Altogether, by 2021 there were about 4,299 warehouses located in the IE, and about 9,500 in Southern California that are over 1 acre in size. The warehouses are part of a vast network connecting the ports of Los Angeles and LA to other parts of California (and the nation), with high concentrations in the cities of Industry, Commerce, and Carson in LA County (Robert Redford Conservancy 2024; Robert Redford Conservancy et al. 2024; Singh and Uteuova 2022). By 2022, the top 10 cities in the IE with the most space dedicated to warehouses were (in rank order of square footage of existing and planned and approved warehouse space): (1) Ontario, (2) Moreno Valley, (3) Fontana, (4) March Joint Powers Authority, (5) Perris, (6) Rialto, (7) Chino, (8) Jurupa Valley, (9) Beaumont, and (10) Rancho Cucamonga (Horseman 2024).

While many of the highest concentrations of warehouses in the IE are in places that have historically been heavily industrial, warehouses are also starting to move into areas that were formerly primarily residential, like Bloomington and Rialto, with large industrial trucks traveling within residential areas. Residents in many of these areas oppose these new warehouse and logistics-related developments, though the typical narrative from municipal-level entities like county board of supervisors, planning departments, and local officials is that these developments will bring in jobs and economic stimulus (De Lara 2018; Emmons Allison and Reese 2023; Muñoz et al. 2023). A few cities have issued warehouse moratoriums, but even in these areas, new logistics-related developments continue to be approved.

Among IE cities, Ontario has, by far, the largest square footage of warehouse space (Singh and Uteuva 2022). Known for its Ontario International Airport and proximity to major highways, the city has become a major hub for air cargo and freight movement. The city's landscape has been transformed as warehouses have replaced dairies and rural farmlands. Amazon is building its largest known warehouse in Ontario, California, covering 4,055,000 square feet, almost a fifth the size of Disneyland. Once completed, the facility is expected to dispatch about 125 million packages annually. In 2022, another 5.3-million-square-foot logistics center was planned adjacent to Amazon's warehouse (Singh 2022).

The World Logistics Center (WLC) in Moreno Valley, designed to be a 40.6-million-square-foot warehouse park, will be among the largest of its kind globally. Approved in 2015 and expected to be completed by 2030, the WLC will occupy 2,610 acres or 10% of the city's land (equivalent to 700 football fields). Proponents of the project suggest that it will help to boost employment in the region by generating over 33,000 jobs in construction and operations. Local residents and environmental organizations, on the other hand, remain concerned that it will increase traffic, air pollution, and harm native wildlife. Environmental lawsuits against the approval of this project were settled in 2021 for $47 million and required the developer to adopt various measures to minimize environmental and social impacts, including the installation of rooftop solar panels and electric vehicle charging points (Bartholomew 2023).

COMMUNITY AND ENVIRONMENTAL IMPACTS

The expansion of warehouses and consequent pollution of the IE is an environmental justice concern that is exacerbating existing social, economic, and health inequities in the region. As of 2023, the IE has 1 billion square feet of warehouse space and is awaiting the approval of an additional 170 million square feet, which will increase the production of emissions in the region by 10%. Focusing on the impacts of the 3,321 warehouses larger than 100,000 square feet in the South Coast Air Basin (which includes the counties of Los Angeles, Orange, Riverside, and San Bernardino), researchers found that warehouses generate over 200 million diesel truck trips, which in turn produce over 300,000 pounds of diesel particulate matter, 30 million pounds of nitrogen oxide, and 15 billion pounds of carbon dioxide per year (Muñoz et al. 2023).

Geography and extreme weather such as "heat waves, temperature inversions and atmospheric stagnation episodes" make the bad air quality worse (Muñoz et al. 2023: 10). The IE is a basin surrounded by the San Gabriel, San Bernardino, Santa Ana, and San Jacinto

mountains. This geography channels air currents through the IE's mountain passes, carrying pollutants from the Los Angeles basin, but also prevents pollution from escaping (Muñoz et al. 2023). The combination of geographic and socio-economic factors have resulted in the Inland Empire having the highest ozone levels in the country (American Lung Association 2023).

Communities that are close to warehouses are also adversely impacted by nuisances such as noise pollution, increased traffic congestion, and monotonous warehouse facades stretching along for miles on roads that have been made unwalkable because they exist at the scale of semi-truck traffic, not humans. Warehouse expansion also disrupts communities' ecology and way of life, replacing agricultural lands, areas of cultural significance, green spaces, and natural carbon sinks such as desert lands (Muñoz et al. 2023). The South Ontario Logistics Center Specific Plan of 2021, for example, was designed to replace more than 200 acres of open lands (Kaneko 2022).

Community advocates view the disproportionate location of warehouses in low-income communities of color as environmental racism. A 2021 report by think tank Economic Roundtable examined Southern California census tracts that spend the most amount of money on Amazon shopping, census tracts where warehouses are located, and census tracts where warehouse workers live. The results showed the economic polarization and structure of privilege in the four-county region. Amazon's consumers are concentrated in affluent coastal and hillside communities. Warehouses and workers are concentrated in struggling working class communities. And public infrastructure bears the cost of trucking goods from ports to warehouses to consumers (Flaming and Burns 2019).

HEALTH IMPACTS

The concentration of warehouses being built near residential areas puts community members at greater potential risk for air pollution-related health problems. For example, residents living near distribution centers or corridors with heavy diesel truck traffic have a higher risk of experiencing asthma or cancer. Some census tracts in Riverside County have over a 15% asthma rate, with some in San Bernardino County at almost 20% (Muñoz et al. 2023). Cancer risk is within the 95th percentile near the Ontario warehouse gigacluster (Muñoz et al. 2023). These rates become particularly concerning when considering where these warehouses are being built. Within the South Coast Air Basin, 640 schools are within a half-mile radius of a warehouse (Torres et al. 2021). There are also racial and socio-economic disparities related to warehouse locations. Historically marginalized groups are also over-represented when examining proximity to warehouse locations. In Riverside County, 61% of Latino residents live within 300 feet of a warehouse, though Latino residents make up only 46% of the population. In San Bernardino County, the comparable figures are only slightly better: 61% and 50%, respectively (Flaming and Burns 2023).

Environmental justice and other community activists have pressured public regulatory agencies to protect residents from bad air quality (Torres et al. 2021). In response, the South Coast Air Quality Management District passed an Indirect Source Rule in 2021 that requires warehouses over 100,000 square feet to offset pollution from truck traffic by investing in zero-emissions or near-zero-emissions technology or pay fines. Since the rule came into effect recently, its effects are not yet known.

Another issue is health care access. Not only are IE residents more likely to be exposed to air pollution than those living in coastal counties, such as Orange County, but they also have lower access to health care. There are fewer doctors in the IE per person compared to Orange County, potentially because doctors in the IE are paid less and might seek out more lucrative positions in more affluent neighboring counties. Family incomes also tend to be lower in the IE than in Orange County, which tends to further reduce children's and other residents' access to health care (Muñoz et al. 2023).

As discussed in our interview findings below, air quality as a public health issue is also a worker issue when so many residents work in the TDL sector yet receive inadequate health care through their employers. The intersection of environment, health, and work is further evident in the push for California's Occupational Safety and Health Agency to implement a meaningful indoor heat standard for workers (Warehouse Worker Resource Center 2023). On a macro level, carbon emissions, worsened by the concentration of warehouses in the IE, exacerbate indoor heat issues. At the workplace, the combination of heat, poor air flow, higher incidence of respiratory illnesses, and lack of support for worker relief can lead to deadly working conditions.

Logistics developers continue to be drawn to the IE by regional boosters such as the Inland Empire Economic Partnership because of a vicious cycle. The region's low numbers of college graduates rely on so-called low-

skill jobs (Guilhem 2015), yet as the region's economy has grown ever more dependent on warehouses, this limits the options for workers, and workers have little leverage to demand and attain high-quality employment. The remainder of this report examines the state of TDL workers in the Inland Empire and then presents models for considering environmental impacts, the state of TDL work, and overall quality of life within the same frame.

IMPACTS ON WORKERS: QUANTITATIVE RESEARCH FINDINGS

Who are TDL workers and what are their employment conditions? To begin to respond to these questions, we analyzed survey findings from government surveys (ACS and CPS), focusing on key occupations and industries.

OCCUPATIONAL ANALYSES: KEY FINDINGS

Below, we compare the social and job characteristics of those employed as heavy-duty, medium-duty, and light-duty truck drivers and five of the most common blue-collar warehouse occupations (following De Lara 2013), and their supervisors and managers using 5-year ACS data unless otherwise specified. Unless otherwise specified, the occupational category used in these analyses includes both long distance and local delivery drivers. For a detailed list and description of these selected eight occupations, see Appendix 2. We also consider how working conditions among blue-collar warehouse laborers (the most common blue-collar warehousing occupation) compares across several key industries.

Figure 1 shows the size of these occupations across all industries in the IE relative to the total number of employed workers in the IE. The most common blue-collar occupations in the TDL sector are laborers and freight, stock, and material movers (hand) and truck drivers. As might be expected, supervisors and managers are the least common among the eight occupations selected for analysis, making up the smallest percentages of employed workers.

As Figure 2 shows, most employed workers in each selected TDL occupation were Black or Latino, but the percentage of Black or Latino workers was the smallest among supervisors and managers in comparison to the blue-collar warehouse and truck driving occupations. Most of those employed in these 8 occupations are native-born, but immigrant workers made up significant percentages (19% to 43%) of those employed in these jobs. The occupations with the highest percentages of immigrant workers employed in them were hand packers and packagers (43%) and truck drivers and sales workers (40%). Immigrant workers made up the smallest percentages (19% each) of supervisors of

FIGURE 1.

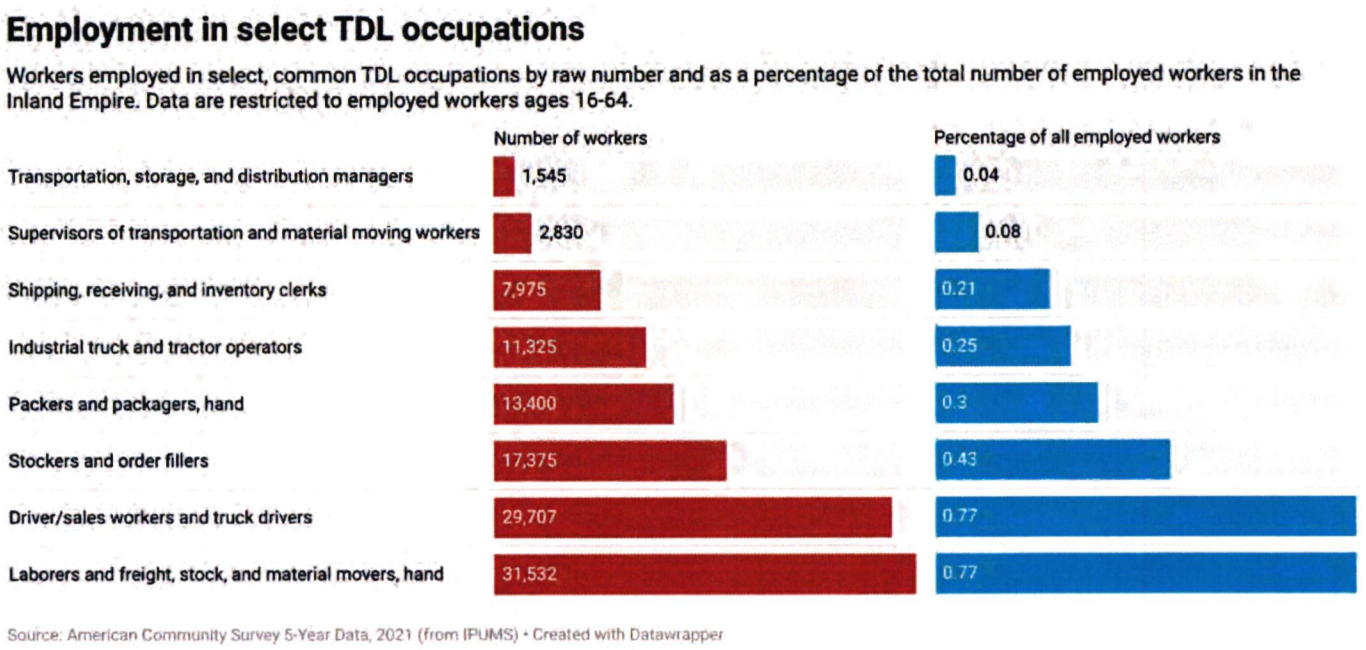
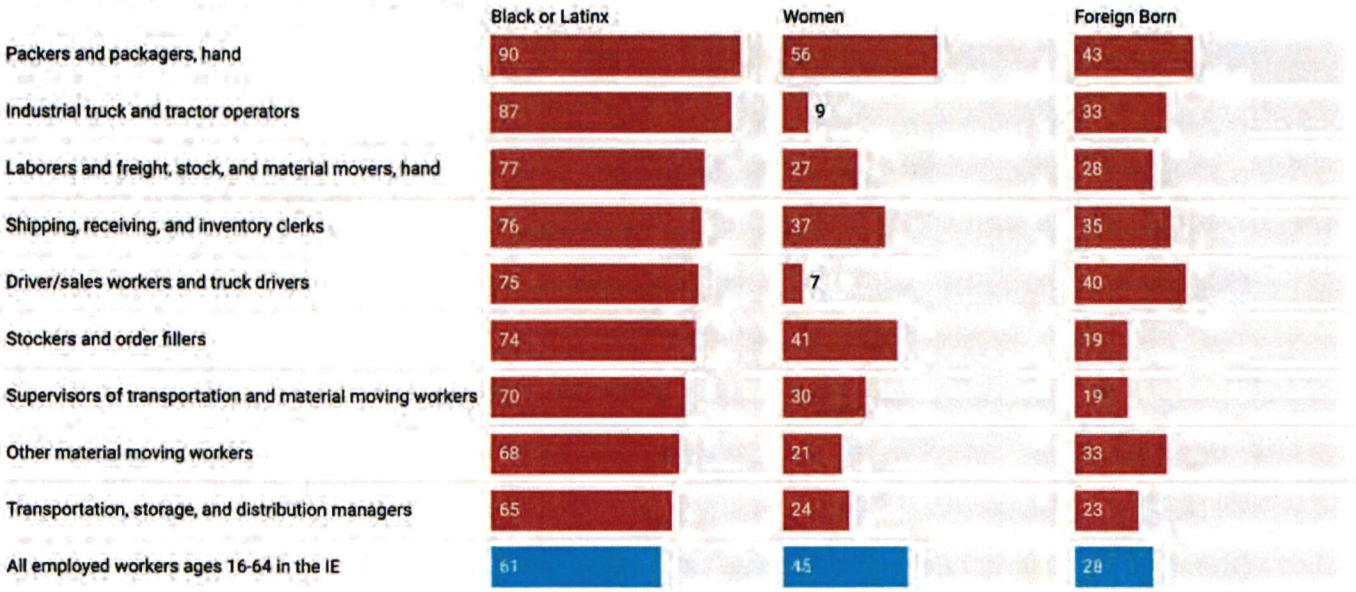


FIGURE 2.

Occupational segregation in select TDL occupations

"Occupational segregation" is the term used to describe when a demographic group is overrepresented in a particular type of work. This chart shows the percentage of Black or Latinx workers, women workers, and foreign-born workers in selected TDL occupations. It shows that Black or Latinx workers make up 61 percent of all employed workers ages 16-64 in Riverside and San Bernardino counties, but in every TDL sector occupation that we looked at, they are overrepresented. On the other hand, women are overrepresented in packer and packager jobs but underrepresented in every other occupation we examined. Women are drastically underrepresented in industrial truck and tractor (forklift and yard truck) operator jobs and truck driver jobs.



Source: American Community Survey 5-Year Data, 2021 (from IPUMS) • Created with Datawrapper

Transportation and Material Moving occupations and stockers and order fillers.

As we can see from Figure 2, the TDL sector has been and continues to be male dominated. Most of those employed in all of the TDL occupations shown were men with the exception of hand packers and packagers, an occupation where women made up a slight majority (56%) of employed workers. Stockers and order fillers were the second most gender integrated occupation shown, with 41% women. In all other occupations, women made up no more than 30% of the workers employed. The most male dominated occupations were industrial truck and tractor operators (9% of whom are women) and truck drivers and sales workers (7% of whom are women).

Figure 3 shows the median personal annual income from employment for each occupation. As expected, managers are the highest paid occupation, followed by supervisors. Median personal income is also notably higher among truck drivers and sales workers in comparison to all five of the selected blue-collar warehouse occupations. In fact, their median personal income is just over $11,000 more per year in comparison to the highest paid blue-collar warehouse occupation, industrial truck and tractor operators (or forklift drivers). Shipping, receiving and inventory clerks are the second highest paid among these selected blue-collar warehouse occupations. Hand packers and packagers receive the lowest median annual income ($23,211) among all 8 occupations. Laborers and stockers and order fillers are also low paid positions, receiving a median salary of just over $25,000 per year.

Figure 4 compares the median monthly incomes among each selected TDL occupation with the median monthly rent paid in the IE. The three lowest paid occupations (packers and packagers, laborers, and stockers/order fillers), each have about less than $700 left over after paying rent to pay for all other bills, such as food, transportation, child care, health care and prescription medications, utilities, cell phones, clothing, etc. These findings suggest that these workers struggle to pay for basic bills and many likely rely on help from friends, family, or social assistance programs. Monthly budgets are tightest among packers and packagers, who only

end up with about $520 per month to pay for non-housing related expenses after paying rent.

The contrast between managers and blue-collar warehouse workers is fairly stark. Managers can have about $3,000 per month left over for non-housing related expenses after paying the median monthly rent for the region (see Figure 4). In comparison, truck drivers and supervisors end up with over $1,000 less in monthly disposable income. This extra income may provide managers with greater ability to afford higher quality housing, establish savings, and/or spend money on leisure activities. Even so, median earnings are relatively low relative to the overall cost of living in the IE even among managers.

Median personal incomes among workers employed in the TDL sector do not provide living wages for workers with another non-working adult or child in their family according to the estimates provided by the MIT Living Wage calculator for Riverside County and San Bernardino County for 2021. According to these estimates for 2021, a worker with a family composed of two adults (one not working) and no children would need to earn an annual income of at least $59,120 in 2021 to afford basic living expenses (including food, housing, transportation, health care, etc.), and workers with families with children, even single-parent families with one child, need to earn even more than this to earn a living wage for their families. Even transportation, storage, and distribution managers, with a median personal income of $53,380 in 2021, are earning less than a living wage if they live with another non-working adult or a child, and just above the living wage if they live with another wage earning adult and have two children (Glasmeier 2021a, 2021b; see Figure 3).

Most workers in these 8 TDL occupations are employed full-time and full-year (see Appendix 1 Figure 6). More than two thirds of workers primarily employed in each of these 8 occupations are employed full-year (or 50–52 weeks per year) but the extent of full-year employment varies across these occupations. More than 90% of managers, supervisors, and truck drivers/sales workers—the three occupations that have the highest median personal annual incomes—are employed full-year. In contrast, 77% of packers and packagers, which earn the lowest median personal incomes, are employed full-year.

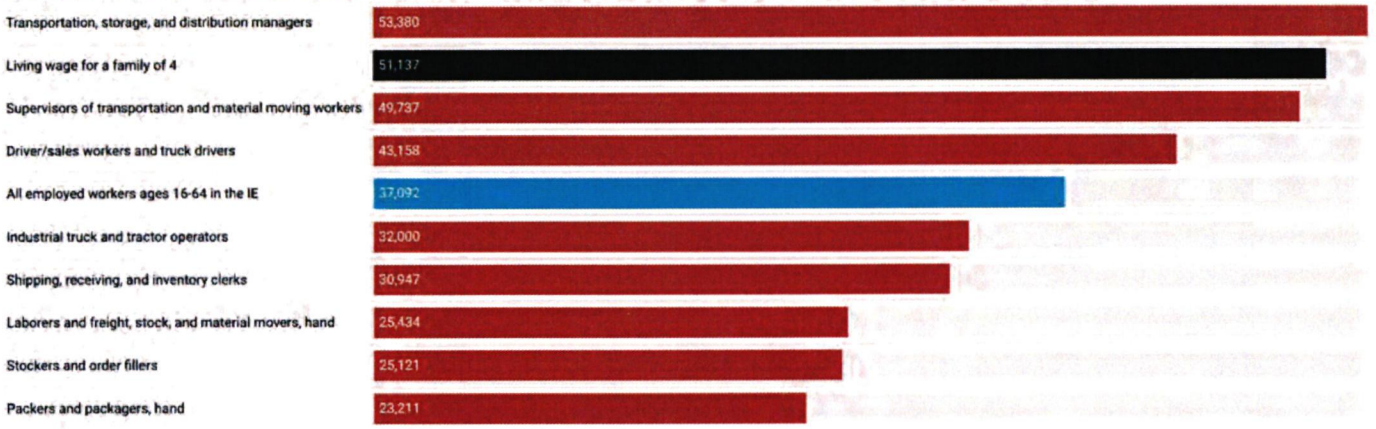
Most workers in each of the 8 selected occupations are also employed full-time (30 hours or more per week). Part-time workers are most common among laborers and stockers/order fillers, of whom 24% and 31% respectively are employed part-time. These figures may underestimate the extent of part-time and part-year employment within these industries since it only includes workers for which these occupations are their primary job. Undocumented immigrant workers are also likely to be under-represented in the ACS data since many avoid interactions with government officials.

Self-employment is most common among truck drivers/sales workers, 13% of whom are self-employed. Many of these drivers own and operate their own vehicles, some of whom may be misclassified drivers who mostly serve large logistics or retail companies. About 6%

FIGURE 3.

Median real annual earnings for select TDL occupations

Figures for each occupation are the median total pre-tax wage and salary income (i.e., money received as an employee) per worker for the previous year. Data are limited to employed workers ages 16-64. The black bar shows the required annual income before taxes that each adult would have to make (the "living wage") to cover all basic needs in a household with two working adults and two children across Riverside and San Bernardino counties. By this measure, only transportation, storage, and distribution managers made a living wage.



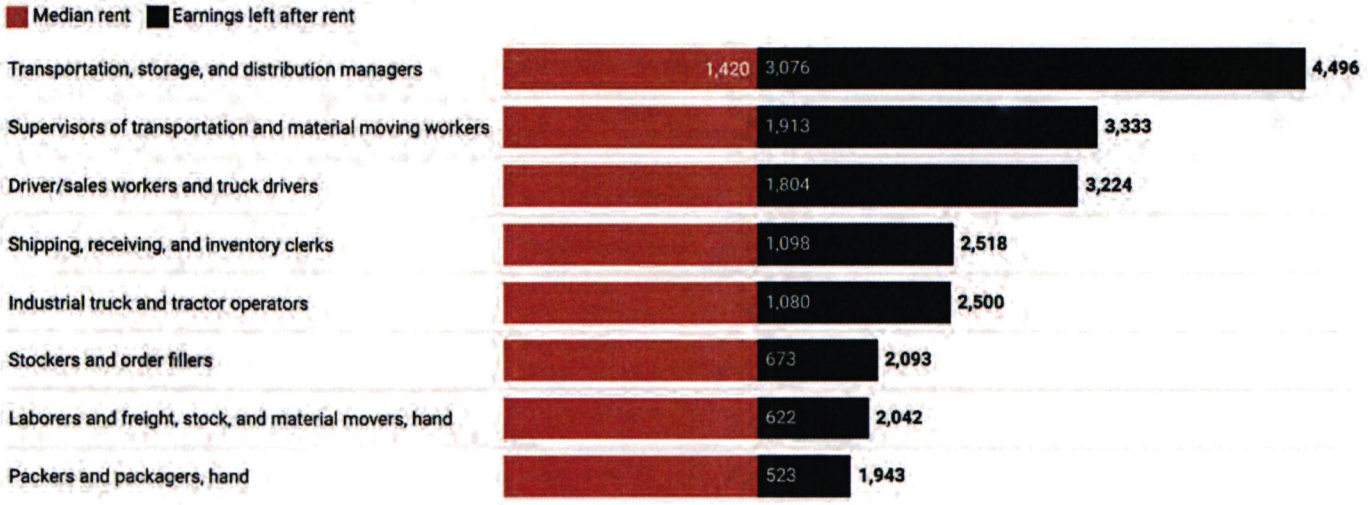
The living wage for Riverside and San Bernardino counties was calculated by averaging the required annual income before taxes for a family of four in each of the two counties, then dividing that figure in half to account for two working adults.

Source: American Community Survey 5-Year Data, 2021 (from IPUMS); MIT Living Wage Calculator for Riverside County, CA, and San Bernardino County, CA, 2021 (from Archive.org) • Created with Datawrapper

FIGURE 4.

What's left after rent

According to the US Department of Housing and Urban Development, a household is cost burdened if it spends more than 30 percent of its income on housing costs. For Inland Empire TDL workers in a sampling of occupations, the housing cost burden ranges from 73.1 percent for packers and packagers to 31.6 percent for transportation, storage, and distribution managers. The median monthly wage for each occupation is displayed in bold to the right of each bar.



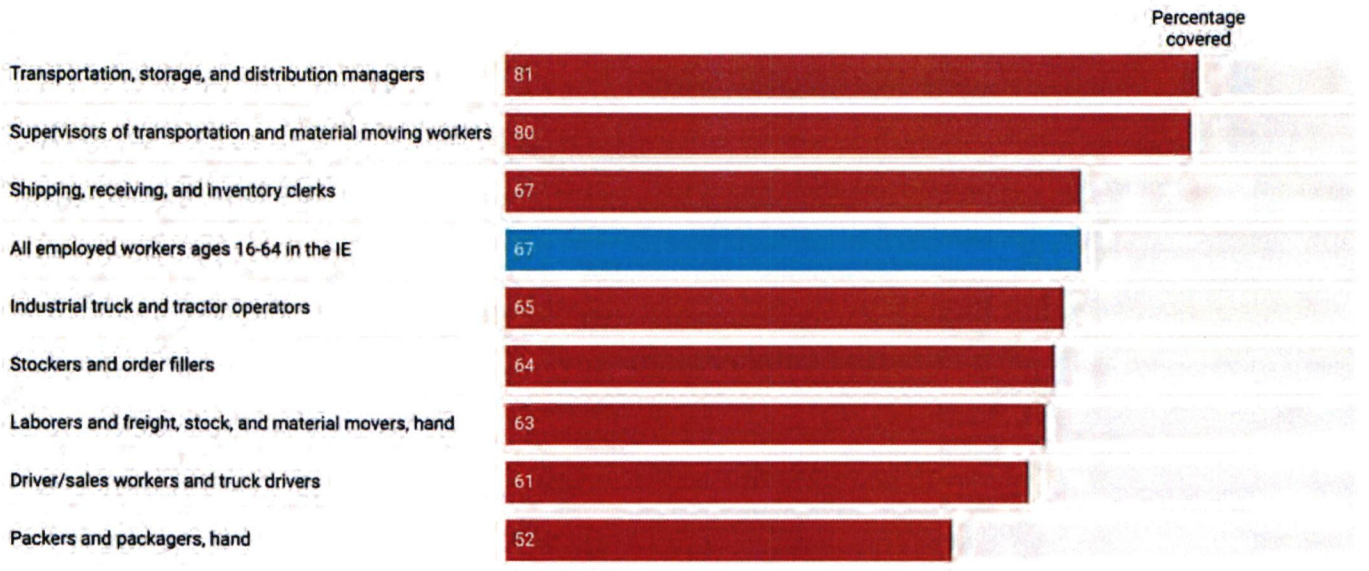
Earnings left after rent equal the median monthly wage across the region for each occupation minus the median monthly rent for the region of $1,420.

Source: American Community Survey 5-Year Data, 2021 (from IPUMS) • Created with Datawrapper

FIGURE 5.

Health insurance coverage with employer contributions for select TDL occupations

One hallmark of high job quality is for workers to have health insurance with employer contributions (U.S. Department of Commerce 2022). For statistical purposes, the American Community Survey counts workers who receive health insurance coverage through a family member's employer in this category. It is also important to note that health insurance coverage is a baseline. In practice, variations in co-pays, deductibles, provider networks, pharmaceutical costs, access to flexible spending plans, and other factors can shape the quality of health care that workers are able to receive.



Source: American Community Survey 5-Year Data, 2021 (from IPUMS) • Created with Datawrapper

of managers are self-employed, perhaps at smaller warehouses or logistics companies. Among all other occupations, only about 1–2% of employed workers are self-employed.

While most workers employed in all 8 occupations have employer-provided health insurance, as seen in Figure 5, coverage rates vary. At the lowest end of the spectrum, 48% of packers and packagers and 37% of laborers lack employer-provided health insurance. Among blue-collar truck drivers, 39% lack access to employer-provided health insurance. In contrast, 19% of managers and 20% of supervisors lack access to employer-provided health insurance.

Overall, these findings reveal that managers and supervisors tend to earn the most income, have the greatest access to employer-provided health insurance, and nearly all are employed full-time and full-year. On the other hand, packers and packagers tend to earn the least, have the lowest access to health insurance, and are the least likely to have full-time, full-year employment. Among blue-collar workers, truck drivers tend to earn more than warehouse workers. Additional analyses of employed workers in selected TDL occupations based on ACS data can be found in Table 3 in Appendix 1.

JOB OPPORTUNITIES BY OCCUPATION & SUBREGION: BURNING GLASS DATA FINDINGS

To further examine how job opportunities for truck driving and warehouse labor vary across subregions within the IE, we analyzed Burning Glass data on job postings for the most recent year of data available to our research team. According to data from November 2020 to October 2021, the majority of job postings across the heavy duty truck drivers, light duty truck drivers, and laborers occupations are concentrated in either East San Bernardino County or in Northwest Riverside County. The desert regions, which have smaller populations, have fewer job postings, but do have a significantly higher ratio of all job postings in Heavy and Tractor-Trailer occupations than the other occupations studied. These findings show how TDL workers in the IE have more employment opportunities to obtain work in some subregions than others (see Figure 6).

INDUSTRY ANALYSES: KEY FINDINGS

As Table 4 in Appendix 1 shows, workers employed in the Transportation and Warehousing (2-digit) industry earned lower average monthly incomes in the Inland Empire ($4,372) compared to other Southern California counties ($5,729) and the state ($5,983) according to the most recent year of QWI available (third quarter 2021 through the second quarter of 2022). The difference in average monthly incomes was sizable, with IE workers in this sector earning an average of $1,300 less per month than their counterparts in the rest of Southern California and the state.

Warehouse workers, truckers, and other logistics types of TDL workers are employed across a broad range of specific industries, including industries such as passenger bus transportation and commercial airlines, that are mostly focused on activities outside of the good movement sector. For this reason, we examined the social and job characteristics of workers employed by 25 specific (4-digit) industries that are involved in the transportation, storage, and final assembly of products for sale and distribution using QWI data from 2022 (see Table 5 in Appendix 1).

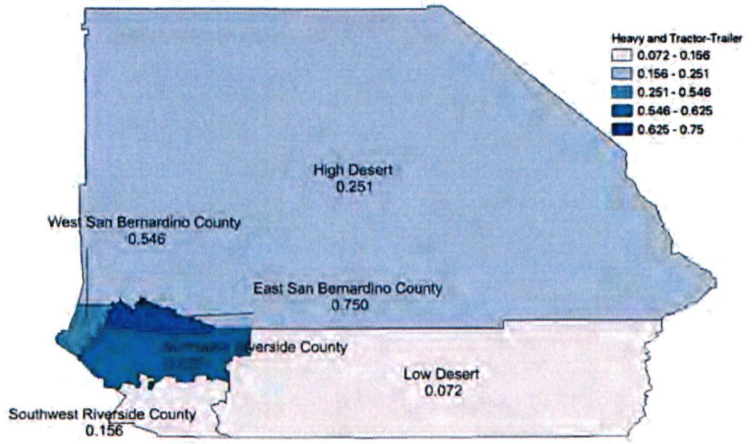
Overall, this analysis reveals that in most of these 25 TDL industries, employed workers were predominantly male and mostly Black or Latino workers (see Table 5 in Appendix 1 for details). The percentage of employed female workers is especially low (less than 20%) in general freight trucking (19%), specialized freight trucking (17%), commercial and industrial machinery and equipment (except automotive and electronic) repair and maintenance (16%), and beer, wine, and distilled alcoholic beverage merchant wholesalers (16%).

Several of these 25 TDL industries are quite large and play important roles within the regional economy, especially within San Bernardino County. Table 6 and 7 in Appendix 1 show the top employing 4-digit industries in Riverside County and San Bernardino County respectively. As they indicate, Warehousing and Storage employed the second highest number of workers in Riverside County and the largest number in San Bernardino County. In San Bernardino County, General Freight Trucking was the seventh largest employer, while Grocery and Related Product Merchant Wholesalers was the 20th largest.

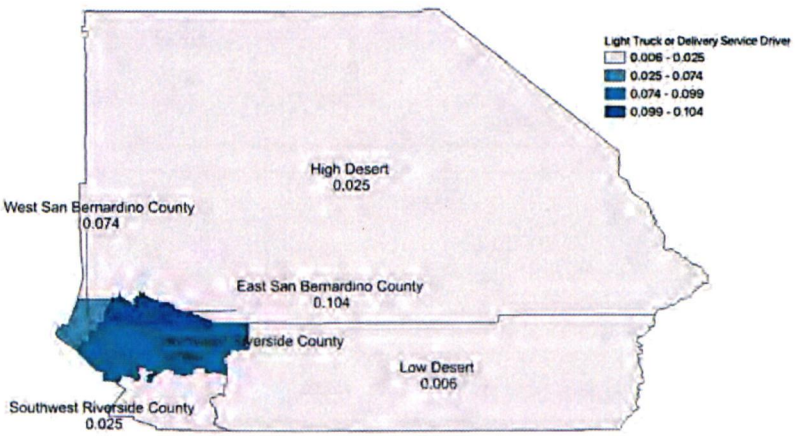
Average monthly earnings across these 25 industries ranged from a low of $4,425 per month (in miscellaneous non-durable goods merchants wholesalers) to a high of $8,304 per month (in lumber and other construction materials wholesalers). It is important to note that these findings are for workers employed in a broad range of occupations within these 25 industries which could be an important contributing factor to the

FIGURE 6. JOB POSTING RATIOS

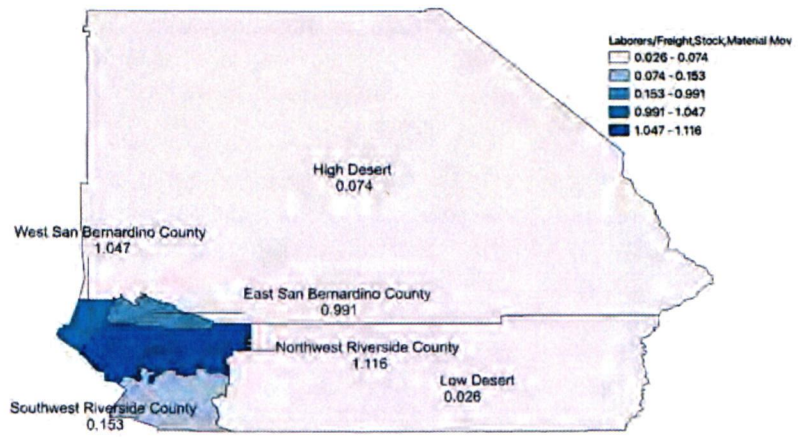
Job Posting Ratio: Heavy and Tractor-Trailer occupations as a proportion of all job postings by Sub-Region



Job Posting Ratio: Light Truck or Delivery Service Driver occupations as a proportion of all job postings by Sub-Region



Job Posting Ratio: Laborers and Freight, Stock, and Material Movers, Hand occupations as a proportion of all job postings by Sub-Region



earnings inequality observed across them (see Table 5 in Appendix 1).

Unequal earnings across industries becomes even more pronounced when one considers annual incomes. For example, among laborers, the most common occupation in the warehouse industry, median annual earnings in the IE are notably lower among those employed within the employment services (temporary agency) industry than in electronic shopping or warehousing and storage, which is partly due to the lower percentage of workers employed full-year (50-52 weeks per year) and full-time (35 hours or more per week). Less than 35% of laborers in the IE's employment services sector have access to employer-provided health insurance, compared to 52% in the warehousing and storage industry and 73% in the electronic shopping industry (see Table 8 in Appendix 1). Similar inequalities across industries are found when we consider the findings for blue-collar warehouse occupations more generally by combining five of the most common occupations (see Table 9 in Appendix 1).

Analyses of ACS data over time reveal that the percentage of self-employed workers to total employed workers in the transportation and warehousing industry (2-digit) has risen over time in the IE, similar to what has occurred in Southern California and the state. Within the IE, the share of self-employed as a percentage of total employed workers in transportation and warehousing for the county has hovered around 10 percent over the last decade. **In other words, there is one self-employed worker for every 10 employed workers in this sector** (see Appendix 1, Figures 1–5). These self-employed workers include truck drivers who are owner-operators as well as other types of self-employed workers, such as gig delivery drivers that are classified as independent contractors. Many of these workers, especially many of those in the gig economy, may be misclassified and as a result are denied employment benefits and other labor rights provided to other workers.

Research has shown that when workers are misclassified as independent contractors, they lose workplace protections, access to benefits, and experience a reduction in wages. To address the vulnerabilities workers experience as independent contractors, particularly truck drivers in the logistics industry, the U.S. Department of Labor announced a final rule for employee or independent contractor classification. Beginning on March 11, 2024, employers must abide by new standards to classify employees, which are consistent with the Fair Labor Standards Act (FLSA), to reduce the number of misclassified workers (US Department of Labor 2024). The new rule seeks to protect workers from being denied minimum wage and overtime pay and establishes consistent standards business owners can reference to classify workers.

JOB QUALITY: A CLOSER LOOK

In recent years, *good jobs* and *job quality* have become buzzwords as the COVID pandemic has compelled workers, employers, and policymakers to rethink what makes work fulfilling. Yet in the Inland Empire, many elected officials and business leaders are quick to tell anyone that a good job is one that exists. How can the region move beyond this low bar?

To assess job quality in the TDL sector in the IE, we adapt categories from the U.S. Department of Commerce's *Job Quality Toolkit*. The toolkit draws on input from a range of experts, including labor unions, in order to guide employers in developing strategies to reduce employee turnover, increase workers' satisfaction and productivity, and promote customer satisfaction (2022:3–4). The strategies offered are categorized by eight drivers of job quality: recruitment and hiring; pay; benefits; job security and working conditions; organizational culture; diversity, equity, inclusion and accessibility; empowerment and representation; and skills and career advancement.

The following summary of findings from worker interviews is organized by the five drivers of job quality from the Toolkit that workers and researchers mentioned the most: (1) job security and working conditions, broken down into the lack of job security and inequalities related to employment status, excessive work hours and lack of work-life balance, physical and mental health concerns, and, for truckers, parking and routing; (2) pay, benefits, and costs (condensed into a single discussion); (3) entry, skills, and opportunities for advancement; and (4) empowerment and representation.

JOB SECURITY AND WORKING CONDITIONS

Employment Status and the Lack of Job Security

Subcontracting and other non-standard employment arrangements that are commonly used in the trucking and warehouse industries often make it difficult to hold employers accountable for working conditions and for workers to access various labor rights and employment benefits. Workers sometimes do not even know the large retailers or companies for whom they are working and who set the terms of their employment contracts. While subcontracting is common within both warehousing and trucking, temporary and seasonal work contracts are more common within the warehouse industry while the misclassification of truck drivers as independent contractors is more commonly found in trucking. All of these arrangements tend to increase workers' precarity and vulnerability to abusive and exploitative working conditions (De Lara 2018; Viscelli 2016; Emmons Allison and Reese 2023; Gutelius and Theodore 2019).

Warehouse Workers

Warehouse employers' reliance on temporary help (or employment service) agencies to recruit warehouse workers negatively affects their job quality. In comparison to workers who are directly employed by firms, temporary agency workers tend to earn less and have less access to employment benefits such as employer-provided health insurance (e.g., see Allison et al. 2015a, 2015b; De Lara 2013, 2018; Emmons Allison and Reese 2023; Gutelius and Theodore 2019; and see Table 9 in Appendix 1). Warehouse employers' reliance on temporary agency workers has declined in recent years. Many employers are instead recruiting warehouse workers directly as "seasonal employees," a status through which new workers are hired for a limited period of time and paid less and given fewer employment benefits than regular employees.

While the hiring of seasonal and temporary workers tends to increase during peak seasons of consumer spending, such as during the holidays, it often occurs throughout the year. Similar to temporary agency and subcontracted workers, employers' obligations to employ seasonal workers are time limited, rendering them precarious and vulnerable to job loss (Emmons Allison and Reese 2023; Gutelius and Theodore 2023).

Warehouse workers like Mike and Samantha shared their stress over job security, particularly as seasonal workers. Samantha's experience transitioning from a

WORKER PROFILES

JOHN

Location: Moreno Valley

Occupation: Long-haul trucker (small company)

John is a Black man in his fifties who was born in New Orleans and moved to the Inland Empire in the 2000s after living in other states. He has been driving trucks for close to 10 years, specializing in long hauls and refrigerated trucks. He works for a small trucking company and lives in Moreno Valley, supporting a multi-generational household with 10 dependents. He was convicted of a felony in another state. Upon his release, the women in his family encouraged him to seek a credential to support himself.

John began training as a travel agent and then as a mechanic, but faced multiple challenges. Eventually he attended an eight-month commercial driver's license (CDL) training program in Fontana. He took the test three times before he passed it. John emphasized that he was actively recruited by a Black woman whose job was to bring in more truckers of color. He credits his successful entry and license to her tenacity in following up with him.

John's training program offered a wage during training, but at $400–$500 a week, he called it "slave" labor. Students did not have to pay for the program if they completed it in the prescribed 8 months. He said such training programs extract a tremendous amount of work from trainees that isn't compensated, and he wished the system weren't so exploitative. Offering benefits (health, dental, sick pay) to trainees, he said, would be ideal.

John started out driving for a megacarrier, but he has worked for smaller companies for most of his career. He loves the trucking industry, he said, and believes it's a viable sector for people who need an alternative to college, including people with criminal records and young men of color. He said he loves not having a supervisor standing over his shoulder and the "serenity" of being on the road.

On the other hand, John said, he doesn't feel that he gets a consistent, fair wage from the company with which he contracts. Although the company covers most of his maintenance costs, John is responsible for paying any tickets he receives while working. He also said that truckers typically aren't covered for "pre-check" work they do prior to a long trip.

John owned a truck for the past two years, but it was repossessed a few months prior to our interview with him. He had made a $25,000 down payment to initiate his lease. He shared that leasing programs for truckers are scams; all profits are eaten up by hidden fees that owners pass along to truckers. High fuel and operating costs made it difficult to continue his truck lease, he said, but he plans to get the truck back. He also complained that owner-operators undercut each other by offering ridiculously low prices.

John explained that as an independent contractor he doesn't receive any health or dental benefits, paid sick time, or leave. When he needs medical care, he said, he goes to the hospital and pays out of pocket. The time he spends away from his family also affects him, especially since his employer will change his route and timeline mid-trip.

John is aware of the political influence that can be garnered from collective action, saying, "If we [truck drivers] shut down for three days, it's gonna be problems. ... You get no fuel, no gas, no food, no medicine—madness. Nothing. It would be chaos out here." He said, however, that he has no interest in joining a union, even though he knows unions offer better benefits. He cited the bankruptcy of national trucking megacarrier Yellow and how its unionized workers had their supposedly secure pensions reduced. He thinks unions do not offer enough of a guarantee that the benefits will be worth the cost of paying dues.

John lamented the racial tension between Black and Latino workers. Once, he recounted, a worker at a dock to which he was delivering called him a "n-----" and "bitch" in Spanish and repeatedly ordered him to leave. He said the racist worker forced a physical confrontation that was recorded by company cameras. The company fired him a month later, he said, even though he did not instigate the incident.

seasonal to a permanent employee sheds light on the additional stress and uncertainty faced by temporary workers. As she explained, "Seasonal work is basically the same as like a temp, you don't get all the benefits... you get like partial benefits... you have to work harder to prove that you're gonna be a good worker."

While prior to the pandemic warehouses drew on staffing agencies to address worker shortage, the pandemic's rising dependency on online shopping not only increased the volume of orders but also labor costs due to rising pay rates. Warehouses sought to recruit and retain employees by directly hiring workers through sign-on bonuses, increased hourly wages, and allowing for flexible schedules (Gutelius and Theodore 2019). However, third-party logistics firms continued to hire temporary workers since their contract terms inhibited many from increasing their costs of labor. These firms managed the increase in demand for services and labor by requiring overtime, increasing recruitment and retention, and relying on temporary workers (Gutelius and Theodore 2023).

Truck Drivers

A critical issue in the trucking industry is the misclassification of truckers as independent contractors. This employee misclassification, which increased after the passage of the Motor Carrier Act in 1980, is especially prevalent in California's for-hire local freight sector, particularly in port trucking (Smith, Marvy, and Zerolnick 2014). Legitimate independent contractors often work in specialized segments of the trucking industry, handle specialized cargo, arrange their own business with shippers, and work unaffiliated with one company on an exclusive basis.

However, we often see "dependent contractors" today rather than independent contractors. The Transportation Research Board (TRB) defines "dependent contractors" as drivers who "operate under another motor carrier's authority, hauls that motor carrier's freight, and that motor carrier manages its affairs to a significant degree" (Appel and Zabin 2019: 6). Many drivers that own or lease their trucks lease their services for long periods of time to particular freight or logistics companies, giving those companies considerable control over their working conditions (Viscelli 2016).

The misclassification of truck drivers results in lower compensation for drivers and strips these drivers of essential labor rights typically afforded to regular employees. As owner-operators, many truckers are considered self-employed, which means they are responsible for their own vehicle maintenance, insurance, and operating costs. While this arrangement offers a degree of independence, it also means they are denied employment benefits like health insurance, workers' compensation, and retirement plans. Furthermore, being classified as independent contractors prevents these drivers from engaging in collective bargaining, leaving them more vulnerable to exploitative practices by trucking companies (Appel and Zabin 2019).

Misclassification not only impacts truck drivers' financial stability and job security but also affects their ability to seek redress for grievances, negotiate better working conditions, and receive fair compensation (Appel and Zabin 2019; Smith et al. 2014). As Viscelli describes, misclassified long-haul truck drivers "shoulder the expenses of owning and operating the truck they drive but get no real benefits in terms of pay or control over their work" (Viscelli 2018: 6). Turnover tends to be high among drivers who are misclassified as independent contractors and who are especially vulnerable to highly exploitative working conditions since they are not covered by many labor laws. As a result, these drivers are also "likely to be less-skilled, less-safe, and less-efficient drivers" (Viscelli 2018: 6).

The Department of Labor's 2024 final rule distinguishing employees from independent contractors may help to discourage the misclassification of truck drivers (U.S. Department of Labor 2024). To have its intended effect, however, it will require additional monitoring and enforcement.

Excessive Work Hours and Lack of Work-Life Balance

Warehouse Workers

Warehouse workers interviewed described the pressure to work long hours, especially during peak times, as a common theme. Melissa described the stress of meeting high quotas during busy periods, while other workers highlighted the challenges in balancing work with personal, student, and family responsibilities. Long and exhausting work hours also created challenges for workers enrolled in college to succeed academically, creating barriers for their upward mobility (Emmons Allison and Reese 2023: 87–90).

Samantha's struggle with caregiving responsibilities illustrates the hard choices workers face due to rigid schedules: "Sometimes I have to choose between

going to work and I have to go to San Diego to help her [mother]. So I have to choose between picking up an extra shift or going down there to help her. So I don't get a lot of rest for myself or time for myself."

Long and inflexible working hours strain the work-life balance of warehouse workers. Workers like Mike and Xavier lamented missing out on family time and personal commitments. For Ivy, this was why she left warehouse work: "I couldn't stay because I was rarely seeing my family ... they were with, you know, my husband or childcare all day, and then my husband would get them. By the time I'm home they're asleep. And all I want to do is sleep [during] my day off because I'm so exhausted. ... Those overtime checks. Yeah, they look nice. But for what like what am I really doing that for? You know, I'm wearing, tearing my body, but I'm not spending any time with my family. So that was why it was like, OK, you guys can have that. This is for them single people who ain't got no kids."

Truck Drivers

Similarly, a common theme that comes across from truck drivers is the long hours that are spent on the road each day. For instance, Mateo, when asked about his biggest dislike of his job as a feeder trailer truck driver for UPS, stated, "It takes up all your time." Mateo was like many other interviewees, who work 11 hours per day on average. Such long work hours interfered with his work-life balance "because your whole day would be gone."

Long-haul driving jobs are especially taxing on workers' physical and mental health. Drivers are typically away from home for days, often 5 days or sometimes even more. As Mateo describes it, "So when you're long haul you just pick up and go and you drive right? You drive for about 10 hours straight." Solo owner-operators often work seven days a week. Many drivers miss their family and friends when they are away for days or weeks at a time, and frequent absences from home often put a strain on family relationships and routines. Sahib, a driver whose father started driving in 1990, summarized how, "while growing up, you don't realize, like, hey, why is he missing out on all these events?"

Physical and Mental Health Concerns

Warehouse Workers

Warehouse workers, in their interviews with members of our research team, reported being asked to perform unsafe tasks, often contradicting company policies. The physical toll of the job, including injuries and muscle strains, was a significant concern. Samantha's experience with a pinched nerve and general body soreness illustrates the long-term impact of physically demanding work. As Mike put it, "Working at a warehouse is fine, but doing it for 10 years, 20 years, basically, like all your life is, you know, it'll eventually catch up to you."

Workplace safety issues are common among warehouse workers, especially Amazon warehouse workers. In a 2023 report, the Strategic Organizing Center (SOC) found that the overall injury rate among Amazon warehouse workers was about 7.0 per 100 workers in 2022 (4). While this rate has slightly improved since 2021, it remains high compared to non-Amazon warehouses. During 2022, 95% of Amazon's 38,609 injuries were considered serious, forcing workers to take time off or be given a different position. Workers stated they were given different responsibilities to heal their injuries rather than being given time off. If workers did receive time off, they were pressured to return to work by their supervisors although they had not fully recovered from their injury (Rosenblatt 2023).

As a result of Amazon's egregious failure to ensure the safety of their warehouse workers, some safety violations at their warehouses have been deemed "willful." This is the most serious type of safety violation that OSHA can issue, and is given when companies are found to be "'knowingly fail[ing] to comply with a legal requirement' or operating with 'plain indifference to employee safety'" (cited in Strategic Organizing Center 2023: 9). In 2018, Amazon rolled out a "temporary light duty" (now called "return to work") program that created additional positions for workers that were hurt too badly to perform their normal jobs. This program allows Amazon to reduce the number of injuries it has to report in the most severe injury category and helps to reduce Lost Time Injuries and workers compensation costs. Some investigations have also found that some Amazon facility managers have repeatedly failed to keep accurate records of workplace injuries. Amazon has the expertise to identify dangers in the workplace and the power to mitigate them, but often fails to do so. In light of Amazon continuously choosing to prioritize profit over people, it is evident that workers, regulators, share-

holders, and consumers must force Amazon to make its workplaces safer (Strategic Organizing Center 2023).

The high injury rates found at Amazon and other warehouses are related to employers' fixation on speed, with workers being continuously surveilled by productivity monitoring systems that pressure them to move and work at a dangerous pace. In response, California passed Assembly Bill 701 (2021), which aims to protect workers from the use of unreasonable production quotas that lead to health and safety and other labor law violations (Strategic Organizing Center 2023).

Many warehouse workers reported being under relentless pressure to meet unreasonably high productivity standards, often leading to stress and unfair penalization, particularly for those physically less capable of handling heavy loads quickly. "They would know our rate and how many boxes we were doing, like per hour. And if we weren't like doing enough, they would come talk to us," said Melissa. Marcos recounted times that he would be going so fast that he was sweating, but managers would still tell him that he was going too slow. He also described how there was a "big board" in the workplace that showed all of the employees' names and the rate at which they were working, which was akin to a "public humiliation" board. Christina, on the other hand, said she was thankful for the incentive to exercise every day.

Several of the warehouse workers we interviewed described extremely hot temperatures in warehouses. "During the summer the warehouse does have air conditioning, but since it's such a big warehouse it's almost impossible to cool off," Christina said. "And in the area that we pick, since there's so much product, the aisles are small, the heat just gets trapped." Melissa described how "people got heatstroke from like, being in the warehouse... If we would try to, like take breaks and stuff, they'd be like, oh, why aren't you working?... I witness[ed] one lady. She was like, a bit older. She worked outside a lot. She was the one directing the truck. And she collapsed."

Mental health concerns, including concerns related to mental stress, alienation, social isolation, and boredom, are also commonly reported among warehouse workers (Emmons Allison and Reese 2023). The warehouse environment often lacks supportive interpersonal relations, leading to feelings of undervaluation and insincerity. Favoritism and cliques contribute to a sense of unfairness and alienation, while the vast and solitary nature of the work leads to isolation and disconnection from a supportive work community. "People look down on you. Nobody's ever motivating you or complimenting you," said Kay.

The repetitive and monotonous nature of warehouse work was noted by several workers, including Melissa, as mentally taxing. Xavier described the job as physically and mentally draining, while Tabitha and Kay discussed the boredom and physical strain associated with tedious, repetitive tasks. Mike explained that as a packer, he has been asked to stand in one spot for a full 12-hour shift. He takes the items that are handed to him, places them into a box, seals it, and repeats the process again and again for the full shift. Day after day, he returns to the warehouse to place items in a box and seal it. Mike said there is no satisfaction in completing a task because it never ends. The work is unbearable because he cannot move.

Truck Drivers

With their long hours, discussed above, long-haul truck drivers are at risk of experiencing vehicular accidents. They must constantly stay alert while driving to scan for driving hazards, including deer and road traffic. However, many drivers, especially when they are working long hours, find that they tend to "become complacent on the road" and to "get tunnel vision out there at night, especially when you drive through the night," stated Mateo.

Sleeping away from home, often in the back of a truck, reduces the quality of sleep among many long-haul truck drivers. Drivers sometimes need to leave their engines on overnight to keep the heat or air conditioning on if it is very cold or hot. "Yea, I keep my air conditioning on—the heat is no joke" (Simranjit). The engine makes a lot of noise so this practice often reduces the quality of sleep among long haul drivers. Although some drivers, like Mateo, Alex, and Sahib bring their own food with them, many of the food options on the road, such as fast food, are not healthy.

Others describe the impacts of back-to-back round trips between the IE and East Coast in terms of the persistent stress of making time, getting a return load, and being attentive to noises and road conditions, to make sure their engine and tires will get them to their destination without any mishaps. "After driving for 10 years," Gurjant said, "a person's body gets tired. You eat, sit, and sleep. I got high blood pressure from driving. There's no time for exercise.... [We are] constantly on the road." Drivers sometimes skip or reduce their

meal and other work breaks to get to their destination in a timely fashion.

Sitting for long hours every day takes its toll—it's bad for your back, and it interferes with drivers' ability to get sufficient exercise. As Mateo put it, "You just go to shit." Although some drivers go to the gym and exercise after work, long work hours, lack of daylight or good weather conditions in winter months, and many days of travel on the road can make it difficult for long-haul truckers to get sufficient exercise. Basic hygiene is also a challenge for drivers, who do not have toilets in their trucks. "You have to wait for the next truck stop or navigate accordingly." The same is true for showers. "I might not be able to shower today because the showers book up" or "there's a four hour wait," Sahib said. Mateo summed it up: "If I were to just sit down, do my job every day. It is detrimental to your health."

Electronic monitoring of drivers is also on the rise, contributing to stressful working conditions (Alimahomed-Wilson 2020). Joe described how his truck with a previous employer was equipped with a driver-facing camera that tracked his eyeballs. This was stressful for him, he said, because if he looked down, the camera would identify him as being in a distracted state, and it would begin recording. His current truck does not have a camera, and he is relieved that he is more trusted to do his job.

Parking and Routing

Truck drivers find that they have to pay for traffic tickets for parking in no-truck zones even when there is no other place to park and they are forced to do so to deliver their goods. Carlos described how he "can get literally ticketed for just parking at a local Walmart." When he's "driving for eight plus hours a day, and wants to go to the bathroom or eat," it feels inhumane to be cited just for taking a parking spot.

Finding lots in which to park while at home in the IE has become increasingly difficult and expensive. Since so much formerly open space is now occupied by "a lot of warehouses," truck drivers face a dilemma: "You can't park on the streets or on the side. 'No commercial parking,' are signs over and over. I don't want to risk getting towed. And wherever I try to find parking, it's ... full price is way too much. If I go to a truck stop in the area, there's never any parking because everybody parks their truck there, leaves their truck there for weeks on end because they're not taking any loads" (Simranjit). Some blame it on "these big companies. They're just buying up all the land" (Maninder). Truck lots take up commercial real estate, so as property prices "have gone significantly higher, in order for the truck yards to break even, especially for new owners, they have to upcharge." "It used to be like $150 to $200 a spot, but now they're charging $500 plus" (Sahib).

Others noted that the locations where trucks have more restrictions are biased in terms of race, class, and ethnicity. Commenting on the much-protested difference in warehouse developments between south and north Fontana (Gongora 2020), Simranjit said, "Pull up the map of Fontana [showing] south Fontana and north Fontana. All the commercial traffic is on the south side. All the north side has houses, they have plazas of convenience stores. You'll see road signs saying 'No trucks over five tons,' 'Local deliveries only,' 'Trucks: No right turn, no left turn.' And on south Fontana's side, you'll barely see one."

Gurjant and Karamjit noted the contradictions of living close to warehouses where it is more convenient to pick up loads. Karamjit remarked, "It is dangerous to have "warehouses all close to residences. One person was killed because they got run over by a trailer. His car went underneath the trailer and immediately died." The traffic is terrible and the costs of living there have risen. But, Gurjant explained, as warehouses "keep expanding outwards away from where people are living, it will be further to drive to pick up loads."

PAY, BENEFITS & COSTS

Warehouse Workers

Wages within the goods movement sector depend on the type of job, workers' education and training credentials, and collective bargaining agreements (ICF Incorporated, LLC 2019). Within the interviews conducted, many workers expressed concerns over unfair pay practices, such as low pay and newer employees earning more than long-term workers. For example, Melissa reported that when she was hired by Amazon as a warehouse worker she was offered $17 per hour. Several years later, new hires were offered $19 per hour, but there were no raises for incumbent workers.

Samantha, employed as a picker at an Amazon warehouse, also desired better compensation. Samantha said, "I would like to work 40 [hours per week] and get paid the same amount as working 60. Yeah, but I have bills to pay, so 60 it is." As a result, Samantha typically works long shifts, often beginning her workday at 7:30 AM

and leaving work at 6:00 PM. Similarly, Kay reported that she felt pressure to work overtime in order to make more money to pay her bills: "I should be able to work a regular eight-hour shift and make some good money out here in California because [the cost of] everything is high! They should be paying us well. We are tax-paying citizens.... We are getting taxed off everything, so why not raise everything [prices and wages]?!"

Kay suggested that, given the high costs of living in California, warehouse workers should earn at least $20–25 per hour. Xavier viewed his employer's practice of offering small incentives to motivate workers to work hard as insufficient: "The joke is, they want you to work 10 times harder to make their department look really good, and then, in return you're getting a 25-cent slice of pizza on your break."

Although warehouse jobs might offer health care, medical visits can come with copays that add up or with strings attached. Marcos described how he obtained a bad injury on the job, which caused him to have to go to the doctor and be absent for a week. He went to his own primary care provider because that is who he was most comfortable with, but because of this, his company would not pay him for the full week he was absent. His employer argued that in order to get paid for the time off, he had to use the company doctor.

Not all warehouse workers were dissatisfied with their pay and benefits. Christina's company offers a beginning hourly rate of $22. In addition, her employer provides workers with two reviews a year to determine their performance. If employees are exceeding their metrics, they are provided with a 50-cent raise and a $600 bonus check. Christina also receives holidays off, 12 hours per month of paid vacation, and a 5% employer match for her 401(k) retirement account.

Truck Drivers

Since the deregulation of trucking in the 1980s, and increasing prevalence of subcontracting within the industry since the 1970s, union density and working conditions among truck drivers have declined. Truck drivers often experience financial problems due to low pay and unpredictable work hours. Owner-operators also have to pay out-of-pocket expenses for their vehicles, fuel, insurance, and vehicle repairs and maintenance. This further reduces their take-home pay and often puts them into debt (Viscelli 2016; Smith et al. 2014). James expressed wishing he was part of a union

WORKER PROFILES

PRABH

Location: Fontana

Occupation: Truck Driver

Prabh is a 43-year-old man, born in Punjab into a family of farmers. He emigrated to the U.S. in 1999, first to San Jose then Fontana, in order to enter the trucking industry. He drove a truck in order to be self-employed and self-sustaining. He and his parents received high school educations in Punjab, and he had some college in the U.S. His three brothers and one brother-in-law are in trucking, which Prabh explains was because they could get into it without having a higher education or having completed a degree.

Prabh started out doing long-haul, interstate driving for five years, and now does short-haul refrigerated and dry van truck trips within Southern California, starting and ending in Fontana. He does not own his own truck. He said he keeps track of changes in the industry, such as those pertaining to emissions, technology, and safety and operation challenges, through social media and Punjabi papers and cultural events.

For a period of time Prabh made trips in and out of the Port of Long Beach, where he became familiar with electric trucks and the fact that there were government subsidies to purchase them. At $300,000, however, new electric trucks are well beyond his means even with subsidies. He also said there are many "unknowns" regarding maintenance. He is skeptical that he would ever be able to afford one, but he would be happy to drive one if charging it were as convenient as pulling into a gas station now to fill up.

Prabh lives in a house about 15 minutes from warehouses and experiences the noise and traffic from trucks. He wishes there were better planning so truck traffic would not affect schools and residential neighborhoods. He also wishes there were more government involvement in helping truckers with concerns like better pay, good health care plans, and safety.

WORKER PROFILES

XAVIER

Location: San Bernardino

Occupation: Warehouse worker

Xavier is a Mexican-American man in his early twenties who is originally from Los Angeles. He currently works as a forklift operator in a warehouse in the Inland Empire for a major retailer. Often working 10–12 hours per day, five days a week, Xavier brings in $27,000 annually. For the past three years, his daily work routine has been to pack semi-trailers with products that are distributed to retail stores across the country.

Xavier turned to warehouse work in 2020 when he lost his immediate family to the pandemic. Overnight, Xavier found himself unhoused. He moved to the Inland Empire where he could find more affordable housing and a full-time job that required little experience.

Xavier is not attached to his current work. He sees it as a stepping stone as he finishes school. He is a full-time student who will receive his bachelor's degree in mechanical engineering this year and intends to find a job within that industry. He lives close to his campus and lives frugally. For now, he is dependent on his warehouse work. He said he prefers having a job that he doesn't have to think about after clocking out for the night. He also does not seek advancement or worry about termination.

Even though his warehouse work is transitory, Xavier is critical of it being regarded as a viable long-term option for other workers. He described it as "slaving away for a small amount of money when you know someone on the other end is profiting millions of dollars." He said the work is "physically and mentally depressing," and he doesn't wish it on anyone. "Who wants to walk around for 12 hours without music playing through their heads to distract them from the fact that they're participating in capitalism and completely selling their life away for a small paycheck? That's gonna get them by for a month, and then after the same thing, over and over and over and over again." He is hopeful things will one day change.

so he could have access to health care and retirement benefits.

Some truck drivers incur considerable debt through exploitative lease-to-own contracts that charge high interest rates for their trucks (Viscelli 2018). Even when they own their trucks, the costs of maintaining them are substantial. As Sahib put it, "You want to have savings.... I might not work for the next month. My truck might break down. So, the biggest thing is don't get into debt; that's how you weather through all these market fluctuations." Drivers' incomes tend to be unpredictable because demand for their labor is seasonal, and often fluctuates over time due to many factors beyond their control, such as those related to the "just in time" consumer economy.

Various drivers interviewed claimed that the pay rates for carrying cargo have declined or are too low given the high cost of living and their work expenses, including the high price of fuel. They describe how the pandemic brought a lot of business, but also led to inflated truck prices. "During COVID everybody saw how much money you can make. And everybody got so greedy. And then they're like, Oh, it's going to keep happening forever and ever. Everybody went out. They bought multiple trucks. That's why now you see, like people are going out of business because they can't afford it," stated Maninder. Other truck drivers believe "the industry is getting oversaturated, ...all these newcomers, they're killing the rates" (Varinder).

Some drivers have to pay high fees to brokers that further reduce their incomes. Maninder described how, if he gets a long haul direct from a customer, he might get $6 a mile, but "that same load I got from a broker, the broker, he was quoting me, he's like, 'Oh, the best I can do is like $2'.... That's the story every broker will tell you, 'Dude, that's the best I can do.'" Alex expressed that he wished he could be part of a union because he believes that unions could push for legislation that would regulate brokers.

Drivers are usually only paid for the time they spend driving, or by the mile. They are not paid for wait times, although they often must wait a long time to load and unload cargo (Viscelli 2016). The American Transportation Research Institute (2023), an industry think tank, has repeatedly found driver detention (an industry term for wait times) to be one of the top 10 issues facing drivers, with frequent delays of six hours or more to load or unload. Simranjit explained that at "bigger warehouses like Amazon or Walmart or Costco, my appointment will be at eight. I won't be free from there 'til 11, sometimes

12, because they're such a large area. You're waiting about an hour to even get a [dock]. By the time you get your paperwork and out the door it is about three, four hours there."

One driver, Randy, said that his current position pays him hourly for all of his work time, including waiting, loading, and unloading. Nonetheless, he said, the cost of traffic tickets adds up. Many customers are located on streets that are no-truck zones. As a result, he receives tickets that go on his personal driving record and that he has to pay for out of pocket.

ENTRY, SKILLS & OPPORTUNITIES FOR ADVANCEMENT

Warehouse Workers

Lack of Other Options: Workers like Mike and Kay expressed frustration over the lack of opportunities in other industries, feeling pigeonholed into warehouse work despite aspirations for different careers. "School wasn't really my thing," Jonny explained. "Trying to find a job was hard. No one was giving me a shot, let alone hiring me, so I just took the route that my mom did... I really wasn't trying to stay in that role, but I had no choice."

Opportunities for Advancement: Many workers believe, like Kay, that there is no financial motivation to continue doing warehouse work and that promises of promotion are rarely fulfilled. This view is reinforced by common hiring practices for management positions found within the warehouse industry, including Amazon, which give preference to workers with college degrees rather than years of warehouse work experience (Emmons Allison and Reese 2023: 112-113). A few warehouse workers had positive views or experiences however. "They don't know what we want unless we voice our opinion," Christina said. "I recently just had my review. And that's what I told my supervisors, that I was looking into going into cross-training into other departments just to get experience on everything."

Alfonso pursued upskilling on his own, paying out of pocket to obtain forklift training. His forklift certification was ultimately valuable because it qualified him for his union job. He then thought he could obtain a truck driver position with a different employer and again paid out of pocket for a commercial driver's license (CDL) program, comparison-shopping for the one with the lowest fee. He did not ask his union employer to cover the cost, he explained, because his workplace didn't employ distribution drivers and he didn't want management to know he was considering leaving.

Unfortunately, Alfonso didn't realize that many companies hiring truck drivers required one or two years of experience. He ended up remaining at his job and, with his CDL, was able to take on a yard truck driving role, which involves repositioning trailers within the truck yard. It came with a $2-per-hour wage increase on top of his warehouse floor job.

Truck Drivers

Training and Retention: There is a seemingly endless cycle of headlines about the so-called truck driver shortage. Research suggests, however, that the alleged shortage is largely a myth perpetuated by large trucking companies. For example, Semuels (2021) and Fuller (2023) indicate that there is actually an excess of drivers with commercial driver's licenses (CDLs) in comparison to the jobs available. According to Semuels (2021), competition among drivers for scarce jobs, along with inadequate government regulations, has led to a "race for the bottom" that exacerbates bad working conditions and contributes to a significant problem of worker retention within the industry. Companies with revenues exceeding $30 million experience turnover rates around 92%.

Furthermore, the use of drivers is often inefficient, as brokers can pit a large number of drivers against each other, resulting in lower wages and working conditions, and longer wait times for load pickups. Researchers contend that the deregulation of the trucking industry and decline in unionization has contributed to the decline in labor standards in the industry. Following the deregulation of trucking, wages in truck driving fell 44% from 1977 to 1987 (Semuels 2021).

The industry also faces challenges in training and training-related debt for new drivers. Federal and state governments have funded driver training since the COVID pandemic's onset. Many drivers, however, are required to enter training contracts that require drivers to work for the same company that provides their training for a certain period post-training in order to repay the cost (Viscelli 2016). Several drivers we interviewed, including Randy and Roberto, said they took such opportunities and fulfilled the post-training work period requirement, but they did not stay with the carrier that provided the training. James and John opted to attend driving school, both completing their programs in eight months. Alex

learned the trade through an informal apprenticeship with an uncle who was already in the industry.

Systemic Gender Bias: Gender inequalities and barriers to women's entry and retention are persistent in the trucking industry, despite some gains in terms of gender diversity. Research finds that diversity and inclusion policies are becoming more common within the industry and that an increasing percentage of those employed in managerial positions, safety and dispatch positions, as well as truck drivers are women compared to the past. There is a very notable lack of gender diversity and a massive need for positions among technicians. It is estimated that an additional 200,000 technicians in the US will be needed over the next 10 years, but schools are only producing 3,500 new technicians per year (Women in Trucking Association 2023).

As of 2021, women made up only 4.8% of 1.37 million truck drivers nationally. Women truck drivers often encounter gender discrimination and sexual harassment, which discourage many from remaining in the field (Eavis 2023). Policies such as same-gender training, while intended to reduce harassment, have been criticized for functioning as barriers to women's participation in trucking (Eavis 2023; Fernández and Molloy 2022). Because there are so few women truck drivers, it is often impossible to find one to train another.

In 2023, three women truck drivers filed a discrimination complaint against Stevens Transport for its same-gender training policy. Apparently such policies are still common within the trucking industry despite a 2014 federal ruling that prohibited them. Proponents of these rules, including trucking companies and Ellen Voie, who founded the nonprofit Women in Trucking Association, argue that these policies help to reduce sexual harassment of women drivers because trainers spend weeks on the road with their trainees and often sleep in the same cabin. Yet, critics of these policies contend that sexual harassment would be better addressed through other mechanisms, such as anti-harassment policies or providing hotel rooms to truck drivers when traveling (Eavis 2023).

We made repeated efforts to interview women truck drivers for this report but were unable to secure any interviews. We recommend that future research be conducted on the experiences of women truck drivers in the IE.

EMPOWERMENT & REPRESENTATION

As prior research and our findings here have demonstrated, workers across the nation are seeking to join workplaces that have supportive work environments and policies and give workers opportunities for growth. The U.S. Department of Commerce's (2022) *Job Quality Toolkit* includes job quality principles such as workers having the ability to voice their concerns without fear of employer retaliation, to engage in decision-making processes, and to provide insight on an organization's future work initiatives.

In order to cultivate a workplace where workers truly feel empowered and have their voices heard, employers must develop regular processes of communication with workers, create a system where workers can file complaints and receive protections from retaliation, and conduct workforce assessments to assess workers' satisfaction. Most important, employers should encourage and support workers' rights to organize, form unions, and engage in collective bargaining (U.S. Department of Commerce 2022). Unionization establishes democratic mechanisms for workers' concerns to be addressed, and collective bargaining agreements—contracts negotiated between workers and management—are the only legally enforceable way that workers can ensure their rights and interests are protected.

On top of the strategies for worker empowerment and representation outlined in the *Job Quality Toolkit*, California's High Road Training Partnerships (HRTP) initiative offers guidelines on designing worker training programs in ways that foster worker voice and worker power. The term *high road* in HRTP refers to approaches to work and the economy that "are guided by policies that jointly uphold and advance the social values of shared prosperity, environmental sustainability, and shared decision-making" (González-Vásquez and López 2021: 8).

In the HRTP model, worker training programs are an opportunity for workers to develop and share their own strategies for industry and worker success. Workers can provide insights on training and workforce needs, provide recommendations on wraparound services to reduce any barriers that prevent trainees from becoming successful in the field, and effectively design and execute programs themselves (UC Berkeley Labor Center 2020).

In its study of how worker voice empowers both current workers and workers in training, the UC Berkeley Labor Center (2020) showcases how one of the core HRTP concepts, whole person support, recognizes that

workers' lived experiences are a form of expertise they bring to the job and that it is in the overall interest of the workplace to create cultural alignment between workers and workplace culture. Experienced workers can be tapped as peer mentors for new workers. In these ways, industries can provide underserved and underrepresented workers with leadership opportunities and access to career advancement, thereby increasing overall job quality. Union collective bargaining agreements can help ensure the long-term success of measures that center worker voice (González-Vásquez and López 2021: 27).

The Union Difference

Although the details of union contracts differ across employers, unionized workers tend to be paid more than non-union workers, have greater access to employment benefits, and have more rights on the job (Fieveson 2023). What is the degree of union density among transportation and warehouse workers?

Figure 7 shows the valid percentages of employed workers (age 16-64) in select occupations in transportation and warehousing that are union members and covered by a union contract in the IE using IPUMS data sourced from the CPS (Aug 2021 – Aug 2023).[3] It shows that, among the 8 occupations shown, union density is greatest among truck drivers. About 15 percent of truck drivers belong to a union and about 22 percent are covered by a union contract. Viscelli (2016) finds that, among truck drivers, unionization tends to be greatest among those that do not carry full loads, such as parcel delivery.

Among blue-collar warehouse workers, industrial truck and tractor operators (or forklift drivers) have the highest union density. About 10 percent of workers in these jobs belong to a union and about 12 percent of them are covered by a union contract. In contrast, packers and packagers have the lowest union density among blue-collar workers. Less than 5 percent of workers in this occupation belong to a union and only about 7 percent are covered by a union contract.[4]

Using national data reported by Hirsch, MacPherson, and Even (2024), we find that, compared to the U.S., union density is greater in the IE in four of the eight occupations shown in Figure 7 but it is lower among laborers, packers and packagers, transportation and material moving workers' supervisors, and transportation, storage, and distribution managers. The difference between national and regional union density among

WORKER PROFILES

SAHIB

Location: Fontana

Occupation: Truck Driver and dispatcher

Sahib is a 26-year-old Punjabi American male whose parents immigrated to the U.S. in the nineties. He lives with his parents and three other siblings in Fontana, where he grew up. His father started driving a truck in 1990, and he has other relatives who are also in the industry. Sahib describes going to the truck yard with his father as a youth to work on his truck, and notes the growth in the size of the truck yards, the number of trucks parked there, and the cost from $150 or $200 a spot to $500+ today.

Sahib graduated from college and, during COVID in 2020, got his Class A license in order to help his father. His father owns one truck, but started off working for other companies. He never expanded beyond one truck because he didn't want to worry about the additional risk or to put trust in other drivers. Sahib, however, also does truck dispatching.

Sahib recognizes the challenges of the job, remembering that his father missed a lot of Sahib and his siblings' special events because he was on the road. As an independent owner-operator, his father handles his own truck maintenance and repair, so there was rarely any down time.

Their family keeps up with industry news from Punjabi language radio and word of mouth from their immediate community. Though some people in their community are competitive and don't help one another, Sahib said, most "back each other up." He explained that an immigrant from Punjab might first get a job in a gas station, "but you can only work at the gas station and grind for so long, you know?" Most of Punjab is agricultural, and political problems with India have resulted in unequal access to jobs and land ownership, segregation, and restrictive legislation that makes it "hard to make a dollar". Punjabi men of Sahib's father's generation brought a work ethic from their impoverished agricultural background that Sahib said his generation doesn't have or want.

MATEO

Location: West San Bernardino County
Occupation: Truck Driver

Mateo is a Chicano male in his early thirties who has been working for UPS for 15 years. After working his way up, he now earns $42 per hour as a driver. He grew up in the Inland Empire and has been working since he was 16, starting in fast food and transitioning into warehouse work before UPS. "My union contract helped me out of poverty," he said. Nonetheless, Mateo and his wife rent an apartment in Rancho Cucamonga because they cannot afford a house.

Mateo has driven both long-haul and local runs for UPS. He currently works local runs, driving an average of 11 hours per day. During the COVID-19 shutdown, he recounted, management pressured workers to be "heroes" and do twice the amount of work for the same pay. With their Teamsters union contract, however, workers were able to receive a form of hazard pay by signing up for the "9.5 list." Signing up for the list limits a worker's daily hours to 9.5, and if a worker exceeds the limit three times in one week, they're guaranteed triple pay.

Mateo is active in his union, Teamsters Local 63. His first exposure to labor organizing began when he supported striking workers at Republic Services, a waste management company, in San Diego. When the workers obtained their contract, Mateo said, "I saw the impact of supporting your fellow brothers and sisters. Even if it's [a different] industry." He described going door-to-door as an organizer and asking residents about the impact of the logistics industry on the Inland Empire: "A lot of the responses [are], 'You know what, man, I tried to leave this place. ... I'm trying to get out of here.' They see it as a lost cause. They see it as these companies are going to win no matter what ... I see that as an opportunity to empower people, saying, 'The only way big corporations win is with an uninformed electorate.'"

DOUG

Location: Riverside and San Bernardino

Occupation: Warehouse worker

Doug is a Black man in his mid-thirties and former warehouse worker who grew up in and around the Inland Empire. He holds an AA in automotive technology from Chaffey College. He currently lives with and cares for his grandmother, helping her with routine household tasks.

Doug's first warehouse job was at a non-union manufacturing facility in Riverside County that stored its goods in an adjoining warehouse. Although he mostly worked in the manufacturing side of the facility, he obtained his forklift license through his work obtaining parts from the warehouse side. He did not like the management because they were disrespectful to workers. He recalled an incident when a physical fight nearly broke out between the workers and the manager after the manager called the workers "a bunch of monkeys."

More recently, Doug worked for a freight company in San Bernardino whose workers were unionized by Teamsters Local 63. He was proud to be working at a union job and was encouraged that his co-workers expressed that they were "ready to work and willing to strike." He earned a relatively low $17.50 per hour because the workers had lost some of their wage gains through concessionary contract negotiations. The union contract still included good medical, dental, and vision insurance, however, which he greatly appreciated.

Doug enjoyed his medical benefits and working with pro-union coworkers. He said, however, that hours were long, with occasional mandatory overtime, and he developed muscle strain from heavy lifting and poorly maintained equipment. The work was also dangerous. Doug described how one trailer he was working in almost tipped over, and he observed other workers being injured from trailers tipping over or goods falling on them, including one worker who was hospitalized and had to go on disability. The management, he said, did not train workers sufficiently. Workers relied on one another to learn how to work safely and sometimes intervened to protect each other from accidents.

After about a year of working at this facility, Doug was laid off when work slowed down. He now commutes to a public transit job in Orange County.

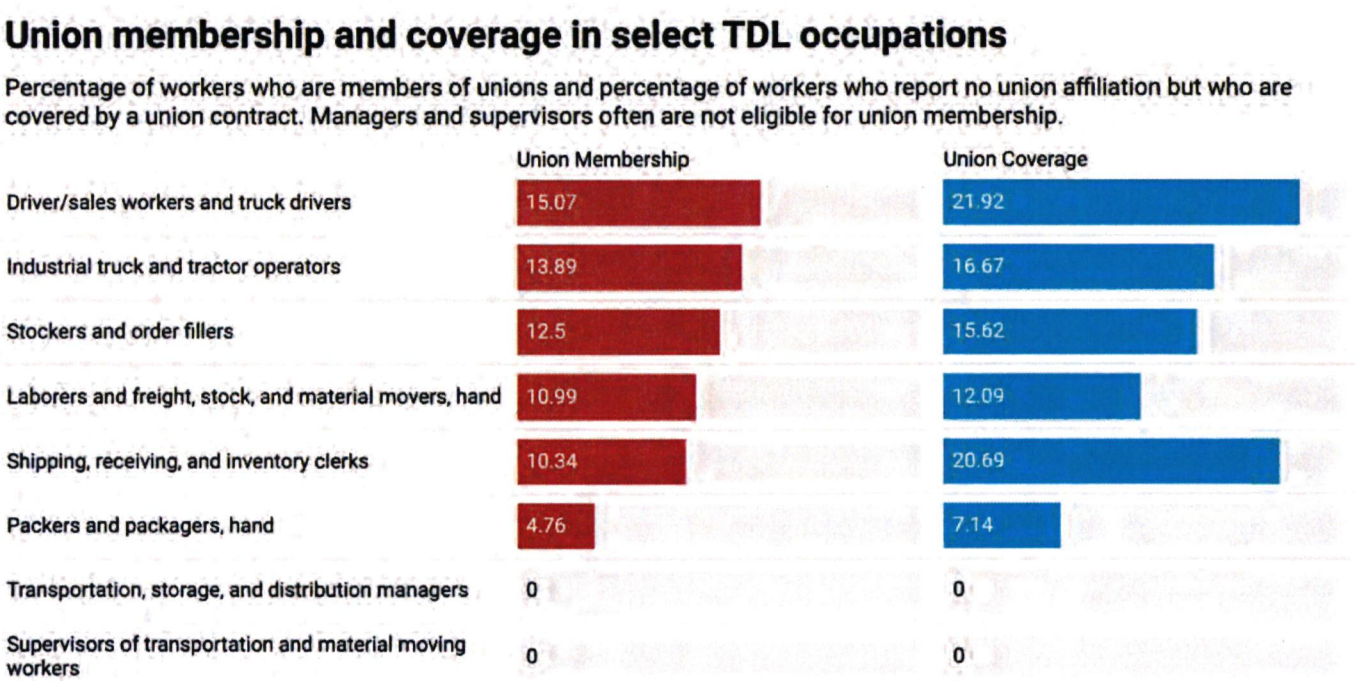
supervisors is especially striking. In the IE, there are apparently no supervisors that belong to a union, compared to 10.1% in the United States (see Table 10 in Appendix 1 for details).

The Teamsters is the largest union to represent workers in Southern California's TDL sector, with IE Teamsters belonging primarily to Local 63 (warehousing and trucking) and Local 848 (mostly trucking). Both Teamsters locals include workers across Southern California in a region that is far larger than the IE. A few other Teamsters locals, such as 630 (food distribution) and 638, represent smaller numbers of warehouse workers employed by particular companies. Other unions that represent TDL workers in the IE, albeit in smaller numbers, include the United Auto Workers (auto parts distribution center workers), the United Food & Commercial Workers (distribution workers at meatpacking facilities), and the United Steelworkers (distribution workers at manufacturing facilities).

Teamsters union contracts typically provide workers with medical benefits as well as retirement benefits or pensions. Teamsters members usually have access to various health benefits, including medical, dental, and vision insurance as well as vacation time.[5] The UPS Teamsters contract, the largest private sector union contract in North America, is widely regarded as among the best in the industry. Teamsters' new UPS contract adopted in 2023 provides UPS drivers and warehouse workers with good wages and retirement pensions. According to Eidlin (2023), this contract "eliminates the two-tier driver classification that had sparked widespread member anger in the 2018 contract. It provides sizable wage increases, especially for the lowest-paid part-timers, which will do more to raise the wage floor at UPS than any previous contract. It also requires UPS to create more full-time jobs, provide protections against excessive heat, restrict management surveillance, and limit forced overtime, among other gains."

Alfonso, a Teamsters member, described his transition from a non-union job to his current union position. At the non-union job, he was earning $19.75 per hour after working there for four years, and he paid about $480 per month for insurance. When he moved to his union position, he took a pay cut, starting at $17.77. However, he received health insurance for his family of four with no premiums. He also had a clear path to promotion after his fifth year due to the seniority provisions of the workers' collective bargaining agreement. Now on his sixth year with his current employer, he receives $28.88 per hour and is entitled to five weeks of vacation time per year. He also notes that his employer offers a path-

FIGURE 7. PERCENTAGE OF EMPLOYED WORKERS THAT BELONG TO A UNION AND ARE COVERED BY A UNION CONTRACT IN SELECTED TDL OCCUPATIONS



way to advancement by hiring management staff from among rank-and-file workers—he has actually turned down a management position, because he thought there was more job security in being part of the union rank-and-file—and offers $100 to any worker who makes a suggestion for improvement that is then implemented. Alfonso has seen the $100 incentive given out multiple times.

As elsewhere in the United States, union members and leaders in the IE region are very concerned not only with the rapid growth of non-unionized TDL employers, such as Amazon, that compete with companies with unionized TDL workers, such as UPS. The recent demise of Yellow, a unionized trucking company, is another concern for workers seeking union employment in the region. Yellow, which had been in operation for 99 years, filed for bankruptcy in 2023 after experiencing a series of mergers and mounting debt, resulting in the loss of 30,000 jobs nationwide, 22,000 of which were Teamster positions. Unfortunately, Yellow's demise could also mean trouble for the Central State Pension Fund, a multi-employee pension fund that already received a federal bailout in December of 2022 (Page and Biswas 2023). Nonetheless, many transportation and warehouse workers are continuing to organize in the region and some have made gains, even amid enormous challenges.

Worker Centers

In the absence of unions, worker centers play a critical role for worker empowerment and representation. A 2022 UCLA Labor Center study found worker centers to be an essential complement to the public workforce development system because of the way in which they combine "workforce development, community organizing, strategic labor law enforcement, and policy advocacy ... in an attempt to break down the systemic barriers to economic prosperity" (Lee et al. 2022: 2).

Racism, discrimination and systemic vulnerability due to immigration status, and the predominance of temporary and subcontracted work in an industry are issues that may create extra barriers to unionization but that can still be addressed by worker center organizing, policy, and legal efforts (De Lara, Reese, and Struna 2016). The Warehouse Worker Resource Center (WWRC), formed in 2011, has helped to organize, educate, and provide services, including health and legal services, to warehouse workers and their families in Southern California, especially the IE. Warehouse workers that they helped to organize won access to more secure jobs, wage increases, and other improvements in their working conditions.

WWRC has also helped many warehouse workers to win historic legal settlements worth millions of dollars against various employers, including temporary agencies and third party logistics firms, that engaged in wage theft or violated other labor laws, including workplace health and safety regulations. WWRC and its allies in the labor movement have also promoted and won the adoption of new state policies to better protect warehouse workers' rights and workplace health and safety, such as new indoor heat regulations and new restrictions on work quotas within warehouses (Emmons Allison and Reese 2023).

In 2022, the U.S. Equal Employment Opportunity Commission filed the two largest racial bias lawsuits in California history on behalf of 300 Black warehouse workers at two warehouse operators' facilities, primarily employed through temporary agencies (Roosevelt 2022). The research, organizing, and workforce development efforts of the Inland Empire Black Worker Center help illuminate how a historic case such as this one is part of a larger pattern of the systemic, intergenerational discrimination and disinvestment that Black workers and their families particularly face (Smallwood-Cuevas et al. 2020). James, a truck driver, described how the Drive-A-Check (DAC) report card system, which tracks drivers' records over 10 years in the industry, is wielded as a tool of systemic discrimination and exclusion. He said that often drivers of color are targeted and "blacklisted" in the industry because of negative DAC reports. When workers lack a union and collective bargaining power, worker centers can step in to foster mutual support and cultivate collective leadership around shared issues (Lee et al. 2022).

Worker Organizing

IE Amazon Workers United and other Amazon worker organizing: Among warehouse workers, Amazon workers have conducted the most visible organizing efforts in the IE's TDL sector over the past 10 years, in part due to their sheer numbers across the region. Amazon worker organizing in the IE has been a core part of the larger movement in the region to gain greater community benefits from the TDL sector . Perhaps the longest sustained Amazon worker organizing campaign has been at the Amazon Air hub in San Bernardino, under the name of IE Amazon Workers United (AWU). AWU has staged multiple walkouts to call for pay increases,safer working conditions, and no retaliation for worker

organizing (Emmons Allison and Reese 2023; Yee 2022). Since AWU workers are assigned to tarmac operations in extreme heat conditions, their calls for a safer workplace have included access to cold water, breaks to cool down, and fans while working indoors (Warehouse Worker Resource Center 2023b).

As workers at an air hub, AWU members do not receive additional compensation for their high-risk conditions. As one worker, Rex, explained, "Because we have associates standing in front of aircrafts with running engines ... we are given extra responsibility, but there's no extra compensation for it" (cited in Salazar 2023). AWU workers have also expressed concerns about Amazon hiring anti-union consultants to surveil workers and prevent them from joining the union. According to Jamieson (2023), Amazon paid external consultants $3,000 a day to host meetings to convince workers not to unionize, spending over $14.2 million dollars in 2022. AWU has filed an Unfair Labor Practice complaint against Amazon for threats, surveillance, and retaliation (Salazar 2023).

Amazon warehouse workers, both in the IE and in other U.S. regions, have been inspired by the 2023 UPS Teamsters contract. Some hoped that the new UPS wages could raise standards for similar occupations across the logistics industry (Leon 2023). Amazon workers in Southern California have also pursued new strategies, such as unionizing delivery drivers who are technically employed by third-party contractors (or delivery service providers [DSP]. In 2023, unionized delivery drivers in Palmdale, Los Angeles County, who delivered packages for Amazon but were employed by a DSP (Battle Tested Strategies), took their strike to Amazon facilities across the region and across the country. The drivers continue to protest their layoffs which resulted from Amazon's decision to terminate its contract with Battle Tested Strategies after the drivers had successfully unionized with the Teamsters and negotiated their first union contract with this DSP (Sainato 2023).

THE FUTURE OF TDL WORK IN THE IE

AUTOMATION

Given the central role of the TDL sector in the IE economy, the impact of automation on workers is of great concern. Muro et al. (2019) find that, between 1980 and 2016, the implementation of information technology produced 54 million net new jobs nationally. Yet, most of these new jobs were on the so-called lower and higher

WORKER PROFILES

MELISSA

Location: Riverside

Occupation: Patient care assistant, former warehouse worker

Melissa, a 26-year-old Mexican-Cambodian woman, is a patient care assistant and nursing student who previously worked as a warehouse associate at Amazon. She obtained the warehouse job after being laid off as a medical scribe during the pandemic shutdown. Although Melissa had read about the fast-paced work environment, she said she was taken by surprise by the large number of orders received each day and the intense supervision. Some of her friends were terminated for not meeting the expected work rate, and Melissa received a warning for her work rate. Being petite, Melissa said she struggled to haul large containers that weighed approximately 300 pounds.

Along with sorting packages for routes, Melissa had to stock heavy boxes of bags, which resulted in a shoulder injury. She said she did not report the injury, fearing her managers would not believe her, and instead often requested days off or a different position for the day to let her shoulder heal. When it was not possible to switch roles, Melissa said she worked through her shoulder pain, performing the same motions that had resulted in her injury. Even after leaving the job, she continues to feel the pain and has been required to undergo physical therapy.

Melissa said that technology could prevent many worker injuries and health concerns. She also wished that warehouses would introduce large ventilation systems. After witnessing a coworker collapse from heat illness during a shift, Melissa sought to take breaks to cool off, but her productivity was questioned.

Melissa wanted to draw attention to the pay gaps between long-term employees and newly hired ones. She was hired at a wage of $17 dollars per hour. Later, she witnessed new employees being offered $19 per hour, which was more than her pay after two and a half years on the job. Melissa believed it was unfair for newly hired employees to earn higher wages that were not offered to longer-term workers.

WORKER PROFILES

TABITHA

Location: San Bernardino

Occupation: Warehouse worker

Tabitha is a Black woman who began working in the warehouse industry at age 18, accumulating over 20 years of experience within the field. She has worked in multiple warehouses through temporary staffing agencies, earning about $30,000 annually. Along with her three children and fiancé, she financially and emotionally supports two of her younger siblings.

Although staffing agencies do not provide their workers with health care, pay increases, or pensions, Tabitha thought they offered certain advantages. She found that their workers tended to be paid $1–$2 more per hour compared to direct hires. Temp agencies also make it convenient to find employment. Tabitha recalled walking off a job site one morning and finding a new warehouse position later the same day.

Nonetheless, working through temp agencies prevented Tabitha from being recognized for her hard work and being promoted to management. As Tabitha described, "They started asking me to train the temps. After this, I was like a lead, but I didn't get paid like a lead." When Tabitha asked her supervisor about being hired directly as a manager, she was told her responsibilities would still include intense physical labor and offer a lower wage than her temp position.

Tabitha described experiencing numerous unsafe working conditions, including working with moldy fruit for eight hours a day, working in extreme heat and cold, and hearing stories from her uncle about being crushed by a machine while working at a warehouse. At one of her jobs, she said, a fire broke out and "they just wanted us to ... continue working without no explanation." Tabitha also recounted experiences with sexual harassment.

Tabitha made it clear she would never return to a warehouse job due to being undervalued, mistreated, harassed, and placed in danger. More than anything, however, it was the never-ending, monotonous work that made her unwilling to return. She is now developing her own videography business. Along with seeing her company flourish, she would like to see her children graduate from high school and go to college, and for her son to "never work in a warehouse ever in his life."

ends of skill distribution rather than middle-skill, middle-wage jobs.

Among the groups projected to be most impacted by automation are men, young adults ages 16–24, and Latinos, American Indians, and Black workers, since they tend to be employed in industries and occupations, including those in the TDL sector, that are likely to be heavily impacted by automation (Broady et al. 2021; Muro et al. 2019). Jobs based on repetitive tasks, whether physical or cognitive, have been and continue to be at high risk of automation. Muro et al. (2019) estimate that about 78% of light truck and delivery service driver positions will be affected by automation. Other researchers similarly find that workers employed as warehouse laborers, truck drivers, and forklift drivers are among those with the largest need for skill development and training in the goods movement sector due to the impacts of workplace automation (ICF Incorporated, LLC 2019).

Trucking

Currently, automation in trucking can take the form of software—the use of integrated transportation management systems that analyze data and employ machine learning to calibrate loads, routes, and other operations in real time—and hardware, in the form of driverless trucks.

The prospect of automated trucks presents a significant threat to the job security of truck drivers. Companies investing in this technology argue that autonomous trucks can increase efficiency, reduce accidents, and cut costs. However, the human cost of such advancements is substantial. Many truck drivers fear that automation will eventually lead to widespread job losses, fundamentally changing the industry landscape. As the technology continues to develop, the trucking industry faces the challenge of attending to the livelihoods of millions of truck drivers and helping truck drivers to obtain the training needed for new positions (Gittleman and Monaco 2020; Viscelli 2018).

Researchers vary in their estimates of the extent of job losses that are likely to result from automation within trucking. In an analysis of how susceptible more than 700 occupations are to machine learning and robotics, Frey and Osborne (2017) found that 47% of all US jobs are at high risk of automation, with heavy-truck drivers at a 79% risk. Gittleman and Monaco (2020) estimate that as many as 419,00 truck drivers with a primary range of 201 or more miles could be displaced through

what they call "high automation," one step short of full automation (15). Viscelli (2018) projects that over the next 25 years, up to 294,000 long-distance drivers could be replaced by autonomous trucks.

Research by Arntz et al. (cited in Gittleman and Monaco 2020) suggests that a change in methodology for how one classifies jobs changes the percentage of jobs that are at risk due to full automation. Gittleman and Monaco (2020) claim that estimates of job losses from automation and driverless trucks within truck driving may be overstating job displacements because they include occupations that are not directly involved in driving or likely to be impacted by the automation of driving. They also note that even when automation does take place, labor market impacts are likely to depend on the occupation, tasks, and how the rest of the economy responds to automation.

Various factors are likely to discourage or slow down the displacement of drivers through automation. First, truck drivers do more than simply drive. They provide security for goods, maintain their vehicles, and complete paperwork. Such additional tasks could help to mitigate job losses to automation. Researchers also suggest that "first- and last-mile problems" will still require a professional driver. Meanwhile, regulation and the infrastructure required for autonomous trucks to operate safely, such as systems for handling vehicles that break down in transit, could discourage widespread use of driverless vehicles (Gittleman and Monaco 2020; Viscelli 2018).

Automation does not simply replace human labor with machines; it can also change the types of jobs needed and the nature of the tasks performed within jobs (Gittleman and Monaco, 2020). For example, there are various modes for the use of driverless trucks, some of which are more reliant on human drivers than others (Viscelli 2018).

The Teamsters have been heavily involved in attempting to preempt the most destructive projected impacts of autonomous trucking. In 2022, Doug Bloch, then the political director for Teamsters Joint Council 7, called on a U.S. House of Representatives transportation subcommittee to ensure that autonomous trucks maintain human drivers trained to intervene for safety; to maintain data on injuries, crashes, fatalities, and malfunctions for regulatory purposes; and to support training programs to assist workers during the transition to autonomous vehicles.

In line with Bloch's testimony, the Teamsters supported Assembly Bill 316 (2023), which required a trained human operator in autonomous vehicles weighing over 10,000 pounds in order to prevent accidents and injuries on the road. AB 316 aimed to ensure public safety and create high-quality jobs for workers (Teamsters 2023b). Although the bill passed the California Legislature with bipartisan support, it was vetoed by Governor Gavin Newsom. In 2024, the State Legislature will consider Senate Bill 915, which, if passed, would give local jurisdictions the authority to regulate autonomous vehicles (Cortese 2024), as well as a new version of AB 316. Both of these bills enjoy Teamsters support (Teamsters 2024).

Warehouses

Similar to trucking, warehouse automation takes the form of both software and hardware. Integrated warehouse management systems, or process automation, can cut back on inventory paperwork, use machine learning to adjust operations in real time, and employ algorithmic labor management systems that track worker productivity. Physical automation can include conveyor belts; scanners; voice-directed picking; automated guided vehicles, such as driverless forklifts; automated storage and retrieval systems, which can compress goods into a more compact space; and autonomous mobile robots, which cut down on human workers' walking time. Forms of automation may be implemented permanently or as a subscription-based service during peak times (Gutelius and Theodore 2019).

Gutelius and Theodore (2019) find that technological change is unevenly distributed across the warehouse industry. While some warehouses may utilize conveyors or track goods with radio frequency identification (RFID) technology, they may also use older software systems that rely on human decision-making. And while technological uptake may be more common in e-commerce warehouses, which emphasize speed, Gutelius and Theodore (2019) note that many e-commerce distribution operations are outsourced to third-party logistics providers (3PLs), who may be less inclined to accommodate physical automation because of the relatively short length of their contracts (3–5 years) and the fact that they may serve multiple customers with a range of product characteristics.

According to Gutelius and Theodore (2019), the introduction of automated machinery can reduce the physical impact of workers' tasks, but it can also deskill and displace workers and subject them to new health

and safety problems. For instance, worker monitoring technologies, as discussed in our interview findings, can put pressure on workers to increase their pace to an unsafe level. The negative impact of productivity monitoring technologies on worker health and safety is well documented in research on Amazon workers (Gutelius and Pinto 2023; Strategic Organizing Center 2021, 2022).

Alfonso, one of the warehouse workers we interviewed, described his experiences with automation at a unionized wholesale food distribution facility. His employer adopted an autonomous guided vehicle (AGV) to shuttle pallets around the facility. The AGV was supposed to adhere to a path marked by a yellow line. However, the AGV would often lose sight of the yellow line and "get lost." It became a safety hazard, Alfonso said, because it would get in the way of workers when it was not supposed to. He also noted that the AGV's battery would die, so it would stop in the middle of the path, and workers would have to attend to it when that was not part of their role.

Alfonso recounted that workers ultimately resented that their employer had invested in the AGV when the company could have given human workers more overtime and weekend hours. The workers used their union collective bargaining process to ensure that if any automated equipment was adopted in the future, it would come with labor hours for a human to oversee the equipment.

The demand by workers at Alfonso's facility for automated equipment to be assigned a human supervisor aligns with research that calls for workers to be upskilled to manage new technologies. Gutelius and Theodore (2019), however, predict that such recommendations will not be implemented and that workers will instead be deskilled as technology removes the ability to engage in decision-making and critical thinking. The reliance of many warehouses on 3PLs and temporary agencies to meet their demands for labor complicates the implementation of workplace protections, making temporary and contract workers especially vulnerable to safety problems related to technological change.

Gutelius and Theodore (2019) predict that full, human-replacing automation is "little more than a remote possibility over the near to medium term" (67). Nonetheless, policymakers, workforce development professionals, and labor organizers should be attentive to the nuances by which partial automation is implemented at regional facilities. If properly managed by companies, Nantee and Sureeyatanapas (2021) suggest, the introduction of new technologies in some cases can help warehouse floor workers to gain analytical and computing skills, and also increase "soft" skills such as problem-solving. They draw on two case studies to show that "no layoff" policies can pave the way for worker upskilling.

To further protect workers from the negative impacts of technological change, Muro et al. (2019) urge federal, state, local, business, and civic leaders to work together to ensure technological advancements support workers' living standards. Collective bargaining by union representatives, as in Alfonso's experience, can protect workers from job displacements, prevent significant impacts from technological changes in the workplace, and shield workers from intrusive forms of electronic surveillance (AFL-CIO 2019). By involving workers in decision-making processes, collective bargaining helps ensure workers continue to have access to good jobs, including benefits such as full-time employment, union representation, and retirement pensions.

The national contract negotiated between the Teamsters and UPS in 2023 is one example of how collective bargaining agreements can address the impacts of automation for workers. The contract bans the "use of drones or driverless vehicles to transport, deliver or pick up packages" and requires that if UPS were to seek to reverse this ban, the company would have to negotiate the change with the union (Teamsters 2023a: 17). The contract also requires existing union workers to perform any "new or modified work" created by technological change, and to be trained to do so if necessary (Teamsters 2023a: 18–19). Although Teamsters UPS workers have been able to use the collective bargaining process to maintain a voice in technological change, UPS operates a non-union freight forwarding, warehousing and distribution, and customs brokerage unit, UPS Supply Chain Solutions, which recently opened a facility in Kentucky designed to be operated by 3,000 robots and 200 human workers (Black 2023). For reasons such as this, broader labor protections that prevent logistics operators from evading collective bargaining through corporate restructuring are necessary.

ELECTRIFICATION

The TDL sector in California is currently being reshaped by new federal and state regulations, programs, and funding that aim to improve air quality and respond to the climate crisis by requiring and facilitating the transition to zero-emissions transportation. These changes are the outcome of many years of activist demands by

environmental, health, and other community organizations.

Among the most significant of these new policies is the state's mandate to transition to zero-emissions transportation by 2045 (Governor's Executive Order N-79-20). The rule serving this mandate that will have the most direct impact on logistics fleet operators is Advanced Clean Fleets, which was adopted by the California Air Resources Board (CARB) in 2023 and is pending approval by the Environmental Protection Agency (EPA) as of January 2024. The initial timeline for Advanced Clean Fleets required all drayage trucks registering for operation at seaports and railyards to be zero-emissions beginning January 1, 2024, with the goal of phasing out any combustion-powered drayage trucks by 2035. Advanced Clean Fleets also mandates a timeline for phasing out all other medium- and heavy-duty vehicles by 2045 (California Air Resources Board 2024).

A small number of IE heavy-duty truck drivers, dealers, and technicians began to experience the transition to battery electric trucks through demonstration projects by 2021. Through a project called Volvo LIGHTS (Low Impact Green Heavy Transport Solutions), funded by California Climate Investments, two IE-based fleet operators deployed battery electric heavy-duty trucks, yard tractors, and forklifts at their yards in Chino and Ontario. A truck dealership in Fontana also participated in the project, and San Bernardino Valley College's Heavy/Medium Duty Truck Technology program piloted an electric truck technician course. In addition, a community organization trained first responders in the potential hazards of high-voltage electrical equipment. As part of the lessons learned from Volvo LIGHTS, the project team highlighted the need for charging infrastructure technicians (Volvo Group North America 2022).

Electric truck demonstration projects and early-adopter fleets indicate how workforce needs, whether skills or occupations, will change in the near term for large fleet operators. For dependent contractors, however, the issues are distinct (for the definition of dependent contractors, see p. 14). The zero-emissions mandate hearkens back to the state's earlier efforts to implement rules to lessen trucking emissions. As Appel and Zabin (2019) show, several thousand trucks most likely fell out of compliance with the 2008 Truck and Bus Rule due to compliance costs falling on misclassified contractors, even as the companies for whom they transported freight reported hundreds of millions of dollars in revenue (12–13).

WORKER PROFILES

SOPHIA

Location: San Bernardino

Occupation: Full-time student, former warehouse worker

Sophia migrated from Central America at age 11 and is currently in her early thirties. At age 18, she began working in warehouses due to having limited employment opportunities because of her Temporary Protected Status (TPS). With the instability of TPS, Sophia had to work two full-time jobs and help her sister clean buildings part-time. This work helped her pay for the childcare of her two children out of pocket.

She later met her current husband, who has financially assisted Sophia in enrolling in community college and enabled her to work one full-time job to spend more quality time with her family. Sophia decided to enroll in community college after realizing that she wasn't spending quality time with her children, that she wasn't making a lot of money, and that she didn't want to work in warehouses her whole life. "I didn't spend quality time with my kids," she said. "I was always at work ... I was always tired. And I had to do it because my kids were everything for me."

While working at Amazon, Sophia worked 10–12 hour shifts during peak season and stayed up late to finish her homework. During midterms, she used her Personal Time Off (PTO) to prepare for exams and communicated with her professors about being an employed student-parent. She also planned her school schedule around her work schedule to use less of her PTO.

Sophia decided to leave Amazon and continue her journey in higher education when she found out she was pregnant. A big motivation was being diagnosed with a high-risk pregnancy. "[The] doctor put in the doctor's note that they don't want me to take the stairs; they don't want me to be standing for more than an hour. And they [Amazon supervisors] don't care," Sophia said. She was given verbal warnings and write-ups for not reaching her daily performance goals. "I remember crying because nobody was helping me and I feel that I was gonna lose my baby because I was already bleeding."

As a full-time college student preparing to apply to graduate school, Sophia continues to experience barriers that inhibit her success, including childcare subsidy restrictions. Sophia hopes employers and higher education institutions can create spaces where student parents can thrive along with their children.

KARLA

Location: Victorville

Occupation: Unemployed; previously a small business owner

Karla is a 49-year-old Mexican woman and undocumented immigrant. She lives with her domestic partner and three sons. She previously owned a third-party logistics business but is currently unemployed. She estimated that her household's total annual income is $80,000, with members of her household receiving public benefits such as SSI and CalFresh. Karla said her legal status has had an economic impact on her in terms of available employment opportunities and ability to receive public assistance.

Karla's logistics business was established by her husband. While working as a welder, he saved up enough money to buy his own truck. As a truck driver, he saved from 1998 through 2016. In 2017, he used his savings to invest in his own business.

Karla's husband passed away due to COVID in 2021. At that point, Karla took charge of all operations, including hiring a dispatcher and a truck driver to do the long-haul driving her husband had previously done. Karla said the dispatcher and truck driver with her company worked as independent contractors. Any employment benefits they received, she said, came from contracts with bigger companies.

Karla decided to close the business in May 2023. She cited intense stress from being responsible for any and every eventuality; low profit margins, if any; few jobs; and an accident involving the truck driver. Karla said that brokers take a large percentage of income per cargo job. During the business's final year, it was in the red. When she closed the company, she said she was left with $6,000.

JACK

Location: Redlands

Occupation: Warehouse service manager

Jack is a Southeast Asian man in his late thirties who works as a warehouse service manager at a small warehouse in Redlands. Born and raised in San Diego, he resides in Redlands with his two sisters and girlfriend.

Jack has worked for his current employer since 2017, starting as a team lead at $19/hour. He has worked in the lowest-tier warehouse positions and spent 10 years in fulfillment at Home Depot, along with working service-sector jobs in his teen years.

At his current position, Jack is salaried and makes $120,000–$150,000 per year. The warehouse operator is a multinational firm headquartered in London with thousands of warehouses across the globe. Jack's workplace has about 15 employees, who, he says, are treated fairly and have access to a variety of benefits. Jack said he is mindful of how laborious warehouse work can be, so he tries to be accommodating. He said his company hires only full-time workers and they receive the same health care package he does.

Jack said that his company tends to give in-house workers priority for promotions instead of hiring from outside for higher positions. Reflecting on perceptions of the warehouse industry, Jack said, "Pretty soon it'll be like every other person's gonna have worked at Amazon at some point in their life. ... I heard there's some ambulance outside that they keep, you know, just to work people until the point of exhaustion ... and then I think [Amazon and other warehouses] don't have roles for people to grow into. They'll take them, use them until they don't need them anymore. ... [At] a company such as ours there's a lot of roles they could step into after."

Although the State of California currently offers small truck fleets subsidies to alleviate the costs of purchasing electric trucks, they do not cover the full amount, and most incentive programs require a large amount of upfront capital because they are reimbursement-based. Many operators withdraw from applying to subsidies due to the extensive documentation required (Flaming and Burns 2023). Paperwork for incentive programs is perceived to be difficult and burdensome. Even with incentives, "You need competitive pricing to bring those trucks to a reasonable price," says Karamjit. Several owner-operators mention that repairs will also be out of the orbit of most mechanics, "it would be like me trying to fix the computer... I can only imagine the cost to fix a mechanical failure" (Carlos).

Some who own and operate only a few trucks are angry about the changing regulations, and believe that independent owners are being priced out of the industry. Drivers mentioned that government subsidies that encourage truck electrification focus on the initial transition or purchase of vehicles rather than the long-term maintenance costs, such as battery replacements. While new trucks tend to be more expensive to purchase, older trucks tend to require more costs to maintain them. Yet many truck drivers, like Carlos, believe that a well-maintained truck is better for the environment than scrapping it for a new vehicle. He wishes agencies were better at communicating new regulations, too, and that they went through the DMV to reach truck drivers directly, instead of at the moment when you are told you are out of compliance.

Most truck drivers point to the huge burdens ahead in regards to "the charging situation." As it is, "people can't even find a parking spot at truck stops. They're parking on the side of roads, they're parking on the shoulders of exits, they're parking at rest areas. I don't feel like there are enough places to be able to give everybody an EV charger at the end of the night" (Simranjit). Varinder wonders, "Where are they going to get the electricity to power all these batteries? I mean, they can't even sustain AC during the summer months out here in California.... The state doesn't have any sort of infrastructure set up to support electric charging." While some long-haul drivers only see EVs working for local use since that would take less charging time, short-haul drivers don't believe electrification of their trucks will make a difference to air quality.

Several owner-operators grouse that regulatory agencies such as CARB are "putting fines and regulations and all this stuff on the trucking industry, and they need to provide information about it in advance" through people, not just the Internet (Carlos). Others worry about privatization, and that the government needs to step in more. "I believe the government should come in and help truckers with concerns like getting better pay, good health care plans for truckers, and also on the safety and maintenance, where the government can provide us better programs to help individuals and self-employeds" (Prabh).

The zero-emissions transition within logistics has important implications for workforce development. The state and region must prepare workers, including workers that could be displaced through this transition, to enter into new green jobs created by it and help to ensure good labor standards within those jobs. Such new jobs include those related to developing and maintaining new charging stations; electric grid construction and maintenance; the manufacture, sale, operation, and repair of zero-emissions vehicles, including electric delivery trucks; the production and sale of lithium batteries; and the installation and repair of solar rooftop panels on warehouses (Economic Policy Institute 2021; Phadke et al. 2021). Recommendations for preparing for these changes in workforce needs are discussed on p. 39.

WORKFORCE DEVELOPMENT

The current landscape of workforce development in the TDL sector in the IE should be considered in light of what federal and state labor agencies regard as low-skill versus middle-skill jobs. These broad categories are roughly tied to the U.S. Bureau of Labor Statistics' (2023) education and training classification system, which considers the typical education needed for entry to an occupation, the commonly required work experience, and the typical on-the-job training needed to obtain competency in the occupation. The Inland Empire Regional Planning Unit of California's Employment Development Department (2024) lists only heavy and tractor-trailer truck drivers and order clerks among the region's top 20 in-demand middle-skill TDL sector occupations for 2020 through 2030. The most common TDL sector occupations, discussed in the quantitative findings of this report, are regarded as low skill.

In a 2019 workforce needs assessment for the goods movement sector that was conducted for the Port of Los Angeles, researchers found that across 38 occupations, 47% of employers required short-term on-the-job training, 45% required moderate on-the-job training, and 8% did not require any training at all. About 65% of employers also required workers to have a high school diploma. The needs assessment found a shortage of

community-based workforce training programs in the sector, especially for "higher-skilled" occupations (ICF Incorporated, LLC 2019: 3).

As our research findings and the Port of Los Angeles needs assessment show, a lack of workforce development plagues the TDL sector in the IE. Entry-level workers are too often seen as cheap, disposable labor to fulfill menial tasks, not whole people whose development as workers is worth investing in. In this section we look at several approaches to workforce development in low- and middle-skill occupations. We then examine the outlook for workforce development with the changes the sector is undergoing.

Case Studies: "Low-Skill" Jobs

Young Visionaries

Young Visionaries collaborates with Community Action Partnership (CAP) in San Bernardino to provide community members with free forklift training and, once finalized, Occupational Safety and Health Administration (OSHA) certification. The training program occurs once a month, from Monday through Thursday during a single week. The first two days are spent on orientation, obtaining materials, and filing documentation, with the last two days focused on having participants obtain hands-on experience by managing forklift operations in CAP's warehouse facility.

Many San Bernardino residents experience food, housing, and financial insecurity. As a result, many of the participants that undergo the forklift training program are unemployed, men, and over the age of 30. In order to reduce the barriers to participating, Young Visionaries provides childcare, gas gift cards and bus passes when available, and food during the training days, but funding limits the availability of these wraparound services. During the program, participants also have access to learn about financial literacy through Chase Bank. Shakoya Henderson, project manager for Young Visionaries who oversees multiple programs including the forklift training program, states,

"The ultimate goal for the program, I would say, is to definitely expand one's horizon. Land a job hopefully in the field of the forklift. And just a better way of life, a better improvement for oneself."

While Young Visionaries does not have the capacity to place workers in occupations, they collaborate closely with San Bernardino's Violence Intervention Prevention program to connect its training graduates to employment opportunities and follow up with them throughout their journeys. The training program helps increase participants' chances to be hired as forklift drivers across temporary, seasonal, and full-time positions. In the future, Young Visionaries hopes to expand their free forklift training program to residents in the High Desert, including in Victorville and Hesperia.[6]

Teamsters 1932 Training Center

The Teamsters 1932 Training Center, based in San Bernardino, offers a warehouse and distribution program whose aim is to create a pipeline for workers to access union jobs in logistics. It is based on the needs of unionized companies to recruit and retain employees, and it provides workers interested in this industry with the skills they need for a long-term career with opportunities for advancement. In these ways, the training program challenges the stereotype of jobs in the TDL sector as only being "dead-end jobs."

The warehouse and distribution training program piloted in 2023 as a four-week course for six hours per week, free of charge, and taught by a rank-and-file Teamsters warehouse worker. Participants have ranged in age from high school seniors to workers in their forties. Both men and women are included, and the participants are racially and ethnically diverse. In 2024, the program is set to transition to six hours per week and include forklift and OSHA 10 training (an industry-recognized health and safety certification).

In addition to occupation-specific skills, training participants receive job preparedness training, resume feedback, and one-on-one job placement support. Participants also learn about environmental justice issues associated with the TDL sector and about the importance of a union contract and how it improves workers' access to employment benefits. The program's instructor, Fredy Campos, shared that he felt fortunate to have learned about his union warehouse job only because he worked at a non-union facility across the street and would encounter the union workers at the corner store. He wants to introduce people to union possibilities in an inclusive environment, he said, explaining, "Given the way my life has shaped out, I want that for everybody. ... I don't want it to seem like [union jobs] are hoarded."[7]

Case Studies: "Middle-Skill" Jobs

Transportation and Advanced Technology Center, Pacific High School

In early 2023, Pacific High School in San Bernardino unveiled a Transportation and Advanced Technology Center. The center is the first public school facility of its kind in California, according to district officials, and serves students that are interested in assorted mechanical and electrical training. At more than 20,000 square feet, the facility is equipped like a professional auto shop with the capacity to work on heavy-duty vehicles (Whitehead 2023).

Through a partnership with San Bernardino Valley College, students in the course associated with this facility learn the intricacies of heavy- and-medium-duty trucks, while some are simultaneously enrolled in an after-school college-level course. Course professor Mike Stayon spoke to the value of the course for students who are more trade-oriented:

"I'm a trade school guy," Stayton said. *"When I graduated high school, I didn't want to go to college, just like some of these kids here. Some will go to college, but a lot of them are not interested right now. They want to get done with school and go to work or a trade school, like when I was a kid"* (cited in Whitehead 2023).

Since opening, the facility has garnered enough interest to justify hiring another teacher for the course.

Amazon Logistics Pathway, Cajon High School

Another career pathway program related to logistics has been developed at Cajon High School in San Bernardino. In 2019, Cajon High received $50,000 from Amazon to develop a curriculum to prepare and motivate students for managerial careers in logistics. The Amazon Logistics and Business Management Pathway program emerged through a collaboration with educators at Cajon High, California State University San Bernardino, and Chaffey College. Students who enroll in the curriculum are provided with college credit at both institutions. As of 2022, there were 96 students enrolled, including 64 students in 10th grade.

The curriculum teaches students about Amazon's impacts on global supply chains and e-commerce and includes classes that focus on working with labor unions, ethical decision making, and maintaining motivated employees. Students are required to work in teams to develop managerial methods for maintaining skilled employees' motivation without offering higher salaries and bonuses. Although Amazon is very well known for engaging in union-busting across the nation, students in this program were trained in collective bargaining. The program also requires students to participate in an internship at Amazon facilities or other nearby logistics companies. The program has been criticized for its seemingly purposeful promotion of Amazon corporate propaganda (Gordon and Gurley 2022).

While the Cajon High program and others like it may prepare some students for management positions in the TDL sector, it is not clear how they will benefit the vast majority of workers, who are employed in blue-collar occupations. Union representation and collective bargaining remains critical to maintaining and improving the labor standards within the industry (AFL-CIO 2019).

InTech Center, Chaffey College

Since 2019, the InTech Center at Chaffey College in Fontana has received more than $3 million in grants for its advanced manufacturing training programs, which include a three-month pre-apprenticeship in automation, robotics, and mechatronics (ARM). The ARM program is designed to train students for careers as mid-level technicians in automated warehouse equipment, such as robotic and automated conveyor belt systems. InTech staff advertise an average starting wage of $25 per hour in this field (Scauzillo 2022).

Workforce Development Outlooks

The cornerstone of workforce development in the TDL sector must be individual and community development. TDL sector workers must be viewed with dignity regardless of wage or "skill" level and have the opportunity to develop as whole people with the right to grow and thrive. The COVID pandemic shutdown sharply illustrated that frontline TDL sector workers do essential work in a consumer economy.

As discussed in the "Automation" section above, automation presents an opportunity for workers to be upskilled rather than deskilled. On the warehouse floor and on the road, workers can supervise and maintain automated technologies. In the office, workers can use data analytics for advanced problem-solving. Regardless of role, all workers can benefit from honing skills in critical thinking, communication and interpersonal interactions, adaptability and resilience, and collabo-

ration and teamwork (O'Brien et al. 2020). Fostering "uniquely human qualities" is a key way to ensure work remains meaningful for humans (Muro et al. 2019: 55).

The U.S. Government Accountability Office (GAO) (2022) recommends preparing workers for the impacts of automation by training them in work skills that will be in high demand to ensure workers have sustainable employment, addressing the psychological impacts of losing their previous jobs, and providing them with employer-recognized credentials, thereby developing career pathways that can lead to increased wages.

Multiple studies on the impact of automation for TDL sector workers recommend planning and preparing for change through partnerships between employers, training providers, and worker leaders (ICF Incorporated, LLC 2019: 42–43; U.S. GAO 2022: 29). Training can take various forms, including hands-on training, paid internships, mentorship, summer employment, career exploration programs, and contract training (O'Brien et al. 2020: 27). Stakeholders can promote active learning by investing in reskilling workers, developing accelerated training programs and certifications, and providing on-the-job training or tuition reimbursement (Muro et al. 2019: 52). Insufficient funding and a lack of qualified instructors, training providers, and equipment are identified as obstacles to meeting these training and educational needs (O'Brien et al. 2020: 28).

One study examining the potential impact of automation on workers urges federal, state, local, business and civic organizations to work together to ensure technological advancements are not only maintaining high productivity, but also supporting workers' living standards (Muro et al. 2019: 48). Similarly, Viscelli (2018) suggests that statewide trucking innovation and jobs councils should be created in order to ensure that training, career counseling, and financial assistance is provided to workers, particularly truck drivers, facing displacement through technological innovations.

The implementation and enforcement of what Muro et al. (2019) call a Universal Adjustment Benefit—encompassing career counseling, retraining opportunities, and income support—across industries can assist workers who experience displacement to reduce the barriers to enter the workforce again. Along the same lines, stakeholders can provide displaced or struggling workers access to government benefits such as the Earned Income Tax Credit and expanded unemployment benefits. Lastly, when automation is implemented, stakeholders should invest in reducing the impact of new technologies by supporting communities to develop in-demand skills for new occupations and invest in impacted communities to develop regional growth (Muro et al. 2019: 57–67).[8]

The following section outlines broader, more holistic ways to pursue the workforce development recommendations summarized here.

CHANGING THE NARRATIVE: WORKER WELL-BEING AS COMMUNITY WELL-BEING

Residents and policymakers hold a spectrum of views on the proliferation of warehouses in the Inland Empire. Although the most polarized perspectives receive the most publicity, many residents have measured opinions. They might resent the truck traffic and pollution, for example, but concede that warehouse work is what enables them to support their family. As one San Bernardino resident told the *New York Times*, "It's taken away the neighborhood feel. Kids don't play outside. No one is in their yards. ... [But] if you want jobs, they're out here in the warehouses, and that's a fact" (Lee 2022).

This section focuses on collective, bottom-up interventions in logistics development that begin with that middle ground. But, rather than simply responding to the sector's dominance in the IE, these interventions assert holistic, people-centered visions in which worker well-being is community well-being: Residents can have great jobs that pay enough to support a family, prioritize their health and safety in a pandemic, and let them retire without worry. Residents can also have secure housing, clean air, outdoor spaces for recreation, and time to devote to their communities. Most of all, as residents, legislation, and investors press logistics developers and operators to transform their operations for people and the planet, stakeholders can and must collaborate to ensure that no workers are left behind.

Below we review some ways that residents, policymakers, and logistics developers have worked to calibrate what outcomes the TDL sector has for residents who have felt the greatest negative impacts of its dominance in the IE economy. Subsequently, we outline models of action in which visions of worker well-being and community well-being become reality because residents come together to demand them and policymakers rise to the challenge of meeting those demands.

COMMUNITY ACTION AND CONSTRAINING FACTORS

Until recent years, IE policymakers rarely held developers accountable for mitigating the adverse effects of logistics development upon residents. Elected officials and developers neglected to be proactive about seeking resident input. New developments slipped by, buried in planning commission meeting agendas.

The environmental review process that developers must go through when seeking to build new facilities has been the main opportunity for residents to participate in decision-making. Participation, however, is constrained by the realities of the process. Developers hire their own environmental consultants to influence decisions with zoning changes, general plan amendments, and project approvals. These third-party consultants have no accountability to local residents and tend to minimize the public health risks that warehouses present. The consultants often produce environmental reports that are hundreds of pages long just days before a city is set to vote on a project (De Lara 2018; Emmons Allison and Reese 2023; Muñoz et al. 2023).

Campaign contributions are a driving force for elected officials favoring developers' voices over those of residents (Muñoz et al. 2023: 31–33). Thousands of dollars worth of campaign contributions from developers and individuals who list an employer within the TDL sector can be found in the campaign finance reports of elected officials in jurisdictions with dense warehouse development.

In addition, cities may provide tax breaks to attract employers. For fiscal years 2018 through 2022, for example, the City of Rialto reported a 20-year tax abatement agreement of 50% with an unnamed distribution center for constructing the facility and establishing its point of sale there. The total amount of taxes abated over the five fiscal years was $14,380,066 (City of Rialto 2018: 97; City of Rialto 2019: 94; City of Rialto 2020: 93; City of Rialto 2021: 89; City of Rialto 2022: 100). Aside from local funding, the State of California has granted tax credits of more than $26,000,000 to three distribution and fulfillment center projects potentially to be located in San Bernardino or Riverside counties. These credits have been awarded through the California Competes program since 2014 (California GO-Biz 2024).

As residents and some elected officials have grown weary of warehouse development, a variety of groups and city councils have mobilized to keep it in check. Their efforts have mostly focused on environmental and health impacts, however, while leaving out the long-term working conditions that warehouses tend to bring.

In south Fontana, for example, where warehouses occupy more than 16 million square feet, a group of residents called the South Fontana Concerned Citizens Coalition formally appealed the city planning commission's approval of a warehouse proposed by Duke Realty in 2021. The planned warehouse of approximately 205,000 square feet at Slover and Oleander avenues was set to abut one high school and sit within less than one mile of another. The city denied the residents' appeal (City of Fontana 2021: 349–57).

Subsequently, California Attorney General Rob Bonta filed a lawsuit against the city for violating the California Environmental Quality Act. In response, the City of Fontana revised its municipal code to incorporate "sustainability standards" for new industrial developments. The new regulations included building landscape buffers, the development and enforcement of truck routes to prevent trucks from driving in residential neighborhoods, the use of zero-emission vehicles, solar panel installation, and the use of environmentally friendly construction materials (City of Fontana 2022). The city and the Attorney General thereafter reached a settlement that also involved Duke Realty creating a $210,000 "community benefit fund" for specific forms of environmental impact mitigation (Office of the Attorney General 2022). Since the scope of the lawsuit and settlement were limited to direct environmental impacts, there were no long-term labor provisions.

Developers have begun to preempt residents' concerns with "voluntary" community benefit payouts. One recent example can be found in documents that Howard Industrial Partners (HIP), a developer based in Orange County, submitted to the City of Rialto upon seeking approval to develop a 470,000-square-foot warehouse in 2023. HIP proposed donations of $5 million to fund a Rialto charter high school focused on entrepreneurship, $1 million to the National Latina Business Women Association Inland Empire Institute to support women of color entrepreneurs and small businesses, and $5 million to the city's police department to train officers on commercial enforcement policies and construct a new police station. HIP also agreed to fund infrastructural improvements in the city. The developer's labor offerings were limited to three construction project labor agreements and one job fair—no provisions for long-term labor standards (City of Rialto 2023).

The exclusion of long-term labor provisions as a key community benefit can be explained in some part by the

fact that warehouse developers tend to gain support from unions in the building trades, who view the construction of new warehouse projects as job security for their members. At a January 2024 hearing for a warehouse in unincorporated San Bernardino County, one county supervisor lamented that development approval votes always came down to a choice between jobs and the environment. Nonetheless, he said, addressing the "orange shirts" (worn by construction union members) in the audience, he would side with workers (San Bernardino County 2024).

The county supervisor skirted the real issue: Why do the region's elected representatives not reshape the circumstances so that workers never have to choose between a job and clean air?

COMMUNITY BENEFITS AGREEMENTS

Inland Empire residents and organizations have worked hard to counter the false opposition of "jobs versus the environment." Perhaps the largest coordinated effort toward this to date has been the San Bernardino Airport Communities (SBAC) 2019–2020 Eastgate community benefits agreement campaign. The campaign centered on the Eastgate Air Cargo Logistics Center at the San Bernardino Airport. The developer, Hillwood Properties, was set to sign a 35-year lease with an unnamed tenant suspected to be Amazon. The project's aviation aspect meant that the impact would be much larger than usual, involving residents living all along the airport's flight path, and that it would require federal approval.

SBAC brought together unions and environmental and social justice organizations in a shared effort to impose labor standards, enable local access to high-quality logistics jobs, and take specific steps toward emissions mitigation and public health. Despite a concerted campaign involving community meetings, door-to-door canvassing, and the collection of about 600 pledge cards from residents, Hillwood and allied policymakers bulldozed through the approval process for the Eastgate project, which eventually became the Amazon Air regional hub (Emmons Allison and Reese 2023: 212–16).

SBAC pushed for a community benefits agreement (CBA) because it is a legally binding contract that originates with the needs of low-income residents who will be most directly impacted by a development. CBAs are designed through negotiation between developers, community organizations, and labor organizations to address residents' concerns, allow community members to be engaged in decision-making processes, hold developers accountable, and contribute to the development of sustainable projects (PowerSwitch Action 2024).

Although agreements to share the benefits of private land development have existed in the US for over a century (Rosen 2023: 178), the specific form of CBAs was a response to the presumption that development processes are "shaped by powerful corporate actors who use their influence to gain city subsidies and help in the entitlement process to support their interests while working against those of others," namely stakeholders with the fewest resources to shape development outcomes (Saito 2012: 130).

As discussed above, municipalities might use tax breaks as an incentive for desired development projects under the premise of job creation and economic development. However, low-wage workers often have little power to ensure that the long-term jobs that will be created as a result of proposed developments will pay well, will meet the job quality standards discussed earlier in this report, and will not displace them. At the same time, developers often face complex bureaucracy and extensive public review processes before they can break ground. The CBA model addresses both of these circumstances.

In one of the earliest and most well-studied CBA cases, the 2001 LA Live CBA, a large community coalition facilitated the environmental review and permitting process for a downtown Los Angeles development that includes what is now the Crypto.com Arena and the housing and entertainment complex surrounding it. In this case, the coalition was able to gain leverage for city council support by citing the millions of dollars in subsidies that the city offered to the developer. The CBA's key workforce provision was for the developer to contribute $82,000 to local hiring and job training programs and to collaborate with community groups to fulfill the local hiring requirements. Most notably, the jobs in question were permanent, so-called low-skill jobs, not only project construction jobs (Saito 2012: 142–43).

In the TDL sector, a landmark CBA is the Port of Oakland Good Jobs Policy. The policy was enacted in 2012 and expanded in 2017 after negotiations between the City of Oakland; Revive Oakland, a coalition of community and labor organizations; and logistics developers at the former Oakland Army Base. It established the West Oakland Job Resource Center, which offers TDL pre-apprenticeship and truck driver (commercial driver's license) apprenticeship programs. Located in an area with 44 percent unemployment at the time of the agreement, the job center acts as the first source of

hire for the port warehouse complex (González-Vásquez and López 2021: 35). Oakland's Good Jobs Policy also provided for living wages, limits on temp workers, preference for workers from disadvantaged zip codes, and a "ban the box" policy (Baldassari 2017; PowerSwitch Action 2024).

Just San Bernardino, a coalition of eight community organizations that work in the city of San Bernardino, has a toolkit on CBA campaigns that is tailored to the area. The main points of the toolkit are as follows:

1. Unite the coalition: Ensure each party is represented and there are clear channels of communication.
2. Identify the development project: This requires proactively following news about upcoming local decisions regarding land use.
3. Research, research, research: Learn the details of the developer, the development plan, and the plan's projected impacts for local residents.
4. Engage the neighborhood: Speak with neighbors by going door-to-door, holding in-person meetings, and being creative about other kinds of events that will draw people in. Hire local artists to create engaging materials.
5. Identify community priorities: Use a democratic voting process among stakeholders.
6. Draft the CBA outline: Work with an attorney to translate community priorities into contractual language.
7. Educate decision makers: Draw on existing relationships and researchers to decide on city council members and other decision makers to engage.
8. Approach the developer: Highlight the scope of your support based on the results of the previous steps.
9. Negotiate: Ideally, seek an attorney for this process, and maintain a united front.
10. Use city processes and media to your advantage: Be familiar with every aspect of the local jurisdiction's approval process. Use the timeline the developer must work with to create deadlines in the negotiation process.
11. Sign the CBA: As the coalition and the developer reach an agreement, the coalition should be ready to show its support of the project based on the agreed-upon benefits.
12. Implement, monitor, and enforce: The coalition should keep track of whether the developer is holding up its end of the bargain (Just San Bernardino 2023: 11-38).

As with any toolkit, we recommend reading and discussing the Just SB resource with potential partners to design an overall strategy that takes into account the characteristics of specific cities or neighborhoods within the Inland Empire. Coalitions should also be aware that specific economic and political conditions in an area can be critical to their success. These include the strength of existing relationships between labor and community organizations (Saito 2022).

THE HIGH ROAD MODEL OF WORKFORCE DEVELOPMENT

Equity, climate resilience, and job quality: These were the three core principles that the California Workforce Development Board emphasized when it rolled out its High Road Training Partnership (HRTP) initiative in 2017. Drawing on a model that revitalized manufacturing in Wisconsin beginning in the 1990s, California's initial HRTP projects tested the success of workforce development that was designed through partnerships of employers, workers, and labor representatives; driven by industry needs; and guided by the expertise of workers themselves (González-Vásquez and López 2021: 13–16).

The West Oakland Job Resource Center (WOJRC) was one of the HRTP demonstration projects funded in 2017. As mentioned in the previous section, WOJRC runs a pre-apprenticeship program in TDL and a truck driver (commercial driver's license, or CDL) apprenticeship. The TDL pre-apprenticeship combines occupational skills, such as OSHA 10 (an industry-recognized health and safety certification) and forklift training, with life skills such as computer literacy, financial literacy, and mental health awareness. Since WOJRC serves an area burdened by disinvestment, it offers individual case management for participants who may need a range of basic needs met: housing, transportation, legal services, and one-on-one financial counseling, among others.

When participants complete the TDL pre-apprenticeship, they may seek employment at logistics facilities at the Port of Oakland, which must fulfill local hiring mandates that are enforced by the city's Good Jobs Policy committee (described above). If they choose to pursue a CDL apprenticeship, they receive points toward

an application with the Northern California Teamsters Apprentice Training and Education Trust Fund or can enroll at a private, employee-owned CDL school. In both cases, the apprenticeship has no cost for the trainee. Both the pre-apprenticeship and apprenticeship are linked to equipment electrification efforts at the Port of Oakland.[9]

As the WOJRC example illustrates, the HRTP model is notable because it accommodates for job quality, skill building, and worker power in occupations that are commonly regarded as low-skill. Another highly successful HRTP that leaves no worker behind is Building Skills Partnership (BSP), which operates in multiple locations in California. Originating with the Justice for Janitors labor movement of the 1990s, BSP trains and empowers property service workers—janitors; security officers; maintenance and custodial workers; and stadium, arena and airport workers. Its programs include "green janitor" education to reduce the carbon footprint of buildings, infectious disease certification, ESL for the workplace, and digital literacy. BSP operates these programs through a partnership between the SEIU United Service Workers West union, janitorial service companies, building owners, and community organizations (Building Skills Partnership 2023).

Both WOJRC and BSP show what can be achieved when people come together around their collective interests in fulfilling, dignified work as a cornerstone of community well-being. Both of their successes can be attributed to having arisen out of diverse coalitions or movements and having at least some aspects of their operations formalized through legally enforceable agreements and labor-management partnerships that give workers and employers equal seats at the table.

PUBLIC FUNDING

Policymakers can play their part in working toward a vision of worker well-being as community well-being by anchoring logistics development and environmental impact mitigation to labor standards.

To address emissions from the TDL sector, environmental justice organizations have fought for specific policies and programs that temper the ways in which warehousing and trucking alter local ecosystems and quality of life. Air quality improvements, especially the use of zero-emissions vehicles and equipment, receive the most attention because they have the most immediate impact. There are many other recommended steps, however. These include building or retrofitting existing facilities for energy efficiency, such as by installing rooftop solar panels; planting trees; creating site designs that have minimal impact on groundwater recharge; and not building in areas that are endangered species habitats.

In the coming years, IE workers will be needed to do this work and help meet California's goals to achieve carbon neutrality (Governor's Executive Order B-55-18), draw energy from 100% zero-carbon sources (Senate Bill 100, 2018), and convert all medium- and heavy-duty vehicle operations to 100% zero emissions (Governor's Executive Order N-79-20)—all by 2045. The federal and state funding that will make these goals possible makes provisions for encouraging contractors to plan projects in accordance with community needs.

Federal Funding

Current federal funding that addresses climate adaptation and mitigation in the TDL sector falls mostly under the Infrastructure Investment and Jobs Act (IIJA, also known as the Bipartisan Infrastructure Law; 2021) and Inflation Reduction Act (IRA, 2022). As one example of how workers, contractors, and workers' communities can all benefit, any project proposals that the Department of Energy considers under the IIJA and IRA, must include community benefits plans. Such plans can be developed with little to no consultation with workers and nearby residents. But a solid community benefits agreement that includes community groups as signatories is likely to make a proposal stronger (Department of Energy, n.d.).

State Funding

On top of federal provisions, California Senate Bill 150 (2023) adds workforce standards to IIJA and IRA projects granted to California state agencies and subcontracted to private contractors. The standards to be imposed are still under deliberation as of this writing, but preliminary hearings indicate that they will draw substantially on the U.S. Employment Plan designed by Jobs to Move America (2020; California Government Operations Agency et al. 2024).

California state funding for zero-emissions transportation and charging infrastructure comes with its own workforce mandates and programs. For any charging infrastructure project funded in whole or in part by the state's Air Resources Board, Energy Commission, or Public Utilities Commission, Assembly Bill 841 (2020)

requires that "at least 25 percent of the total electricians working on the crew for the project, at any given time," hold the Electric Vehicle Infrastructure Training Program (EVITP) certification. The EVITP course was co-designed by the International Brotherhood of Electrical Workers to meet high safety standards, and the union offers the course through its electrical training centers. Regardless, any certified electrician can become EVITP certified (Goodheart 2022).

Although union standards apply at least in part to many projects that involve installing EV chargers, there are no legislative provisions for the long-term job of EV charger maintenance. With passenger EVs, charger reliability has proved to be a serious problem. Common issues range from unresponsive screens, to problems connecting to the payment system, to failures in interoperability between a vehicle's charging technology and the charger itself (St. John 2023).

Resolving EV charger issues does not require thousands of hours of specialized electrical training, so, unlike charger installation, the emerging occupation of EV charger technicians has so far been excluded from unionization and the high labor standards that union contracts are able to secure. In addition, charger technician jobs so far tend to be on-call rather than on-site (Muller 2022), so as these jobs grow, they may not benefit local workers. As public electric truck charging stations begin to roll out, this is a workforce issue that public funding agencies must consider. The memorandum of agreement signed by the state Energy Commission and Workforce Development Board in January 2024 is a promising step.

Regional Incentives

The South Coast Air Quality Management District (SCAQMD)'s Indirect Source Rule, described on p. 5, has been implemented through a program called Warehouse Actions and Investments to Reduce Emissions (WAIRE). The Riverside–San Bernardino–Ontario metro area falls under SCAQMD's jurisdiction.

The WAIRE program takes a carrot-or-stick approach. Warehouse operators can either pay an emissions mitigation fee, or they can earn "WAIRE points" by taking concrete steps to decrease their emissions. SCAQMD offers a "menu" of options for earning WAIRE points, or a warehouse operator can submit a custom WAIRE plan for consideration (South Coast Air Quality Management District 2024).

We recommend that SCAQMD consider custom WAIRE plans that follow the community benefits agreement model and visions. Custom WAIRE plans could be developed in collaboration with local community organizations, who are signatory to the plans. Plans could include partnerships with local organizations to provide worker training and preferential hiring to residents from Senate Bill 535 "disadvantaged communities" within a 20-mile radius of the warehouse. Such partnerships could include zero-emissions shuttles to ensure that workers have reliable transportation to get to work. Warehouse management could participate in environmental justice trainings. Warehouse operators could establish startup funds for local minority and disadvantaged entrepreneurs with limited access to large, low-interest loans to establish businesses centered on climate mitigation and adaptation.

BROADER POLICY RECOMMENDATIONS

In addition to the recommendations discussed earlier in this section, we see larger policy opportunities for improving worker and community welfare. Broader policy changes within the region could address warehouse development from the perspective of land use and local economic development. Statewide policy changes could improve and enhance labor standards within the industry.

Regional Policy

Restrict changes to zoning and land use. County and city policymakers must make it a priority to protect diverse land uses by placing restrictions on changes to how land is zoned. In 2022, zoning changes were approved for the South Ontario Logistics Center development on former protected agricultural lands because the protections were not written permanently into law (Kaneko 2022). Also in 2022, the Bloomington Business Park development pushed through a deal to displace a local elementary school so the developer would not have to address public health concerns that the warehouse raised for the school district (Linden 2022). Bloomington Business Park was also set to displace the residents of 100 homes (Noroozi and Story 2022). As Ricardo Cisneros, principal officer of the Inland Empire Labor Council, AFL-CIO, notes, debates that pit workers against residents and environmental justice organizations can be preempted simply by making it prohibitive to rezone non-industrial land.[10]

Diversify the Inland Empire's economy. The reason that warehouse developments continue to be pushed through in the name of jobs to begin with is because economic development strategists and boosters have fostered a regional dependency on warehouse construction and operations. In reality, no worker should have to celebrate a drastic alteration to their local environment for a job that does not provide the compensation or security needed to raise a family.

San Bernardino's downtown redevelopment project, made possible by the demolition of Carousel Mall, is an opportunity to establish employment and entrepreneurship opportunities that keep worker dollars in the community and that build intergenerational wealth for residents who have been disadvantaged by redlining and systemic racism. Cisneros says that the downtown redevelopment project could create 25 years' worth of construction work, on top of the long-term opportunities it presents. Other cities in the region could pursue such integrated plans that center the needs of current residents by embracing density and building upward, Cisneros suggests.[11]

Climate adaptation, mitigation, and resilience projects focused on buildings and communities, which could include everything from home weatherization, to community composting, to utility-scale energy generation, should also be looked to as job creators now and for the foreseeable future.

State and National Policy

Drawing inspiration from the sectoral bargaining strategy of fast-food workers and the United Auto Workers' (UAW) approach to highlighting discrepancies in CEO compensation, these recommendations aim to promote fair labor practices and equitable income distribution.

In California's fast food sector, worker organizing led to a $20 minimum wage (taking effect April 2024) across the sector and the creation of a Fast Food Council with equal representation of business and labor that will set working conditions in the industry (Kuang 2024). This sectoral bargaining strategy, adapted from the European labor model, shows one way to raise the bar for the lowest-wage occupations in the TDL sector.

Already, fast food franchise operators have implied that the planned wage increase will lead them to lay off workers (Kuang 2024), and mass media coverage has promoted this framing. Yet the UAW's 2023 campaign for auto industry workers gives the lie to this argument. The UAW built worker support for a new contract with the "Big Three" automakers in 2023 by drawing attention to the fact that workers' labor was channeled into a 40% increase in CEO pay over the previous four years, while rank-and-file workers saw a pay increase of just 6% (Kaye and Hsu 2023).

In addition, a 2024 analysis of inflation from 2019 through 2023 found that corporate profits drove 53% of inflation during the second and third quarters of 2023. In comparison, corporate profits drove 11% of consumer price increases for the 40 years between 1980 and 2020. While the economy ostensibly recovers from the pandemic shutdown period, labor's share of income has actually declined while corporate profits have risen (Pancotti and Owens 2024). In other words, there is plenty of room to increase the pay of wage workers and close the pay gap between wage workers and CEOs, if business prioritizes the redistribution of corporate profits to communities through worker pay. Hourly workers must not be scapegoated for price increases that can be directly attributed to the greed of corporations and investors.

Building upon insights from Smith et al. (2014), we recommend that state and federal labor law enforcement agencies intensify their efforts to investigate and address labor law violations within the TDL industry. This would include enhanced funding for agencies to recruit and train staff capable of conducting thorough investigations.

Workers in the TDL sector in the IE will also benefit from other state and federal policies that generally strengthen and expand workers' rights. Policies that protect workers against retaliation for organizing and filing complaints about labor law violations should be fortified and implemented. The recent Department of Labor policy on employee misclassification, especially among drivers, is a step in the right direction. This policy change aligns with the need for more comprehensive worker protections, including new rights for temporary agency workers, such as those adopted in Illinois and New Jersey in 2023. A similar legislative push in California, following the model of these new standards, could significantly improve the working conditions for all temp workers, including those in the TDL sector.

It is important to acknowledge the economic implications of improved labor conditions. As Viscelli (2016) notes, better working conditions and fair wages can reduce the high turnover rates that currently cost companies billions annually. Therefore, these policy recommendations not only aim to create a more equitable and

just working environment for workers but also offer a pragmatic approach to reducing operational costs for employers in the long run.

FUTURE RESEARCH AVENUES

Identifying gaps in current research and proposing future study areas, such as the long-term effects of automation and electrification on regional economies, is fundamental. Methodologies for ongoing monitoring and comparative studies across regions and logistics sub-sectors should be developed.

Investigating the implications of automation and electrification, understanding occupational shifts and their effects on workers, and exploring the interplay of policy and industry responses are essential. This research will not only offer insights into the sector's transformation but also guide the development of strategies that ensure technological advancements are harmoniously integrated with workforce welfare and industry growth.

We hope that this research we have presented in this report can serve as a foundation for evidence-based policy decisions, particularly those impacting workers. Our goal is for this research to inform policies that not only respond to current trends but also proactively shape a more equitable and sustainable future for the logistics industry and its workers.

We recommend the following topics and approaches for future research about Inland Empire workers:

- Comprehensive surveys of regional warehouse workers and truck drivers to better understand their work and employment experiences, with sample sizes of at least 1,000
- Longitudinal studies tracking regional warehouse workers and truck drivers through retirement
- Experiences of women and transgender truck drivers
- Workforce development program participant outcomes, quantitative and qualitative
- Auxiliary TDL sector occupations, such as pallet suppliers, warehouse equipment technicians, and truck dealership salespersons
- Worker health and safety in the TDL sector, including how it relates to working under extreme weather in the IE

CONCLUSION

This report provides an in-depth analysis of the Transportation, Distribution, and Logistics (TDL) sector, a key component of the Inland Empire's economy. It explores the sector from multiple perspectives, considering the interplay between job growth, environmental impacts, and workers' experiences.

The significant expansion of the TDL sector in the Inland Empire, particularly in warehousing and transportation, has shaped the employment landscape, offering both challenges and opportunities. As the largest employing industry, it contributes substantially to the regional economy but also raises concerns about environmental degradation and job quality, especially for blue-collar roles.

A key insight from this report is the nuanced understanding of the TDL sector's impact on workers, achieved by combining quantitative data with personal narratives. This approach has provided a comprehensive view of working conditions, wage disparities, job security, and the effects of technological advancements like automation and electrification. The sector's growth, while providing employment opportunities, has also led to challenging working conditions.

To address these diverse impacts, the report recommends several policy interventions aimed at improving the TDL sector. These include strengthening labor standards, raising the minimum wage across the industry, enhancing labor law enforcement at state and federal levels, incorporating labor standards in climate policy, and adopting policies against employee misclassification, inspired by recent legislative examples like the temporary agency workers' bill of rights. These recommendations seek to balance economic growth with enhanced worker and community well-being.

This report also outlines future research directions, including comprehensive surveys of warehouse workers and truck drivers, longitudinal studies, and analyses of workforce development program outcomes. It emphasizes the importance of focusing on the evolving nature of the sector and ensuring that the voices of those most affected remain central to the discussion.

In conclusion, this report advocates for a balanced approach to address the multifaceted impacts of the TDL sector. It calls for informed policymaking and strategic planning that not only capitalizes on the sector's economic potential but also prioritizes the well-being of workers and the broader community. These insights aim to guide decision-makers, employers, workers, and community activists in developing a future for the Inland Empire that is both economically robust and socially equitable.

ENDNOTES

1 We selected these five warehouse occupations, following the approach of De Lara (2013) and Gutelius and Theodore (2019).

2 Latino workers self-identified as Latino, Hispanic, Central American, or Mexican.

3 We excluded survey participants that did not respond to this question and included self-employed workers. When we redid the analysis excluding self-employed workers (106 respondents), we found that the percentages remained the same.

4 CPS surveys have relatively small sample sizes at the county level which reduce the certainty of these findings.

5 Interview with Teamsters 1932 Training Center staff with Ellen Reese on September 5, 2023.

6 Information about this training was based on a personal interview with Shakoya Henderson by Elvira De La Torre on January 24, 2024.

7 Interview with Fredy Campos by Natalie Carranza and Athena Tan, November 17, 2023. Information on the Teamsters 1932 Training Center is based on an interview with Becky Lepins by Ellen Reese on September 5, 2023.

8 For similar recommendations regarding workforce development for truck drivers, see Section 5 in Viscelli (2018).

9 Information on WOJRC's programs and partnership with the Northern California Teamsters Apprentice Training and Education Trust Fund (NCTAT) is from a WOJRC site visit by Plug In IE staff on July 27, 2022, and a conversation between WOJRC, NCTAT, and Plug In IE staff on November 16, 2022.

10 Personal interview with Ricardo Cisneros by Athena Tan, January 25, 2024.

11 Personal interview with Ricardo Cisneros by Athena Tan, January 25, 2024.

REFERENCES

AFL-CIO Commission on the Future of Work and Unions. 2019. Report to the AFL-CIO General Board. AFL-CIO. https://aflcio.org/reports/afl-cio-commission-future-work-and-unions

Alimahomed-Wilson, Jake. 2020. "The Amazonification of Logistics: E-Commerce, Labor, and Exploitation in the Last Mile," in The Cost of Free Shipping: Amazon in the Global Economy, edited by Jake Alimahomed-Wilson and Ellen Reese, chap. 4. London: Pluto Press.

Allison, Juliann, Joel Herrera, and Ellen Reese. 2015. "Why the City of Ontario Needs to Raise the Minimum Wage: Earnings among Warehouse Workers in Inland Southern California." UCLA Institute for Research on Labor and Employment. Research & Policy Brief 36: 1–10. http://www.irle.ucla.edu/publications/documents/Research-Brief_Reese36.pdf

Allison, Juliann, Joel Herrera, Mila Huston, and Ellen Reese. 2015. "Health Care Needs and Access among Warehouse Workers in Southern California." UCLA Institute for Research on Labor and Employment. Research & Policy Brief 35: 1–10. http://www.irle.ucla.edu/publications/documents/ResearchBrief_Reese35.pdf

American Lung Association. 2023. "Most Polluted Places to Live." State of the Air. https://www.lung.org/research/sota/key-findings/most-polluted-places

American Transportation Research Institute. 2023. Critical Issues in the Trucking Industry, 2022. https://truckingresearch.org/wp-content/uploads/2023/10/ATRI-Top-Industry-Issues-2023.pdf

Appel, Sam and Carol Zabin. 2019. Truck Driver Misclassification: Climate, Labor, and Environmental Justice Impacts. Berkeley, CA: UC Berkeley Labor Center.

Baldassari, Erin. 2017. "Proposed Agreement Will Ensure Thousands of New Livable Wage Jobs at Port of Oakland." Mercury News, September 21. https://www.mercurynews.com/2017/09/20/community-groups-laud-proposed-living-wage-local-hire-agreement-at-port-of-oakland-warehouse-complex/

Bartholomew, Dana. 2023. "Highland Fairview to Break Ground on 40.6M SF Logistics Center in Moreno Valley." Real Deal, March 13. https://therealdeal.com/la/2023/03/13/highland-fairview-to-break-ground-on-40-6b-sf-logistics-center-in-moreno-valley/

Black, Thomas. 2023. "Robots to Outnumber People at UPS's Massive New Warehouse." Bloomberg, November 15. https://www.bloomberg.com/news/articles/2023-11-15/ups-jobs-at-new-kentucky-warehouse-go-mostly-to-robots

Bloch, Doug. 2022. "The Road Ahead for Automated Vehicles": Hearing before the Subcommittee on Highways and Transit, Committee on Transportation and Infrastructure, U.S. House of Representatives. Witness statement, February 2. https://docs.house.gov/Committee/Calendar/ByEvent.aspx?EventID=114362

Broady, Kristen E., Darlene Booth-Bell, Jason Coupet, and Moriah Macklin. 2021. Race and Jobs at Risk of Being Automated in the Age of COVID-19. Washington, DC: Hamilton Project at the Brookings Institution. https://www.brookings.edu/wp-content/uploads/2021/03/Automation_LO_v7.pdf

Building Skills Partnership. 2023. https://www.buildingskills.org/

California Air Resources Board. 2024. "Advanced Clean Fleets." Programs. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets

California Employment Development Department. 2024. "Supply and Demand Tool." Labor Market Information. https://labormarketinfo.edd.ca.gov/geography/supply-and-demand-tool.html

California GO-Biz (Governor's Office of Business and Economic Development). 2024. "Tax Credit Awardee List." California Competes. https://business.ca.gov/california-competes-tax-credit/

California Government Operations Agency, California Labor & Workforce Development Agency, California Natural Resources Agency, and California State Transportation Agency. 2024. Senate Bill 150, Workshop 5: Recommendations and Next Steps. January 25. Sacramento, CA.

California Workforce Development Board. 2023. High Road Training Partnerships. https://cwdb.ca.gov/initiatives/high-road-training-partnerships/

City of Fontana. 2021. Regular City Council Meeting: Agenda and Minutes, June 22. https://fontana.legistar.com/View.ashx?M=A&ID=979588&GUID=ECA68A54-D5E9-4019-A49C-3BC7FE22D376

City of Fontana. 2022. "An Ordinance of the City Council of the City of Fontana, California Amending Chapter 9 of the Fontana Municipal Code to Revise Article V..." Ordinance No. 1891, passed April 12. https://www.fontanaca.gov/3453/Final-Approved-Industrial-Commerce-Center

City of Rialto. 2018. Annual Comprehensive Financial Report: Fiscal Year Ending June 30, 2018. https://www.yourrialto.com/ArchiveCenter/ViewFile/Item/65

City of Rialto. 2019. Annual Comprehensive Financial Report: Fiscal Year Ending June 30, 2019. https://www.yourrialto.com/ArchiveCenter/ViewFile/Item/66

City of Rialto. 2020. Annual Comprehensive Financial Report: Fiscal Year Ending June 30, 2020. https://www.yourrialto.com/ArchiveCenter/ViewFile/Item/248

City of Rialto. 2021. Annual Comprehensive Financial Report: Fiscal Year Ending June 30, 2021. https://www.yourrialto.com/ArchiveCenter/ViewFile/Item/263

City of Rialto. 2022. Annual Comprehensive Financial Report: Fiscal Year Ending June 31 [sic], 2021. https://www.yourrialto.com/ArchiveCenter/ViewFile/Item/288

City of Rialto. 2023. Regular Meeting, City Council: File No. 23-375, Attachment 1, April 25. https://rialto.legistar.com/MeetingDetail.aspx?ID=1089253&GUID=54F7161C-CEB1-467B-BF73-285AE2195961

Concerned Neighbors of Bloomington. 2022. Health and Environmental Impacts Report: Bloomington, CA. https://pc4ej.org/bloomington-report/

Cortese, Dave. 2024. "Bill by Senator Cortese Empowers Local Communities to Steer Driverless Car Safety." Press release, January 9. https://sd15.senate.ca.gov/news/bill-senator-cortese-empowers-local-communities-steer-driverless-car-safety

De Lara, Juan. 2013. Warehouse Work: Path to the Middle Class or Road to Economic Insecurity? USC Program for Environmental and Regional Equity (PERE). https://dornsife.usc.edu/eri/publications/warehouse-work/

De Lara, Juan. 2018. Inland Shift: Race, Space and Capital in Southern California. Berkeley: University of California Press.

De Lara, Juan, Ellen Reese, and Jason Struna. 2016. "Organizing Temporary, Subcontracted, and Immigrant Workers: Lessons from Change to Win's Warehouse Worker United Campaign." Labor Studies 41(4): 309-332.

Eavis, Peter. 2023. "Women Could Fill Truck Driver Jobs. Companies Won't Let Them." New York Times, October 5. https://www.nytimes.com/2023/10/05/business/economy/women-truck-drivers.html

Economic Policy Institute. 2021. "The Shift to All-Electric Vehicles Could Create Over 150,000 Jobs by 2030—If Policymakers Make Smart Investments to Secure U.S. Leadership in the Auto Sector." Press release, September 22. https://www.epi.org/press/the-shift-to-all-electric-vehicles-could-create-over-150000-jobs-by-2030-if-policymakers-make-smart-investments-to-secure-u-s-leadership-in-the-auto-sector/

Eidlin, Barry. 2023. "The Teamsters UPS Contract: A Win that Leaves Some Unfinished Business." Jacobin, August 11. https://jacobin.com/2023/08/teamsters-ups-contract-part-time-pay-tier-system-strike-organizing

Emmons Allison, Juliann and Ellen Reese. 2023. Unsustainable: Amazon, Warehousing, and the Politics of Exploitation. Oakland: University of California Press.

Energy: Transportation Electrification: Energy Efficiency Programs: School Energy Efficiency Stimulus Program. Assembly Bill 841. California Legislature, 2019–2020.

Fee, Sara. 2023. "How My Co-Workers Got Me Reinstated at Amazon's San Bernardino Air Hub." Labor Notes, February 6. https://labornotes.org/2023/02/how-my-co-workers-got-me-reinstated-amazons-san-bernardino-air-hub

Fernández Campbell, Alexia and Molloy, Claire. 2022. "Attacked behind the Wheel." Center for Public Integrity, December 11. http://publicintegrity.org/labor/female-drivers-attacked-behind-the-wheel/

Fieveson, Laura. 2023. "Labor Unions and the U.S. Economy." U.S. Department of the Treasury, August 28. https://home.treasury.gov/news/featured-stories/labor-unions-and-the-us-economy

Flaming, Daniel and Patrick Burns. 2019. Too Big to Govern: Public Balance Sheet for the World's Largest Store. Los Angeles: Economic Roundtable. https://economicrt.org/publication/too-big-to-govern/

Flaming, Daniel and Patrick Burns. 2023. Exhausting Our Air: Environmental and Human Costs of Diesel Trucks. Los Angeles: Economic Roundtable. https://economicrt.org/publication/exhausing-our-air/

Frey, Carl Benedikt and Michael A. Osborne. 2017. "The Future of Employment: How Susceptible Are Jobs to Computerisation?" Technological Forecasting and Social Change 114: 254–80.

Fuller, Craig 2023. "The Perpetual Truck Driver Shortage Is Not Real." FreightWaves, September 6. https://www.freightwaves.com/news/the-perpetual-truck-driver-shortage-is-not-real

Gittleman, Maury and Monaco, Kristen. 2020. "Truck-Driving Jobs: Are They Headed for Rapid Elimination?" ILR Review 73(1): 3–24. https://doi.org/10.1177/0019793919858079

Glasmeier, Amy K. 2021a. "Living Wage Calculation for Riverside County, California." Living Wage Calculator. Massachusetts Institute of Technology. https://web.archive.org/web/20210427103505/https://livingwage.mit.edu/counties/06065

Glasmeier, Amy K. 2021b. "Living Wage Calculation for San Bernardino County, California." Living Wage Calculator. Massachusetts Institute of Technology. https://web.archive.org/web/20210412062610/https://livingwage.mit.edu/counties/06071

Gongora, Kareem. 2020. "It Is 'Appalling' to See the Increase of Warehousing in South Fontana." Fontana Herald News, November 19. https://www.fontanaheraldnews.com/opinion/it-is-appalling-to-see-the-increase-of-warehousing-in-south-fontana/article_9b11fc5c-2a83-11eb-b4b0-1f8a45d79952.html

González-Vásquez, Ana L. and Magaly N. López. 2021. The High Road to Economic Prosperity: An Assessment of the California Workforce Development Board's High Road Training Partnership Initiative. Los Angeles: UCLA Labor Center. https://www.labor.ucla.edu/publication/highroadreport/

Goodheart, Jessica. 2022. "Who Will Build California's Electric Vehicle Charging Stations and Why It Matters." Capital & Main, April 28. https://capitalandmain.com/who-will-build-californias-electric-vehicle-charging-stations-and-why-it-matters

Gordon, Aaron and Lauren K. Gurley. 2022. "Amazon Paid for a High School Course. Here's What It Teaches." Motherboard: Tech by Vice, January 26. https://www.vice.com/en/article/bvndja/amazon-paid-for-a-high-school-course-heres-what-they-teach

Guilhem, Matt. 2015. "How the Inland Empire Became Home to Massive Warehouses." KCRW, August 18. https://www.kcrw.com/news/articles/how-the-inland-empire-became-home-to-massive-warehouses

Gutelius, Beth and Sanjay Pinto. 2023. Pain Points: Data on Work Intensity, Monitoring, and Health at Amazon Warehouses. Chicago: University of Illinois Center for Urban Economic Development. https://cued.uic.edu/pain-points/

Gutelius, Beth and Nik Theodore. 2019. The Future of Warehouse Work: Technological Change in the U.S. Logistics Industry. UC Berkeley Center for Labor Research and Education. https://laborcenter.berkeley.edu/future-of-warehouse-work/

Gutelius, Beth and Nik Theodore. 2023. Pandemic-Related Trends in Warehouse Technology Adoption. UC Berkeley Center for Labor Research and Education. https://laborcenter.berkeley.edu/pandemic-related-trends-in-warehouse-technology-adoption/

Hirsch, Barry, David Macpherson, and William Even (2024). Union Membership, Coverage, and Earnings from the CPS. http://www.unionstats.com/

Horseman, Jeff. 2023. "How Many Inland Empire Warehouses Are Locally Owned? Does It Matter?" Press-Enterprise (Riverside, CA), February 27. https://www.pressenterprise.com/2023/02/27/how-many-inland-empire-warehouses-are-locally-owned-does-it-matter/

Horseman, Jeff. 2024. "These 10 Communities Have the Most Warehouses in the Inland Empire." Press Enterprise (Riverside, CA), February 12. https://www.pressenterprise.com/2024/02/12/these-10-communities-have-the-most-warehouses-in-the-inland-empire/

ICF Incorporated, LLC. 2019. Goods Movement Sector Workforce Assessment of Southern California. San Pedro, CA: Port of Los Angeles.

Jamieson, Dave. 2023. "Amazon Spent $14 Million on Anti-Union Consultants in 2022." HuffPost, March 31. https://www.huffpost.com/entry/amazon-anti-union-spending-2022_n_6426fd1fe4b02a8d518e7010

Jobs to Move America. 2020. "U.S. Employment Plan." Resources, April 10. https://jobstomoveamerica.org/resource/u-s-employment-plan-2/

Just San Bernardino. 2023. Good Jobs, Clean Air, Healthy Communities: A Local Framework for Community Benefit Agreements in the San Bernardino Valley. https://issuu.com/justsb/docs/just_sb_toolkit_v1

Kaneko, Ann. 2022. "Warehouses Pave Over Historic Dairy Lands in Ontario and Chino." PBS SoCal, May 2. https://www.pbssocal.org/shows/earth-focus/warehouses-pave-over-historic-dairy-lands-in-ontario-and-chino

Kaye, Danielle and Andrea Hsu. 2023. "Sky-High CEO Pay Is in Focus as Workers Everywhere Are Demanding Higher Wages." NPR, September 14. https://www.npr.org/2023/09/13/1198938942/high-ceo-pay-inequality-labor-union-uaw-workers

Kuang, Jeanne. 2024. "California Gave Fast Food Workers a Seat at the Table. What Comes Next?" CalMatters, January 29. https://calmatters.org/california-divide/2024/01/california-fast-food-council-2/

Lee, Kevin L., Magaly López, and Ana Luz González-Vásquez. 2022. "New Directions in Racial and Economic Justice: How California's Worker Centers Are Bringing Worker Power into Workforce Development." Working paper, February. https://www.labor.ucla.edu/publication/caworkercenters/

Lee, Kurtis. 2022. "As Warehouses Multiply, Some Cities Say: Enough." New York Times, October 10. https://www.nytimes.com/2022/10/10/business/economy/warehouses-moratorium-california.html

Leon, Luis Feliz. 2023. "Wage Gains at UPS Have Amazon Workers Demanding More." Labor Notes, August 3. https://labornotes.org/2023/08/wage-gains-ups-have-amazon-workers-demanding-more

Linden, Jonathan. 2022. "Future of Bloomington Elementary School Depends on Approval of Warehouse Project." KVCR, July 22. https://www.kvcrnews.org/local-news/2022-07-22/future-of-bloomington-elementary-school-depends-on-approval-of-warehouse-project

Muller, Joann. 2022. "Hot Job of the Future: Fixing Electric Car Chargers." Axios, October 27. https://www.axios.com/2022/10/27/ev-electric-car-charger-mechanics-technicians

Muñoz, Amparo, Susan Phillips, and Mary A. Ruiz. 2023. "A Region in Crisis: The Rationale for a Public Health State of Emergency in the Inland Empire." Working paper, CCAEJ, Sierra Club San Gorgonio, and Robert Redford Conservancy for Southern California Sustainability. https://www.ccaej.org/regionincrisis

Muro, Mark, Robert Maxim, and Jacob Whiton. 2019. Automation and Artificial Intelligence: How Machines are Affecting People and Places. Washington, DC: Metropolitan Policy Program at Brookings. https://www.brookings.edu/articles/automation-and-artificial-intelligence-how-machines-affect-people-and-places/

Nantee, Natnaree and Panitas Sureeyatanapas. 2021. "The Impact of Logistics 4.0 on Corporate Sustainability: A Performance Assessment of Automated Warehouse Operations." Benchmarking: An International Journal 28(10): 2865–95.

Noroozi, Arayana and Prince J. Story. 2022. "San Bernardino County Board of Supervisors Unanimously Approves Bloomington Warehouse Project." IE Voice, December 13. https://theievoice.com/san-bernardino-county-board-of-supervisors-unanimously-approves-bloomington-warehouse-project/

O'Brien, Tom, Deanna Matsumoto, Diana Sanchez, Caitlin Mace, Elizabeth Warren, Eleni Hala, and Tyler Reeb. 2020. Southern California Regional Workforce Development Needs Assessment for the Transportation and Supply Chain Industry Sectors. San Jose, CA: Mineta Transportation Institute. https://transweb.sjsu.edu/research/1921-Workforce-Development-Needs-Assessment-Transportation-Supply-Chain

Office of the Attorney General (California). 2022. "Attorney General Bonta Announces Innovative Settlement with City of Fontana to Address Environmental Injustices in Warehouse Development." Press release, April 18. https://oag.ca.gov/news/press-releases/attorney-general-bonta-announces-innovative-settlement-city-fontana-address

Page, Paul and Soma Biswas. 2023. "Trucker Yellow Files for Bankruptcy, Will Liquidate." WSJ.com, August 7. https://www.wsj.com/articles/trucker-yellow-files-for-bankruptcy-will-liquidate-aced4aa6

Pancotti, Liz and Lindsay Owens. 2024. "Inflation Revelation: How Outsized Corporate Profits Drive Rising Costs." Groundwork Collaborative. https://groundworkcollaborative.org/wp-content/uploads/2024/01/24.01.17-GWC-Corporate-Profits-Report.pdf

Phadke, Amoi, Nikit Abhyankar, Jessica Kersey, Taylor McNair, Umed Paliwal, David Wooley, Olivia Ashmoore, Robbie Orvis, Michael O'Boyle, Ric O'Connell, Utkarsha Agwan, Prihanka Mohanty, Priya Sreedharan, Deepak Rajagopal. 2021. 2035: The Report. Transportation (2035 2.0). University of California Berkeley Goldman School of Public Policy. https://www.2035report.com/transportation/

PowerSwitch Action. 2024. "Community Benefits Agreements." https://www.powerswitchaction.org/resources/community-benefits-agreements/

Robert Redford Conservancy, Radical Research, and R-NOW [Riverside Neighbors Opposing Warehouses]. 2024. "Warehouse CITY." https://radicalresearch.shinyapps.io/WarehouseCITY/

Roosevelt, Margot. 2022. "In California's Largest Race Bias Cases, Latino Workers Are Accused of Abusing Black Colleagues." Los Angeles Times, August 22. https://www.latimes.com/business/story/2022-08-22/california-racial-discrimination-cases

Rosen, Jovanna. 2023. Community Benefits: Developers, Negotiations, and Accountability. Philadelphia: University of Pennsylvania Press.

Rosenblatt, Lauren. 2023. "Amazon Warehouse Work Is Getting Safer but Still More Dangerous than 2020." Seattle Times, April 12. https://www.seattletimes.com/business/amazon-warehouse-work-is-getting-safer-but-still-more-dangerous-than-2020/

Sainato, Michael. 2023. "Amazon's First Delivery Workers to Unionize Were Later Fired—Now They're Striking at Warehouses." Guardian, November 13. https://www.theguardian.com/us-news/2023/nov/13/amazon-drivers-union-fired-strike

Saito, Leland T. 2012. "How Low-Income Residents Can Benefit from Urban Development: The LA Live Community Benefits Agreement." City & Community 11(2): 129–50.

Saito, Leland T. 2022. Building Downtown Los Angeles: The Politics of Race and Place in Urban America. Palo Alto, CA: Stanford University Press.

Salazar, Christopher. 2023. "San Bernardino Amazon Worker Target of Union Busting Efforts, Says IE Amazon Workers United." Frontline Observer, January 6. https://www.frontline-observer.com/san-bernardino-amazon-air-worker-target-of-union-busting-efforts-labor-groups-claim/

San Bernardino County. 2024. Board of Supervisors Regular Meeting, January 23. https://sanbernardino.legistar.com/MeetingDetail.aspx?ID=1163606&GUID=5B56DC45-36E1-4311-A14B-CA2720527340

Scauzillo, Steve. 2022. "Chaffey College Using $500,000 Grant to Prepare Students for Warehouse Jobs." San Bernardino Sun, March 26. https://www.sbsun.com/2022/03/26/chaffey-college-using-500000-grant-to-prepare-students-for-warehouse-jobs/

Semuels, Alana. 2021. "The Truck Driver Shortage Doesn't Exist." Time, November 12. https://time.com/6116853/truck-driver-shortage-supply-chain/

Singh, Maanvi. 2022. "How Giant Amazon Warehouses Are Choking a California Town." Consumer Reports, September 13. https://www.consumerreports.org/environment-sustainability/how-giant-amazon-warehouses-are-choking-a-california-town-a7109420991/

Singh, Maanvi and Aliya Uteuova. 2022. "Revealed: How Warehouses Took Over Southern California 'Like a Slow Death.'" Guardian, December 29. https://www.theguardian.com/us-news/2022/dec/29/e-commerce-warehouses-amazon-ups-fedex-california-pollution

Smallwood-Cuevas, Lola, Semi Cole, Ellen Reese, and Gary Rettberg. 2020. Ain't No Sunshine: The State of Black Workers and Demands for a Brighter Future in the Inland Empire. Inland Empire Black Worker Center Project Advisory Group. https://www.iebwc.org/aint-no-sunshine

Smith, Rebecca, Paul A. Marvy, and Jon Zerolnick. 2014. The Big Rig Overhaul: Restoring Middle-Class Jobs at America's Ports Through Labor Law Enforcement. National Employment Law Project, Change to Win Strategic Organizing Center, Los Angeles Alliance for a New Economy. https://www.nelp.org/wp-content/uploads/2015/03/Big-Rig-Overhaul-Misclassification-Port-Truck-Drivers-Labor-Law-Enforcement.pdf

South Coast Air Quality Management District. 2024. "WAIRE Program." Rules & Compliance. http://www.aqmd.gov/home/rules-compliance/compliance/waire-program

St. John, Jeff. 2023. "EV Chargers Have a Big Reliability Problem. Can the Government Fix It?" Canary Media, December 11. https://www.canarymedia.com/articles/ev-charging/ev-chargers-have-a-big-reliability-problem-can-the-government-fix-it

Strategic Organizing Center. 2021. Primed for Pain: Amazon's Epidemic of Workplace Injuries. Washington, DC: Strategic Organizing Center. https://thesoc.org/amazon-primed-for-pain/

Strategic Organizing Center. 2022. The Injury Machine: How Amazon's Production System Hurts Workers. Washington, DC: Strategic Organizing Center. https://thesoc.org/what-we-do/the-injury-machine-how-amazons-production-system-hurts-workers/

Strategic Organizing Center. 2023. In Denial: Amazon's Continuing Failure to Fix its Injury Crisis. Washington, DC: Strategic Organizing Center. https://thesoc.org/what-we-do/in-denial-amazons-continuing-failure-to-fix-its-injury-crisis/

Teamsters. 2023a. National Master United Parcel Service Agreement for the Period August 1, 2023 through July 31, 2028. https://teamster.org/ups-agreements-2023-2028/

Teamsters. 2023b. "Teamsters, California Pols Rally to Demand Gov. Newsom Sign AB 316." Press release, September 19. https://teamster.org/2023/09/teamsters-california-pols-rally-to-demand-gov-newsom-sign-ab-316/

Teamsters. 2024. "Teamsters Applaud Introduction of CARS Package on Autonomous Vehicles." Press release, January 16. https://teamster.org/2024/01/teamsters-applaud-introduction-of-cars-package-on-autonomous-vehicles/

Torres, Ivette, Anthony Victoria, People's Collective for Environmental Justice, and Dan Klooster and University of Redlands students. 2021. Warehouses, Pollution, and Social Disparities: An Analytical View of the Logistics Industry's Impact on Environmental Justice Communities Across Southern California. https://earthjustice.org/experts/ivette-torres/warehouses-pollution-and-social-disparities

UC Berkeley Labor Center. 2020. "HRTP Essential Elements: Worker Voice." Four Essential Elements of High Road Training Partnerships. https://cwdb.ca.gov/wp-content/uploads/sites/43/2020/08/HRTP-essential-element-3-worker-voice-FINAL_ACCESSIBLE.pdf

U.S. Bureau of Labor Statistics. 2023. "Employment Projections Data Definitions." Employment Projections, September 6. https://www.bls.gov/emp/documentation/definitions.htm

U.S. Department of Commerce. 2022. Job Quality Toolkit. https://www.commerce.gov/work-us/job-quality-toolkit

U.S. Department of Energy. n.d. "About Community Benefits Plans." Clean Energy Infrastructure. https://www.energy.gov/infrastructure/about-community-benefits-plans

U.S. Department of Labor. 2024. "U.S. Department of Labor Announces Final Rule on Classifying Workers as Employees or Independent Contractors Under the Fair Labor Standards Act." News Release, January 9. https://www.dol.gov/newsroom/releases/whd/whd20240109-1

U.S. Government Accountability Office. 2022. Workforce Automation: Insights into Skills and Training Programs for Impacted Workers. https://www.gao.gov/products/gao-22-105159

Viscelli, Steve. 2016. The Big Rig: Trucking and the Decline of the American Dream. Oakland: University of California Press.

Viscelli, Steve. 2018. Driverless? Autonomous Trucks and the Future of the American Trucker. UC Berkeley Center for Labor Research and Education and Working Partnerships USA. https://laborcenter.berkeley.edu/driverless/

Volvo Group North America. 2022. Volvo LIGHTS: Bringing Battery-Electric Freight Trucks to Market, from Demonstration to Commercialization; Lessons Learned. https://www.lightsproject.com/volvo-group-north-america-publishes-lessons-learned-guidebook-for-volvo-lights-project/

Warehouse Worker Resource Center. 2023a. "Workers Call on Cal/OSHA to Protect Workers and End Delays on Indoor Heat Standard." Press release, May 18. https://warehouseworkers.org/workers-call-on-cal-osha-to-protect-workers-and-end-delays-on-indoor-heat-standard/

Warehouse Worker Resource Center. 2023b. "Warming Climate, Heat Wave Threaten Workers." Press release, July 18. https://warehouseworkers.org/warming-climate-heat-wave-threaten-workers/

Whitehead, Brian. 2023. "$12.4 Million Center Brings Trade Education to Pacific High in San Bernardino." San Bernardino Sun, March 6. https://www.sbsun.com/2023/03/06/12-4-million-center-brings-technical-trades-to-pacific-high-in-san-bernardino/

Women in Trucking Association. 2023. Women in Trucking Index, 2023: Executive Summary. https://www.womenintrucking.org/index

Yee, Gregory. 2022. "Why Amazon Warehouse Workers Walked Off the Job in San Bernardino." Los Angeles Times, August 15. https://www.latimes.com/california/story/2022-08-15/amazon-warehouse-workers-walkout-san-bernardino-air-hub

To view the report appendices, please see: https://ielcc.ucr.edu/research

AUTHORS & ACKNOWLEDGMENTS

The authors gratefully acknowledge everyone who gave time to be interviewed for this report. In addition, we thank the following individuals for their contributions and support:

Hillary Jenks, Inland Empire Labor Institute

Sir Duplechan, Plug In IE

Randy Korgan, Shaun Martinez, and Mario Vasquez, Teamsters Local 1932

Andrea Vidaurre and Ivette Torres, People's Collective for Environmental Justice

Yassi Kavezade, Sierra Club

The CREATE-IE research team, 2022–23, UC Riverside

Dr. Nosakhere Thomas and Monét Warren, Inland Empire Black Worker Center

Joyce Guy, Tarecq Amer, Wonda Kidd, and Regina Amos, West Oakland Job Resource Center

Shelly Hinkle, Northern California Teamsters Apprentice Training and Education Trust Fund

This report was produced through a collaboration that involved the Center for Social Innovation at UCR, the Inland Empire Labor & Community Center, and Plug In IE, a project of the Inland Empire Labor Institute. The following authors contributed to this report: Tejpaul Singh Bainiwal, Michael Bates, Marissa Brookes, Sara Bruene, Eric Calderon, Natalie Carranza, Elvira De La Torre, Pedro Freire, Catherine Gudis, Jingyan Guo, Gregory B. Hutchins, KeAysia Jackson, Manisha Kapoor, Fatima Nelson, Zhuoyu Qiu, Ellen Reese, Gary Rettberg, Beth Tamayose, and Athena Tan.

We thank the workers who shared their personal stories with us for this report and Sonia Rana for additional research assistance. We additionally extend our gratitude to Zoe Caras, Jeddy Jacinto Molina, and Eren Whitfield for their support.

This report was funded by a California Workforce Development Board High Road Training Partnerships WIOA 3.0 grant, with additional support from the James Irvine Foundation, the UC Workers Rights Policy Collaborative, and a UCR OASIS internal award.

Cover photo courtesy of Freddy Calderon

UC RIVERSIDE | Inland Empire Labor and Community Center

CSIUCR
CENTER FOR SOCIAL INNOVATION

Plug In IE

Inland Empire
LABOR
INSTITUTE

APPENDICES

APPENDIX 1: SUPPLEMENTARY TABLES

TRANSPORTATION AND WAREHOUSING: A LARGE AND RAPIDLY GROWING INDUSTRY IN THE IE

Table 1 shows the top 5 employing industries in the Inland Empire, which employ 57 percent of the total number of jobs (or employed workers) in the region for the most recent year provided by the Quarterly Workforce Indicators (QWI). In Table 1 "Other So Cal" includes the following six Southern California counties that surround the IE: Imperial, Los Angeles, Orange, San Diego, Santa Barbara, and Ventura.

According to Quarterly Workforce data for 2021 (3rd quarter)-2022 (2nd quarter) and using 2-digit industry codes, the Transportation and Warehousing industry is the second largest employing industry in the Inland Empire, providing 13 percent of all jobs. It provides the largest percentage of jobs (16.2%) by industry in San Bernardino County and the fourth highest percentage of jobs in Riverside County (9.7%).

TABLE 1. PERCENTAGE OF TOTAL EMPLOYMENT IN THE TOP 5 EMPLOYING INDUSTRIES IN THE IE (2021 Q3–2022 Q2)

	Jobs by Industry by Region				
Industry	**Inland Empire**	**Riverside**	**San Bernardino**	**Other SoCal**	**California**
Total Employment	1,595,771	778,113	817,659	8,394,856	17,289,942
Health Care and Social Assistance	14.9	14.7	15.2	15.4	15.2
Transportation and Warehousing	13	9.7	16.2	3.6	4.6
Retail Trade	10.8	11	10.5	9.1	9.1
Accommodation and Food Services	9.9	11.5	8.3	9.1	8.8
Educational Services	8.4	9.1	7.7	8.2	8.2

Source: QWI (2-digit industry codes)

The actual extent of employment in transportation and warehousing occupations is even larger since many are employed as warehouse workers, truck drivers, and those who supervise and manage those occupations are employed in other industries, including Employment Services (which includes the Temporary Help industry), Retail Trade, and Wholesale Trade industries.

The Transportation and Warehousing industry is not only large, but has grown rapidly in the past five years (See Table 2). Overall employment in the Inland Empire has increased by 12.61 percent during the last five years, compared to 3.95 percent in California. Notably, the Transportation and Warehousing employment jumped from 11,2058 to 20,5863, marking an increase of 83.71 percent over the five-year period. As shown below, the percent increase in the Transportation and Warehousing industry was greater in San Bernardino (nearly 87 percent) than in Riverside (about 74 percent).

Other workers in the region besides those directly employed in this industry have been affected by the growth of this industry, including those building warehouses, repairing roads, providing supplies to warehouses and truckers, or selling food and refreshments to those employed in this industry.

TABLE 2. TRENDS IN EMPLOYMENT OVER THE PAST 5 YEARS

	Inland Empire			Riverside			San Bernardino		
	Employment (2016 Q3-2017 Q2)	Employment (2021 Q3-2022 Q2)	Percent Change	Employment (2016 Q3-2017 Q2)	Employment (2021 Q3-2022 Q2)	Percent Change	Employment (2016 Q3-2017 Q2)	Employment (2021 Q3-2022 Q2)	Percent Change
Health Care and Social Assistance	204,298	236,099	15.57%	95,207	113,198	18.90%	109,091	122,902	12.66%
Transportation and Warehousing	112,058	205,863	83.71%	41,771	74,518	78.40%	70,287	131,345	86.87%
Retail Trade	170,858	170,541	-0.19%	84,662	85,077	0.49%	86,197	85,464	-0.85%
Accommodation and Food Services	147,020	156,334	6.34%	83,493	88,943	6.53%	63,527	67,391	6.08%
Educational Services	132,964	132,901	-0.05%	69,188	70,299	1.61%	63,776	62,602	-1.84%

Source Note: QWI data from 2016 Q3–2017 Q2 until 2021 Q3–2022 Q2 (2-digit industry codes)

TABLE 3. CHARACTERISTICS OF 6 SELECTED TDL OCCUPATIONS (4-DIGIT CODES)

Occupation Code	160	9130	9620	9640	9005	9600
Occupation Name	Transportation, Storage, and Distribution managers	Driver/ Sales Workers and Truck Drivers	Laborers and Freight, Stock, and Material Movers, Hand	Packers and Packagers, Hand	Supervisors of Transportation and Material Moving Workers	Industrial Truck and Tractor Operators
Number employed	4688	78126	70394	31701	6807	22597
Average earnings	66424	45142	28887	24555	53830	32879
Percentage that work 35 hours per week or more	83	80	65	71	88	87
Percentage that work 50-52 weeks per year	81	75	60	57	87	76
Percentage with Medical insurance covered by employer	71	54	51	42	76	56
Percentage that are women	22	8	28	58	29	11
Percentage that are Black or Latino	60	73	76	89	69	86
Percentage that are foreign born	26	38	27	42	21	33
Time spent traveling to work	34	37	29	27	34	29
Percentage with a BA degree or above	24	5	4	5	11	3

Occupation Code	160	9130	9620	9640	9005	9600
Occupation Name	Transportation, Storage, and Distribution managers	Driver/ Sales Workers and Truck Drivers	Laborers and Freight, Stock, and Material Movers, Hand	Packers and Packagers, Hand	Supervisors of Transportation and Material Moving Workers	Industrial Truck and Tractor Operators
Percentage with some college	28	22	23	17	29	16
Percentage with high school degree	44	54	57	54	54	61
Percentage with less than high school	4	19	16	24	5	20
Minimum age	21	16	16	16	19	18
Maximum age	81	94	85	87	77	88
Average age	42	43	34	35	40	38
Median age	40	45	31	33	37	36

Notes: data are sourced from the American Community Survey (ACS) provided by IPUMS (2021 5-year file)

Earnings are Lower in the IE Compared to the State and Neighboring Southern California Counties

Table 4 below shows the average monthly earnings in the Transportation and Warehousing industry and for all industries overall by region in the most recent year of data provided by QWI. Within this sector and all industries, average monthly earnings are lower in the Inland Empire than in other Southern California counties and California, although the difference is smaller within the Transportation and Warehousing industry which is relatively lower paying compared to all industries combined.

TABLE 4: AVERAGE MONTHLY EARNINGS BY INDUSTRY

Industry	Inland Empire	Riverside	San Bernardino	Other SoCal	California
Overall	4,872	4,789	4,950	6,268	7,141
Transportation and Warehousing	4,372	4,353	4,383	5,729	5,983

Source: QWI, 3rd Qtr, 2021-2nd Qtr, 2022 (2-digit industry codes)

TABLE 5. TDL REPORT FOR 25 NAICS CODES (2022)

NAICS Code	Number Employed	Percentage Black or Latino	Percentage Women	Average Monthly Earnings (Beginning of Quarter)
4231 Motor Vehicle and Motor Vehicle Parts and Supplies Merchant Wholesalers	8234	57	28	5681
4232 Furniture and Home Furnishing Merchant Wholesalers	3152	56	38	8304
4233 Lumber and Other Construction Materials Merchant Wholesalers	4254	63	24	6139
4234 Professional and Commercial Equipment and Supplies Merchant Wholesalers	5818	47	39	5563
4235 Metal and Mineral (except Petroleum) Merchant Wholesalers	1939	61	25	6831
4236 Household Appliances and Electrical and Electronic Goods Merchant Wholesalers	3615	42	35	5578
4237 Hardware, and Plumbing and Heating Equipment and Supplies Merchant Wholesalers	4972	60	26	6613
4238 Machinery, Equipment, and Supplies Merchant Wholesalers	6525	52	26	5555
4241 Paper and Paper Product Merchant Wholesalers	1639	50	34	6193
4242 Drugs and Druggists' Sundries Merchant Wholesalers	2166	40	56	5528
4243 Apparel, Piece Goods, and Notions Merchant Wholesalers	1867	56	52	4790
4244 Grocery and Related Product Merchant Wholesalers	12021	68	30	5877
4245 Farm Product Raw Material Merchant Wholesalers	390	56	31	6249
4246 Chemical and Allied Products Merchant Wholesalers	1211	52	34	6600
4247 Petroleum and Petroleum Products Merchant Wholesalers	612	55	24	5642
4248 Beer, Wine, and Distilled Alcoholic Beverage Merchant Wholesalers	757	64	16	4451
4249 Miscellaneous Nondurable Goods Merchant Wholesalers	3868	51	36	4425
4821 Rail Transportation	.	.	.	.
4841 General Freight Trucking	26162	71	19	6030
4842 Specialized Freight Trucking	8597	68	17	5223
4885 Freight Transportation Arrangement	4402	66	35	4587
4911 Postal Service	162	10	36	5883
4921 Couriers and Express Delivery Services	22278	70	26	6715
4931 Warehousing and Storage	135115	69	46	6206
8113 Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	2517	45	16	5368

Notes: The data in Table 6 are from QWI. The values are the average over the four quarters in 2022 weighted by the number of employed.

TABLE 6: TOP 20 INDUSTRIES BY EMPLOYMENT IN RIVERSIDE COUNTY

Rank	NAICS	Industry	Employment	Earnings
1	7225	Restaurants and Other Eating Places	70317	2212
2	4931	Warehousing and Storage	57291	3753
3	6111	Elementary and Secondary Schools	56198	5760
4	6241	Individual and Family Services	34117	1713
5	6221	General Medical and Surgical Hospitals	23350	7388
6	5613	Employment Services	20023	2813
7	2381	Foundation, Structure, and Building Exterior Contractors	19747	3632
8	7211	Traveler Accommodation	19461	4093
9	2382	Building Equipment Contractors	18914	5329
10	4451	Grocery and Convenience Retailers	16297	2978
11	5617	Services to Buildings and Dwellings	15066	3472
12	2383	Building Finishing Contractors	13505	3723
13	4552	Warehouse Clubs, Supercenters, and Other General Merchandise Retailers	12590	3210
14	6211	Offices of Physicians	11556	7044
15	7139	Other Amusement and Recreation Industries	10501	2659
16	9221	Justice, Public Order, and Safety Activities	9944	7947
17	5616	Investigation and Security Services	9085	3460
18	9211	Executive, Legislative, and Other General Government Support	8517	6896
19	9231	Administration of Human Resource Programs	8405	7149
20	6113	Colleges, Universities, and Professional Schools	8176	5596

Notes: This table shows the top 20 industries by employment in Riverside County in 2022 using 4-digit industry codes. The data are from QWI from the US Census Bureau. Among the 20 largest employing industries, warehousing and storage ranked first, while transportation industries are not among the top 20.

TABLE 7: TOP 20 INDUSTRIES BY EMPLOYMENT IN SAN BERNARDINO COUNTY

Rank	NAICS	Industry	Employment	Earnings
1	4931	Warehousing and Storage	78570	3613
2	7225	Restaurants and Other Eating Places	63623	2123
3	6111	Elementary and Secondary Schools	50011	5356
4	5613	Employment Services	41427	2600
5	6241	Individual and Family Services	31405	1854
6	6221	General Medical and Surgical Hospitals	29296	6498
7	4841	General Freight Trucking	19763	4914
8	4921	Couriers and Express Delivery Services	18128	3856
9	4451	Grocery and Convenience Retailers	14918	2979
10	9221	Justice, Public Order, and Safety Activities	14050	7984
11	6211	Offices of Physicians	13094	7720
12	2382	Building Equipment Contractors	12510	6325
13	4552	Warehouse Clubs, Supercenters, and Other General Merchandise Retailers	12011	3071
14	6214	Outpatient Care Centers	11244	7026
15	9211	Executive, Legislative, and Other General Government Support	10462	8559
16	2381	Foundation, Structure, and Building Exterior Contractors	9668	4401
17	5617	Services to Buildings and Dwellings	8067	3741
18	8111	Automotive Repair and Maintenance	7894	3904
19	4411	Automobile Dealers	7420	7915
20	4244	Grocery and Related Product Merchant Wholesalers	7196	5656

Notes: This table shows the top 20 industries by employment in San Bernardino County in 2022. The data are from QWI from the US Census Bureau. The top industries by employment in San Bernardino County are warehousing and storage, restaurants, elementary and secondary schools, employment services, and individual and family services. Among those industries, warehousing & storage ranked 1st (and average monthly pay in this industry is lower compared to Riverside County). General freight trucking ranked 7th and courier and express delivery services ranked 8th.

JOB QUALITY IN WAREHOUSE OCCUPATIONS: INEQUALITIES ACROSS INDUSTRIES

Workers employed in transportation and warehouse occupations confront unequal employment conditions across industries. For example, while warehouse workers are typically employed in the traditional 'warehousing and storage' industry, some are employed within other industries, such as Employment Services (which includes the temporary help industry) and the electronic shopping industry.

Table 8 below shows how various aspects of job quality among warehouse workers differ across these three industries in the most recent 5-year ACS data. In the Inland Empire, most employees of "freight, stock, and material handlers" work in "warehousing and storage" industry, followed by "electronic shopping" and "employment services." "Warehousing and storage" have the largest share of workers employed full-time (35 hours or more per week) and full-year (50-52 weeks per year, and thus they have the highest median income. On the other hand, temporary agency workers in the "employment services" have the lowest median wages, partly related to the smaller share of workers that are full-time and full-year. Workers in "electronic shopping" are more likely to have health benefits (or employer-provided health insurance), while workers in the "employment service" are the least likely to have health benefits.

TABLE 8: JOB QUALITY IN THE OCCUPATIONS OF "FREIGHT, STOCK, AND MATERIAL HANDLERS" IN THE IE

Industry	Median Wage	% Employed full-time	% Employed full-year	% with Health Benefits
Electronic shopping	$21,579	75.96%	70.61%	72.86%
Employment services	$15,700	70.65%	52.28%	34.63%
Warehousing and storage	$24,074	89.38%	78.18%	51.45%

Source: ACS 2021 5-year file

For five common blue-collar and non-supervisory warehousing occupations, including "laborer and freight, stock, and material movers, hand," "packers and packagers, hand," most workers are employed in the traditional "warehousing and storage" industry, followed by the newer "electronic shopping" industry, with the least number employed in the "employment services" industry in the Inland Empire. On the other hand, while "warehousing and storage" have the largest percentage of full-time and full-year workers, the percentage of full-year workers is lower in "employment services" than in "electronic shopping," and the percentage of full-time workers is higher in "Employment services" than in "Electronic shopping." Across all industries, median wages are relatively low.

TABLE 9: JOB QUALITY IN FIVE COMMON BLUE-COLLAR AND NON-SUPERVISORY WAREHOUSING OCCUPATIONS IN THE IE

Industry	Median Wage	% Employed full-time	% Employed full-year	% with Health Benefits
Electronic shopping	21579	71.99%	70.31%	70.24%
Employment services	19076	78.79%	58.53%	33.53%
Warehousing and storage	25434	91.15%	80.18%	53.66%

Source: ACS 2021 5-year file, Inland Empire

SELF-EMPLOYMENT IN TRANSPORTATION AND WAREHOUSING

A large and increasing number of workers in the Transportation and Warehousing industry are self-employed workers, some of whom are misclassified employees. While there can be some benefits to self-employment, self-employed workers typically do not enjoy the same labor rights as other employed workers and many struggle to earn a good living after paying for their materials and supplies, including maintaining their own trucks and paying for gas.

Figure 1 below shows the rise in the absolute number of self-employed workers in the Transportation and Warehousing industry between 2005 and 2022. Overall, the number of people engaging in self-employed activities in the transportation and warehousing sector was around 15,463 in the Inland Empire, 45,946 in Southern California, and 78,966 in California in 2005. During 2005-2022, people engaged in self-employment in transportation and warehousing have increased by 41.9 percent, 82.9 percent, and 82.6 percent in the Inland Empire, Southern California, and California respectively.

FIGURE 1. NUMBER OF SELF-EMPLOYED WORKERS IN TRANSPORTATION AND WAREHOUSING, 2005-2022

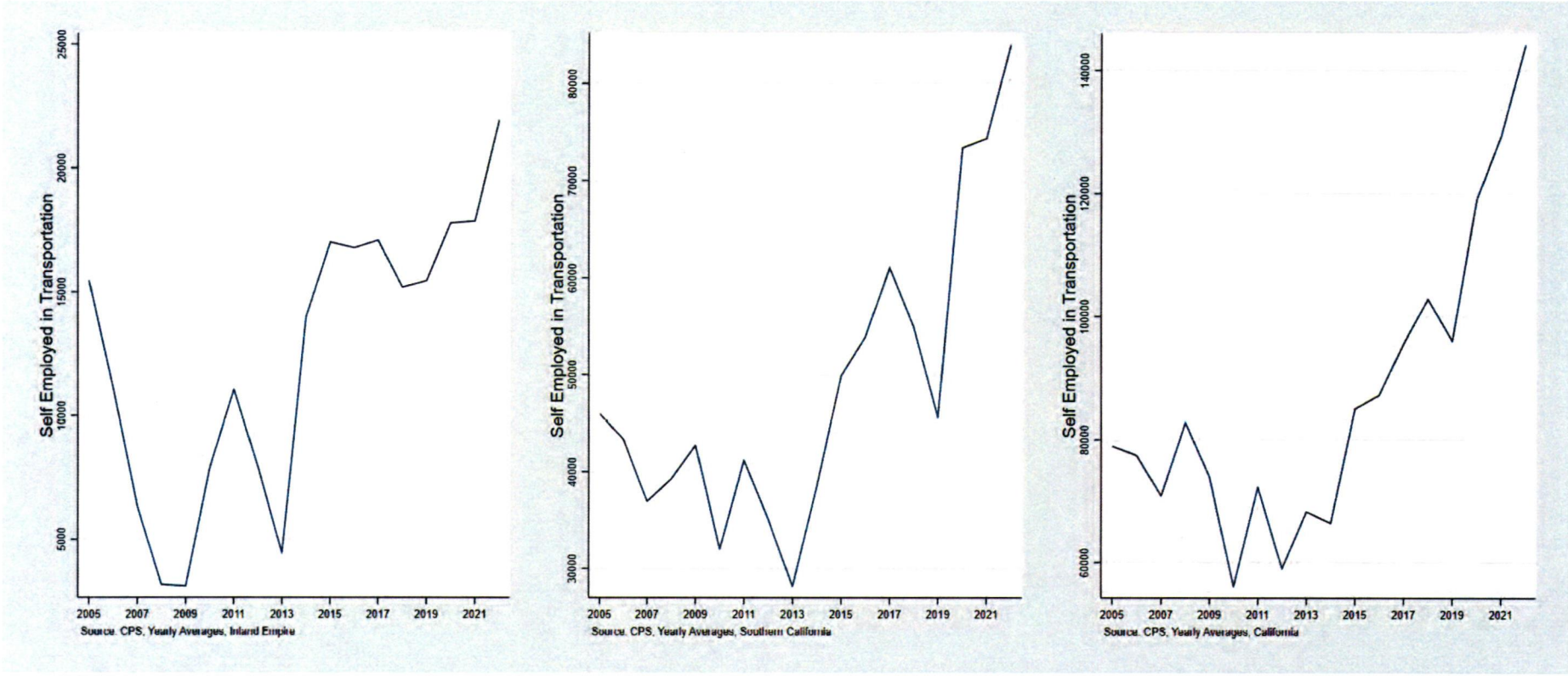


Figure 2 plots the number of self-employed workers in Transportation and Warehousing by incorporation status. There are two categories of workers – incorporated and not-incorporated. Incorporated self-employed are individuals that run their business or practice as a separate legal entity. Not-incorporated self-employed are individuals that run their own business which does not have a legal entity of its own.

Non-incorporated self-employed individuals are higher than incorporated self-employed since 2005. In 2005 in California, out of the total self-employed, 79 percent were engaged in non-incorporated activities. A large increase is observed in the non-incorporated self-employed after 2014, which increased from 47,327 to 71,040 between 2014-2015 in California. Since then, this percentage has generally increased with minor dips in 2019. A similar increase is seen in the incorporated self-employed after 2018. The number of people conducting registered self-employment activities increased in California by 11,510 between 2018-2019. With the high increase of incorporated self-employed in 2018 the share of self-employed in non-incorporated activities is moving downwards and currently stands at 67 percent.

FIGURE 2. NUMBER OF SELF-EMPLOYED WORKERS IN TRANSPORTATION & WAREHOUSING BY INCORPORATION STATUS, 2005-2022

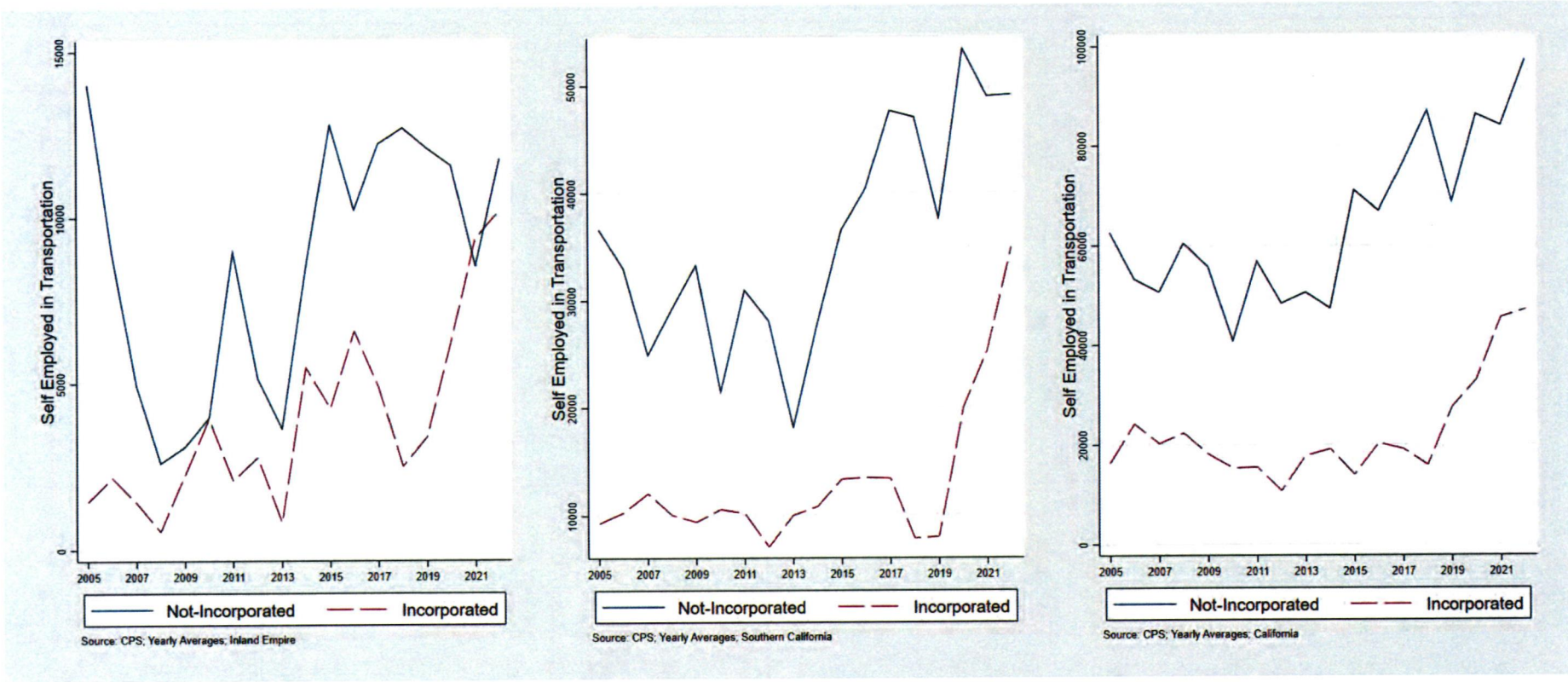
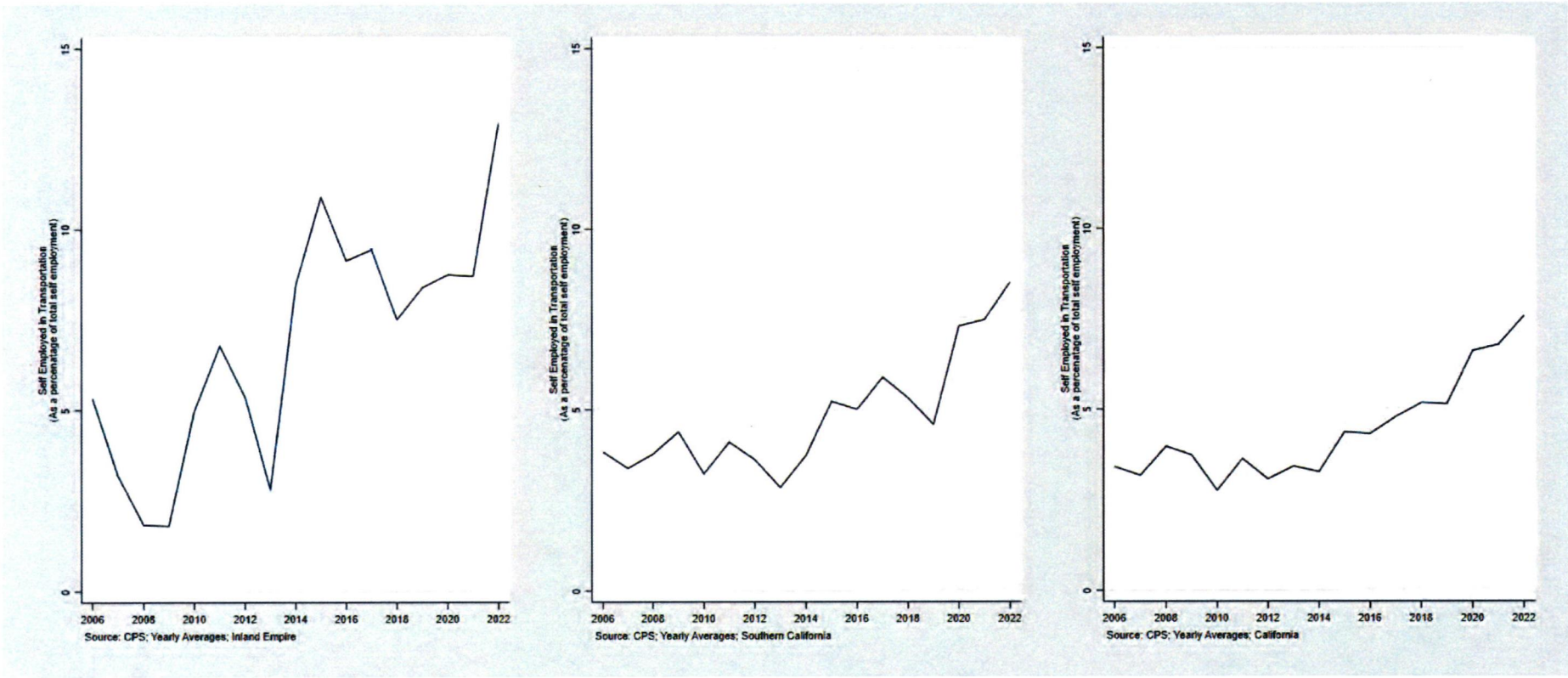


FIGURE 3. SELF-EMPLOYED IN TRANSPORTATION & WAREHOUSING AS A PERCENTAGE OF ALL SELF-EMPLOYED WORKERS, 2005



Notes: (from left to right) Panel A shows Inland Empire, Panel B shows Southern California (4 metropolitan regions are included: El Centro; Los Angeles-Long Beach-Anaheim; Los Angeles-Long Beach-Santa Ana; Oxnard-Thousand Oaks-Ventura; Riverside-San Bernardino-Ontario), Panel C shows California.

Figure 3 plots the number of self-employed workers in transportation and warehousing as a percentage of all self-employed workers to give us a glimpse of the role that sector plays in the growth of self-employment. Among all self-employed workers in California, the percentage employed in the transportation and warehousing sector has been on the rise since 2014. The same trends are seen for Southern California. Between 2006 and 2014, the share of self-employed in transportation and warehousing as a percentage of all self-employed workers remained below 5 percent in both California as a whole, and the Southern California region. Since 2014, this percentage has risen to around 8-9 percent. The trends for the Inland Empire are somewhat similar but the sample size is limited, reducing the certainty of these findings. However, the overall trend has been on the rise for the region as well.

The pandemic had no effect on the increase in self-employment in transportation and warehousing. This points towards the strong growth of the sector. Both Figure 3 and Figure 4 show that the share of self-employed in transportation is on the rise recently among the total of self-employed workers and

total employed workers in transportation for California, the Southern California region, and the Inland Empire. In sum, the absolute rise in self-employment in transportation has been faster not only compared to self-employment generally, but the sectoral growth in employment as well.

Figure 4 and Figure 5 below show the composition of the transportation and warehousing sector by class of workers. In California, the current ratio of self-employed workers to salaried workers in the sector is around 0.15. However, Figure 5 shows that self-employment in transportation and warehousing as a percentage of total employment in transportation and warehousing has been on the rise in California over the last decade. Southern California follows the same pattern as the state average.

FIGURE 4. RATIO OF SELF-EMPLOYED TO SALARIED IN TRANSPORTATION AND WAREHOUSING

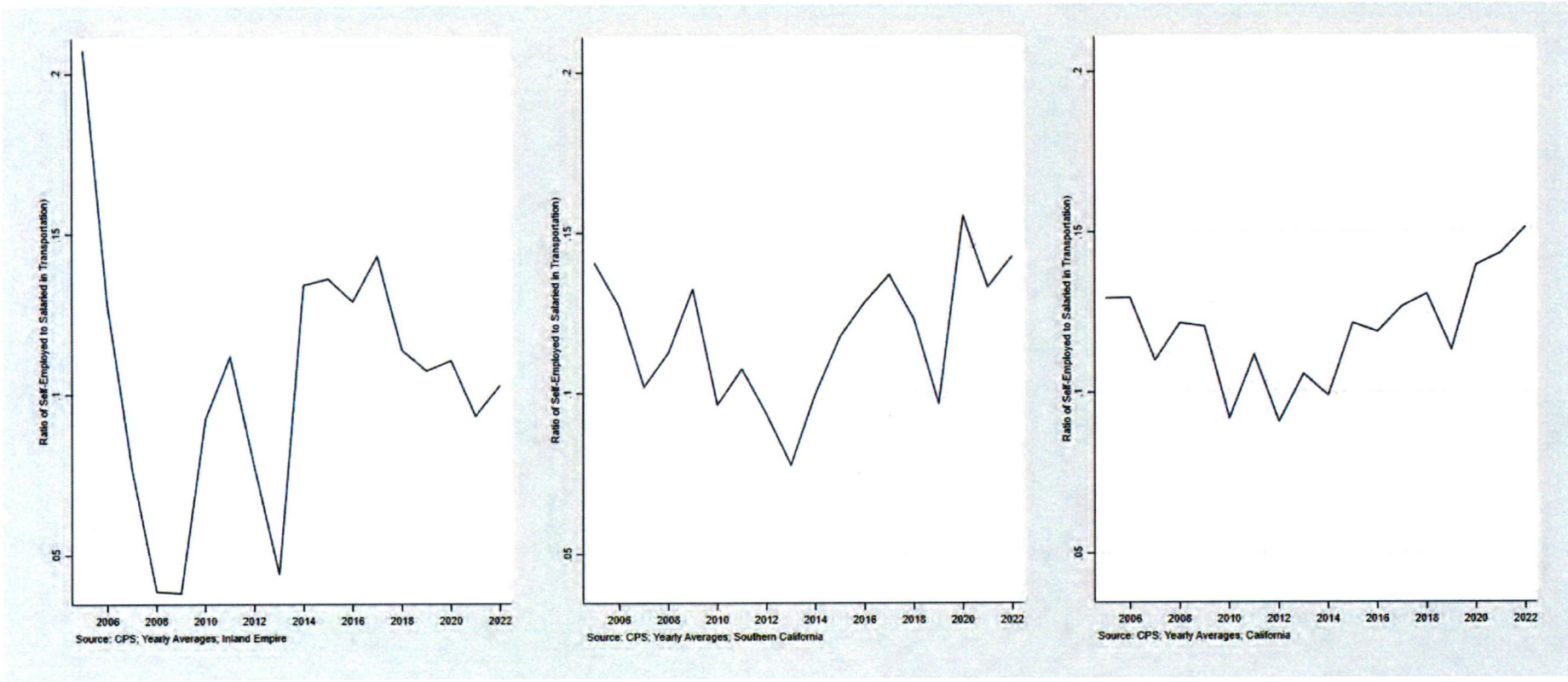
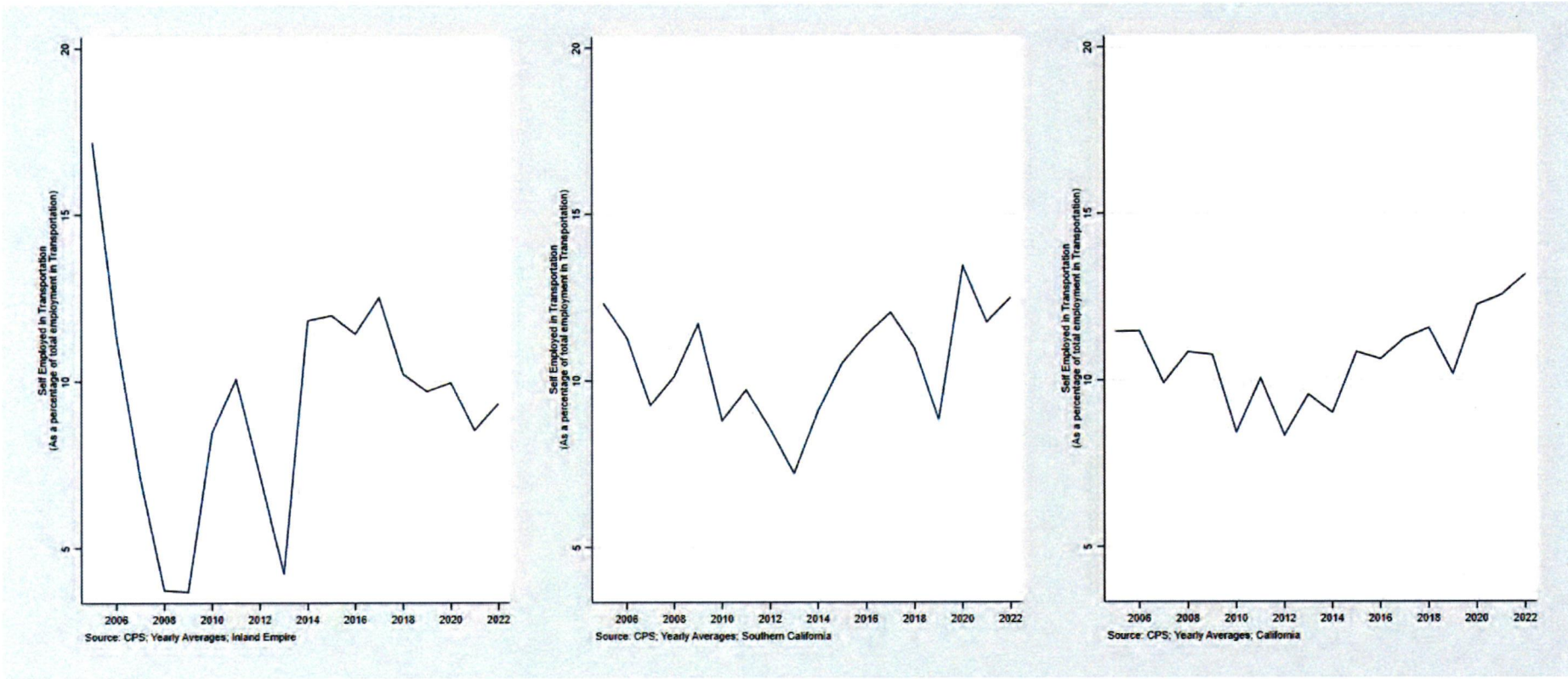


FIGURE 5. SELF-EMPLOYED IN TRANSPORTATION AND WAREHOUSING



In both California and Southern California, the percentage of self-employed workers to total employed workers in transportation and warehousing bottomed out at around 7-8 percent in 2012 and then rose to close to 13 percent in 2022. The data for the Inland Empire is a bit noisier, potentially due to the small sample size, but the share of self-employed as a percentage of total employed workers in transportation and warehousing for the county has hovered around 10 percent over the last decade. In other words, for every 10 employed workers in this sector, there is another worker who is self-employed within it. These self-employed workers include truck drivers who are owner-operators as well as other types of self-employed workers, such as gig workers that are classified as independent contractors.

In times of recessions – in 2008 and 2020 – the plots for California and Southern California show an uptick in the percentage of all employed workers in the transportation and warehousing industry who are self-employed. In other words, the number of self-employed workers in this industry rose more quickly than other forms of employment in transportation and warehousing during those recession years. This could be due to employers relying more heavily on self-employed workers as a way to cut labor costs as well as workers entering self-employment in response to shrinking employment opportunities within this sector.

TABLE 10. U.S. UNION DENSITY AND COVERAGE RATES IN SELECTED TDL OCCUPATIONS, 2023

Occupation	% Union Members	% Union Covered
Drivers/sales Workers & Truck Drivers	9.6%	10.50%
Industrial Tractor Operators/Forklift Drivers	11.50%	12.60%
Laborers, and Freight, Stock & Material Movers	12.20%	13.3%
Packers and Packagers, Hand	5.90%	6.5%
Shipping, Receiving, & Inventory Clerks	7.40%	8.60%
Stockers and Order Fillers	5.90%	6.5%
Supervisors of Trans. & Material Moving Workers	10.10%	11.20%
Transportation, Storage, & Distribution Managers	5.60%	6.70%

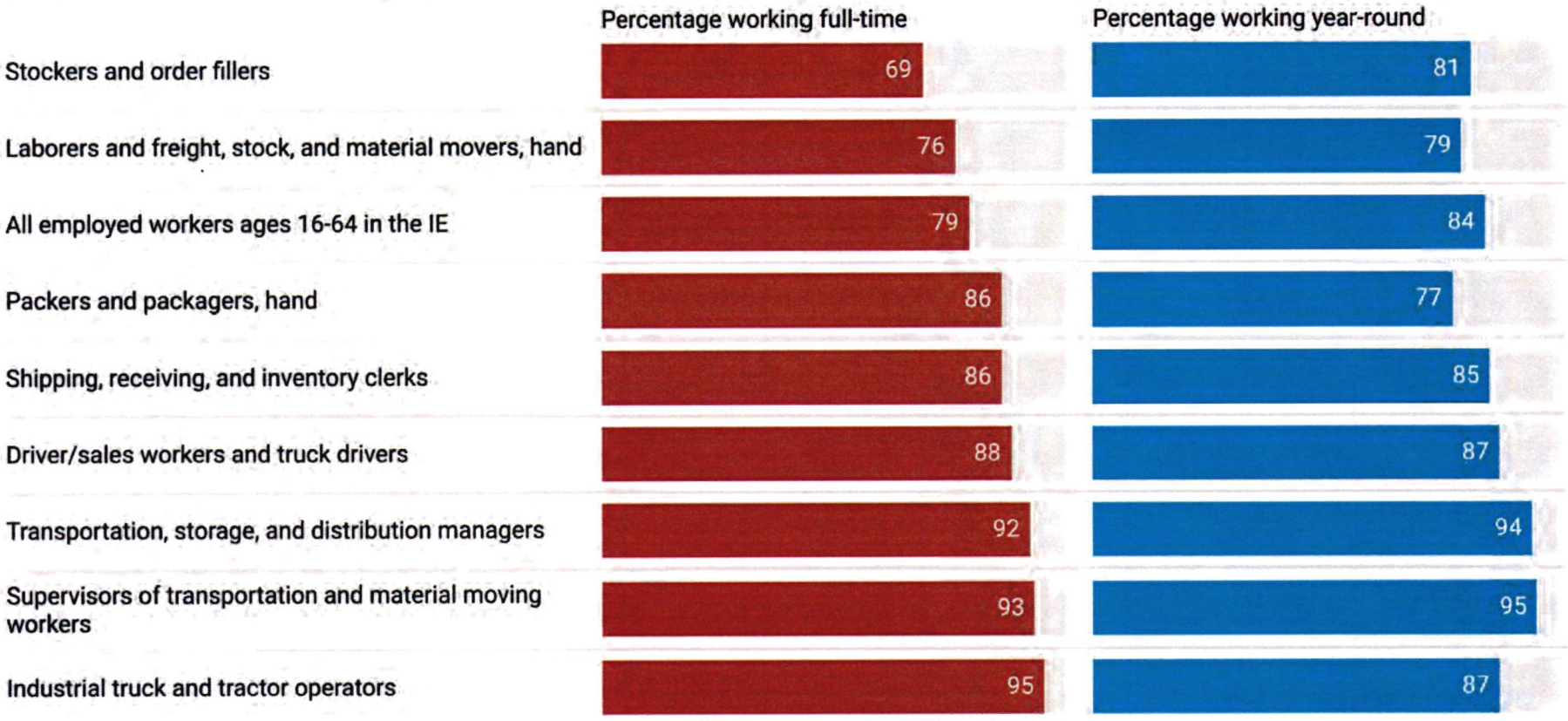
Notes: Percentages shown are for the percent of employed workers in the U.S.

Source: Hirsch, MacPherson and Even (2023), available at https://unionstats.com

FIGURE 6. FULL-TIME AND YEAR-ROUND WORK FOR SELECTED TDL OCCUPATIONS

Full-time and full-year work for select TDL occupations

Figures for each occupation are the percentage of employed workers in the occupation in the IE that work full-time (35 hours or more per week) and the percentage of employed workers in the occupation in the IE that work full-year (50-52 weeks per year). Data are restricted to employed workers ages 16-64.



Source: American Community Survey 5-Year Data, 2021 (from IPUMS) • Created with Datawrapper

APPENDIX 2: OCCUPATIONS USED IN QUANTITATIVE ANALYSIS

The occupational codes used in this report vary by the data set. We selected the most detailed occupational codes for each occupation available from that source that were available at the county level.

AMERICAN COMMUNITY SURVEY (AVAILABLE THROUGH IPUMS)

Using ACS data, we selected the eight occupational categories, which were the most detailed occupational categories available through IPUMS at the county level for blue-collar warehouse workers, heavy-duty and light duty truck drivers, and their supervisors and managers. Our descriptions below are from the U.S. Bureau of Labor Statistics' Division of Occupational Wage and Employment Statistics (May 2022). For warehouse workers, we selected five of the most common blue-collar and non-supervisory warehouse occupations, following De Lara (2013).

53-7062 Laborers and Freight, Stock, and Material Movers, Hand

According to the Bureau of Labor Statistics, workers employed in this occupation "manually move freight, stock, luggage, or other materials, or perform other general labor. Includes all manual laborers not elsewhere classified." This occupational code excludes "Construction Laborers" (47-2061) and "Helpers, Construction Trades" (47-3011 through 47-3019). Excludes "Material Moving Workers" (53-7011 through 53-7199) who use power equipment."

See: https://www.bls.gov/oes/current/oes537062.htm

53-7065 Stockers and Order Fillers

Workers employed in this occupation "receive, store, and issue merchandise, materials, equipment, and other items from stockroom, warehouse, or storage yard to fill shelves, racks, tables, or customers' orders. May operate power equipment to fill orders. May mark prices on merchandise and set up sales displays." This occupation excludes "Shipping, Receiving, and Inventory Clerks" (43-5071), "Laborers and Freight, Stock, and Material Movers, Hand" (53-7062), and "Packers and Packagers, Hand" (53-7064).

See: https://www.bls.gov/oes/current/oes537065.htm

53-7051 Industrial Truck and Tractor Operators

Workers employed in this occupation "operate industrial trucks or tractors equipped to move materials around a warehouse, storage yard, factory, construction site, or similar location." Excluded from this occupation are "Logging Equipment Operators" (45-4022).

See: https://www.bls.gov/oes/current/oes537051.htm

53-7064 Packers and Packagers, Hand

Workers employed in this occupation, "Pack or package by hand a wide variety of products and materials."

See: https://www.bls.gov/oes/current/oes537064.htm

43-5071 Shipping, Receiving, and Inventory Clerks

Workers in this occupation, "verify and maintain records on incoming and outgoing shipments involving inventory. Duties include verifying and recording incoming merchandise or material and arranging for the transportation of products." These workers, "may prepare items for shipment." The occupation excludes "Weighers, Measurers, Checkers, and Samplers, Recordkeeping" (43-5111), "Mail Clerks and Mail Machine Operators, except Postal Service" (43-9051), and "Stockers and Order Fillers" (53-7065).

See: https://www.bls.gov/oes/current/oes435071.htm#ind

53-3030 Driver/Sales Workers and Truck Drivers

According to the BLS, workers employed in this occupation include the following three types of workers:

- 53-3031 Driver/Sales Workers
- 53-3032 Heavy and Tractor-Trailer Truck Drivers
- 53-3033 Light Truck Drivers

53-3031 Driver/Sales Workers

Workers in this occupation, "drive truck or other vehicle over established routes or within an established territory and sell or deliver goods, such as food products, including restaurant take-out items, or pick up or deliver items such as commercial laundry." These workers can also "take orders, collect payment, or stock merchandise at point of delivery." This occupation does not include "Coin, Vending, and Amusement Machine Servicers and Repairers" (49-9091) and "Light Truck Drivers" (53-3033).

See: https://www.bls.gov/ooh/transportation-and-material-moving/delivery-truck-drivers-and-driver-sales-workers.htm

53-3032 Heavy and Tractor-Trailer Truck Drivers

Workers in this occupation "drive a tractor-trailer combination or a truck with a capacity of at least 26,001 pounds Gross Vehicle Weight (GVW)." Some of these workers are "required to unload truck[s]." Workers in this job are required to have a commercial drivers' license. This occupation "includes tow truck drivers," and "excludes "Refuse and Recyclable Material Collectors" (53-7081).

See: https://www.bls.gov/oes/current/oes533032.htm

53-3033 Light Truck Drivers

Workers in this occupation, "drive a light vehicle, such as a truck or van, with a capacity of less than 26,001 pounds Gross Vehicle Weight (GVW), primarily to pick up merchandise or packages from a distribution center and deliver." This occupation "may load and unload vehicle." This occupation does not include "Couriers and Messengers" (43-5021) and "Driver/Sales Workers" (53-3031).

See: https://www.bls.gov/oes/current/oes533033.htm

11-3071 Transportation, Storage, and Distribution Managers

Workers in this occupation "plan, direct, or coordinate transportation, storage, or distribution activities in accordance with organizational policies and applicable government laws or regulations." This occupation "includes logistics managers."

See: https://www.bls.gov/oes/current/oes113071.htm

53-1047 First-Line Supervisors of Transportation and Material Moving Workers, Except Aircraft Cargo Handling Supervisors

This occupation includes the following 2018 SOC occupations: "53-1042 First-Line Supervisors of Helpers, Laborers, and Material Movers, Hand; 53-1043 First-Line Supervisors of Material-Moving Machine and Vehicle Operators; 53-1044 First-Line Supervisors of Passenger Attendants; and 53-1049 First-Line Supervisors of Transportation Workers, All Other."

See: https://www.bls.gov/oes/current/oes531047.htm

BURNING GLASS DATA ANALYSIS (NOVEMBER 2020 THROUGH OCTOBER 2021).

Heavy and Tractor-Trailer Truck Drivers

53-3032.00

According to O-Net Online, heavy and tractor-trailer truck drivers, "Drive a tractor-trailer combination or a truck with a capacity of at least 26,001 pounds Gross Vehicle Weight (GVW)," "may be required to unload truck," and "requires commercial drivers' license." This occupation includes tow truck drivers as well as workers employed in job titles such as the following: "CDL Driver (Commercial Driver's License Driver), Driver, Line Haul Driver, Log Truck Driver, Over the Road Driver (OTR Driver), Production Truck Driver, Road Driver, Semi Truck Driver, Tractor Trailer Driver, Truck Driver."

See: https://www.onetonline.org/link/summary/53-3032.00

Light Truck Drivers

53-3033.00

According to O-Net Online, light truck drivers, "drive a light vehicle, such as a truck or van, with a capacity of less than 26,001 pounds Gross Vehicle Weight (GVW), primarily to pick up merchandise or packages from a distribution center and deliver." They might be required to "load and unload vehicle[s]." This occupational code includes workers employed in job titles such as the following: "Bulk Delivery Driver, Delivery Driver, Driver, Light Truck Driver, Package Car Driver, Package Delivery Driver, Route Driver, Service Provider, Truck Driver, Warehouse Driver."

See: https://www.onetonline.org/link/summary/53-3033.00#:~:text=Read%20maps%20and%20follow%20written,statements%2C%20in%20accordance%20with%20regulations.

Laborers and Freight, Stock, and Material Movers, Hand

53-7062.00

According to O'Net Online, laborers and freight, stock, and material movers, hand "manually move freight, stock,luggage, or other materials, or perform other general labor," and it "includes all manual laborers not elsewhere classified." This occupational code includes workers employed in job titles such as the following: Dock Worker, Laborer, Line Tender, Loader, Material Handler, Merchandise Pick Up Associate, Receiver, Receiving Associate, Shipping and Receiving Materials Handler, Warehouse Worker."

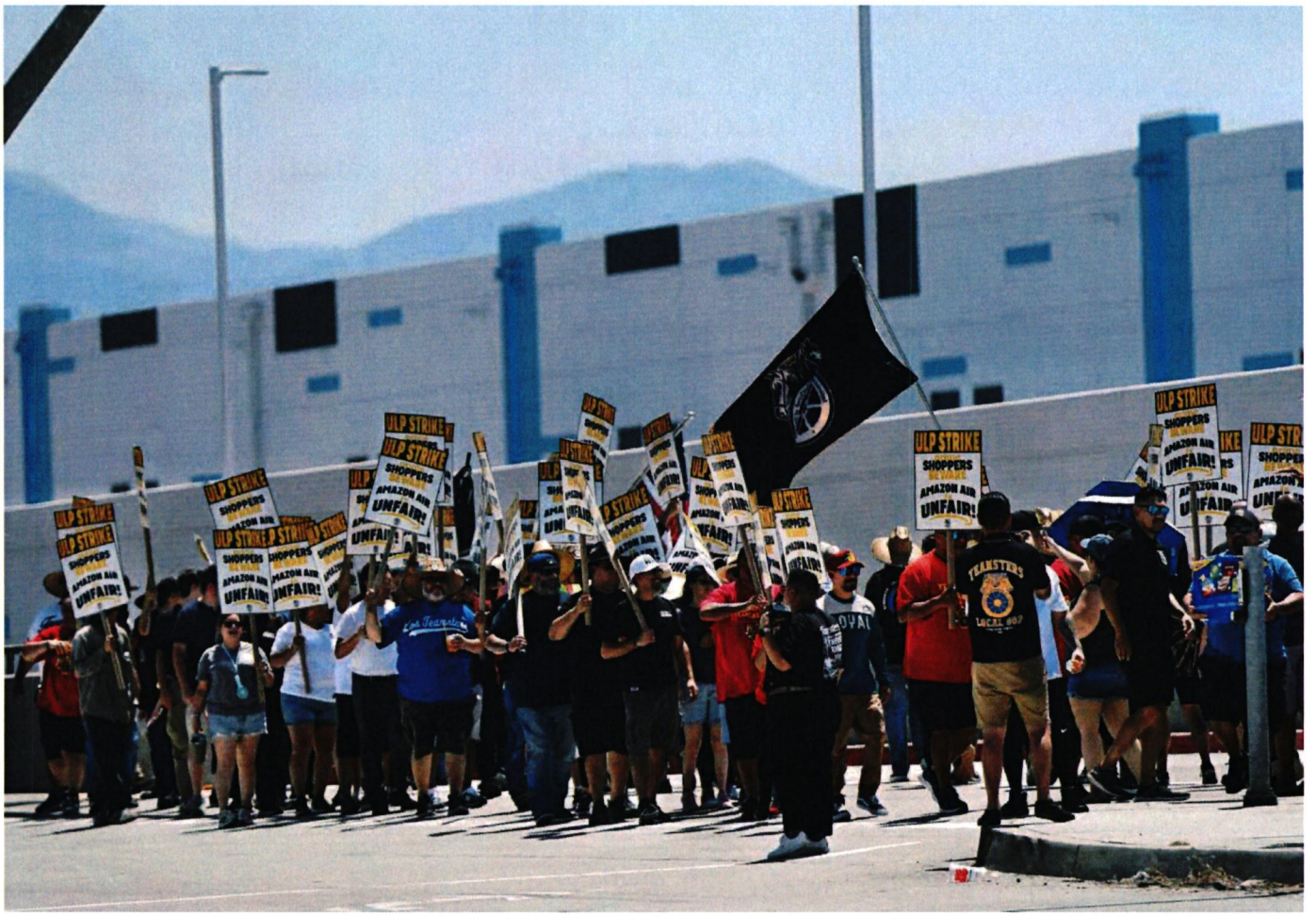
See: https://www.onetonline.org/link/details/53-7062.00

Attachment D

ECONOMY

Report: Warehouse wages trail Inland average

UC Riverside researcher sees growth in high- and low-paying jobs but a weak middle



Amazon workers and supporters protest in July 2024 outside the company's San Bernardino air hub. According to a report, warehouse workers in the Inland Empire earn 75% of what other workers in the region make. photo by milka soko

By Jeff Horseman

jhorseman@scng.com

The average rank-and-file warehouse worker in the Inland Empire earns 75% of what other workers make in the region, according to a report that

lauds what it calls "historic gains" those in the logistic industry made last year.

The report, "State of the Unions: California Labor in 2024," includes a chapter on efforts in recent years to protect workers from extreme heat and to unionize employees at Amazon's San Bernardino air hub.

"The IE appears to be growing with either high-paying or low-paying jobs, but there is no growth for middle-class jobs," said David Mickey-Pabello, research director at UC Riverside's Inland Empire Labor and Community Center, which wrote the chapter about warehouse workers in the report by UCLA's Institute for Research on Labor and Employment.

"We generally believe that a more diverse economy would greatly benefit the area, as an over-reliance on logistics could expose us to the risks associated with that industry, for example, tariffs and automation," Mickey-Pabello added in a news release about the report.

While logistics "plays a central role in the Inland Empire's economy, (it) continues to leave its workers behind," the report states.

In an emailed statement, Amazon spokesperson Eileen Hards said the company "strongly question(s) the validity and objectivity of the recently published report on Inland Empire warehouse workers because it relies heavily on data and citations from labor organizations with clear agendas, raising significant concerns about its accuracy and impartiality."

According to the report, one in 15 Inland Empire workers is employed in warehousing. The average warehouse worker who's not in management earns just under $45,000 a year, with growth in non-management warehouse jobs outpacing jobs in other industries between 2014 and 2023, according to the report, which cited census data when referencing wages.

During that timeframe, the number of warehouse hand packers and packagers grew 125.8%, but the average wage of that job — $42,850 — was the lowest in the logistics industry, the report added.

Latinos, who make up 42% of the Inland workforce, are 62% of warehouse workers, according to the report.

Researchers also recapped the showdown between the Teamsters and Amazon over the union's push to represent workers at the San Bernardino air hub, also known as KSBD.

Organizing workers "is necessary to support warehouse workers' ongoing efforts to gain union recognition, good contracts, and workplace safety," the report concluded.

In December, the Teamsters announced it represented more than 1,000 air hub workers. Amazon disputes this, saying the Teamsters have never been chosen in a National Labor Relations Board election to represent air hub employees and that the board hasn't ordered Amazon to bargain with the Teamsters.

"We respect our employees' right to choose whether or not to join a union, and the report's characterization of organizing efforts fails to acknowledge that the vast majority of our employees have consistently chosen direct relationships with Amazon," Hards said.

"The fact is, Amazon already offers what many unions are requesting: competitive pay, health benefits on day one, and opportunities for career growth. We look forward to working directly with our team to continue making Amazon a great place to work."

The report also praises a state board's January 2024 decision to fine Amazon $14,000 for not doing enough to protect air hub workers from excessive heat. Amazon disputed the findings that led to the fine.

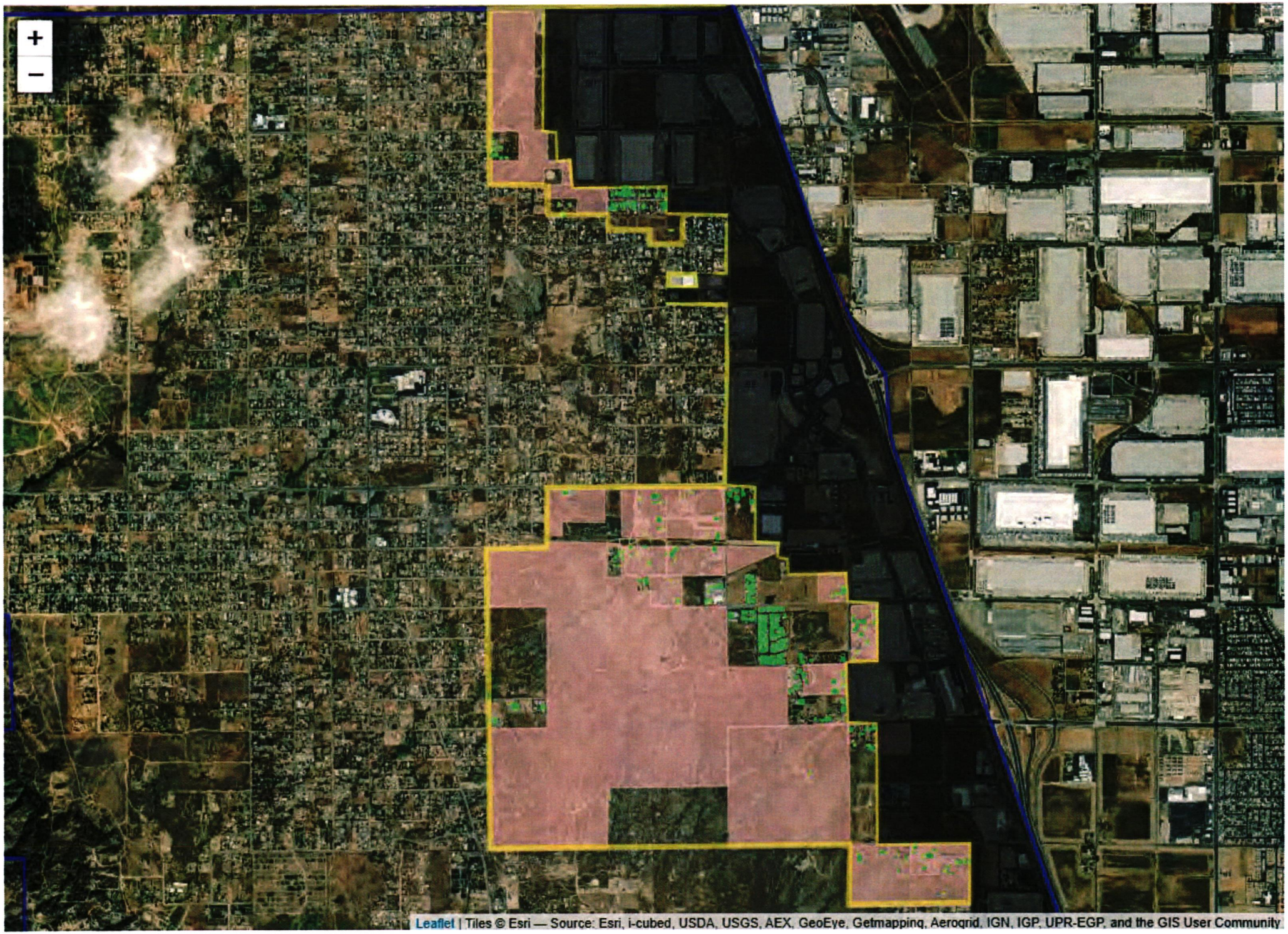
Amazon has said it trains workers on spotting and preventing heat illness and takes a number of steps to protect employees from excessive heat.

These include heat breaks for employees, providing heat-fighting apparel such as cooling sleeves, installing shade structures and misting fans on the air hub tarmac and policies to ensure air hub employees are never more than a minute away from water and that the air hub's indoor temperature doesn't exceed 72 degrees.

Attachment E


N
W
E
S
0 1,000 2,000 4,000 Feet

Attachment F

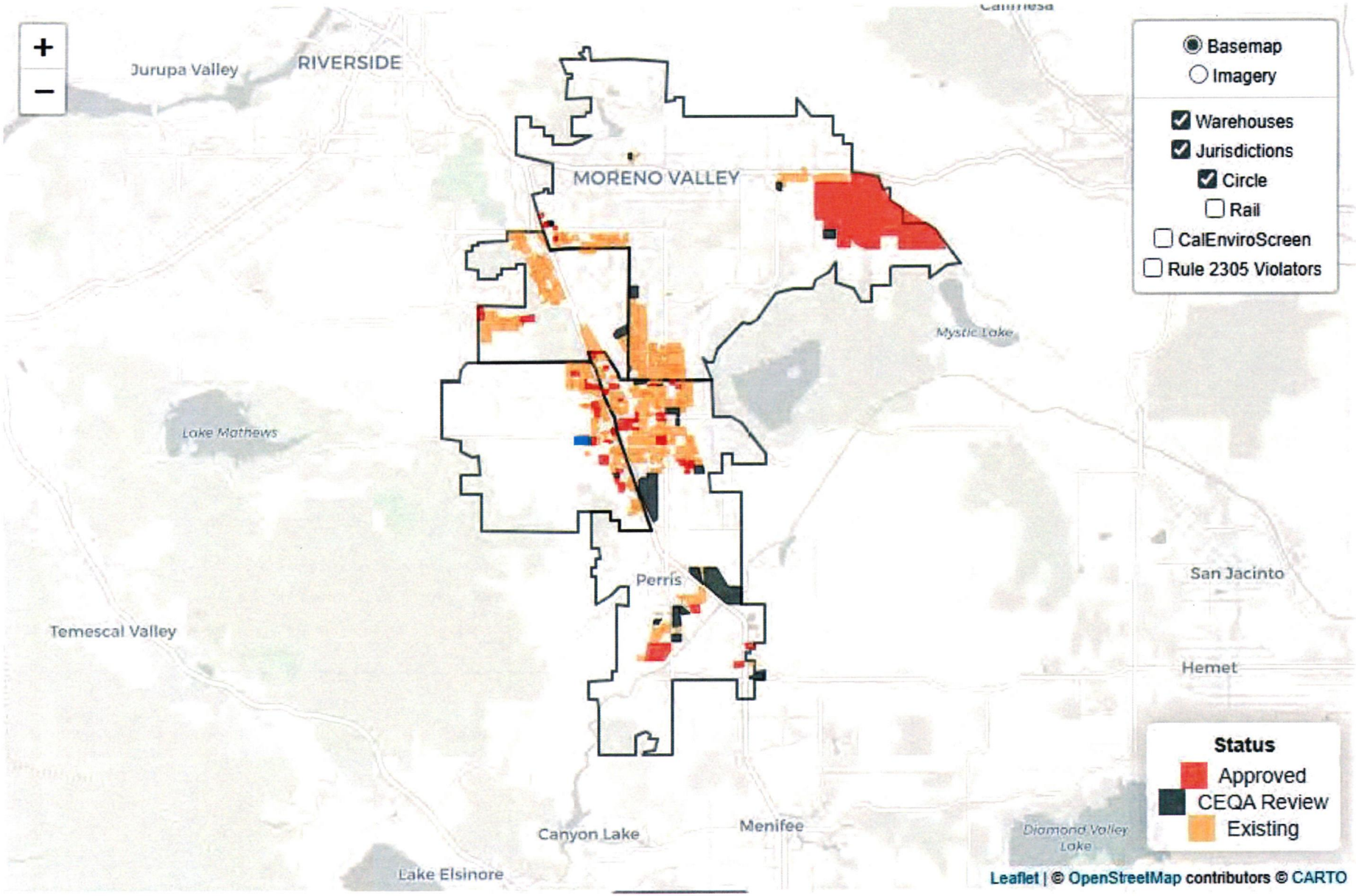

+
−
Leaflet | Tiles © Esri — Source: Esri, i-cubed, USDA, USGS, AEX, GeoEye, Getmapping, Aerogrid, IGN, IGP, UPR-EGP, and the GIS User Community

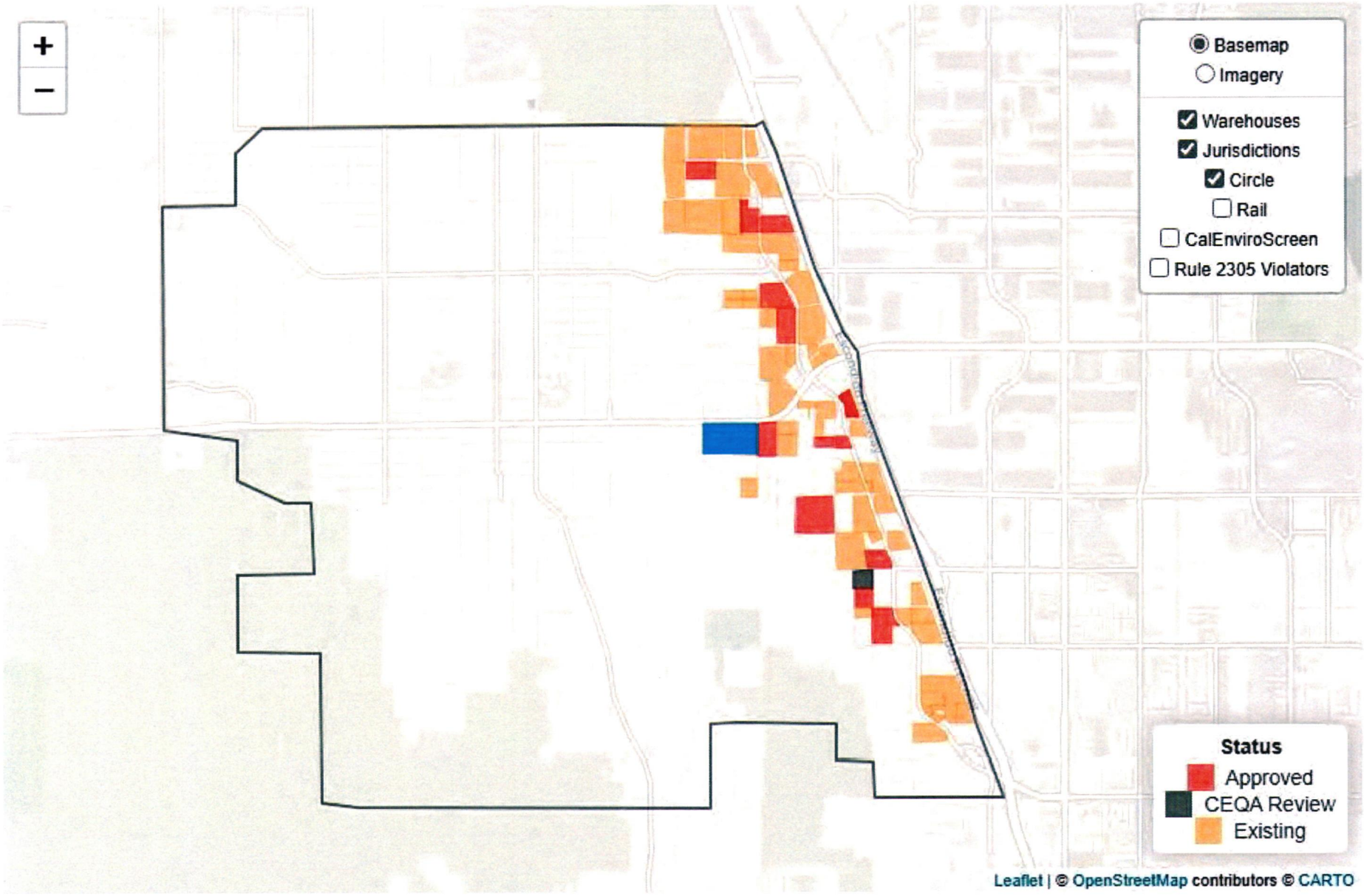
Attachment G

Status	Project Name	Location	Acres	Building sq.ft.	GPA proposed?
Pending	New Perris Commerce Center Specific Plan Project	City of Perris	368	8,808,000	Yes
Pending	Harvest Landing Retail Center & Business Park Project	City of Perris	288	6,895,000	Yes
Pending	Perris Airport Logistics Center	City of Perris	92	2,214,000	No
Approved	South Campus Specific Plan and Village West Drive Extension Project	Riverside County (March JPA)	66	1,591,000	Yes
Pending	Perris Valley Towne Center	City of Perris	65	1,554,000	Yes
Approved	Majestic Freeway Business Center Phase II	Mead Valley, Perris	62	1,491,000	No
Pending	Meridian D-1 Gateway Aviation Center	Moreno Valley, Riverside County (March JPA)	53	1,274,000	No
Pending	Merwin Property Project	City of Moreno Valley	53	1,260,000	Yes
Approved	Ramona Gateway Project	Perris	47	1,124,000	No
Pending	Heacock Commerce Center Project	City of Moreno Valley	44	1,053,000	Yes
Pending	OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project	City of Perris	42	998,000	No
Approved	Rider and Patterson Business Center	Mead Valley	37	897,000	Yes
Pending	Mapes Commerce Center Project	City of Perris	36	853,000	No
Approved	Ellis Logistics Center Project	Perris	33	779,000	No
Approved	Perris DC 11	Perris	29	702,000	No
Pending	The Cubes at Placentia Industrial Project	City of Perris	29	689,000	No
Pending	Ethanac Logistics Center	City of Perris	26	625,000	Yes
Approved	First March Logistics Project	Perris	26	618,000	No
Pending	First Industrial Logistics at Harley Knox and Indian (DPR 22-00016 and TPM 25-0004 (TPM 38684))	City of Perris	25	606,000	No
Approved	Duke Warehouse at Patterson Avenue and Nance Street Project	Perris	25	601,000	No
Approved	Mapes and Trumble Industrial Facility Project	Perris	21	504,000	No
Approved	First Industrial Logistics at Sinclair Street Project, DPR 22-00027	Perris	20	482,000	No
Approved	Harvill at Water Industrial	Mead Valley	20	477,000	No
Pending	Crystal Windows West Coast Headquarter Project	City of Moreno Valley	18	441,000	Yes
Approved	DPR 20-00020 Redlands West Industrial Project	Perris	17	404,000	No
Approved	Seaton Avenue and Cajalco Road Industrial Project - Plot Plan No. 210133	Mead Valley, Riverside County	17	397,000	No
Approved	Patterson Commerce Center	City of Perris	15	369,000	No
Pending	Distribution Park Commercial and Industrial Project	City of Perris	15	359,000	No
Approved	PVCCSP, Amendment No. 13 (SPA19-05287)	City of Perris	15	357,000	No
Approved	Muranaka Warehouse Project	Mead Valley, Riverside County	15	354,000	No
Approved	Ramona-Indian Warehouse	City of Perris	14	340,000	No
Approved	Perris & Morgan 3 Building Industrial Complex	City of Perris	14	326,000	No
Pending	Waypoint Commerce Center	City of Perris	13	322,000	No
Approved	Redlands East Industrial Project - DPR 20-00021, SPA 22-05053, TPM 22-05028	City of Perris	12	284,000	No

Approved	Old 215 Industrial Park Project (PEN21-0105 through 0110)	City of Moreno Valley	12	278,000	No
Approved	Barker Logistics, LLC Project (PPT 190008)	Riverside County (near Perris)	11	267,000	No
Pending	Bay & Day Commerce Center Project	City of Moreno Valley	10	239,000	No
Pending	Thrifty Oil North Business Center	Mead Valley, Riverside County	10	239,000	Yes
Pending	Moreno Valley Business Park Building 5	City of Moreno Valley	10	234,000	Yes
Approved	Plot Plan No. 2200047 (PPT220047) and Variance #230002	Riverside County (near Perris)	10	232,000	No
Approved	First Industrial Logistics at Wilson Avenue Project DPR 22-00017	City of Perris	9	222,000	No
Approved	Plot Plan No. 220001 BCI IV Harvill Industrial Center Project	Mead Valley, Riverside County	9	211,000	No
Approved	Moreno Valley Business Center Project PEN20-0162	City of Moreno Valley	8	185,000	No
Approved	First Industrial Warehouse at Day Street Project	City of Moreno Valley	8	184,000	No
Approved	DPR 20-00019 and TPM 38061 / 21-05272 Operon HKI Project	City of Perris	7	177,000	No
Approved	Ramona Expressway and Brennan Avenue Warehouse Project	City of Perris	7	177,000	No
Approved	Development Plan Review 21-00008 - Harley Knox Boulevard Industrial Project	City of Perris	7	172,000	No
Pending	Edgemont Commerce Center	City of Moreno Valley	7	169,000	No
Approved	Cottonwood & Edgemont Project	City of Moreno Valley	7	165,000	No
Approved	Harley Knox Commerce Center	City of Perris	6	156,000	No
Approved	Redlands and Placentia Project	City of Perris	6	151,000	No
Approved	Plot Plan No. 220024	Mead Valley, Riverside County	5	127,000	No
Approved	Development Plan Review 22-00012 - Wilson Avenue Industrial Project	City of Perris	5	111,000	No
Approved	Patterson Business Center - Development Plan Review 22-00013	City of Perris	5	111,000	No
Approved	Plot Plan PPT No. 220026 (Patterson and Harvill Business Center)	Mead Valley, Riverside County	5	109,000	No
Approved	Westport Perris Industrial Project	City of Perris	5	109,000	No
Approved	Markham Street Warehouse Project	City of Perris	4	98,000	No
Pending	Brew Harley Knox Warehouse Project (SPA 22-05375 and DPR 22-00036)	City of Perris	4	96,000	No

Attachment H


Basemap
Imagery
Warehouses
Jurisdictions
Circle
Rail
CalEnviroScreen
Rule 2305 Violators
Jurupa Valley
RIVERSIDE
MORENO VALLEY
Mystic Lake
Lake Mathews
Perris
San Jacinto
Temescal Valley
Hemet
Canyon Lake
Menifee
Lake Elsinore
Diamond Valley Lake
Status
Approved
CEQA Review
Existing
Leaflet | © OpenStreetMap contributors © CARTO


+
−
Basemap
Imagery
Warehouses
Jurisdictions
Circle
Rail
CalEnviroScreen
Rule 2305 Violators
Status
Approved
CEQA Review
Existing
Leaflet | © OpenStreetMap contributors © CARTO

Attachment I

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

Table of Contents

I. Background 1
II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies 3
III. Community Engagement 4
IV. Warehouse Siting and Design Considerations 5
V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation 7
VI. Noise Impacts Analysis and Mitigation 10
VII. Traffic Impacts Analysis and Mitigation 11
VIII. Other Significant Environmental Impacts Analysis and Mitigation 12
IX. Conclusion 13

In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)[1] regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies regarding warehouse projects, and in rare cases the Bureau has filed litigation to enforce CEQA.[2] This document builds upon the Bureau's work on warehouse projects, collecting information gained from the Bureau's review of hundreds of warehouse projects across the state.[3] It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.[4] While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, nearly all of which have been adapted from actual warehouse projects in California.

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.[5] California, with its ports, population centers, and transportation network, has found itself at the center of this trend. In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade.[6] The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day.[7] Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last five years.[8] This trend has only accelerated, with e-commerce growing to

---

[1] https://oag.ca.gov/environment/justice.

[2] https://oag.ca.gov/environment/ceqa; *People of the State of California v. City of Fontana* (Super. Ct. San Bernardino County, No. CIVSB2121829); *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).

[3] This September 2022 version revises and replaces the prior March 2021 version of this document.

[4] Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.

[5] As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.

[6] Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units) (2020), https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/ (Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide) (last accessed September 18, 2022).

[7] U.S. Dept. of Transportation, Federal Highway Administration, *FHWA Operations Support – Port Peak Pricing Program Evaluation* (2020), available at https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm (last accessed September 18, 2022).

[8] South Coast Air Qual. Mgmt. Dist., *Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*, at 7-8, 41 (May 2021).

13% of all retail sales and 2021 being a second consecutive record year for new warehouse space leased.[9] The latest data and forecasts predict that the next wave of warehouse development will be in the Central Valley.[10]

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[11] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[12] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts and systemic vulnerability. For example, a comprehensive study by the South Coast Air Quality Management District found that communities located near large warehouses scored far higher on California's environmental justice screening tool, which measures overall pollution and demographic vulnerability.[13] That

---

[9] U.S. Census Bureau News, Quarterly Retail E-Commerce Sales 4th Quarter 2021 (February 22, 2022), https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf (last accessed September 18, 2022); CBRE Research, *2022 North America Industrial Big Box Report: Review and Outlook*, at 2-3 (March 2022), *available at* https://www.cbre.com/insights/reports/2022-north-america-industrial-big-box#download-report (last accessed September 18, 2022).

[10] CBRE Research, *supra note* 9, at 4, 36; New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), *available* at https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html.

[11] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (last accessed September 18, 2022) (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts (last accessed September 18, 2022); Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (last accessed September 18, 2022) (DPM).

[12] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (last accessed September 18, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

[13] South Coast Air Quality Management District, "Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305" (May 2021), at 4-5.

study concluded that, compared to the South Coast Air Basin averages, communities in the South Coast Air Basin near large warehouses had a substantially higher proportion of people of color; were exposed to more diesel particulate matter; had higher rates of asthma, cardiovascular disease, and low birth weights; and had higher poverty and unemployment rates.[14] Each area has its own unique history, but many of these impacts and vulnerabilities reflect historic redlining practices in these communities, which devalued land and concentrated poverty, racial outgroups, and pollution into designated areas.[15]

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically guide warehouse development, we encourage local governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and direct sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take many forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors[16] can help attract investment while avoiding conflicts between warehouse facilities and residential communities. Transition zones with lighter industrial and commercial land uses may also help minimize conflicts between residential and industrial uses.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related general plan elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help

---

[14] *Id.* at 5-7.

[15] Beginning in the 1930s, federal housing policy directed investment away from Black, immigrant, and working-class communities by color-coding neighborhoods according to the purported "riskiness" of loaning to their residents. In California cities where such "redlining" maps were drawn, nearly all of the communities where warehouses are now concentrated were formerly coded "red," signifying the least desirable areas where investment was to be avoided. *See* University of Richmond Digital Scholarship Lab, Mapping Inequality, https://dsl.richmond.edu/panorama/redlining/#loc=12/33.748/-118.272&city=los-angeles-ca (Los Angeles), https://dsl.richmond.edu/panorama/redlining/#loc=13/32.685/-117.132&city=san-diego-ca (San Diego), https://dsl.richmond.edu/panorama/redlining/#loc=11/37.81/-122.38&city=oakland-ca (Oakland), https://dsl.richmond.edu/panorama/redlining/#loc=13/37.956/-121.326&city=stockton-ca (Stockton), https://dsl.richmond.edu/panorama/redlining/#loc=12/36.751/-119.86&city=fresno-ca (Fresno) (all last accessed September 18, 2022).

[16] In this document, "sensitive receptors" refers to residences, schools, public recreation facilities, health care facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.[17]

Local ordinances and good neighbor policies that set development standards for all warehouses in the jurisdiction are a critical and increasingly common tool that serve several goals. When well-designed, these ordinances direct investment to local improvements, provide predictability for developers, conserve government resources by streamlining project review processes, and reduce the environmental impacts of industrial development. While many jurisdictions have adopted warehouse-specific development standards, an ordinance in the City of Fontana provides an example to review and build upon.[18] Good neighbor policies in Riverside County and by the Western Riverside Council of Government include additional measures worth consideration.[19]

The Bureau encourages jurisdictions to adopt their own local ordinances that combine the strongest policies from those models with measures discussed in the remainder of this document.

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The

[17] For more information about SB 1000, *see* https://oag.ca.gov/environment/sb1000.
[18] https://oag.ca.gov/system/files/attachments/press-docs/Final%20Signed%20Fontana%20Ordinance.pdf (last accessed September 18, 2022).
[19] For example, the Riverside County policy requires community benefits agreements and supplemental funding contributions toward additional pollution offsets, and the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors. https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf (last accessed September 18, 2022) (Riverside County); http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId= (last accessed September 18, 2022) (Western Riverside Council of Governments).

information should be in a format that is easy to navigate and understand for members of the affected community.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community liaison to the surrounding community.
- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints, and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[20]
- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.
- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

---

[20] CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted in some scenarios. CARB, Concept Paper for the Freight Handbook (December 2019), *available at* https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf (last accessed September 18, 2022).

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.[21]
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.
- Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.

[21] CEQA Guidelines § 15369.

- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- 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.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- 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.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring all heavy-duty vehicles engaged in drayage[22] to or from the project site to be zero-emission beginning in 2030.

[22] "Drayage" refers generally to transport of cargo to or from a seaport or intermodal railyard.

- 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.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- 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.
- 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.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- 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)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- 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.
- 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.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of

trucks.

- 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.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- 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.
- 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.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound

pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

- Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license

is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.

- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.
- Using full cut-off light shields and/or anti-glare lighting.
- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.
- Using cool pavement to reduce heat island effects.

- Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.
- Using light colored roofing materials with a solar reflective index of 78 or greater.
- Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.
- Designing skylights to provide natural light to interior worker areas.
- Installing climate control and air filtration in the warehouse facility to promote worker well-being.

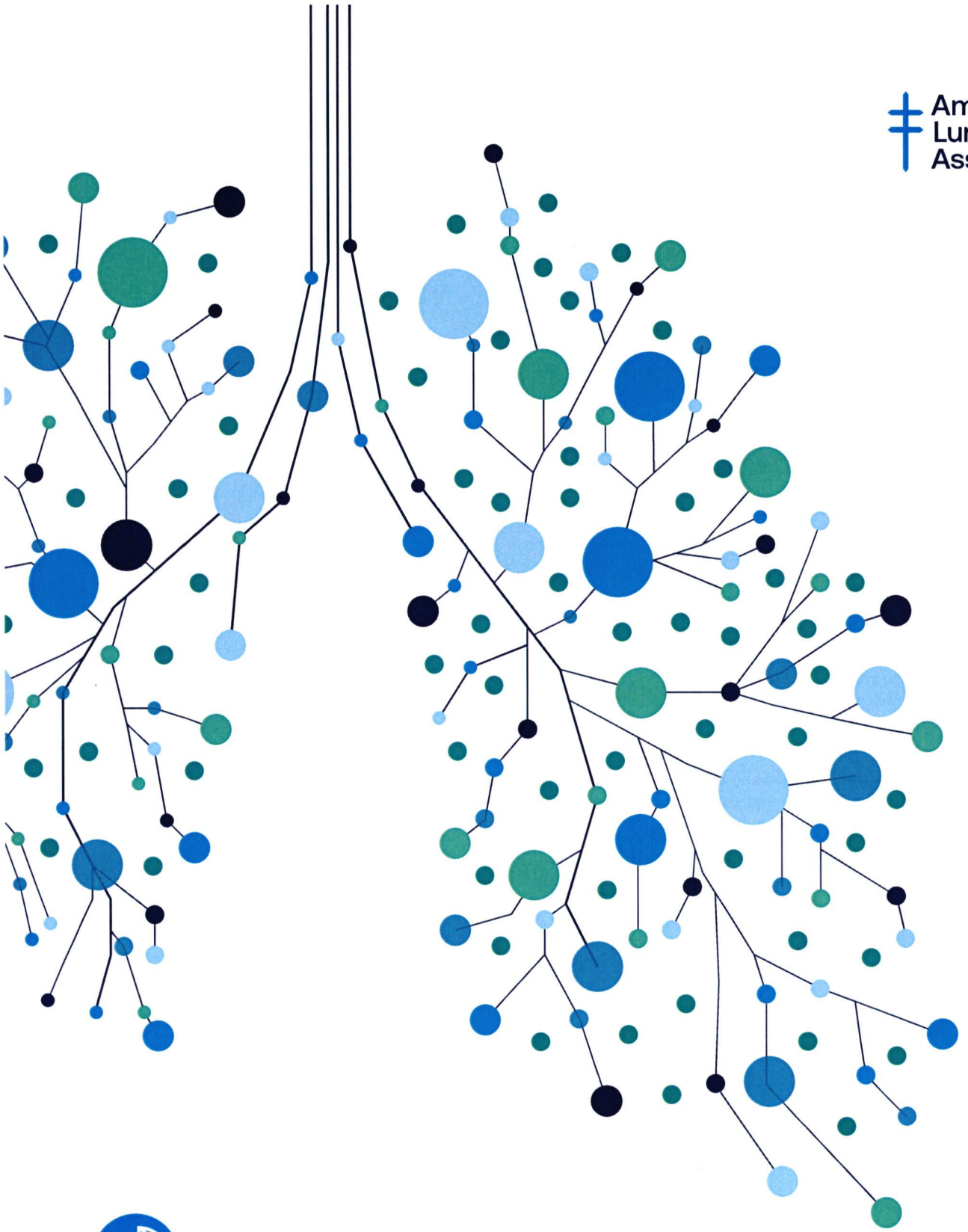
IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Attachment J

American Lung Association.



State of the Air

2025 Report

Table of Contents

About this Report

Acknowledgements 4

Why State of the Air? 5

Methodology 7

Key Findings

Key Findings 12

Ozone Pollution Trends 13

Short-term Particle Pollution Trends 16

Year-Round Particle Pollution Trends 19

Populations at Risk 21

Most Polluted Places to Live 23

Cleanest Places to Live 24

Health Impact of Air Pollution

Health Effects of Particle Pollution 25

Health Effects of Ozone 27

People at Risk 29

Recommendations for Action

Defend EPA Funding 34

Defend EPA Rules 35

Move Forward at the State, City, Community and Individual Levels 36

Data Tables

Understanding Grades and Tables 37

Table 1: Populations at Risk by Grade and by Pollutant 38

Table 2 a-c: Populations at Risk in 25 Most Polluted Cities, by Pollutant 39-41

Table 3 a-c: Cleanest Cities, by Pollutant 42-44

Table 4 a-c: Cleanest Counties, by Pollutant 45-48

State Data Tables 50

Acknowledgments

The American Lung Association "State of the Air" 2025 is the result of the hard work of many.

We would like to thank Allen S. Lefohn, Ph.D., of A.S.L. and Associates, who compiled the data, and John Balmes, M.D., who served as expert volunteer reviewer for the health impacts section. Special thanks this year goes to the air quality professionals who agreed to share stories about how the work they do makes a difference.

Great appreciation goes to the National Association of Clean Air Agencies, who strove to make this report better through comments, review and concerns. Many of its members reviewed and commented on their state data to verify their accuracy. We also appreciate the assistance of members of the Association of Air Pollution Control Agencies, some of whom also reviewed data from their states. We appreciate them all as our partners in the fight against air pollution. The results in this report should in no way be construed as a comment on the work any of these agencies do.

"State of the Air" 2025 would not have been possible but for the first twenty formative years of inspiration, dedication and hard work of the late Janice E. Nolen. Her spirit still guides us all.

The American Lung Association assumes sole responsibility for the content of "State of the Air" 2025.

American Lung Association
55 W. Wacker Drive, Suite 1150
Chicago, IL 60601

Advocacy Office
1331 Pennsylvania Avenue, NW, Suite 1425 North
Washington, DC 20004
(800) 586-4872

Lung.org/sota

Copyright ©2025 by the American Lung Association.

American Lung Association and State of the Air are registered trademarks of the American Lung Association.

Why "State of the Air"?

The Clean Air Act requires the U.S. Environmental Protection Agency (EPA) to set health-based limits, called National Ambient Air Quality Standards (NAAQS), for six dangerous outdoor air pollutants: particulate matter, ozone, nitrogen dioxide, sulfur dioxide, carbon monoxide and lead. "State of the Air" looks at two of the most widespread and dangerous pollutants from this group, fine particulate matter and ozone.

The NAAQS identify what is considered a safe level of each pollutant to breathe, based on the most recent health and medical science, including an adequate margin of safety for those most at risk. These standards require states and local governments to take steps to reduce emissions to attain the standards. The standards also serve to alert families with children, seniors, individuals with lung or heart conditions, and others about dangerous air pollution levels through color-coded air quality alerts. This enables them to take necessary precautions to minimize their exposure. Under the Clean Air Act, the standards must be based solely on what is needed to protect health and must be periodically updated as the science evolves.

Setting national health-based standards and requiring states that violate the standards to enact plans to clean up their air pollution problems have been a great benefit to the public health of the nation. Since the Clean Air Act was passed in 1970, the combined emissions of six key air pollutants have fallen by 78%, according to EPA. But as "State of the Air" 2025 shows, many millions of people in this country are still breathing unhealthy air.

Purpose and history of "State of the Air"

In the year 2000, the American Lung Association launched its annual "State of the Air" report to provide the public with easy-to-understand information about the quality of the air in their communities based on the credible data and sound science that EPA is required to use to set and enforce the air quality standards.

For the first several years, "State of the Air" focused solely on ozone pollution and included data for five populations at increased risk—children, older adults, children with asthma, adults with asthma and people with emphysema. In 2004, changes to the air quality standards and the deployment of air pollution monitoring enabled the addition of short-term and year-round fine particle pollution ($PM_{2.5}$) to the report. Over time, accumulating scientific evidence has shown significant health harms from both ozone and particle pollution among other groups of vulnerable individuals. "State of the Air" has accommodated this new information by gradually adding populations-at-risk categories to its reporting. "State of the Air" 2025 now includes data for 10 vulnerable groups.

Since its inception, "State of the Air" has been tremendously successful in raising awareness about particle pollution and ozone, two of the most dangerous and pervasive air pollutants nationwide. The American Lung Association is proud and grateful that the public, the media, clean air advocates and decision-makers have used this report every day, year after year, to call attention to the work that remains to be done to protect the public from the threat of air pollution.

How "State of the Air" can be used

We write and release "State of the Air" every year to make information on air quality and health clear and accessible to everyone. We show the progress each community has made and how much more needs to be done to achieve healthy air. In this report, you'll find information on local air quality nationwide. You'll also find the latest research on how air pollution affects health. With these tools, you can take proactive steps to safeguard both your lungs and your family's lungs from unhealthy air.

Every year, "State of the Air" also includes recommendations for actions that both policymakers and individual people can take to improve air quality. This year, the report highlights threats to the staff, funding and work of the U.S. Environmental Protection Agency that put clean air at risk for people across the country. We ask that you join

us in taking advocacy action to protect EPA and its clean air progress. Your voice and your individual perspective are more powerful now than ever. Please share your story and add your name to our petition – and then, take the next step. Reach out to your representatives at every level of government, share the "State of the Air" results for your community, and call on them to take action to protect EPA in the interest of public health.

State of the Air 2025 Methodology

Statistical Methodology: The Air Quality Data

Data Sources

Ozone and short-term particle pollution. The data on air quality throughout the United States were obtained from the U.S. Environmental Protection Agency's Air Quality System (AQS). The American Lung Association contracted with Dr. Allen S. Lefohn, A.S.L. & Associates, Montana, to characterize the hourly averaged ozone concentration information and the 24-hour averaged $PM_{2.5}$ concentration information for the three-year period for 2021-2023 for each monitoring site.

Year-round particle pollution. Design values for the annual $PM_{2.5}$ concentrations by county for the period 2021-2023 were retrieved November 18, 2024 from data posted on August 8, 2024 at the U.S. Environmental Protection Agency's website at https://www.epa.gov/air-trends/air-quality-design-values.

The Lung Association received critical assistance from members of the National Association of Clean Air Agencies and the Association of Air Pollution Control Agencies. With their assistance, all state and local agencies were provided the opportunity to review and comment on the data in draft tabular form. The Lung Association reviewed any discrepancies with the agencies and, if needed, with Dr. Lefohn at A.S.L. & Associates. The American Lung Association wishes to express its continued appreciation to the state and local air directors for their willingness to assist in ensuring that the characterized data used in this report are correct.

Ozone Data Analysis

The 2021, 2022 and 2023 AQS hourly ozone data were used to calculate the daily 8-hour maximum concentration for each ozone-monitoring site. The hourly averaged ozone data were downloaded on June 26, 2024, following the close of the authorized period for quality review and assurance certification of data. Only the hourly average ozone concentrations derived from FRM and FEM monitors were used in the analysis. The data were considered for a three-year period for the same reason that EPA uses three years of data to determine compliance with the ozone standard: to prevent a situation in which anomalies of weather or other factors in any single year create air pollution levels that inaccurately reflect normal conditions. For each county, the highest 8-hour daily maximum concentration was identified for each day with sufficient data based on the EPA-defined ozone season for 2021, 2022, and 2023.

The current national ambient air quality standard for ozone is 70 parts per billion (ppb) measured over eight hours. The EPA's Air Quality Index (AQI) reflects the 70 ppb standard. A.S.L. & Associates prepared a table by county that summarized, for each of the three years, the number of days the ozone level was within the ranges identified by EPA based on the Air Quality Index:

8-hour Ozone Concentration	Air Quality Index Levels
0-54 ppb	Good (Green)
55-70 ppb	Moderate (Yellow)
71-85 ppb	Unhealthy for Sensitive Groups (Orange)
86-105 ppb	Unhealthy (Red)
106-200 ppb	Very Unhealthy (Purple)
>200 ppb	Hazardous (Maroon)

For this report, the objective was to identify the number of days that 8-hour daily maximum concentrations in each county occurred within the defined ranges. This approach provided an indication of the level of pollution for all monitored days, not just those days that fell under the requirements for attaining the national ambient air quality standards. Therefore, no data capture criteria were applied to eliminate monitoring sites or to require a number of valid days for the ozone season.

The daily maximum 8-hour average concentration for a given day is derived from the highest of the 17 consecutive 8-hour averages beginning with the 8-hour period from 7:00 a.m. to 3:00 p.m. and ending with the 8-hour period from 11:00 p.m. to 7:00 a.m. the following day. This follows the process EPA uses for the current ozone standard adopted in 2015. All valid days of data within the ozone season were used in the analysis. However, for computing an 8-hour average, at least 75 percent of the hourly concentrations (i.e., 6-8 hours) had to be available for the 8-hour period. In addition, an 8-hour daily maximum average was identified if valid 8- hour averages were available for at least 75 percent of possible hours in the day (i.e., at least 13 of the possible 17 8-hour averages). Because EPA includes days with inadequate data (i.e., not 75 percent complete) if the standard value is exceeded, our data capture methodology also included the site's 8-hour value if at least one valid 8-hour period were available, and it was 71 ppb or higher.

As instructed by the Lung Association, A.S.L. & Associates included the exceptional (e.g., wildfires) and natural events (e.g., stratospheric intrusions) that were identified in the database and identified for the Lung Association the dates and monitoring sites that experienced such events. Some data have been flagged by the state or local air pollution control agency to indicate that they had raised issues with EPA about those data. For each day across all sites within a specific county, the highest daily maximum 8-hour average ozone concentration was recorded and then the results were summarized by county for the number of days the ozone levels were within the ranges identified above.

Following receipt of the above information, the American Lung Association identified the number of days each county, with at least one ozone monitor, experienced air quality designated as orange (Unhealthy for Sensitive Groups), red (Unhealthy) or purple (Very Unhealthy). When some monitored data were collected sometime during the three-year period, but insufficient data were available in any year, an "incomplete" was identified for the 3-year period. Insufficient data exist for various reasons. For example, when a specific monitor was used for a special study and the monitor was then discontinued in other years, an "incomplete" is assigned.

ii Analysis of the daily $PM_{2.5}$ data for "State of the Air" 2024 was completed in January 2024, before EPA announced the finalization of the revised $PM_{2.5}$ NAAQS and Air Quality Index. The values used in this report are based on the 2012 Air Quality Index.

Short-Term Particle Pollution Data Analysis

For each county, A.S.L. & Associates identified the maximum daily 24-hour AQS $PM_{2.5}$ concentration for each day with sufficient monitoring information in 2021, 2022 and 2023. The 24-hour averaged $PM_{2.5}$ data were downloaded on August 27, 2024 from the EPA website following the correction of the hourly values by the EPA of the $PM_{2.5}$ data associated with monitors using method codes 236 and 238. Using the downloaded $PM_{2.5}$ daily data from the EPA website, A.S.L. & Associates prepared a table by county that summarized, for each of the three years, the number of days the $PM_{2.5}$ concentration was within the ranges identified by EPA based on the Air Quality Index, as adopted by the EPA on February 7, 2024:

24-hour $PM_{2.5}$ Concentration	Air Quality Index Levels
0.0 µg/m³ to 9.0 µg/m³	Good (Green)
9.1 µg/m³ to 35.4 µg/m³	Moderate (Yellow)
35.5 µg/m³ to 55.4 µg/m³	Unhealthy for Sensitive Groups (Orange)
55.5 µg/m³ to 125.4 µg/m³	Unhealthy (Red)
125.5 µg/m³ to 225.4 µg/m³	Very Unhealthy (Purple)
greater than or equal to 225.5 µg/m³	Hazardous (Maroon)

All previous data collected for 24-hour average $PM_{2.5}$ were characterized using the AQI thresholds listed above.

For this report, the objective was to identify the number of days that the maximum in each county of the daily $PM_{2.5}$ concentration occurred within the defined ranges. This approach provided an indication of the level of pollution for all monitored days, not just those days that fell under the requirements for attaining the national ambient air quality standards. Therefore, no data capture criteria were used to eliminate monitoring sites. Included in the analysis are data collected using only FRM and FEM methods, which reported 24-hour averaged data.

As instructed by the Lung Association, A.S.L. & Associates included the exceptional and natural events that were identified in the database and identified for the Lung Association the dates and monitoring sites that experienced such events. Some data have been flagged by the state or local air pollution control agency to indicate that they had raised issues with EPA about those data. For each day across all sites within a specific county, the highest daily maximum 24-hour $PM_{2.5}$ concentration was recorded and then the results were summarized by county for the number of days the concentration levels were within the ranges identified above.

Following receipt of the above information, the American Lung Association identified the number of days each county, with at least one $PM_{2.5}$ monitor, experienced air quality designated as orange (Unhealthy for Sensitive Groups), red (Unhealthy), purple (Very Unhealthy) or maroon (Hazardous).

Description of County Grading System

Ozone and Short-Term Particle Pollution (24-hour $PM_{2.5}$)

The grades for ozone and short-term particle pollution (24-hour $PM_{2.5}$) were based on a weighted average calculation. To determine weighted averages, the Lung Association followed these four steps separately for each pollutant in each county:

1. Assigned weighting factors to each category of the Air Quality Index. Days of poor air quality were given the following weighting factors:

   Orange days 1.0
   Red days 1.5
   Purple days 2.0
   Maroon days 2.5

   This ensured that days when the air pollution levels were worse received appropriately greater weight.

2. Multiplied the total number of days within each AQI category by its assigned factor, and added all the categories to calculate a total:

   Total = [Orange days x 1] + [Red days x 1.5] + [Purple days x 2] + [Maroon days x 2.5]

3. Divided the total by three to determine the weighted average, since the monitoring data were collected over a three-year period:

   Weighted Average = Total ÷ 3

Weighted average was then used to determine each county's grades for ozone and 24-hour $PM_{2.5}$ according to the following table:

Weighted Average	Grade
0.0	A
0.3 to 0.9	B
1.0 to 2.0	C
2.1 to 3.2	D
3.3 or higher	F

All counties with a weighted average of zero (corresponding to no exceedances of the standard over the three-year period) were given a grade of "A."

For ozone, an "F" grade was set to generally correlate with the number of unhealthy air days that would place a county in nonattainment for the ozone standard.

For short-term particle pollution, fewer unhealthy air days are required for an F than for nonattainment under the $PM_{2.5}$ standard. The 2006 24-hour $PM_{2.5}$ standard is set to allow two percent of the days during the three years to exceed 35 $\mu g/m^3$ (called a "98th percentile" form) before violating the standard. That would be roughly 21 unhealthy days in three years. The grading used in this report would allow only about one percent of the days to be over 35 $\mu g/m^3$ (called a "99th percentile" form) of the $PM_{2.5}$. The American Lung Association supports using the tighter limits in a 99th percentile form as a more appropriate standard that is intended to protect the public from short-term episodes or spikes in pollution.

Weighted averages allow comparisons to be drawn based on severity of air pollution. For example, if one county had nine orange days and no red days, it would earn a weighted average of 3.0 and a D grade. However, another county that had only seven orange days but also two red days, which signify days with more serious air pollution, would have a weighted average of 3.3, and would receive an F.

Note that this system differs significantly from the methodology EPA uses to determine violations of both the ozone and the 24-hour $PM_{2.5}$ standards. EPA determines whether a county violates the ozone standard based on the fourth maximum daily 8-hour ozone reading each year averaged over three years. Multiple days of unhealthy air beyond the highest four in each year are not considered. By contrast, the system used in this report recognizes when a community's air quality repeatedly results in unhealthy air throughout the three years. Consequently, some counties will receive grades of "F" in this report, showing repeated instances of unhealthy air, while still meeting the EPA's 2015 ozone standard. The American Lung Association's position is that the evidence shows that the 2015 ozone standard fails to adequately protect public health.

Counties were ranked by weighted average. Metropolitan areas were ranked by the highest weighted average among the counties within a given Metropolitan Statistical Area as of 2023 as defined by the White House Office of Management and Budget (OMB).

Weighted average values that appeared in prior reports may not be directly comparable to values in the current report as standards and the AQI may have changed. Therefore, for use in the Lung Association's online resources for the "State of the Air" report at Lung.org/sota, values from earlier years are updated according to the current standard and Air Quality Index.

Year-Round Particle Pollution (Annual $PM_{2.5}$)

Since no comparable Air Quality Index exists for year-round particle pollution (annual $PM_{2.5}$), the grading was based on the 2024 National Ambient Air Quality Standard for annual $PM_{2.5}$ of 9.0 $\mu g/m^3$. Counties that EPA listed as being at or below 9.0 $\mu g/m^3$ were given grades of "Pass." Counties that EPA listed as being at or above 9.1 $\mu g/m^3$ were given grades of "Fail." Where insufficient data existed for EPA to determine a design value, those counties received a grade of "Incomplete."

A design value is the calculated concentration of a pollutant based on the form of the national ambient air quality standard and is used by EPA to determine whether the air quality in a county meets the standard. Counties were ranked by design value. Metropolitan areas were ranked by the highest design value among the counties within a given Metropolitan Statistical Area as of 2023 as defined by the OMB.

Statistical Methodology: Population Data

The Lung Association calculates the county populations at risk from these pollutants based on the population from the entire county where the monitor is located. The Lung Association then calculates the metropolitan populations at risk based upon the largest metropolitan area that contains that county. Not only do people from that county or metropolitan area circulate within the county and the metropolitan area, but the air pollution also circulates to that monitor from throughout the county and metropolitan area.

Details about how the populations-at-risk numbers are derived can be found in Understanding Grades and Tables.

Key Findings



Nearly half of the U.S. population live with unhealthy levels of air pollution



A changing climate is making the job of cleaning up the air more difficult

The "State of the Air" 2025 report finds that even after decades of successful efforts to reduce sources of air pollution, 46% of Americans—156.1 million people—are living in places that get failing grades for unhealthy levels of ozone or particle pollution. This is nearly 25 million more people breathing unhealthy air compared to last year's report, and more than in any other "State of the Air" report in the last ten years.

Extreme heat, drought and wildfires are contributing to worsening levels of air pollution across much of the U.S., exposing a growing proportion of the population to ozone and particle pollution that put their health at risk.

The "State of the Air" report looks at two of the most widespread and dangerous air pollutants, fine particles and ozone. The air quality data used in the report are collected at official monitoring sites across the United States by federal, state, local and Tribal governments. The Lung Association calculates values reflecting the air pollution problem and assigns grades for daily and long-term measures of particle pollution and daily measures of ozone. Those values are also used to rank cities (metropolitan areas) and counties. This year's report presents data from 2021, 2022 and 2023, the most recent three years of quality-assured nationwide air pollution data publicly available. See ***About This Report*** for more detail about the methodology for data collection and analysis.

"State of the Air" 2025 is the 26th edition of this annual report, which was first published in 2000. From the beginning, the findings in "State of the Air" have reflected the successes of the Clean Air Act, as emissions from transportation, power plants and manufacturing have been reduced over time. Over the last decade, however, the findings of the report have added to the extensive evidence that a changing climate is making it harder to protect this hard-fought progress on air quality and human health. Increases in high ozone days and spikes in particle pollution related to extreme heat, drought and wildfires are putting millions of people at risk and adding challenges to the work that states and cities are doing across the nation to clean up air pollution.

After several years of reporting that the worst of the nation's air quality problems were increasingly concentrated in western states, "State of the Air" 2025 finds the geographic distribution of air pollution shifting back East. The year 2023, which is included in this year's report for the first time, brought improved conditions to the west coast but also a deadly heat wave in Texas and an unprecedented blanket of smoke from wildfires in Canada that drove levels of ozone and particle pollution in dozens of central and eastern states higher than they have been in many years.

Again this year, "State of the Air" finds that the burden of living with unhealthy air is not shared equally. Research has shown that communities of color are disproportionately exposed to unhealthy air and are also more likely to be living with one or more chronic conditions that make them more vulnerable to air pollution, including asthma, diabetes and heart disease. Although people of color make up 41.2% of the overall population of the U.S., they are 50.2% of the people living in a county with at least one failing grade. Notably, Hispanic individuals are nearly three times as likely as white individuals to live in a community with three failing grades.

In "State of the Air" 2025, the metropolitan areas that ranked worst in the country for each of the three pollutant measures are unchanged from last year's report. Bakersfield, California tops the list for worst short-term particle pollution for the third straight year. Bakersfield also continues to be the metropolitan area with the worst level of year-round particle pollution for the 6th year in a row. Los Angeles is the city with the worst ozone pollution in the nation, as it has been in 25 of the 26 years of reporting in "State of the Air"—although city residents are exposed to an average of 77 fewer days of unhealthy levels of ozone each year than they were in 2000.

More than 125 million people live in counties with **F grades** for ozone smog.



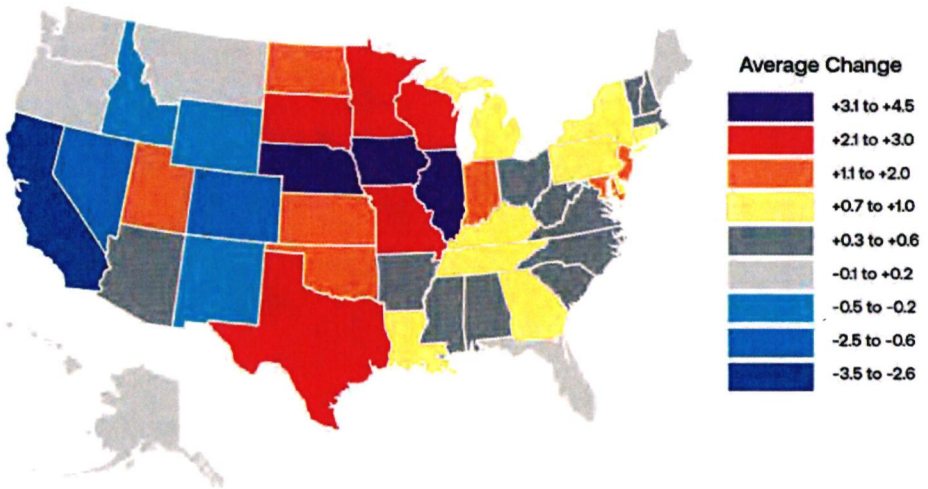
Ozone Pollution Trends

Ozone air pollution is making breathing difficult for more people living in the U.S. than any other single pollutant. In the years 2021, 2022, and 2023, 37% of the population, some 125.2 million people, were exposed to levels of ozone that put their health at risk. This is an increase of 24.6 million people over last year's figure, and includes tens of millions of infants and children, people age 65 or older and others whose conditions make them especially vulnerable to health harm from air pollution.

After several years of successful reductions in ozone pollution in many parts of the country thanks to clean-up measures enacted under the Clean Air Act, the results in "State of the Air" 2025 are a distressing reversal of that progress. The places that earned an "F" grade for ozone in this year's report were spread across 211 counties in 35 states and Washington DC. Ninety-three more counties earned an "F" grade than in last year's report, and 10 more states saw at least one of their counties added to the list. Many places that were considered untroubled by ozone smog in recent years of the report saw their air quality worsen, sometimes by quite a lot—137 counties lost their A grade, including 10 that went from an A to an F.

The hardest hit region of the country for this change is a large swath of states extending north to south from the Midwest and the Plains down to Texas. The worsening ozone was due in large part to two factors that came together in 2023—in the North, the transport of ozone-forming pollutants generated by the extensive, climate change-driven wildfires in Canada, and in the South, high temperatures combined with emissions creating ideal conditions for ozone formation.

Average Change in Ozone Weighted Average by State 2020-2022 to 2021-2023



The severity of the problem and the abruptness of the change are unprecedented in magnitude. Nationwide, nearly five times as many counties' ozone levels worsened as improved. Nine states saw the number of unhealthy days for ozone get worse in every one of their counties monitored for this pollutant, including all 27 monitored counties in Indiana, all 23 in Illinois, and all 17 in Missouri.

The Role of Wildfires in Ozone Formation

In May and June of 2023, Canada experienced its worst wildfire season on record. Smoke plumes from those fires spread across the states of the Upper Midwest and Northeast. In addition to smoke blanketing those states with high levels of particle pollution, the Upper Midwest experienced the highest regional-scale surface ozone levels ever recorded so early in the season. By analyzing findings from air quality monitors, satellites and measurements of atmospheric chemistry taken from research aircraft, scientists found a clear link between the fires and the extreme levels of ozone pollution hundreds of miles downwind.

Wildfire smoke is a very visible and well-recognized source of unhealthy levels of particle pollution. As worsening heat and drought driven by a changing climate have increased the number, size and intensity of wildfires in the U.S. and neighboring Canada, the number and severity of high particle pollution days have also been increasing.

At the same time, the role of wildfires in the development of ozone smog has been less obvious and less well-documented. The chemistry of ozone formation is complex and variable. Many different potential emission sources contribute its precursor components. That complexity, together with the variable mixture of pollutants in wildfire smoke, have made understanding and quantifying the relationship between wildfires and ozone a challenge for atmospheric scientists.

Burning of plants and other organic material, known as biomass, in wildland fires produces particulate matter along with hundreds of reactive gases, including nitrogen dioxide (NO_2), volatile organic compounds (VOCs) and carbon monoxide. All of these gases can play a role in ozone formation, especially in sunny and hot conditions. These emissions undergo a series of chemical reactions as the smoke plume moves away from the source of the fire. In general, ozone production increases as the plume ages and moves downwind. Plumes that drift over reservoirs of NO_2 pollution, such as urban centers and industrial corridors with highways, railroads and ports, are also more likely to produce elevated ozone levels.

Whether or not a particular wildfire event produces significantly elevated levels of ozone depends on a number of factors that affect the emission and transport of precursor gases. This includes the temperature of the combustion, the duration of active flame production (more NO_2 is produced during periods of active flaming than when a fire is smoldering), wind direction and how close to the surface the plume is transported.

Years of successful cleanup of emissions from transportation, energy generation and industrial processes have contributed to falling ozone levels across much of the country since the first "State of the Air" report was published in 2000. Unfortunately, as was shown in 2023, one bad fire season has the potential to offset that progress, at least temporarily, creating new challenges for air pollution control efforts and putting the health of the communities affected at increased risk.

Sources

Cooper O.R. et al. Early surface 2023 wildfires generated record-breaking surface ozone anomalies across the U.S. Upper Midwest. Geophysical Research Letters. 2024; 51:e2024GL111481.

Lin M et.al. Reactive nitrogen partitioning enhances the contribution of Canadian wildfire plumes to U.S. ozone air quality. Geophysical Research Letters. 2024; 51:e2024GL10969.

In spite of these startling results, it is worthwhile pointing out that a handful of western states experienced something of a respite in this year's report. More counties improved than worsened in California, Idaho, Nevada, New Mexico and Wyoming, even though ozone levels in many of their counties continued to be unhealthy on many days.

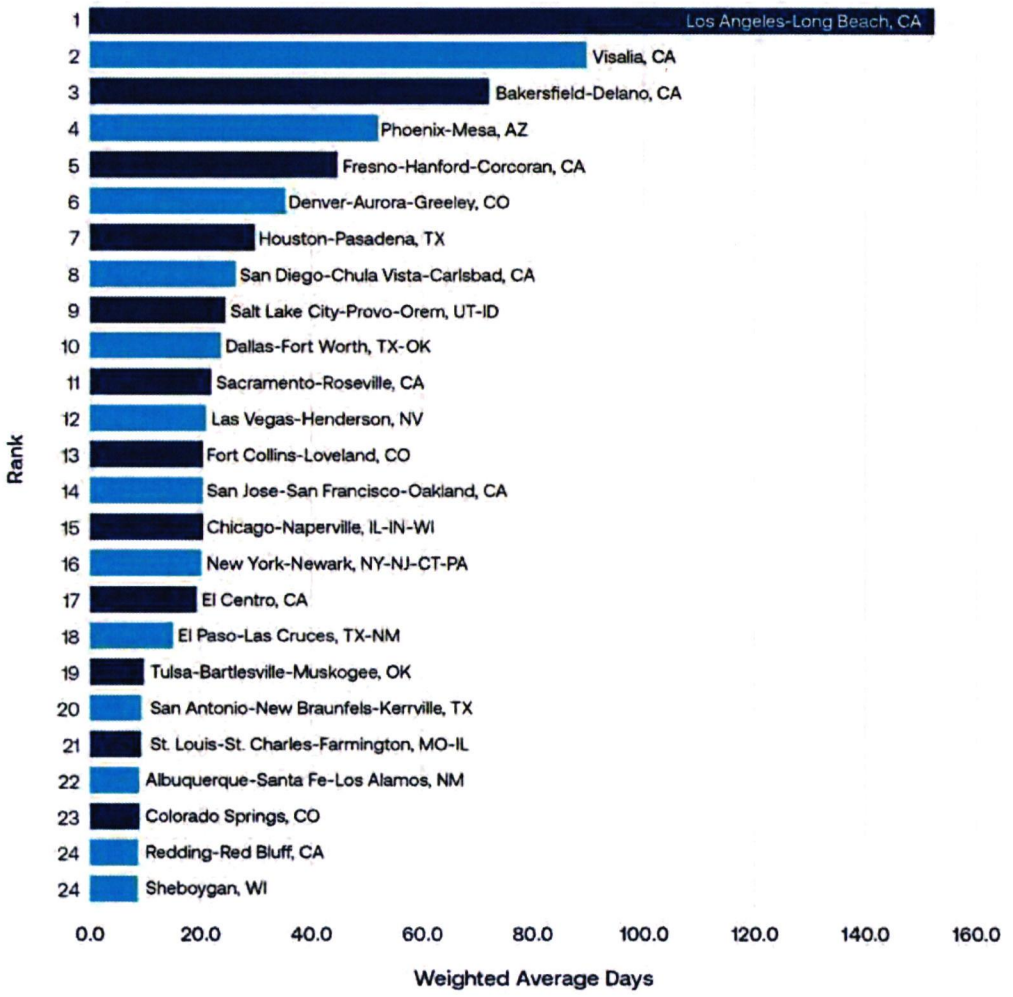
Despite the widespread worsening in parts of the country, the list of the Worst 25 cities for ozone pollution in "State of the Air" 2025 and their order of ranking remains relatively stable compared with last year's report.

The largest changes in rank are for Tulsa, OK, worsening from 31st to 19th worst, and for St. Louis, MO, from 30th to 21st worst. Both were most recently on the Worst 25 list in the 2016 report. Sheboygan, WI is the only other city to join the list this year, having last appeared on the 2021 most polluted list. Those three new cities take the places of San Luis Obispo, CA and Reno, NV, which improved enough to move off the worst 25 list, and Grand Rapids, MI, which worsened significantly, but not enough to remain on the list.

In one small piece of good news, none of the cities on the Worst 25 list reported a worst-ever average number of days of ozone smog. In fact, four cities, all in California—Fresno (for its fifth year in a row), Bakersfield, Sacramento, and Visalia—recorded their fewest-ever number of unhealthy days for ozone, though they all still earned "F" grades.

The geographical distribution of cities on the Worst 25 list repeats the pattern seen over

25 Cities Most Polluted by Ozone



the last decade—the highest levels of ozone air pollution continue to occur in the West. California retains its position of being the state with the most metro areas on the list with 9 of the 25 most-polluted cities. Arizona, Colorado, Nevada, New Mexico, Oklahoma, Texas and Utah account for 12 others. They are joined this year by four more easterly cities, Chicago, New York, St. Louis, and Sheboygan.

Although cleanup of ozone precursor pollutants from industrial, power generation, and mobile sources has been working to reduce ozone concentrations, the impact of climate change has resulted in widespread wildfire disasters and has also meant higher temperatures, dry, sunny skies and more frequent stagnation events. Taken together, these conditions produced much higher numbers of unhealthy ozone days than would otherwise be the case.

Short-term Particle Pollution Trends

77 million people live in counties with **F grades** for daily particle pollution.

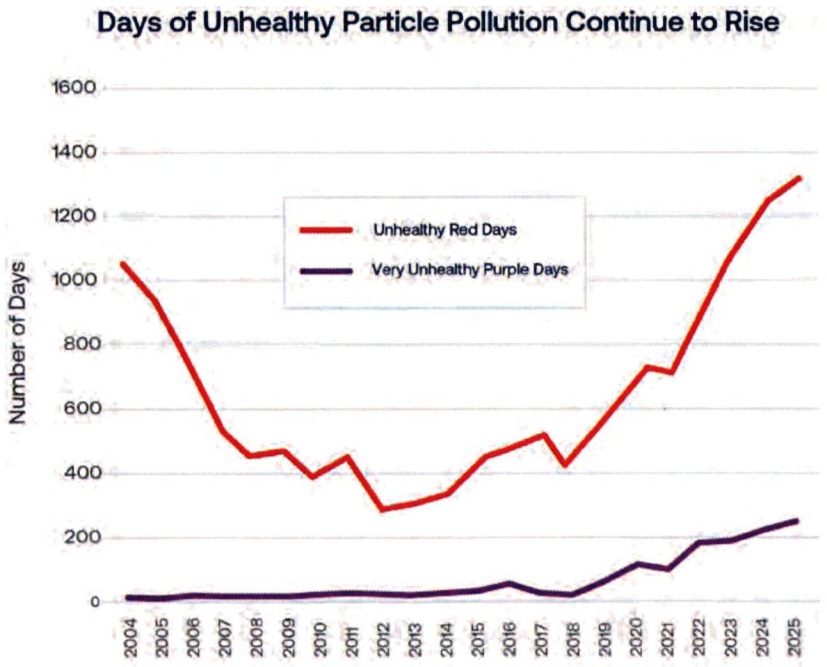


In the years 2021, 2022 and 2023, there were 77.2 million people living in counties across the U.S. that earned an F grade for unhealthy spikes in particle pollution. This represents an increase of 12.1 million more people than in last year's report, the seventh straight year of increasing health threat from this deadly pollutant.

Even compared with the past several years of "State of the Air" reports—in which many cities and counties experienced their highest weighted average number of days ever reported for fine particle pollution—results this year are again worse. In "State of the Air" 2025, 154 counties in 27 states get failing grades for short-term particle pollution. This is 44 more counties and 8 more states, plus Washington DC, than in last year's report. Although 27 counties in the West, including 17 counties in California, improved enough to get passing grades this year, those improvements are more than offset by the 68 counties that have been added, many of them in the Midwest and East. Connecticut, DC, Georgia, Illinois, New York, Ohio, South Dakota, Virginia and Wisconsin are all represented on the F list for the first time in years.

Wildfire has clearly emerged as a major driving factor in determining where in the country people are being exposed to unhealthy spikes in particle pollution. As states and counties experience shifting conditions of heat and precipitation—"good fire years" and "bad fire years"—their levels of air pollution can vary significantly. For example, compared to the disastrous 2020 fire year in California, the three years included in "State of the Air" 2025 were relatively better in the state, allowing counties like Santa Barbara and Marin to go from an F to an A grade in this year's report. In contrast, smoke from extensive wildfires in Canada in 2023 resulted in extremely high levels of fine particle pollution on many days throughout parts of the northeastern and north central U.S. that have not historically been thought of as "fire country."

Wildfires are also continuing to increase the severity of pollution, with smoke in eastern states resulting in this report's highest ever number of red and purple days for particle pollution (1,280 and 231 days, respectively). These are levels on the Air Quality Index that carry strong health warnings. On red Unhealthy days, not only are members of sensitive groups likelier to "experience more serious health effects," but also "some members of the general public may experience health effects." On purple Very Unhealthy days, "the risk of health effects is increased for everyone."

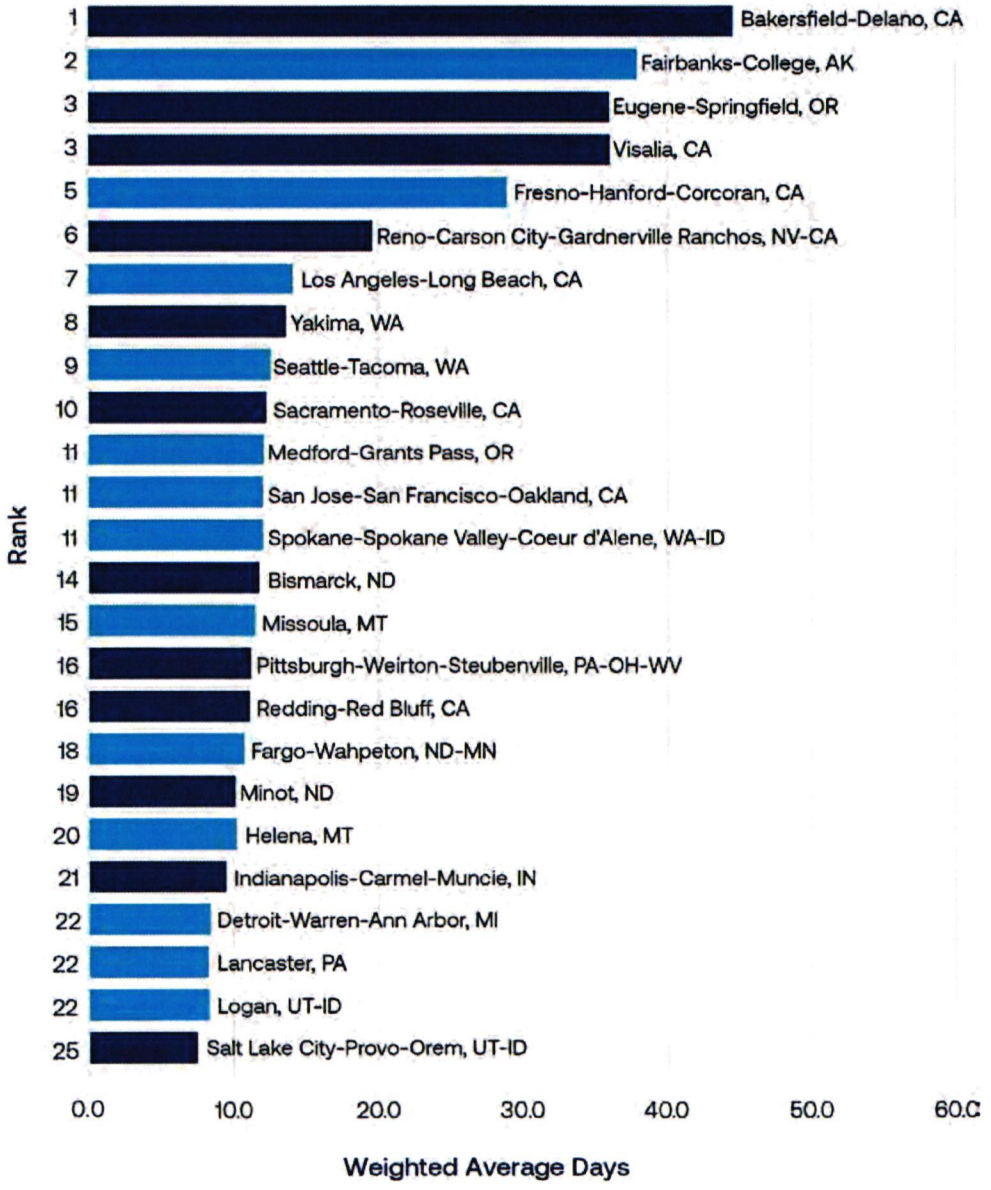


There were also 27 maroon Hazardous days, the highest category, days on which a health warning of emergency conditions is issued, saying, "Everyone is more likely to be affected." Although this is fewer maroon days than in "State of the Air" 2023 and 2024, it is a sharp change from the fewer than ten maroon days reported from 2004 to 2016.

This year's report finds that the health of 56.3 million people across 140 counties in 25 states was put at risk on severely polluted Very Unhealthy (purple) and Hazardous (maroon) days for fine particle pollution. This is 24 million more people than in last year's report. This is drastically worse than the findings in last year's "State of the Air" and a shocking demonstration of a trend that not only is continuing but worsening as a consequence of climate change.

In better news, comparing cities ranked the worst 25 in last year's report with those in this year's, the average number of days per year that residents were exposed to high levels of fine particle pollution decreased by about three days. (However, it was to a still seriously poor weighted average of 16.5 days.) All but one of the ten worst cities on the list improved in this year's report, including Bakersfield, California, which experienced a weighted average of 17.5 fewer bad air days in 2021-2023 for spikes in particle pollution. The exception was Visalia, California, which recorded its highest level of particle pollution spikes in the history of the report—for the third year in a row.

25 Cities Most Polluted by Daily PM



As a result of the geographic shifts in high levels of particle pollution, eight of last year's Worst 25 cities have been replaced in this year's report. Medford, Oregon and Lancaster and Pittsburgh, Pennsylvania rejoined the list after a one-year hiatus. Worsened air quality in Indianapolis, Indiana; Detroit, Michigan; and Bismarck, North Dakota led to them being added to the list. Helena, Montana and Minot, North Dakota, both newly designated Metropolitan Statistical Areas in 2023, join the list for the first time, though Helena's air quality would have put it among the worst 25 in last year's report had it been classified as a metro region.

Improved enough to leave the Worst 25 list this year are the western cities of Phoenix, Arizona; Chico, Salinas, and San Diego, California; Denver, Colorado; Boise City, Idaho; Las Vegas, Nevada and Portland, Oregon.

Year-round Particle Pollution Trends

"State of the Air" 2025 finds that 85 million people living in 115 counties across 31 states have been exposed to year-round levels of particle pollution that do not meet the annual air quality standard. This is a small improvement over the 90.7 million people living in places that got failing marks in last year's report, but still a sobering reminder of the widespread, chronic nature of this deadly form of air pollution.

85 million people
live in counties with failing grades for year-round particle pollution



When looking nationwide at all the counties with measurements for this pollutant, the average severity of annual particle pollution is effectively unchanged since last year's report. By its nature, the year-round measure of average particle pollution is not as changeable from year to year as the daily measure. Variations over time may look smaller, but because they typically represent recurring exposures over many days and weeks, seemingly minor differences can have a big impact on public health.

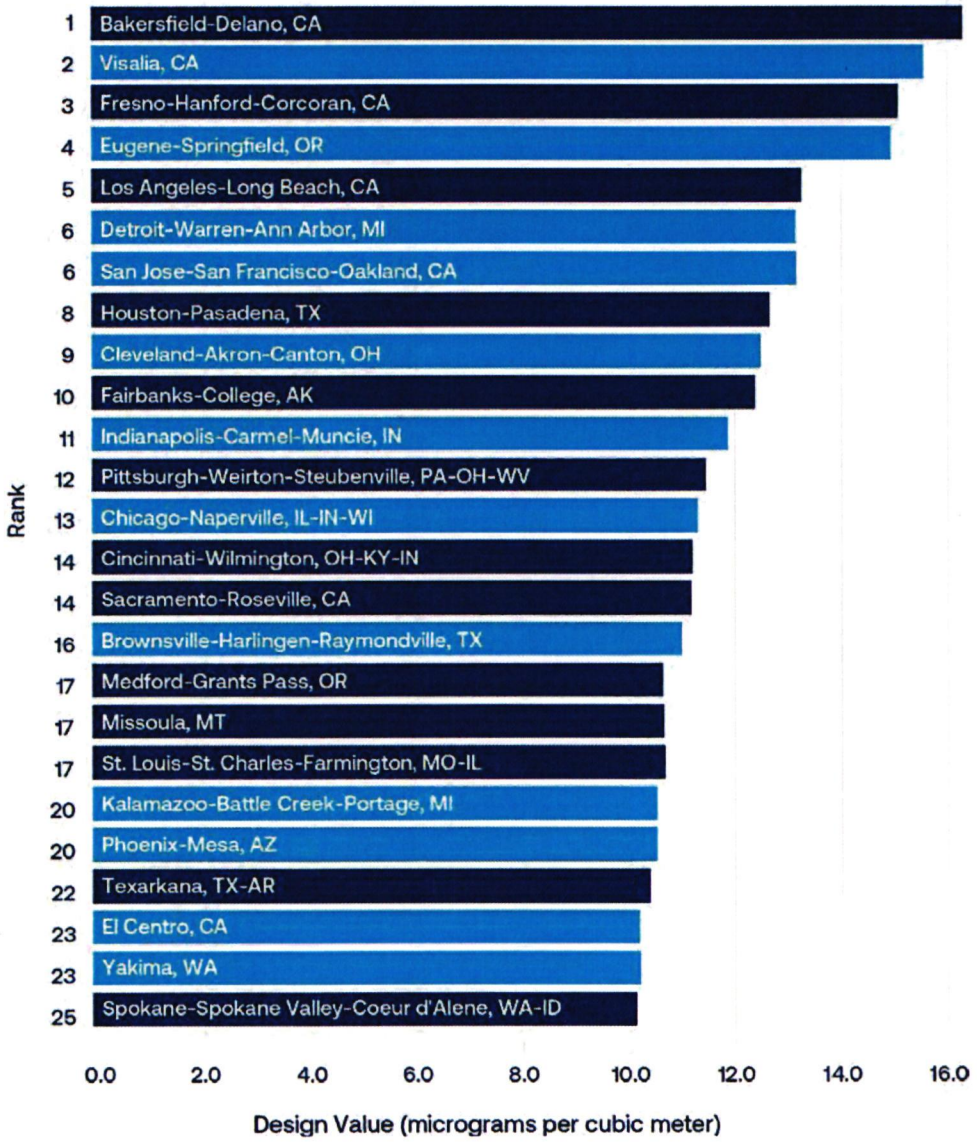
Annual particle pollution levels are most often highest in places that are subject to multiple sources of emissions all year long, such as from highways, oil and gas extraction, power generation and industry. The additional pollution load from wildfire smoke, though comparatively short-lived in any one location, can strongly influence that location's annual average. In this year's report, this influence can be seen reflected in geographic shifts similar to that seen with short-term particle pollution.

Unsurprisingly, given the transport of wildfire smoke across the country, the states with the worst changes from last year's report are mainly in the north central and eastern parts of the U.S. Ten states, ranging from North Dakota to Maryland, saw the year-round average for fine particle pollution get worse in every one of their counties monitored for this pollutant.

In contrast, though California still ranks near the top for worst statewide average, there were 37 million more people living with improved levels than with worse levels compared with last year's report. All but one of California's 42 counties for which comparisons could be made show improvement.

In "State of the Air" 2025, the 25 most polluted cities for year-round particle pollution bucked the worsening trend of recent years by improving an average of about 0.4 micrograms per cubic meter (from 12.35 to 11.98 $\mu g/m^3$). Thirteen of them, all in western states, improved. Fresno-Hanford-Corcoran and Los Angeles-Long Beach, California, posted their lowest levels ever, though they are still among the worst five. Eleven metro areas worsened compared with their levels in last year's report. One (Indianapolis-Carmel-Muncie, IN) was unchanged. None of the 25 most polluted cities for this measure posted their worst-ever levels of year-round particle pollution.

25 Cities Most Polluted by Annual PM



Because of the geographic shift in areas of worse or improved particle pollution, there are more shifts in the rankings on the Worst 25 list than usual. Though the four worst metro areas keep their same ranks as in last year's report, most of the others on the list have moved up or down quite a bit.

Six metro areas experienced levels of air pollution that moved them onto the Worst 25 list. Cleveland, Ohio posted the most dramatic shift in the country, resulting in its rank dropping from 54th to 9th worst. Kalamazoo, Michigan and Brownsville and Texarkana, Texas are all making an appearance on this list for the first time. Missoula, Montana rejoins the list after a three-year absence. St. Louis, Missouri rounds out the additions this year.

Improving enough to leave the list are Augusta, Georgia; Chico, California; Kansas City, Missouri; Las Vegas and Reno, Nevada; Oklahoma City, Oklahoma and Corpus Christi, Texas.

Populations at Risk

More than 265 million people live in the 885 counties with enough monitoring data to be assigned a grade for at least one pollutant in this year's report. The majority of U.S. counties actually don't have monitors—which means that many communities, especially rural ones, don't have official monitored information on their air quality.

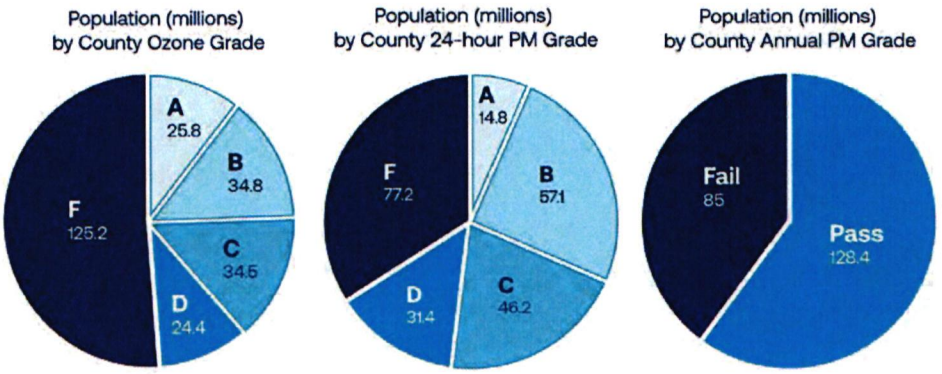
Addressing Data Gaps in Unmonitored Counties

"State of the Air" has long served as a trusted resource for tracking national trends in ozone and particle pollution, but many counties remain unmonitored, leaving communities without access to vital air quality information. To help close these gaps, the American Lung Association's "Something in the Air" reports explore the potential of using emerging technologies to expand the understanding of pollution exposure in under-monitored regions.

The "Something in the Air" series is intended to supplement the "State of the Air" report, providing a clearer picture of air quality where monitoring is limited. By utilizing satellite data and other emerging data tools to complement monitoring networks and expand air quality assessment, community members and decision-makers can better identify pollution hotspots, strengthen research and advocate for more comprehensive clean air protections. Together, these efforts work toward the same goal of ensuring all communities, especially those most at risk, have the information needed to fight for cleaner, healthier air. Learn more at Lung.org/something-in-the-air.

It is important to note that the population numbers included in this section are only for those places that collect air pollution data, and do not reflect the entire population of these groups in the U.S. The availability of data, and hence the population that is included in this report, differs for each pollutant.

All 156.1 million people in the U.S. living in places with failing grades for unhealthy levels of ozone or particle pollution are at risk of harm to their health. But some groups of people are especially vulnerable to illness and death from their exposure. See ***People at Risk*** for more detail about the factors that contribute to increased risk.



The number of people in these high-risk groups in "State of the Air" 2025 are as follows:

- **Children and older adults**—More than 34.6 million children under age 18 and some 25.2 million adults age 65 and over live in counties that received an F for at least one pollutant. Close to 9.5 million children and more than 6.7 million seniors live in counties failing all three measures.
- **People with underlying health conditions**
  - **Asthma**—More than 2.5 million children and nearly 11.8 million adults with asthma live in counties that received an F for at least one pollutant. More than 638,000 children and some 3.1 million adults with asthma live in counties failing all three measures.
  - **Chronic Obstructive Pulmonary Disease (COPD)**—Some 6.8 million people with COPD live in counties that received an F for at least one pollutant. Close to 1.7 million people with COPD live in counties failing all three measures.
  - **Lung Cancer**—Nearly 72,000 people diagnosed with lung cancer as of 2021 live in counties that received an F for at least one pollutant, and about 17,500 people ever diagnosed with lung cancer live in counties failing all three measures.
  - **Cardiovascular Disease**—Close to 9.7 million people with cardiovascular disease live in counties that received an F for at least one pollutant. Nearly 2.5 million people live in counties failing all three measures.
  - **Pregnancy**—Adverse impacts from air pollution have been shown both for those who are pregnant as well as for the developing fetus. More than 1.7 million pregnancies were recorded in 2023 in counties that received at least one failing grade for air pollution. Of those, close to 453,000 were in counties that received failing grades for all three measures.
- **People experiencing poverty**—Nineteen million people with incomes meeting the federal poverty definition live in counties that received an F for at least one pollutant. Close to 5.7 millig grade for ozone and/or particle pollution. Over 26.0 million people of color live in counties that received failing grades on all three measures, including some 15.2 million Hispanics.

For more detail about the number of people at risk by grade and by pollutant, see ***Data Table 1***. The populations at risk are also included by county in the ***State Data Tables***.

Most Polluted Places to Live

In addition to the 25 worst cities for each pollutant listed above, the 25 most polluted counties for ozone and particle pollution are ranked in the tables below.

Ozone Ranking	State	County	WA	PM Ranking	State	County	WA	Annual PM Ranking	State	County	DV
1	California	San Bernardino	153.7	1	California	Kern	44.3	1	California	Kern	16.2
2	California	Riverside	113.7	2	Alaska	Fairbanks North Star Borough	38.7	2	California	Tulare	15.7
3	California	Los Angeles	98.5	3	California	Tulare	36.5	3	California	Fresno	14.8
4	California	Tulare	88.7	3	Oregon	Lane	36.5	4	Oregon	Lane	14.4
5	California	Kern	72.8	5	California	Fresno	28.8	5	California	Kings	14.1
6	Arizona	Maricopa	54.8	6	California	Kings	26.5	6	California	Plumas	14
7	California	Fresno	46.8	7	California	Siskiyou	26.2	7	California	San Bernardino	13.1
8	Colorado	Jefferson	36.7	8	Oregon	Klamath	20.8	8	California	Stanislaus	13
9	Texas	Harris	34.8	9	Nevada	Douglas	19.2	8	Michigan	Wayne	13
10	California	San Diego	27.5	10	California	Inyo	18.7	10	Montana	Lincoln	12.8
11	Utah	Salt Lake	25.7	11	Nevada	Washoe	18.5	11	California	Riverside	12.6
12	Texas	Denton	25.5	12	Nevada	Carson City	17.5	12	Texas	Harris	12.5
13	Colorado	Douglas	25.2	13	California	Plumas	17.3	13	Washington	Okanogan	12.3
14	Utah	Uintah	24.5	14	Montana	Ravalli	14.5	14	California	Los Angeles	12.2
15	New Mexico	Eddy	24.3	15	California	Riverside	14	14	Ohio	Cuyahoga	12.2
16	California	Placer	22.5	16	Washington	Yakima	13.8	16	Alaska	Fairbanks North Star Borough	12.1
17	Nevada	Clark	22.2	17	Washington	Okanogan	13.3	17	Oregon	Klamath	12
18	Texas	Tarrant	21.5	18	Idaho	Lemhi	12.8	18	Indiana	Marion	11.9
19	Colorado	Larimer	20.8	19	Montana	Silver Bow	12.3	19	California	Siskiyou	11.7
20	California	Stanislaus	20.5	19	Washington	Snohomish	12.3	20	Pennsylvania	Allegheny	11.6
21	Illinois	Cook	20.3	21	California	Nevada	12.2	21	Illinois	Cook	11.3
22	Connecticut	Fairfield	20.2	22	California	Stanislaus	12	22	California	San Joaquin	11.2
23	Colorado	Arapahoe	19.5	22	Oregon	Jackson	12	22	California	Sutter	11.2
24	California	Imperial	19.3	22	Washington	Stevens	12	22	Ohio	Butler	11.2
25	Arizona	Pinal	19.2	25	North Dakota	Burleigh	11.7	25	California	Mendocino	11

Twenty-seven counties, listed alphabetically by state below, received failing grades for all three measures of pollution:

Arizona	Maricopa, Pinal
California	Fresno, Imperial, Kern, Kings, Los Angeles, Madera, Merced, Orange, Riverside, Sacramento, San Bernardino, Stanislaus, Sutter, Tulare
Illinois	Cook
Indiana	Lake, Marion
Michigan	Wayne
Ohio	Butler, Cuyahoga
Pennsylvania	Philadelphia
Nevada	Washoe
Utah	Salt Lake
Wisconsin	Milwaukee, Waukeshaw

Cleanest Places to Live

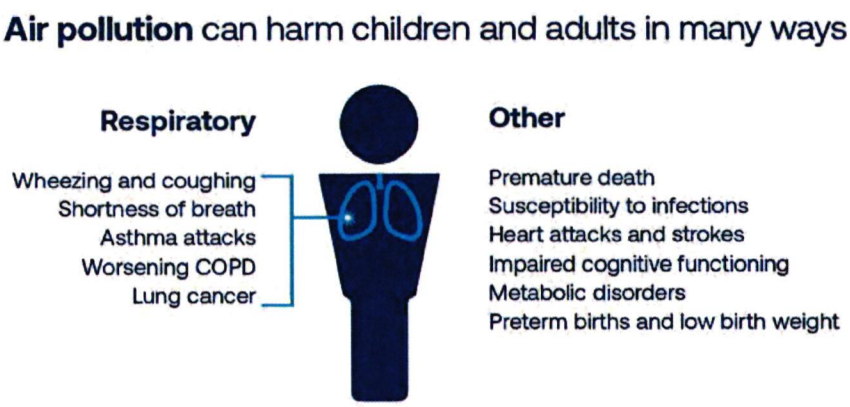
Many cities in the U.S. enjoy air that is considered clean for one or more of the pollution measures tracked in "State of the Air." In this year's report, 35 of the cities for which there is monitoring data had zero high ozone days and 22 cities had zero days with high levels of short-term particle pollution. This is a considerable worsening from last year's report, when 55 cities had no days of high ozone and 75 had no spikes in particle pollution. Because year-round particle pollution is scored differently, the cleanest cities for this measure can be ranked, and the best 25 are considered cleanest. See ***Data Tables 3a-c.***

In another grim indicator of the deterioration of air quality nationwide in this year's report, only two cities—Bangor, Maine and San Juan-Bayamón, Puerto Rico—rank on all three cleanest cities lists. They both earned an A for ozone and short-term particle pollution and are among the 25 cities with the lowest year-round particle levels.

The other four cities that made the Cleanest Places to Live list last year, Johnson City-Kingsport-Bristol, TN-VA, Lincoln-Beatrice, NE, Urban Honolulu, HI and Wilmington NC, all had at least one bad particle pollution day that cost them an A and a return to the cleanest cities list.

Health Impact of Air Pollution

Years of scientific research have clearly established that particle pollution and ozone are a threat to human health at every stage of life, increasing the risk of premature birth, causing or worsening lung and heart disease, and shortening lives. Some groups of people are more at risk of illness and death than others, because they are more likely to be exposed, or are more vulnerable to health harm, or often both.



Health Effects of Particle Pollution

Particle pollution – also known as particulate matter or soot – is a deadly and growing threat to public health in communities around the country. The more researchers learn about the health effects of particle pollution, the more dangerous it is recognized to be.

What is particle pollution?

Particle pollution refers to a mixture of tiny bits of solids and liquids in the air we breathe. Particle pollution comes from many sources. Factories, power plants, and diesel- and gasoline-powered vehicles and equipment either directly emit fine particles or generate other pollutants, such as nitrogen oxides (NO_x) and sulfur oxides (SO_x), known as precursors because they can then form into fine particles in the atmosphere. Other sources of particle pollution include wildfires, burning wood in wood stoves or residential fireplaces and burning biomass for electricity.

Researchers and regulators categorize particles according to size, grouping them as coarse, fine and ultrafine. Coarse particles, called PM_{10}, can include wind-blown dust, ash, pollen and smoke. Fine particles, $PM_{2.5}$, are most often a by-product of burning wood or fossil fuels, and may include components such as toxic compounds, salts and metals. The tiniest are called ultrafine particles, or $PM_{0.1}$. They are also produced by combustion and are included in the larger category of $PM_{2.5}$.

Individual fine particles are too small to be visible, but when pollution levels are high, they can make the air appear thick and hazy.



The differences in size make a difference in how particles affect our health. Our bodies' natural defenses help us to keep the coarse particles we inhale out of the deepest parts of our lungs, although these particles do deposit in the larger airways. However, those defenses do not keep smaller fine or ultrafine particles from penetrating deep into the lungs and even all the way into the air sacs. Many of these particles get trapped there, while the smallest are so tiny that they can pass from the air sacs into the bloodstream and disperse to other organs of the body.

What can particles do to your health?

Particle pollution can be very dangerous to breathe, especially at higher concentrations. It can trigger illness, hospitalization and premature death. Researchers estimate that $PM_{2.5}$ is responsible for more than 50,000 premature deaths in the United States every year.[1]

Short-Term Exposure

Short-term spikes in fine particle pollution that last from a few hours to a few days can kill. Premature deaths from breathing these particles can occur on the very day that particle levels are high, or up to a month or two afterward. Most premature deaths are from respiratory and cardiovascular causes. Fine particle pollution does not just make people die a few days earlier than they might otherwise—in many cases these deaths would not have occurred for years if the air were cleaner.[2]

Studies linking short-term exposure to $PM_{2.5}$ to death from all causes have been accumulating for a number of years. Taken together, this body of research provides consistent evidence of positive associations between fine particle pollution and mortality across diverse geographic locations and in populations with a wide range of demographic characteristics. In 2019, an international study looking at 499 cities across the globe reinforced these consistent findings.[3]

Exposure to even low levels of fine particles can be deadly. Looking nationwide in a 2017 study, researchers found that older adults faced a higher risk of premature death even when levels of short-term particle pollution remained well below the current national standard. This was consistent whether the older adults lived in cities, suburbs or rural areas.[4] Another study published in 2018 using data from 135 U.S. cities found a causal relationship between mortality and exposure to $PM_{2.5}$ at concentrations below the federal standard.[5]

Particle pollution also has many other harmful effects, ranging from decreased lung function to heart attacks. Extensive research has linked short-term increases in particle pollution to:

- increased mortality in infants;[6]
- increased hospital admissions for cardiovascular disease, including heart attacks and strokes;[7]
- increased hospital admissions and emergency department visits for chronic obstructive pulmonary disease (COPD);[8]
- increased severity of asthma attacks and hospitalization for asthma among children.[9,10]

Year-Round Exposure

Decades of research have firmly established that breathing particle pollution day in and day out can also be deadly. Across numerous seminal studies that looked at different groups of people living in different parts of the country, the results consistently showed a clear relationship between long-term exposure to particulate matter and mortality.[11]

Research using publicly available data on a cohort of more than one million adults in the U.S. reconfirmed that long-term exposure to $PM_{2.5}$ was associated with elevated risk of early death. The increased risk was primarily associated with death from cardiovascular and respiratory causes, including heart disease, stroke, influenza and pneumonia. Researchers also found a similar association between exposure to fine particle pollution and an increased risk of death from lung cancer among never-smokers.[12] Another study of 68.5 million Medicare-enrolled adults in the United States between 2000 and 2016 found a 6-8% increase in risk of all-cause mortality for every 10μg/m^3 increase in the annual average $PM_{2.5}$.[13]

Research has also linked year-round exposure to particle pollution to a wide array of serious health effects at every stage of life, from conception through old age. Among

individuals who are pregnant, fetuses and children, long-term particle pollution exposure is linked to:

- Increased risk of preterm birth and low birth weight;[14]
- Increased fetal and infant mortality;[15]
- Impaired neurological development and cognition;[16]
- Reduced lung development and impaired lung function in children;[17]
- Higher likelihood of children developing asthma.[18]

In adults, long-term particle pollution exposure is linked to:

- Increased risk from existing cardiovascular and respiratory disease, including a worsening of heart disease, atherosclerosis and COPD;[19,20]
- Higher likelihood of developing diabetes and subsequent complications;[21,22]
- Higher likelihood of getting lung cancer and of dying from it;[23]
- Impaired cognitive functioning and an increased risk of Parkinson's disease, Alzheimer's disease and other dementias later in life;[24,25]
- Increased risk of clinical depression and anxiety.[26]

The good news is that cleaning up particle pollution makes a difference. Research has shown a consistent relationship between decreasing $PM_{2.5}$ concentrations and improving respiratory health in children and reduced mortality of adults in communities that have reduced their levels of year-round particle pollution.[27,28]

Who is most at risk from particle pollution?

Anyone who lives where particle pollution levels are high is at risk. Some people face greater risk, however, based on their underlying health and other characteristics. [See the ***People at Risk*** section for more information about vulnerable groups] Research has shown that the groups at the greatest risk from particle pollution include:

- Pregnant people and fetuses;[29]
- Infants, children and people age 65 and older;[30]
- People with lung disease, especially asthma, but also people with COPD;[31]
- People with cardiovascular disease;[32]
- People with lung cancer;[33]
- People of color;[34]
- Current or former smokers;[35]
- People with low incomes;[36] and
- People who are obese or have diabetes.[37]

Health Effects of Ozone Pollution

Ground-level ozone, sometimes known as smog, is one of the most widespread and dangerous pollutants in the United States. Scientists have studied the effects of ozone on human health for decades. Hundreds of studies have confirmed that ozone harms people at levels currently found in many parts of the United States.

What is Ozone Pollution?

Ozone is a gas composed of molecules with three oxygen atoms. (The oxygen we need for life is made up of molecules with two oxygen atoms.) Ozone forms in the lower atmosphere when a combination of pollutants, usually nitrogen oxides (NOx) and volatile organic compounds (VOCs), "cook" together in sunlight through a series of chemical reactions. NOx and VOCs are produced primarily when fossil fuels such as gasoline, diesel, oil, natural gas or coal are burned or when solvents and some other chemicals evaporate. NOx is emitted from power plants, motor vehicles and other sources of

high-heat combustion. VOCs are emitted from motor vehicles, oil and gas operations, chemical plants, refineries, factories, gas stations, paint, consumer products and other sources. If these ingredients are present under the right conditions, they react to form ozone. Sunlight is key, with higher temperatures increasing ozone production. Because the reactions take place in the atmosphere, ozone often shows up downwind of the sources of the original emissions, sometimes many miles from where it formed.



Ozone air pollution is sometimes called ground-level ozone, to distinguish it from the much higher-altitude stratospheric ozone layer that protects people from damaging ultraviolet rays from the sun.

What Can Ozone Pollution Do to Your Health?

Ozone gas is a powerful lung irritant. When it is inhaled into the lungs, it reacts with the delicate lining of the small airways, causing inflammation and other damage that can impact multiple body systems. Ozone exposure can also shorten lives.

Ozone has a serious effect on the respiratory system, both in the short term and over the course of years of exposure.

When ozone levels are high, many people experience breathing problems such as chest tightness, coughing and shortness of breath, often within hours of exposure. Even healthy young adults may experience respiratory symptoms and decreased lung function.[38]

Other breathing problems that have been tied to short-term exposure to ozone include:

- Worsening of symptoms, increased medication use, and increased emergency department visits and hospital admissions for people with asthma and COPD;[39]
- Susceptibility to respiratory infections such as pneumonia, resulting in an increased likelihood of emergency department visits and hospitalizations.[40]

Living with ozone pollution long term may cause lasting damage to respiratory health, including:

- Development of new cases of asthma in children;[41]
- Damage to the airways, leading to development of COPD;[42]
- Increased allergic response.[43]

The inflammation and oxidative stress caused by short- and long-term exposure to ozone can also do damage to tissues, genes and proteins throughout the body, which can cause or worsen other disease conditions over time. These include:

- Potential increased risk of metabolic disorders, including glucose intolerance, hyperglycemia and diabetes;[44]
- Potential impact on the central nervous system, including brain inflammation, structural changes and increased risk of cognitive decline;[45,46]
- Increased likelihood of reproductive and developmental harm, including reduced fertility, pregnancy complications, preterm birth, stillbirth and low birth weight;[47,48]
- Possible cardiovascular effects.[49]

The damage ozone does to the body can be deadly. Recent research has affirmed earlier findings that short-term exposure to ozone, even at levels below the current standard, likely increases the risk of premature death, particularly for older adults.[50]

There is also a growing body of evidence that long-term exposures to ambient ozone may be associated with an increased risk of cardiovascular and respiratory disease mortality.[51]

Who is Most at Risk from Ozone Pollution?

Anyone who spends time outdoors where ozone pollution levels are high may be at risk. Some people face a higher-than-average risk, however, because of their underlying health and other characteristics. [See the ***People at Risk*** section for more information about vulnerable groups.] Research has shown that the groups at greatest risk from ozone pollution include:

- Pregnant people and fetuses;[52]
- Children;
- Anyone 65 and older;
- People with existing lung disease such as asthma and COPD;
- People who work or exercise outdoors.[53]

People at Risk

The health burden of air pollution is not evenly shared. Some people are more at risk of illness and death from air pollution than others. Several key factors affect an individual's level of risk:

- Exposure – Where someone lives, where they go to school and where they work makes a big difference in how much air pollution they breathe. In general, the higher the exposure, the greater the risk of harm.
- Susceptibility – Individuals who are pregnant and their fetuses, children, older adults and people living with chronic conditions, especially heart and lung disease, may be physically more susceptible to the health impacts of air pollution than other adults.
- Access to healthcare – Whether or not a person has health coverage, a healthcare provider, and access to linguistically and culturally appropriate health information may influence their overall health status and how they are impacted by environmental stressors like air pollution.
- Psychosocial stress – There is increasing evidence that non-physical stressors such as poverty, racial/ethnic discrimination and residency status can amplify the harmful effects of air pollution.

These risk factors are not mutually exclusive and often interact in ways that lead to significant health inequities among subgroups of the population. Taken all together, these high-risk categories account for a large proportion of the U.S. population.

People of color

Research has shown that people of color are more likely to be exposed to air pollution and more likely to suffer harm to their health from air pollution than white people.[54,55] Much of this inequity can be traced to the long history of systemic racism in the United States. Practices such as redlining, the discriminatory outlining of so-called "riskier" neighborhoods by mortgage lenders, institutionalized residential segregation in the 20th century, impairing the ability of many people of color to build wealth and limiting their mobility and political power. Over the years, decision-makers have found it easier to place sources of pollution such as power plants, industrial facilities, landfills and highways, in economically disadvantaged communities of color than in more affluent, predominantly white neighborhoods. The resulting disproportionate exposure to air pollution has contributed to high rates of emergency department visits for asthma and other diseases.[56,57]

People of color are also more likely than white people to be living with one or more

chronic conditions that make them more susceptible to the health impacts of air pollution, including asthma and diabetes.[58]

People experiencing poverty

There is evidence that having low income or living in lower income areas puts people at increased risk from air pollution, although the correlation is not as strong as with race and ethnicity.[59,60] People living in poverty are more likely to live in close proximity to sources of pollution and have fewer resources to relocate than people with more financial security.[61] Poverty itself, along with the problems that beset many low-income communities, such as lack of safety, green space, and high-quality food access, have been associated with increased psychosocial distress and chronic stress, which in turn make people more vulnerable to pollution-related health effects.[62] People with low income also have lower rates of health coverage and less access to quality and affordable health care to provide relief to them when they get sick.

Children

Children are both more susceptible to harm from air pollution and more likely to be exposed than adults. The growth and development of a child's lungs and breathing ability start in utero and continue into early adulthood. Long-term exposure to particle pollution during pregnancy and early childhood has been linked to reduced lung growth and long-term exposure to ozone has been linked to increased potential for the development of asthma. The developing brain and heart may also be affected, with life-long consequences.[63] In addition, the body's defenses that help adults fight off infections are still developing in children. Children have more respiratory infections than adults, which also seem to increase their susceptibility to air pollution.[64]

Children breathe more rapidly and inhale more air relative to their size than do adults. They are more likely to spend time outdoors, running around, being active and breathing hard. Consequently, they are more exposed to polluted outdoor air than adults typically are.

Older adults

Much of the illness and premature death caused by air pollution occurs in older adults, who are at increased risk of harm for several reasons. As a person ages, the normal process of thinning and weakening of the lung tissue and the supporting muscle and bones of the ribcage results in diminishing lung function over time. The impairment that results from exposure to air pollutants then has an add-on effect, putting stress on the lungs and heart. Older people are also more likely to be living with chronic diseases, and there is evidence that co-existing chronic lung, heart or circulatory conditions may worsen following exposure to environmental pollutants.[65]

The strength of the immune system also declines with age, leaving older people at greater risk of contracting infections and less able to get them under control before they become serious. Because exposure to air pollution increases susceptibility to respiratory infections, it also increases the risk of severe illness and death in older adults.

People with underlying health conditions

For the millions of people in the U.S. living with illnesses such as asthma, COPD, diabetes, heart disease and lung cancer, exposure to air pollution places them at greater risk of harm to their health than those without disease. The cellular injury and systemic inflammation triggered by breathing ozone and particle pollution put additional stress on people's lungs, heart and other organs already compromised by disease. This can result in a worsening of symptoms, increased medication use, more frequent emergency department visits and hospitalizations, an overall reduced quality of life and far too often premature death.

Individuals who are pregnant and fetuses

Pregnancy is always a susceptible time for both the person who is pregnant and the developing fetus. The pregnant body undergoes dramatic physiological changes in hormone levels, metabolism and circulation throughout the months of gestation. The rapid and complex development of the fetus is a precisely timed and sequenced process. The inflammation and oxidative stress resulting from exposure to air pollution during pregnancy can increase the risk of hypertensive disorders, including preeclampsia, and lead to intrauterine inflammation and damage to the placenta that can disrupt the growth and development of the fetus. Fetal health may also be impacted in a number of ways by environmental contaminants that have been shown to cross the placenta.[66]

Exposure to both ozone and particle pollution during pregnancy is associated with premature birth, low birth weight and stillbirth. These risks are amplified when the individual who is pregnant is also at higher risk of health harm from air pollution in other ways, such living in poverty or having asthma.[67]

People with a smoking history

There is some evidence suggesting that current and former smokers are at greater risk of health harm from exposure to fine particle pollution compared with never-smokers. They are more likely to develop lung cancer and to die prematurely.[68] Smoking damages the lungs, heart, blood vessels and other organs.[69] This impairment leaves the person with a smoking history more vulnerable to the health impact of air pollution than a never-smoker.

Endnotes

1. Health Effects Institute. State of Global Air. Boston, MA. 2024.
2. U.S. EPA. Integrated Science Assessment for Particulate Matter. December 2019 EPA/600/R-19/188. Section 11.1.
3. Liu C, Chen R, Sera RF, Vicedo-Cabrera AM, Guo Y, Tong S, Coelho MSZS, Saldiva PHN, Lavigne E, Matus P, Valdes Ortega PN, Osorio Garcia S, Pascal M, Stafoggia M, Scortichini M, Hashizume M, Honda Y, Hurtado-Diaz M, Cruz J, Nunes B, Teixeira JP, Kim H, Tobias A, Íñiguez C, Forsberg B, Åström C, Ragettli MS, Guo Y-L, Chen B-Y, Bell ML, Wright CY, Scovronick N, Garland RM, Milojevic A, Kyselý J, Urban A, Orru H, Indermitte E, Jaakkola JJK, Ryti NRI, Katsouyanni K, Analitis A, Zanobetti A, Schwartz J, Chen J, Wu T, Cohen A, Gasparrini A, Kan H. Ambient Particulate Air Pollution and Daily Mortality in 652 Cities. *N Engl J Med.* 2019; 381(8):705-15.
4. Di Q, Dai L, Wang Y, Zanobetti A, Choirat C, Schwartz JD, Dominici F. Association of Short-Term Exposure to Air Pollution with Mortality in Older Adults. *JAMA.* 2017; 318:2446-2456.
5. Schwartz J, Fong K and Zanobetti A. A national multicity analysis of the causal effect of local pollution, NO2, and $PM_{2.5}$ on mortality. *Environ Health Perspect.* 2018; 126(8):087004-1- 087004-10.
6. U.S. EPA. 2019, Section 9.1.2.6.
7. U.S. EPA. 2019, Section 6.1.2.
8. U.S. EPA. 2019, Section 5.1.2.1.1.
9. U.S. EPA. 2019, Section 5.1.2.1.
10. .U.S. EPA. 2019, Section 5.1.2.2.1.
11. U.S. EPA. 2019, Section 11.2.
12. Pope CA, Lefler JS, Ezzati M, Higbee JD, Marshall JD, Kim S, Bechle M, Gilliat KS, Vernon SE, Robinson AL, Burnett RT. Mortality risk and fine particulate pollution in a large, representative cohort of U.S. Adults. *Environ Health Perspect.* 2019; 127(7):077007-1-077007-9.
13. Wu X, Braun D, Schwartz J, Kioumourtzoglou MA, Dominici F. Evaluating the impact of long-term exposure to fine particulate matter on mortality among the elderly. Sci Adv. 2020; 6.
14. Bekkar B, Pacheco S, Basu R, DeNicola N_Association of air pollution and heat exposure with preterm birth, low birth weight and stillbirth in the U.S.: A systemic review. *JAMA* Network Open. 2020; 3(6):e208243.
15. Bekkar B et al. 2020.
16. Ni Y, Loftus CT, Szpiro AA, Young MT, Hazlehurst MF, Murphy LE, Tylavsky FA, Mason WA, LeWinn KZ, Sathyanarayana S, Barrett ES, Bush NR, Karr CJ. Associations of pre- and postnatal air pollution exposures with child behavioral problems and cognitive performance: A U.S. multi-cohort study. *Environ Health Perspect.* 2022; 130(6).
17. U.S. EPA. 2019, Section 5.2.2.2.1.
18. U.S. EPA. 2019, Section 5.2.3.1.
19. U.S. EPA. 2019, Section 6.2.2.
20. U.S. EPA. 2019, Section 5.2.5.
21. Liu F, Chen G, Huo W, Wang C, Liu S, Li N, Mao S, Hou Y, Lu Y, Xiang H. Associations between long-term exposure to ambient air pollution and risk of type 2 diabetes mellitus: a systematic review and meta-analysis. *Environ Pollut.* 2019; 252(ptB):1235–1245.

22. Wu Y, Zhang S, Qian SE, Cai M, Li H, Wang C, Zou H, Chen H, Vaughn MG, McMillin SE, Lin H. Ambient air pollution associated with incidence and dynamic progression of type 2 diabetes: a trajectory analysis of a population-based cohort. *BMC Med.* 2022; 20:375.
23. U.S. EPA, 2019. Section 10.2.5.1.
24. Shi L, Wu X, Danesh Yazdi M, Braun D, Abu Awad Y, Wei Y, Liu P, Di Q, Wand Y, Schwartz J, Dominici F, Kioumourtzoglou M-A, Zanobetti A. Long-term effects of $PM_{2.5}$ on neurological disorders in the American Medicare population: a longitudinal cohort study. *Lancet Planet Health.* 2020; 4:e557-65.
25. Wilker EH, Osman M and Weisskopf MG. Ambient air pollution and clinical dementia: a systemic review and meta-analysis. *BMJ.* 2023; 381:e071620.
26. Gao X, Jiang M, Huang N, Guo X and Huang T. Long-term air pollution, genetic susceptibility, and the risk of depression and anxiety: a prospective study in the UK Biobank cohort. *Environ Health Perspect.* 2023; 131(1).
27. U.S. EPA. 2019, Section 5.2.11.
28. Pope CA, Ezzati M, Dockery DW. Fine particulate air pollution and life expectancy in the United States. *N Engl J Med.* 2009; 360:376-86.
29. Bekkar B et al. 2020.
30. U.S. EPA. 2019, Section 12.5.1.1.
31 .U.S. EPA. 2019, Section 12.3.5.
32. U.S. EPA. 2019, Section 12.3.1.
33. U.S. EPA. 2019, Section 10.2.5.1.
34. U.S. EPA. 2019, Section 12.5.4.
35. U.S. EPA. 2019, Section 12.6.1.
36. U.S. EPA. 2019, Section 12.5.3.
37. U.S. EPA. 2019, Section 12.3.3.
38. U.S.EPA. Integrated Science Assessment for Ozone and Related Photochemical Oxidants. April 2020. EPA/600/R-20/012. Section 3.1.4.1.
39. U.S. EPA. 2020, Sections 3.1.5 and 3.1.6.
40. U.S. EPA. 2020, Section 3.1.7.
41. U.S. EPA. 2020, Section 3.2.4.1.
42. U.S. EPA. 2020, Section 3.2.4.3.
43. U.S. EPA. 2020, Section 3.2.4.6.
44. U.S. EPA. 2020, Section 5.1.3.
45. U.S. EPA. 2020, Sections 7.2.1 and 7.2.2.
46. Gao Q, Zang E, Bi J, Dubrow R, Lowe SR, Chen H, Zeng Y, Shi L, Chen K. Long-term ozone exposure and cognitive impairment among Chinese older adults: A cohort study. *J Env Int.* 2022; 160:107072.
47. U.S. EPA. 2020, Section 7.1.3.
48. Hao H, Yoo SR, Strickland MJ, Darrow LA, D'Souza RR, Warren, JL, Moss S, Wang H, Zhang H, Chang HH. Effects of air pollution on adverse birth outcomes and pregnancy complication in the U.S state of Kansas (200-2015). *Sci Reports.* 2023; 13:21476.
49. U.S. EPA. 2020, Sections 4.1 and 4.2.
50. Di et al. 2017.
51. Lim CC, Hayes RB. Ahn J, Shao Y, Silverman DT, Jones RR, Garcia C, Bell ML, Thurston GD. Long-term exposure to ozone and cause-specific mortality risk in the United States. *Am J Respir Crit Care Med.* 2019; 200(8):1022–1031.
52. Bekkar B et al. 2020.
53. U.S. EPA. 2020, Section IS.4.4.
54. U.S. EPA. 2019, Section 12.5.4.
55. Liu J, Clark LP, Bechle MJ, Hajat A, Kim S-Y, Robinson AL, Sheppard L, Szpiro AA, Marshall JD. Disparities in air pollution exposure in the United States by race/ethnicity and income, 1990–2010. *Environ Health Perspect.* 2021; 129(12).
56. Lane HM, Morello-Frosch R, Marshall JD, Apte JS. Historical Redlining Is Associated with Present-Day Air Pollution Disparities in U.S. Cities. *Environ Sci Technol Let.* 2022; 9:345-350.
57. Nardone A, Casey JA, Morello-Frosch R, Mujahid M, Balmes JR, Thakur N. Associations Between Historical Residential Redlining and Current Age-Adjusted Rates of Emergency Department Visits Due to Asthma Across Eight Cities in California: An Ecological Study. *Lancet Planet Health.* 2020; 4(1):e24-e31.
58. Centers for Disease Control and Prevention. National Center for Health Statistics. National Health Interview Survey, 2022. Analysis performed by the American Lung Association Epidemiology and Statistics Unit using SPSS software.
59. U.S. EPA. 2019, Section 12.5.3.
60. Liu et al. 2021.
61. Mikati I, Benson AF, Luben TJ, Sacks JD, Richmond-Bryant J. Disparities in Distribution of Particulate Matter Emission Sources by Race and Poverty Status. *Am J Public Health.* 2018; 108(4):480–485.
62. Kioumourtzoglou M-A, Schwartz J, James P, Dominici F, Zanobetti A. $PM_{2.5}$ and mortality in 207 US cities: modification by temperature and city characteristics. *Epidemiology.* 2016; 27(2):221-7.
63. U.S. EPA. 2019, Section 9.1.3.
64. Johnson NM, Hoffmann AR, Behlen JC, Lau C, Pendleton D, Harvey N, Shore R, Li Y, Chen J, Tian Y, Zhang R. Air pollution and children's health—a review of adverse effects associated with prenatal exposure from fine to ultrafine particulate matter. *Environ Health Prev Med.* 2021; 26:72.
65. Yahzdi MD, Wang Y, Di Q, Wei Y, Requia WJ, Shi L, Sabath MB, Dominici F, Coull BA, Evans JS, Koutrakis P, Schwartz JD. Long-term association of Air Pollution and hospital admissions among Medicare patients using a doubly robust additive model. *Circulation.* 2021; 143:1584-1596.

66. Klepak P, Locatelli I, Korošec S, Künzli N, Kukec A. Ambient air pollution and pregnancy outcomes: a comprehensive review. *Environ Research*. 2018; 167:144-159. and identification of environmental public health challenges

67. Bekkar B et al. 2020.

68. U.S. EPA. 2019, Section 12.6.1.

69. U.S. Department of Health and Human Services. *The Health Consequences of Smoking - 50 Years of Progress: A Report of the Surgeon General.* 2014.

Recommendations for Action

"State of the Air" 2025 illustrates the profound impact that climate change is having on air quality and the continued urgency of reducing the sources of emissions that contribute to ozone and particle pollution.

Under the Clean Air Act, the U.S. Environmental Protection Agency has driven decades of progress in cleaning up the transportation, electricity, buildings and industrial sectors. At the same time, EPA has tracked, analyzed and expanded the nation's understanding of air pollution at the community level. Now, however, all of that progress is at risk.

Sweeping staff cuts and reduction of federal funding are stymieing the agency's ability to ensure that people have clean air to breathe. This year's "State of the Air" focuses on an overarching clarion call to people nationwide: support and defend EPA.

Defend EPA Staff and Funding

EPA is, first and foremost, a public health agency. The agency works at every level to address air pollution. People breathe easier every day because of the work of EPA's staff, but they may not realize just how much these workers matter.

EPA staff are the reason the nation has access to air quality data in the first place, including through "State of the Air." A team of environmental scientists, modelers and statisticians and other experts enable the Airnow.gov site to work, which allows people across the country to get air quality forecasts online. They work with state and local governments to share those forecasts with communities across the country. They review the health science and write and update guidance on what people should do to protect themselves when the air quality index hits yellow, orange, red, purple and maroon. They share resources with schools that help them keep students safe when air pollution reaches unhealthy levels.

EPA staff are vital to ensuring that unhealthy levels of air pollution are not just monitored but also cleaned up. This is done in part by writing strong, sound safeguards under the Clean Air Act. For example, EPA is required to regularly update the National Ambient Air Quality Standards – the national limits on ozone and particle pollution on which this report is based. The scientific staff keep abreast of what the scientific research shows about air pollution, come up with different policy options, lead the work of analyzing the benefits to health of each option, and gather public input. For other types of standards, like limits on specific pollutants from power plants and vehicles, EPA staff do complex technical analyses of what technologies are available to reduce pollution, how and where they're being used, and what the impacts would be to health and to industry of pursuing different options.

Another part of ensuring pollution cleanup is making sure these strong safeguards are enforced. EPA staff do that too. They work with state and local governments to make sure new facilities are reviewed before they get built so that they don't add to the burden of unhealthy air in a place that's already too polluted. They test cars and trucks in labs to make sure they're not emitting more pollutants than they're supposed to. They inspect facilities to ensure their compliance with air quality standards to protect communities in the area. They bring cases against companies that violate the laws that protect public health.

EPA also gives grants and other funding to state and local governments, community organizations, businesses and more to help them monitor and reduce air pollution. Many of these grants are from programs to reduce emissions and invest in clean transportation and clean electricity under the Inflation Reduction Act. Many more are under longstanding programs that fund the everyday efforts that state and local governments make to ensure clean air. Without these funds, state and local governments would have a hard time running local air quality monitors, tracking where pollution is coming from and writing and implementing plans to reduce that pollution.

For all of these funds, EPA staff work hand-in-hand with these partners to make sure the funding goes where it needs to go and supports the work that needs to be done.

EPA's key principles are to follow the science, follow the law, and be transparent. Those principles have guided decades of progress toward cleaner air. But efforts to undercut them put the agency's core mission at risk.

The bottom line is this: EPA staff, working in communities across country, are doing crucial work to keep your air clean. Staff cuts are already impacting people's health across the country. Further cuts mean more dirty air.

Defend EPA Rules

In "State of the Air" 2024, we celebrated the fact that several lifesaving new air pollution safeguards were finalized by EPA, thanks to the hard work of agency staff and the health and environmental advocates who supported them. Now, that progress is at risk.

Executive orders issued in January 2025 and EPA announcements in March seek to overturn regulatory policies that reduce pollution from electricity generation and transportation. But a regulation cannot be overturned simply by an executive order or a press statement. That means that the clean air safeguards are still on the books, still the law of the land, and still need to be defended and protected, especially as new actions are announced to reconsider these lifesaving programs. They include:

Updated national particle pollution standards. EPA strengthened the annual fine particulate matter pollution standards from 12 $\mu g/m^3$ to 9 $\mu g/m^3$. States have submitted to EPA their recommendations for which areas should be cleaned up. Now the agency is required to review those recommendations and conduct its own analyses to finalize the areas that need additional pollution control by February 6, 2026.

Rules to clean up methane and other air pollutants from the oil and gas industry. EPA finalized rules to address leaks of methane from the oil and gas production process, like drilling operations. This is a crucial climate measure and will also reduce emissions of dangerous volatile organic compounds (VOCs). While Congress voted in February to overturn a separate methane prevention rule, these limits are still on the books.

Stronger standards for future cars. EPA finalized a rule that will make future light- and medium-duty vehicles cleaner. The rule will help get more zero-emission vehicles on the road and make new gasoline-powered cars less polluting too.

Stronger carbon pollution limits on future trucks and buses. EPA finalized a rule that will make sure future heavy-duty vehicles emit fewer greenhouse gases, including trucks and buses. A separate, 2023 rule also ensures future trucks and buses emit less nitrogen oxide emissions.

Stronger limits on mercury and air toxics from power plants. EPA tightened limits on toxic emissions from coal- and oil-fired power plants and strengthened monitoring requirements to help ensure that cleanup happens quickly.

Limits on carbon pollution from power plants. EPA set limits on carbon emissions from future gas-fired power plants, current coal-fired power plants and some current gas plants.

These rules are on the books. They were adopted by following the law, and EPA must uphold the rule of law now. The rules must stay in place and be implemented and enforced. Anything less means people will suffer health harms from dirty air that could have been prevented.

Move Forward at the State, City, Community and Individual Levels

States and cities still have many tools in their toolbox to reduce emissions that harm people's health, like cleaning up vehicles by adopting the Advanced Clean Cars II and Advanced Clean Trucks policies, investing in charging infrastructure for electric vehicles, and requiring more electricity to come from truly clean sources like wind, solar, geothermal and tidal. They can also adopt policies to reduce emissions from buildings, manufacturing facilities and freight activities.

Cities, communities and individuals can also adopt a suite of "smart surfaces" solutions – things like cool roofs, porous pavement, more green space and solar panels that help reduce heat in their neighborhoods and protect health from the combined health harms of pollution and dangerously high temperatures.

Individuals can keep themselves safe and help their friends and families do the same – things like checking daily air pollution forecasts at Airnow.gov, preparing for wildfires, floods and other disasters at Lung.org/disaster, and reducing emissions from their vehicle or home energy use in their own lives.

Above all: you can also use the power of your personal voice. Even in a time when clean air protections are under threat, the fact remains: people nationwide want clean air. The need for clean air is universal, nonpartisan and knows no boundaries. And sharing a story is powerful–whether it's a time when you had asthma symptoms on a smoggy day, your child spent days indoors because of wildfire smoke, or the concerns you have about how losses of staff and funding at EPA may impact the air you breathe. That's true when you take your story to your elected officials, but it's also true with family, friends, and other members of your community.

Understanding Grades and Tables

*See **Methodology** for a full explanation of data sources and calculations made for state grades.*

Notes for state grades tables

1. Not all counties have monitors for either ozone or particle pollution. If a county does not have any monitoring data for either pollutant, that county's name is not on the list in these tables. The decision about siting monitors in a county is made by the state and the U.S. Environmental Protection Agency, not by the American Lung Association.
2. **INC** (Incomplete) indicates that monitoring data is available for at least one year in that county, but not all three years.
3. **DNC** (Data Not Collected) indicates that data on that particular pollutant was not collected in that county during the three years covered in the report.
4. The **Weighted Average (Wgt. Avg.)** is derived by adding the three years of individual level data (2021-2023), multiplying the sums of each level by the assigned standard weights (i.e., 1=orange, 1.5=red, 2.0=purple and 2.5=maroon) and calculating the average. Grades are assigned based on the weighted averages as follows: A=0.0, B=0.3-0.9, C=1.0-2.0, D=2.1-3.2, F=3.3+.
5. The **Design Value** is the calculated concentration of a pollutant based on the annual National Ambient Air Quality Standard for $PM_{2.5}$, which is 9.0 $\mu g/m^3$. Counties with design values of 9.0 or lower received a grade of "Pass" for Annual $PM_{2.5}$. Counties with design values of 9.1 or higher received a grade of "Fail."

Notes for at-risk groups tables

1. Adding across rows does not produce valid estimates. Adding the at-risk categories (asthma, COPD, poverty, etc.) will double-count people who fall into more than one category.
2. **Total Population** is based on 2023 U.S. Census and represents the at-risk populations in counties with ozone or $PM_{2.5}$ pollution monitors; it does not represent the entire state's sensitive populations.
3. Those **18 & under** and **65 & over** are vulnerable to ozone and $PM_{2.5}$. Do not use them as population denominators for disease estimates—that will lead to incorrect estimates.
4. **Pediatric asthma** estimates are for those under 18 years of age and represent the estimated number of people in that age group who had asthma in 2023 based on the state rates, when available, or national rates when not (Behavioral Risk Factor Surveillance System, or BRFSS), applied to county population estimates (U.S. Census).
5. **Adult asthma** estimates are for those 18 years of age and older and represent the estimated number of people in that age group who had asthma during 2023 based on state rates (BRFSS) applied to county population estimates (U.S. Census).
6. **COPD** estimates are for adults 18 and over who had ever been diagnosed with chronic obstructive pulmonary disease, which includes chronic bronchitis and emphysema, based on state rates (BRFSS) applied to county population estimates (U.S. Census).
7. **Lung cancer** estimates are for all ages and represent the estimated number of people newly diagnosed with lung cancer in 2021 based on state rates (StateCancerProfiles.gov) applied to county population estimates (U.S. Census).
8. **Cardiovascular (CV) disease** estimates are for adults 18 and over who have been diagnosed within their lifetime, based on state rates (BRFSS) applied to county population estimates (U.S. Census). CV disease includes coronary heart disease, stroke and heart attack.
9. **Pregnancy** estimates are for females 18-49 and based on state rates of pregnancies resulting in live births applied to population estimates (U.S. Census).
10. **Poverty** estimates include all ages and come from the U.S. Census Bureau's Small Area Income and Poverty Estimates program. The estimates are derived from a model using estimates of income or poverty from the Annual Social and Economic Supplement and the Current Population Survey, 2023. Puerto Rico poverty estimates come from the U.S. Census Bureau's American Community Survey, 2019-2023.
11. **People of color** are defined as anyone Hispanic or as non-Hispanic Black, Asian, American Indian/Alaska Native, Native Hawaiian and Other Pacific Islander, or two or more races, based on 2023 county population estimates (U.S Census). Puerto Rico race and ethnicity estimates come from the U.S. Census Bureau's American Community Survey, 2019-2023.
12. Based on a request from Connecticut, the Census Bureau shifted from providing population estimates by county to county-equivalent Planning Regions for the state starting with 2022 data. As air quality data continues to be county-based and Planning Regions are incompatible with historic Connecticut counties, Census Bureau population estimates from 2021 are used in this year's report. Disease rates are still from the latest year available.

Table 1 Populations at Risk by Grade and by Pollutant

People at Risk from Short-Term Particle Pollution (Daily $PM_{2.5}$)

	Chronic Diseases					Age Groups						
In Counties Where the Grades Were:	Adult Asthma	Pediatric Asthma	COPD	Lung Cancer	CV Disease	Under 18	65 and Over	Pregnancies	Poverty	People of Color	Total Population	Number of Counties
Grade A (0.0)	1,124,915	247,119	762,250	7,208	1,092,866	3,102,575	2,727,090	157,238	2,130,229	6,588,285	14,764,458	62
Grade B (0.3-0.9)	4,289,395	902,647	2,777,553	28,165	3,969,488	12,088,644	9,863,933	633,944	7,077,114	27,984,148	57,142,408	160
Grade C (1.0-2.0)	3,578,296	777,059	2,115,172	22,314	2,924,564	10,284,615	7,315,386	518,938	5,392,423	22,628,156	46,214,218	132
Grade D (2.1-3.2)	2,494,526	488,473	1,516,172	16,743	2,033,166	6,701,796	5,520,433	333,157	3,772,420	12,136,398	31,357,228	100
Grade F (3.3+)	5,957,863	1,188,978	3,262,762	33,910	4,724,253	16,774,897	12,669,711	822,523	9,432,925	39,123,137	77,178,968	154
National Population in Counties with $PM_{2.5}$ Monitors	17,961,644	3,707,933	10,774,444	111,852	15,242,636	50,483,527	39,407,042	2,541,883	28,671,471	111,697,262	233,762,815	648

People at Risk from Year-Round Particle Pollution (Annual $PM_{2.5}$)

	Chronic Diseases					Age Groups						
In Counties Where the Grades Were:	Adult Asthma	Pediatric Asthma	COPD	Lung Cancer	CV Disease	Under 18	65 and Over	Pregnancies	Poverty	People of Color	Total Population	Number of Counties
Pass	10,122,909	2,011,982	6,078,482	63,610	8,596,829	26,953,506	22,409,791	1,381,553	15,058,221	55,546,609	128,380,895	426
Fail	6,258,046	1,379,394	3,663,712	38,256	5,202,276	19,216,717	13,211,682	946,632	11,101,103	48,309,996	84,997,574	115
National Population in Counties with $PM_{2.5}$ Monitors	17,961,644	3,707,933	10,774,444	111,852	15,242,636	50,483,527	39,407,042	2,541,883	28,671,471	111,697,262	233,762,815	648

People at Risk from Ozone

	Chronic Diseases				Age Groups						
In Counties Where the Grades Were:	Adult Asthma	Pediatric Asthma	COPD	CV Disease	Under 18	65 and Over	Pregnancies	Poverty	People of Color	Total Population	Number of Counties
Grade A (0.0)	1,948,670	361,826	1,370,724	2,035,209	5,050,342	5,443,296	255,197	3,091,849	10,345,036	25,758,934	137
Grade B (0.3-0.9)	2,702,269	568,383	1,781,636	2,536,346	7,307,754	6,368,314	364,608	4,330,183	14,141,417	34,802,173	148
Grade C (1.0-2.0)	2,789,756	579,640	1,821,933	2,442,236	7,631,976	6,005,211	364,325	3,849,007	12,587,711	34,492,823	174
Grade D (2.1-3.2)	1,977,825	394,791	1,186,794	1,635,315	5,233,078	4,212,129	266,456	2,646,545	9,154,408	24,448,296	81
Grade F (3.3+)	9,392,704	1,980,591	5,322,148	7,585,423	27,684,476	19,946,133	1,379,521	15,054,422	66,483,656	125,231,723	211
National Population in Counties with Ozone Monitors	19,014,829	3,932,701	11,597,147	16,401,883	53,502,295	42,448,315	2,657,497	29,329,395	113,897,030	247,396,139	780

Table 2a People at Risk in 25 U.S. Cities Most Polluted by Short-Term Particle Pollution (Daily $PM_{2.5}$)

2025 Rank	Metropolitan Statistical Areas	Total Population	Under 18	65 and Over	Pediatric Asthma	Adult Asthma	COPD	Lung Cancer	CV Disease	Pregnancies	People of Color	Poverty
1	Bakersfield-Delano, CA	913,820	259,728	111,264	16,473	57,210	25,454	313	42,581	9,148	639,578	169,857
2	Fairbanks-College, AK	94,840	22,535	12,395	1,565	7,941	3,951	49	4,980	1,202	30,209	7,015
3	Eugene-Springfield, OR	381,181	65,661	81,956	4,563	37,332	20,889	159	26,719	3,537	78,370	54,725
3	Visalia, CA	479,468	140,917	58,469	8,938	29,621	13,260	164	22,217	4,853	355,437	83,050
5	Fresno-Hanford-Corcoran, CA	1,332,702	364,673	175,198	23,129	84,749	38,374	457	64,440	13,466	972,180	229,167
6	Reno-Carson City-Gardnerville Ranchos, NV-CA	699,307	139,687	141,044	9,992	49,010	41,135	289	44,011	6,481	258,037	67,410
7	Los Angeles-Long Beach, CA	18,316,743	3,923,848	2,876,482	248,870	1,263,845	602,613	6,262	1,025,571	189,174	13,036,866	2,228,294
8	Yakima, WA	256,643	73,483	37,805	5,371	19,664	7,921	121	12,204	2,502	154,962	40,910
9	Seattle-Tacoma, WA	4,993,725	1,019,521	804,469	74,525	426,849	171,424	2,352	263,032	53,000	1,964,673	453,095
10	Sacramento-Roseville, CA	2,706,315	593,708	474,959	37,656	185,863	91,589	924	156,808	27,170	1,368,720	297,127
11	Medford-Grants Pass, OR	308,589	61,414	76,999	4,268	29,192	18,034	129	23,597	2,417	62,148	40,445
11	San Jose-San Francisco-Oakland, CA	9,001,024	1,861,823	1,497,266	118,086	627,407	303,409	3,078	517,775	91,577	5,990,798	872,151
11	Spokane-Spokane Valley-Coeur d'Alene, WA-ID	785,302	168,696	148,630	12,182	65,934	30,875	359	45,908	8,007	126,868	90,163
14	Bismarck, ND	135,786	31,657	25,018	2,060	10,507	5,524	72	8,727	1,606	17,796	10,229
15	Missoula, MT	126,939	22,681	22,869	1,532	12,369	6,916	57	7,793	1,473	15,909	14,224
16	Pittsburgh-Weirton-Steubenville, PA-OH-WV	2,727,866	508,773	605,974	50,022	227,806	173,588	1,468	250,600	25,746	410,735	313,183
16	Redding-Red Bluff, CA	245,262	54,424	52,782	3,452	16,873	8,997	84	15,642	2,158	65,965	33,160
18	Fargo-Wahpeton, ND-MN	285,484	64,560	40,164	3,994	22,676	9,854	150	15,535	3,909	47,884	28,800
19	Minot, ND	75,742	18,142	11,835	1,180	5,912	2,825	40	4,353	931	13,526	5,684
20	Helena, MT	96,091	20,040	20,545	1,354	8,952	5,576	44	6,602	891	9,097	8,618
21	Indianapolis-Carmel-Muncie, IN	2,651,953	629,614	417,423	42,718	234,648	164,452	1,645	195,165	31,238	763,082	292,453
22	Detroit-Warren-Ann Arbor, MI	5,361,927	1,139,647	989,127	82,844	467,408	359,574	2,846	405,547	53,288	1,795,028	739,466
22	Lancaster, PA	558,589	127,940	112,749	12,689	43,953	32,546	298	46,971	5,306	111,949	46,567
22	Logan, UT-ID	157,887	45,666	16,972	2,851	12,407	4,168	41	6,457	2,211	26,848	15,751
25	Salt Lake City-Provo-Orem, UT-ID	2,805,734	771,304	314,357	47,547	225,519	74,264	690	121,225	37,296	720,985	235,887

Notes:

Cities are ranked using the highest weighted average for any county within that Combined Metropolitan Statistical Area or Metropolitan Statistical Area.

Adding across rows does not produce valid estimates. Adding the disease categories (asthma, COPD, etc.) will double-count people who fall into more than one category.

Table 2b People at Risk in 25 U.S. Cities Most Polluted by Year-Round Particle Pollution (Annual $PM_{2.5}$)

2025 Rank	Metropolitan Statistical Areas	Total Population	Under 18	65 and Over	Pediatric Asthma	Adult Asthma	COPD	Lung Cancer	CV Disease	Pregnancies	People of Color	Poverty
1	Bakersfield-Delano, CA	913,820	259,728	111,264	16,473	57,210	25,454	313	42,581	9,148	639,578	169,857
2	Visalia, CA	479,468	140,917	58,469	8,938	29,621	13,260	164	22,217	4,853	355,437	83,050
3	Fresno-Hanford-Corcoran, CA	1,332,702	364,673	175,198	23,129	84,749	38,374	457	64,440	13,466	972,180	229,167
4	Eugene-Springfield, OR	381,181	65,661	81,956	4,563	37,332	20,889	159	26,719	3,537	78,370	54,725
5	Los Angeles-Long Beach, CA	18,316,743	3,923,848	2,876,482	248,870	1,263,845	602,613	6,262	1,025,571	189,174	13,036,866	2,228,294
6	Detroit-Warren-Ann Arbor, MI	5,361,927	1,139,647	989,127	82,844	467,408	359,574	2,846	405,547	53,288	1,795,028	739,466
6	San Jose-San Francisco-Oakland, CA	9,001,024	1,861,823	1,497,266	118,086	627,407	303,409	3,078	517,775	91,577	5,990,798	872,151
8	Houston-Pasadena, TX	7,706,626	1,967,004	990,110	148,098	486,725	282,905	3,288	429,147	97,728	5,106,048	1,058,803
9	Cleveland-Akron-Canton, OH	3,732,803	773,498	767,567	52,388	326,574	241,288	2,289	300,854	38,634	928,916	477,528
10	Fairbanks-College, AK	94,840	22,535	12,395	1,565	7,941	3,951	49	4,980	1,202	30,209	7,015
11	Indianapolis-Carmel-Muncie, IN	2,651,953	629,614	417,423	42,718	234,648	164,452	1,645	195,165	31,238	763,082	292,453
12	Pittsburgh-Weirton-Steubenville, PA-OH-WV	2,727,866	508,773	605,974	50,022	227,806	173,588	1,468	250,600	25,746	410,735	313,183
13	Chicago-Naperville, IL-IN-WI	9,794,558	2,121,326	1,642,328	135,642	747,355	491,566	5,583	611,557	99,967	4,756,478	1,066,086
14	Cincinnati-Wilmington, OH-KY-IN	2,313,417	530,030	395,801	38,809	197,431	151,078	1,509	177,422	25,551	527,325	251,071
14	Sacramento-Roseville, CA	2,706,315	593,708	474,959	37,656	185,863	91,589	924	156,808	27,170	1,368,720	297,127
16	Brownsville-Harlingen-Raymondville, TX	446,747	125,079	64,917	9,417	27,393	16,644	191	25,463	5,200	406,406	103,978
17	Medford-Grants Pass, OR	308,589	61,414	76,999	4,268	29,192	18,034	129	23,597	2,417	62,148	40,445
17	Missoula, MT	126,939	22,681	22,869	1,532	12,369	6,916	57	7,793	1,473	15,909	14,224
17	St. Louis-St. Charles-Farmington, MO-IL	2,900,730	625,580	538,402	47,592	224,152	182,663	1,746	229,436	30,409	777,225	302,295
20	Kalamazoo-Battle Creek-Portage, MI	456,459	100,251	80,613	7,287	39,453	29,110	242	32,526	4,841	105,192	58,511
20	Phoenix-Mesa, AZ	5,124,113	1,127,488	883,602	90,893	412,019	217,161	1,942	303,431	55,017	2,382,001	562,977
22	Texarkana, TX-AR	145,907	34,333	26,385	2,511	10,172	7,693	75	11,124	1,592	52,952	23,723
23	El Centro, CA	179,057	50,348	25,158	3,193	11,282	5,219	61	8,804	1,651	163,029	29,810
23	Yakima, WA	256,643	73,483	37,805	5,371	19,664	7,921	121	12,204	2,502	154,962	40,910
25	Spokane-Spokane Valley-Coeur d'Alene, WA-ID	785,302	168,696	148,630	12,182	65,934	30,875	359	45,908	8,007	126,868	90,163

Notes:

Cities are ranked using the highest design value for any county within that Combined Metropolitan Statistical Area or Metropolitan Statistical Area.

Adding across rows does not produce valid estimates. Adding the disease categories (asthma, COPD, etc.) will double-count people who have been diagnosed with more than one disease.

Table 2c People at Risk in 25 Most Ozone-Polluted Cities

2025 Rank	Metropolitan Statistical Areas	Total Population	Under 18	65 and Over	Pediatric Asthma	Adult Asthma	COPD	CV Disease	Pregnancies	People of Color	Poverty
1	Los Angeles-Long Beach, CA	18,316,743	3,923,848	2,876,482	248,870	1,263,845	602,613	1,025,571	189,174	13,036,866	2,228,294
2	Visalia, CA	479,468	140,917	58,469	8,938	29,621	13,260	22,217	4,853	355,437	83,050
3	Bakersfield-Delano, CA	913,820	259,728	111,264	16,473	57,210	25,454	42,581	9,148	639,578	169,857
4	Phoenix-Mesa, AZ	5,124,113	1,127,488	883,602	90,893	412,019	217,161	303,431	55,017	2,382,001	562,977
5	Fresno-Hanford-Corcoran, CA	1,332,702	364,673	175,198	23,129	84,749	38,374	64,440	13,466	972,180	229,167
6	Denver-Aurora-Greeley, CO	3,691,404	766,337	542,420	53,221	334,291	129,858	182,148	39,810	1,355,755	321,700
7	Houston-Pasadena, TX	7,706,626	1,967,004	990,110	148,098	486,725	282,905	429,147	97,728	5,106,048	1,058,803
8	San Diego-Chula Vista-Carlsbad, CA	3,269,973	675,125	520,284	42,820	227,652	107,004	181,254	34,028	1,859,156	319,714
9	Salt Lake City-Provo-Orem, UT-ID	2,805,734	771,304	314,357	47,547	225,519	74,264	121,225	37,296	720,985	235,887
10	Dallas-Fort Worth, TX-OK	8,654,750	2,133,317	1,119,043	160,881	554,301	322,518	488,815	110,764	4,832,096	895,943
11	Sacramento-Roseville, CA	2,706,315	593,708	474,959	37,656	185,863	91,589	156,808	27,170	1,368,720	297,127
12	Las Vegas-Henderson, NV	2,392,293	521,126	397,842	37,280	164,626	130,769	138,996	24,076	1,450,276	305,770
13	Fort Collins-Loveland, CO	370,771	66,613	65,986	4,626	34,727	14,077	19,851	4,094	72,996	36,698
14	San Jose-San Francisco-Oakland, CA	9,001,024	1,861,823	1,497,266	118,086	627,407	303,409	517,775	91,577	5,990,798	872,151
15	Chicago-Naperville, IL-IN-WI	9,794,558	2,121,326	1,642,328	135,642	747,355	491,566	611,557	99,967	4,756,478	1,066,086
16	New York-Newark, NY-NJ-CT-PA	22,731,508	4,585,113	4,014,254	380,490	1,720,642	881,039	1,353,213	240,627	12,232,605	2,789,907
17	El Centro, CA	179,057	50,348	25,158	3,193	11,282	5,219	8,804	1,651	163,029	29,810
18	El Paso-Las Cruces, TX-NM	1,098,541	274,904	156,492	20,500	72,104	39,813	61,937	13,219	940,363	202,525
19	Tulsa-Bartlesville-Muskogee, OK	1,165,140	282,064	195,327	27,637	99,871	68,921	91,038	13,481	448,694	168,495
20	San Antonio-New Braunfels-Kerrville, TX	2,785,647	667,183	406,533	50,232	180,151	107,861	164,557	34,720	1,836,422	367,038
21	St. Louis-St. Charles-Farmington, MO-IL	2,900,730	625,580	538,402	47,592	224,152	182,663	229,436	30,409	777,225	302,295
22	Albuquerque-Santa Fe-Los Alamos, NM	1,168,363	229,761	243,368	16,413	91,815	47,095	79,693	11,425	717,410	158,778
23	Colorado Springs, CO	768,832	173,860	114,069	12,074	68,042	26,518	37,167	7,835	251,164	55,091
24	Redding-Red Bluff, CA	245,262	54,424	52,782	3,452	16,873	8,997	15,642	2,158	65,965	33,160
24	Sheboygan, WI	117,752	25,055	23,936	1,543	10,063	5,698	8,928	1,088	21,989	10,197

Notes:

Cities are ranked using the highest weighted average for any county within that Combined Metropolitan Statistical Area or Metropolitan Statistical Area.

Adding across rows does not produce valid estimates. Adding the disease categories (asthma, COPD, etc.) will double-count people who have been diagnosed with more than one disease.

Table 3a Cleanest U.S. Cities for Short-Term Particle Pollution (Daily $PM_{2.5}$)

Metropolitan Statistical Area	Population
Asheville-Waynesville-Brevard, NC	513,720
Bangor, ME	155,312
Burlington-Fort Madison, IA-IL	76,906
Charleston-North Charleston, SC	849,417
College Station-Bryan, TX	281,445
Fayetteville-Springdale-Rogers, AR	590,337
Gadsden, AL	103,241
Gulfport-Biloxi, MS	421,916
Hot Springs-Malvern, AR	133,042
Killeen-Temple, TX	501,333
Little Rock-North Little Rock, AR	913,536
Midland-Odessa-Andrews, TX	365,482
Mobile-Daphne-Fairhope, AL	665,147
Montgomery-Selma, AL	421,645
Pensacola-Ferry Pass-Brent, FL	530,090
Peoria-Canton, IL	394,781
Ponce-Coamo, PR	319,592
San Juan-Bayamón, PR	2,360,082
San Luis Obispo-Paso Robles, CA	281,639
Santa Maria-Santa Barbara, CA	441,257
Shreveport-Bossier City-Minden, LA	418,533
Tuscaloosa, AL	278,290

Note:
Monitors in these cities reported no days when $PM_{2.5}$ levels reached the unhealthful range using the Air Quality Index based on the 2012 NAAQS.

Table 3b Top 25 Cleanest U.S. Cities for Year-Round Particle Pollution (Annual $PM_{2.5}$)

2025 Rank	Design Value	Metropolitan Statistical Area	Population
1	3.7	Casper, WY	79,941
1	3.7	Urban Honolulu, HI	989,408
3	4.0	Kahului-Wailuku, HI	164,264
4	4.1	Bozeman, MT	126,409
5	4.8	Bangor, ME	155,312
6	5.1	St. George, UT	202,452
6	5.1	Anchorage, AK	401,314
8	5.2	Cheyenne, WY	100,984
9	5.3	Colorado Springs, CO	768,832
9	5.3	Grand Junction, CO	159,681
11	5.4	Wilmington, NC	467,337
12	5.7	Lubbock-Plainview, TX	396,955
13	5.9	Elmira-Corning, NY	173,487
13	5.9	Salinas, CA	430,723
15	6.0	Duluth-Grand Rapids, MN-WI	326,968
15	6.0	Gainesville-Lake City, FL	425,189
15	6.0	Amarillo-Borger, TX	292,428
18	6.1	Syracuse-Auburn, NY	727,441
19	6.2	Santa Rosa-Petaluma, CA	481,812
20	6.3	Asheville-Waynesville-Brevard, NC	513,720
21	6.4	Burlington-South Burlington-Barre, VT	288,084
22	6.6	Pittsfield, MA	126,818
23	6.7	San Juan-Bayamón, PR	2,360,082
23	6.7	Portland-Vancouver-Salem, OR-WA	3,286,669
23	6.7	Lynchburg, VA	264,590

Notes:
Cities are ranked by using the highest design value for any county within that metropolitan area.

Table 3c Cleanest U.S. Cities for Ozone Air Pollution

Metropolitan Statistical Area	Population
Augusta-Richmond County, GA-SC	629,429
Bangor, ME	155,312
Bellingham, WA	231,919
Brunswick-St. Simons, GA	116,074
Charleston-Huntington-Ashland, WV-OH-KY	643,394
Charlottesville, VA	225,127
Crestview-Fort Walton Beach-Destin, FL	304,818
Fairbanks-College, AK	94,840
Florence, SC	199,630
Gadsden, AL	103,241
Gainesville-Lake City, FL	425,189
Grand Junction, CO	159,681
Greenville-Washington, NC	219,600
Johnson City-Kingsport-Bristol, TN-VA	598,800
Mayagüez-Aguadilla, PR	458,312
Middlesborough-Corbin, KY	172,880
Missoula, MT	126,939
Monroe-Ruston, LA	269,847
Montgomery-Selma, AL	421,645
Myrtle Beach-Conway, SC	463,209
North Port-Bradenton, FL	1,152,221
Palm Bay-Melbourne-Titusville, FL	643,979
Panama City-Panama City Beach, FL	216,371
Pocatello, ID	90,400
Prescott Valley-Prescott, AZ	249,081
Roanoke, VA	314,314
Rocky Mount-Wilson-Roanoke Rapids, NC	288,366
Salinas, CA	430,723
San Juan-Bayamón, PR	2,360,082
Santa Rosa-Petaluma, CA	481,812
Tallahassee-Bainbridge, FL-GA	421,732
Tuscaloosa, AL	278,290
Urban Honolulu, HI	989,408
Victoria-Port Lavaca, TX	118,504
Wilmington, NC	467,337

Notes:

1. This list represents cities with no monitored ozone air pollution in unhealthful ranges using the Air Quality Index based on 2015 NAAQS.

Table 4a Cleanest Counties for Short-Term Particle Pollution (Daily $PM_{2.5}$)

County	State	Metropolitan Statistical Area
Juneau City and Borough	AK	
Baldwin	AL	Mobile-Daphne-Fairhope, AL
Clay	AL	
DeKalb	AL	Huntsville-Decatur-Albertville, AL-TN
Etowah	AL	Gadsden, AL
Mobile	AL	Mobile-Daphne-Fairhope, AL
Montgomery	AL	Montgomery-Selma, AL
Sumter	AL	
Tuscaloosa	AL	Tuscaloosa, AL
Arkansas	AR	
Crittenden	AR	Memphis-Clarksdale-Forrest City, TN-MS-AR
Garland	AR	Hot Springs-Malvern, AR
Jackson	AR	
Polk	AR	
Pulaski	AR	Little Rock-North Little Rock, AR
Washington	AR	Fayetteville-Springdale-Rogers, AR
Apache	AZ	
Pima	AZ	Tucson-Nogales, AZ
Marin	CA	San Jose-San Francisco-Oakland, CA
San Francisco	CA	San Jose-San Francisco-Oakland, CA
San Luis Obispo	CA	San Luis Obispo-Paso Robles, CA
Santa Barbara	CA	Santa Maria-Santa Barbara, CA
Ventura	CA	Los Angeles-Long Beach, CA
Escambia	FL	Pensacola-Ferry Pass-Brent, FL
Polk	FL	Orlando-Lakeland-Deltona, FL
Clayton	GA	Atlanta--Athens-Clarke County--Sandy Springs, GA-AL
Hawaii	HI	
Lee	IA	Burlington-Fort Madison, IA-IL
Madison	IL	St. Louis-St. Charles-Farmington, MO-IL
Peoria	IL	Peoria-Canton, IL
Caddo Parish	LA	Shreveport-Bossier City-Minden, LA
Iberville Parish	LA	Baton Rouge-Hammond, LA
Orleans Parish	LA	New Orleans-Metairie-Slidell, LA-MS
St. Bernard Parish	LA	New Orleans-Metairie-Slidell, LA-MS
Tangipahoa Parish	LA	Baton Rouge-Hammond, LA
Androscoggin	ME	Portland-Lewiston-South Portland, ME
Hancock	ME	
Kennebec	ME	
Penobscot	ME	Bangor, ME
Allegan	MI	Grand Rapids-Wyoming, MI
Manistee	MI	
Cedar	MO	
Hancock	MS	Gulfport-Biloxi, MS
Harrison	MS	Gulfport-Biloxi, MS
Jackson	MS	Gulfport-Biloxi, MS
Buncombe	NC	Asheville-Waynesville-Brevard, NC
Essex	NY	
Suffolk	NY	New York-Newark, NY-NJ-CT-PA
Bayamón	PR	San Juan-Bayamón, PR
Caguas	PR	San Juan-Bayamón, PR
Fajardo	PR	San Juan-Bayamón, PR
Guaynabo	PR	San Juan-Bayamón, PR
Ponce	PR	Ponce-Coamo, PR
Charleston	SC	Charleston-North Charleston, SC
Edgefield	SC	Augusta-Richmond County, GA-SC
Lawrence	TN	Nashville-Davidson--Murfreesboro, TN
Shelby	TN	Memphis-Clarksdale-Forrest City, TN-MS-AR
Bell	TX	Killeen-Temple, TX
Brazos	TX	College Station-Bryan, TX
Ector	TX	Midland-Odessa-Andrews, TX
Carbon	UT	
Norfolk City	VA	Virginia Beach-Chesapeake, VA-NC

Notes:

Monitors in these counties reported no days when $PM_{2.5}$ levels reached the unhealthful range using the Air Quality Index based on the 2012 NAAQS.

Table 4b Top 25 Cleanest Counties for Year-Round Particle Pollution (Annual $PM_{2.5}$)

2024 Rank	County	State	Design Value	Metropolitan Statistical Area
1	Fremont	WY	2.1	
2	Cook	MN	2.7	
3	La Paz	AZ	3.4	
4	Hughes	SD	3.6	
5	Honolulu	HI	3.7	Urban Honolulu, HI
5	Hancock	ME	3.7	
5	Carlton	MN	3.7	Duluth-Grand Rapids, MN-WI
5	Natrona	WY	3.7	Casper, WY
5	Sublette	WY	3.7	
10	Hillsborough	NH	3.9	Boston-Worcester-Providence, MA-RI-NH
11	Maui	HI	4.0	Kahului-Wailuku, HI
11	Essex	NY	4.0	
11	Teton	WY	4.0	
14	Gallatin	MT	4.1	Bozeman, MT
15	Matanuska-Susitna Borough	AK	4.3	Anchorage, AK
16	Hawaii	HI	4.4	
17	Park	WY	4.5	
18	Juneau City and Borough	AK	4.6	
18	Scotts Bluff	NE	4.6	
18	Custer	SD	4.6	Rapid City-Spearfish, SD
21	Penobscot	ME	4.8	Bangor, ME
21	Belknap	NH	4.8	Boston-Worcester-Providence, MA-RI-NH
23	Lake	CA	4.9	
23	San Benito	CA	4.9	San Jose-San Francisco-Oakland, CA
23	Litchfield	CT	4.9	New Haven-Hartford-Waterbury, CT
23	Lake	MN	4.9	
23	Taos	NM	4.9	
23	Kent	RI	4.9	Boston-Worcester-Providence, MA-RI-NH

Notes:

Counties are ranked by Design Value.

Table 4c Cleanest Counties for Ozone Air Pollution

County	State	Metropolitan Statistical Area
Denali Borough	AK	
Fairbanks North Star Borough	AK	Fairbanks-College, AK
Baldwin	AL	Mobile-Daphne-Fairhope, AL
Elmore	AL	Montgomery-Selma, AL
Etowah	AL	Gadsden, AL
Montgomery	AL	Montgomery-Selma, AL
Russell	AL	Columbus-Auburn-Opelika, GA-AL
Sumter	AL	
Tuscaloosa	AL	Tuscaloosa, AL
Clark	AR	
Yavapai	AZ	Prescott Valley-Prescott, AZ
Colusa	CA	
Glenn	CA	
Humboldt	CA	
Lake	CA	
Marin	CA	San Jose-San Francisco-Oakland, CA
Mendocino	CA	
Monterey	CA	Salinas, CA
San Benito	CA	San Jose-San Francisco-Oakland, CA
San Francisco	CA	San Jose-San Francisco-Oakland, CA
San Mateo	CA	San Jose-San Francisco-Oakland, CA
Santa Cruz	CA	San Jose-San Francisco-Oakland, CA
Siskiyou	CA	
Sonoma	CA	Santa Rosa-Petaluma, CA
Archuleta	CO	
Mesa	CO	Grand Junction, CO
Alachua	FL	Gainesville-Lake City, FL
Baker	FL	Jacksonville-Kingsland-Palatka, FL-GA
Bay	FL	Panama City-Panama City Beach, FL
Brevard	FL	Palm Bay-Melbourne-Titusville, FL
Broward	FL	Miami-Port St. Lucie-Fort Lauderdale, FL
Collier	FL	Cape Coral-Fort Myers-Naples, FL
Columbia	FL	Gainesville-Lake City, FL
Flagler	FL	Orlando-Lakeland-Deltona, FL
Holmes	FL	
Indian River	FL	Miami-Port St. Lucie-Fort Lauderdale, FL
Lake	FL	Orlando-Lakeland-Deltona, FL
Leon	FL	Tallahassee-Bainbridge, FL-GA
Liberty	FL	
Manatee	FL	North Port-Bradenton, FL
Martin	FL	Miami-Port St. Lucie-Fort Lauderdale, FL
Okaloosa	FL	Crestview-Fort Walton Beach-Destin, FL
Osceola	FL	Orlando-Lakeland-Deltona, FL
Palm Beach	FL	Miami-Port St. Lucie-Fort Lauderdale, FL
Pasco	FL	Tampa-St. Petersburg-Clearwater, FL
Santa Rosa	FL	Pensacola-Ferry Pass-Brent, FL
Sarasota	FL	North Port-Bradenton, FL
Seminole	FL	Orlando-Lakeland-Deltona, FL
St. Lucie	FL	Miami-Port St. Lucie-Fort Lauderdale, FL
Volusia	FL	Orlando-Lakeland-Deltona, FL
Wakulla	FL	Tallahassee-Bainbridge, FL-GA
Chattooga	GA	Chattanooga-Cleveland-Dalton, TN-GA-AL
Columbia	GA	Augusta-Richmond County, GA-SC
Glynn	GA	Brunswick-St. Simons, GA
Richmond	GA	Augusta-Richmond County, GA-SC
Sumter	GA	
Honolulu	HI	Urban Honolulu, HI
Bannock	ID	Pocatello, ID
Neosho	KS	
Bell	KY	Middlesborough-Corbin, KY
Boyd	KY	Charleston-Huntington-Ashland, WV-OH-KY
Carter	KY	Charleston-Huntington-Ashland, WV-OH-KY
Greenup	KY	Charleston-Huntington-Ashland, WV-OH-KY
Morgan	KY	
Perry	KY	
Pike	KY	
Pulaski	KY	
Bossier Parish	LA	Shreveport-Bossier City-Minden, LA
Ouachita Parish	LA	Monroe-Ruston, LA
Garrett	MD	
Androscoggin	ME	Portland-Lewiston-South Portland, ME
Aroostook	ME	
Kennebec	ME	
Oxford	ME	
Penobscot	ME	Bangor, ME
Washington	ME	
Carlton	MN	Duluth-Grand Rapids, MN-WI
Lake	MN	
Lauderdale	MS	
Flathead	MT	
Missoula	MT	Missoula, MT
Avery	NC	
Buncombe	NC	Asheville-Waynesville-Brevard, NC
Caldwell	NC	Charlotte-Concord, NC-SC
Caswell	NC	
Durham	NC	Raleigh-Durham-Cary, NC
Edgecombe	NC	Rocky Mount-Wilson-Roanoke Rapids, NC
Macon	NC	
Martin	NC	
Montgomery	NC	
New Hanover	NC	Wilmington, NC

Note:
This list represents counties with no monitored ozone air pollution in unhealthful ranges using the Air Quality Index based on 2015 NAAQS.

Table 4c Cleanest Counties for Ozone Air Pollution (cont.)

County	State	Metropolitan Statistical Area
Pitt	NC	Greenville-Washington, NC
Yancey	NC	
Belknap	NH	Boston-Worcester-Providence, MA-RI-NH
Grafton	NH	
Atlantic	NJ	Philadelphia-Reading-Camden, PA-NJ-DE-MD
Warren	NJ	Allentown-Bethlehem-East Stroudsburg, PA-NJ
Hamilton	NY	
Lawrence	OH	Charleston-Huntington-Ashland, WV-OH-KY
Washington	OH	Parkersburg-Marietta-Vienna, WV-OH
Washington	OR	Portland-Vancouver-Salem, OR-WA
Somerset	PA	Johnstown-Somerset, PA
Tioga	PA	
Bayamón	PR	San Juan-Bayamón, PR
Mayagüez	PR	Mayagüez-Aguadilla, PR
Aiken	SC	Augusta-Richmond County, GA-SC
Anderson	SC	Greenville-Spartanburg-Anderson, SC
Charleston	SC	Charleston-North Charleston, SC
Chesterfield	SC	
Darlington	SC	Florence, SC
Edgefield	SC	Augusta-Richmond County, GA-SC
Horry	SC	Myrtle Beach-Conway, SC
DeKalb	TN	
Knox	TN	Knoxville-Morristown-Sevierville, TN
Loudon	TN	Knoxville-Morristown-Sevierville, TN
Sullivan	TN	Johnson City-Kingsport-Bristol, TN-VA
Polk	TX	
Rockwall	TX	Dallas-Fort Worth, TX-OK
Victoria	TX	Victoria-Port Lavaca, TX
Albemarle	VA	Charlottesville, VA
Charles City	VA	Richmond, VA
Hampton City	VA	Virginia Beach-Chesapeake, VA-NC
Prince Edward	VA	
Roanoke	VA	Roanoke, VA
Rockbridge	VA	
Wythe	VA	
Rutland	VT	
Clallam	WA	
Columbia	WA	
Pierce	WA	Seattle-Tacoma, WA
Skagit	WA	Seattle-Tacoma, WA
Whatcom	WA	Bellingham, WA
Cabell	WV	Charleston-Huntington-Ashland, WV-OH-KY
Greenbrier	WV	
Kanawha	WV	Charleston-Huntington-Ashland, WV-OH-KY
Tucker	WV	
Weston	WY	

Note:
This list represents counties with no monitored ozone air pollution in unhealthful ranges using the Air Quality Index based on 2015 NAAQS.

CALIFORNIA

American Lung Association in California

	HIGH OZONE DAYS 2021–2023					HIGH PARTICLE POLLUTION DAYS 2021–2023							
						24-Hour						Annual	
County	Orange	Red	Purple	Wgt. Avg.	Grade	Orange	Red	Purple	Maroon	Wgt. Avg.	Grade	Design Value	Pass/ Fail
Alameda	15	1	0	5.5	F	6	0	0	0	2.0	C	8.9	Pass
Amador	5	0	0	1.7	C	DNC	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Butte	9	0	0	3.0	D	8	7	0	0	6.2	F	8.9	Pass
Calaveras	6	0	0	2.0	C	4	3	0	0	2.8	D	6.7	Pass
Colusa	0	0	0	0.0	A	10	6	1	0	7.0	F	8.9	Pass
Contra Costa	6	0	0	2.0	C	5	0	0	0	1.7	C	9.6	Fail
El Dorado	37	2	0	13.3	F	DNC	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Fresno	121	13	0	46.8	F	71	9	1	0	28.8	F	14.8	Fail
Glenn	0	0	0	0.0	A	DNC	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Humboldt	0	0	0	0.0	A	6	1	4	0	5.2	F	6.9	Pass
Imperial	52	4	0	19.3	F	17	3	0	0	7.2	F	10.2	Fail
Inyo	14	0	0	4.7	F	28	13	3	1	18.7	F	7.4	Pass
Kern	172	31	0	72.8	F	104	18	1	0	44.3	F	16.2	Fail
Kings	46	2	0	16.3	F	66	9	0	0	26.5	F	14.1	Fail
Lake	0	0	0	0.0	A	0	1	0	0	0.5	B	4.9	Pass
Los Angeles	169	79	4	98.5	F	22	5	0	0	9.8	F	12.2	Fail
Madera	41	4	0	15.7	F	17	4	0	0	7.7	F	10.9	Fail
Marin	0	0	0	0.0	A	0	0	0	0	0.0	A	6.4	Pass
Mariposa	26	3	0	10.2	F	DNC	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Mendocino	0	0	0	0.0	A	12	2	0	0	5.0	F	11.0	Fail
Merced	42	1	0	14.5	F	19	2	0	0	7.3	F	10.4	Fail
Mono	DNC	DNC	DNC	DNC	DNC	11	11	0	0	9.2	F	8.0	Pass
Monterey	0	0	0	0.0	A	1	0	0	0	0.3	B	5.9	Pass
Napa	INC	INC	INC	INC	INC	INC	INC	INC	INC	INC	INC	INC	INC
Nevada	47	6	0	18.7	F	6	15	4	0	12.2	F	6.5	Pass
Orange	21	3	0	8.5	F	11	0	0	0	3.7	F	10.2	Fail
Placer	60	5	0	22.5	F	7	10	5	0	10.7	F	8.9	Pass
Plumas	DNC	DNC	DNC	DNC	DNC	30	12	2	0	17.3	F	14.0	Fail
Riverside	205	84	5	113.7	F	24	12	0	0	14.0	F	12.6	Fail
Sacramento	46	3	0	16.8	F	19	5	1	1	10.3	F	9.9	Fail
San Benito	0	0	0	0.0	A	1	0	0	0	0.3	B	4.9	Pass
San Bernardino	190	150	23	153.7	F	14	7	0	0	8.2	F	13.1	Fail
San Diego	81	1	0	27.5	F	1	0	0	0	0.3	B	9.2	Fail
San Francisco	0	0	0	0.0	A	0	0	0	0	0.0	A	INC	INC
San Joaquin	3	0	1	1.7	C	26	1	0	0	9.2	F	11.2	Fail
San Luis Obispo	13	0	0	4.3	F	0	0	0	0	0.0	A	8.0	Pass
San Mateo	0	0	0	0.0	A	1	0	0	0	0.3	B	7.0	Pass
Santa Barbara	1	0	0	0.3	B	0	0	0	0	0.0	A	7.5	Pass
Santa Clara	13	0	0	4.3	F	4	0	0	0	1.3	C	9.1	Fail

CALIFORNIA (cont.)

American Lung Association in California

	HIGH OZONE DAYS 2021–2023					HIGH PARTICLE POLLUTION DAYS 2021–2023							
						24-Hour						Annual	
County	Orange	Red	Purple	Wgt. Avg.	Grade	Orange	Red	Purple	Maroon	Wgt. Avg.	Grade	Design Value	Pass/ Fail
Santa Cruz	0	0	0	0.0	A	1	0	0	0	0.3	B	5.4	Pass
Shasta	15	0	0	5.0	F	5	3	0	0	3.2	D	INC	INC
Siskiyou	0	0	0	0.0	A	15	31	6	2	26.2	F	11.7	Fail
Solano	3	0	0	1.0	C	1	0	0	0	0.3	B	7.3	Pass
Sonoma	0	0	0	0.0	A	2	0	0	0	0.7	B	6.2	Pass
Stanislaus	57	3	0	20.5	F	30	4	0	0	12.0	F	13.0	Fail
Sutter	17	1	0	6.2	F	9	5	0	0	5.5	F	11.2	Fail
Tehama	29	0	0	9.7	F	10	15	0	0	10.8	F	7.5	Pass
Tulare	209	38	0	88.7	F	64	26	2	1	36.5	F	15.7	Fail
Tuolumne	5	0	0	1.7	C	DNC	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Ventura	32	0	0	10.7	F	0	0	0	0	0.0	A	7.5	Pass
Yolo	6	0	0	2.0	C	1	0	0	0	0.3	B	8.2	Pass

CALIFORNIA

American Lung Association in California

County	Total Population	Under 18	65 & Over	AT-RISK GROUPS: Lung Diseases: Pediatric Asthma	Adult Asthma	COPD	Lung Cancer	CV Disease	Pregnancies	Poverty	People of Color
Alameda	1,622,188	315,933	261,127	20,038	114,690	54,586	554	92,845	17,467	151,872	1,169,893
Amador	41,811	6,512	11,749	413	3,139	1,823	14	3,219	271	4,400	10,582
Butte	207,172	42,199	38,881	2,676	14,503	7,075	71	12,053	2,167	40,532	69,617
Calaveras	46,565	8,156	13,834	517	3,425	2,062	16	3,663	334	5,639	10,667
Colusa	22,037	5,915	3,519	375	1,417	689	8	1,177	207	2,677	15,235
Contra Costa	1,155,025	250,439	204,829	15,884	79,697	40,145	394	69,177	11,214	95,369	708,220
El Dorado	192,215	37,109	46,788	2,354	13,764	7,746	66	13,622	1,566	13,438	49,095
Fresno	1,017,162	280,038	134,321	17,761	64,544	29,306	348	49,247	10,334	177,171	748,856
Glenn	28,129	7,470	4,853	474	1,819	908	10	1,559	254	3,769	14,758
Humboldt	133,985	24,839	27,304	1,575	9,615	4,851	46	8,330	1,398	21,856	38,892
Imperial	179,057	50,348	25,158	3,193	11,282	5,219	61	8,804	1,651	29,810	163,029
Inyo	18,527	3,668	4,751	233	1,319	747	6	1,312	149	2,169	7,602
Kern	913,820	259,728	111,264	16,473	57,210	25,454	313	42,581	9,148	169,857	639,578
Kings	152,682	40,721	17,031	2,583	9,770	4,163	53	6,884	1,409	23,950	109,842
Lake	67,878	14,900	16,670	945	4,702	2,653	23	4,660	538	11,790	23,796
Los Angeles	9,663,345	1,952,770	1,520,769	123,854	676,891	321,289	3,302	546,261	102,191	1,299,957	7,221,232
Madera	162,858	43,914	23,846	2,785	10,435	4,905	56	8,309	1,723	28,046	113,482
Marin	254,407	48,217	62,745	3,058	18,319	10,472	87	18,488	1,972	21,535	83,352
Mariposa	16,919	3,036	5,243	193	1,239	753	6	1,338	122	2,899	4,129
Mendocino	89,108	18,532	22,654	1,175	6,266	3,552	30	6,241	739	12,295	33,870
Merced	291,920	82,900	34,885	5,258	18,274	8,064	100	13,461	2,981	53,192	223,791
Mono	13,066	2,257	2,520	143	952	481	4	829	123	1,013	4,555
Monterey	430,723	109,668	66,686	6,956	28,193	13,461	147	22,887	4,142	58,136	313,544
Napa	133,216	25,378	29,031	1,610	9,534	5,076	46	8,831	1,206	11,581	67,693
Nevada	102,037	17,159	30,744	1,088	7,567	4,544	35	8,064	783	10,990	17,386
Orange	3,135,755	645,880	529,921	40,965	219,019	107,518	1,072	184,240	31,411	284,696	1,962,915
Placer	423,561	91,096	88,767	5,778	29,391	15,629	145	27,189	3,820	27,088	139,188
Plumas	19,131	3,233	6,306	205	1,421	887	7	1,584	137	2,418	3,459
Riverside	2,492,442	593,261	392,274	37,628	166,819	79,992	853	136,219	24,848	278,442	1,719,040
Sacramento	1,584,288	357,753	250,123	22,690	107,691	51,284	541	87,181	16,417	185,867	936,276
San Benito	68,175	17,040	9,503	1,081	4,484	2,090	23	3,540	675	6,204	48,484
San Bernardino	2,195,611	553,808	283,489	35,125	143,727	64,943	751	109,152	22,803	284,772	1,656,876
San Diego	3,269,973	675,125	520,284	42,820	227,652	107,004	1,119	181,254	34,028	319,714	1,859,156
San Francisco	808,988	110,389	149,189	7,001	61,356	29,395	277	49,982	8,980	95,298	505,899
San Joaquin	800,965	207,474	110,407	13,159	52,028	24,103	274	40,743	8,082	99,266	587,263
San Luis Obispo	281,639	48,467	64,370	3,074	20,582	10,717	96	18,502	2,703	34,227	95,701
San Mateo	726,353	139,218	135,673	8,830	51,727	26,063	248	44,880	7,100	52,747	468,135
Santa Barbara	441,257	98,119	75,338	6,223	30,126	14,357	151	24,344	4,585	62,891	258,914
Santa Clara	1,877,592	374,375	289,344	23,745	131,880	61,922	643	105,005	19,418	139,084	1,359,960

CALIFORNIA (CONT.)

American Lung Association in California

		AT-RISK GROUPS									
				Lung Diseases							
County	Total Population	Under 18	65 & Over	Pediatric Asthma	Adult Asthma	COPD	Lung Cancer	CV Disease	Pregnancies	Poverty	People of Color
Santa Cruz	261,547	47,101	51,848	2,987	18,889	9,494	89	16,308	2,684	31,840	117,201
Shasta	180,366	38,814	39,483	2,462	12,516	6,683	62	11,618	1,607	23,527	42,035
Siskiyou	42,905	8,468	12,308	537	3,067	1,820	15	3,222	319	7,273	11,133
Solano	449,218	97,528	80,908	6,186	30,961	15,423	154	26,470	4,292	45,402	299,076
Sonoma	481,812	90,254	107,472	5,724	34,625	18,507	165	32,207	4,431	43,143	196,911
Stanislaus	551,430	145,831	77,777	9,249	35,568	16,576	189	28,045	5,506	68,761	351,831
Sutter	97,948	24,291	16,478	1,541	6,479	3,186	33	5,451	940	14,849	57,146
Tehama	64,896	15,610	13,299	990	4,357	2,314	22	4,024	551	9,633	23,930
Tulare	479,468	140,917	58,469	8,938	29,621	13,260	164	22,217	4,853	83,050	355,437
Tuolumne	54,204	9,352	15,553	593	3,989	2,324	19	4,099	399	5,390	11,882
Ventura	829,590	178,129	150,029	11,298	57,389	28,871	284	49,699	7,921	80,427	476,803
Yolo	220,544	43,139	30,613	2,736	15,494	6,717	75	11,132	2,779	31,960	125,905

Attachment K

Lokahi

To:	Mindy Jian, Attorney Shute Mihaly & Weinberger, LLP	*Date:*	October 20, 2025
From:	Shelly Sorensen, PE, PTOE		
Job Number:	24.5710		
RE:	Cajalco Commerce Center Review Traffic Memorandum		



INTRODUCTION AND PURPOSE OF MEMORANDUM

Lōkahi, LLC (Lōkahi) has prepared a Traffic Memorandum in response to a review of the *Cajalco Commerce Center (Formerly: Mead Valley Commerce Cetner) Traffic Analysis* report, dated July 3, 2024.

The *Cajalco Commerce Center Traffic Analysis* ("*Traffic Analysis*" or "EIR") was prepared to evaluate and assess the impacts of the proposed 1,003,510 square foot warehouse building and 14.94 acre active park.

ANALYSIS

TRIP GENERATION

At the time of the report, the specific end user for the development was unknown. The *Traffic Analysis*'s trip generation calculations are based on the following assumptions: 852,984 square feet of high-cube fulfilment warehouse use and 150,526 square feet of high-cube cold storage warehouse use.

The *Traffic Analysis* used local trip generation data published in the High-Cube Warehouse Trip Generation Study (WSP, January 29, 2019), see Appendix A, to estimate the trip generation of the 852,984 square feet portion of the proposed warehouse. The *Traffic Analysis* used the Institute of Transportation Engineers Land Use 157 – High-Cube Cold Storage Warehouse, see Appendix B, to estimate the trip generation of the 150,526 square feet portion of the proposed warehouse.

The *Traffic Analysis* used the San Diego Municipal Code Land Development Code Trip Generation Manual, see Appendix C, to estimate the trip generation of the public park.

10555 N. 114th Street, Suite 105
Scottsdale, AZ 85259
480.536.7150
www.lokahigroup.com

Due to the assumed high percentage of truck users for the proposed facilities' trip generation, a Passenger Car Equivalent (PCE) factor was used to adjust the proposed trip generation to be represented by a standard unit (passenger car) for some of the calculations in the *Traffic Analysis*. The PCE factors were determined following the Riverside County Transportation Analysis Guidelines.

Without knowing the specific end user, it is not possible to accurately calculate the Project's trip generation. Given the parameters of the proposed high-cube warehouse, the Project's actual trip generation could be up to 180 percent higher than that projected by the *Traffic Analysis*. For example, High-Cube Parcel Hub Warehousing is a type of warehouse facility designed for rapid sorting and consolidation of parcels. The Project's specifications could allow this type of facility. Due to the high turnover nature of the High-Cube Parcel Hub Warehouse land use, the average daily trip generation rate is 4.85 trips per 1,000 square feet. This is more than double the average daily trip generation rate of 2.125 used in the *Traffic Analysis* to estimate the Project's trip generation. Without a known specific end user, the trip generation estimates in *the* EIR are too speculative to be useful in analyzing the Project's impacts and may be significantly underestimating the Project's trip generation.

EXISTING TRUCK PERCENTAGE FACTOR

Capacity in traffic engineering is a measurement of the efficiency of a roadway network. The delay (time) associated with moving vehicles along a roadway or through an intersection is calculated and then translated into a level of service grade (A through F). This grade is used in planning and designing new facilities as well as identifying deficiencies in existing circulation patterns. The *Traffic Analysis* evaluated the capacity and level of service of roadways and intersections surrounding the Project site using the methodology presented in the 7th *Edition of the Highway Capacity Manual (HCM)*. Traffic analysis software, Synchro, was used to perform the analyses.

The calculations in Synchro use a variable for truck percentage. This variable is used by the software to determine the effect of trucks on the capacity of the roadway network and intersections. For example, trucks generally take longer to turn, longer to start from a stopped position, and overall tend to move slower than passenger cars. All of these factors are accounted for through the truck percentage variable used when calculating the capacity, or time delay, on a road. Synchro will generally default to a truck percentage variable of 2 percent. However, this default is considered a starting point and should be replaced with a more accurate variable reflecting truck data collected in the field whenever possible. Industrial areas will generally have a higher truck percentage, while suburban residential areas will have lower truck percentages. In areas where trucks make up a higher percentage of the traffic, or the proposed land use is known to generate a significant percentage of truck trips, the variable should be adjusted up to reflect these conditions.

The EIR used a variable of zero percent to calculate existing road capacity surrounding the Project site. This will have an adverse effect on validity of the capacity results, likely underestimating the volume of vehicles, and therefore delay, on studied roads and at studied intersections. While the EIR includes a discussion on the use of the PCE factor in the trip generation, it does not appear to explain the use of the zero percent for the truck factor in the Synchro calculations. While calculations of projected trips generated by the Project have been adjusted using a PCE factor to account for truck traffic on the road, it appears that the *Traffic Analysis* did not use a PCE factor when calculating existing traffic volumes. Not applying a PCE factor to the existing traffic volumes or adjusting the truck percentage variable to reflect current conditions results in underestimating delays. Furthermore, if the *Traffic Analysis* has underestimated the existing delays, then its future projections will also underestimate delays since those calculations rely on the existing condition calculations as a baseline. Underestimating the delay would result in overestimating levels of service and adopting mitigation measures that do not sufficiently mitigate the Project's significant impacts.

EXISTING AND PROPOSED TRUCK ROUTES

Truck routes help manage heavy vehicles by designating specific roadways for their use. This can minimize the damage to smaller roads, reduces noise pollution in residential areas, and enhances safety by separating heavy vehicles from residential streets. Per the *City of Perris Truck Routes Map*, dated August 26, 2022, see Appendix D, Cajalco Road from Seaton Ave east to I-215 is designated as a truck route. Additionally, Harvill Avenue, which runs parallel to I-215 is designated as a truck route.

The EIR shows that trucks will travel along Cajalco Road to the west of the Project site. This portion of Cajalco Road is not currently designated as a truck route. Although specific information could not be found regarding roads that prohibit truck traffic, it is assumed that routes other than those specifically designated for trucks would be less optimal for truck traffic. Truck traffic directed to roadways not designated as truck routes may result in additional roadway damage as well as increased noise pollution and safety concerns, particularly for residential areas.

Additionally, approximately 2 miles west of the Project site, there are residential homes that front Cajalco Road. This portion of Cajalco Road is also narrower (38'). See **Figure 1**. Both of these factors only increase noise pollution and safety impacts to the nearby residences.



Figure 1 – Cajalco Road Frontage

SEATON AVENUE

The *Traffic Analysis* projects that 20-25 percent of traffic resulting from the Project will be distributed to and from Seaton Avenue to the south of Cajalco Road. Assuming that the ultimate destination is the I-215 freeway, this traffic on Seaton Avenue will have to circulate through surface streets to reach the on ramps at Placentia Avenue. These surface streets appear to be undeveloped and may be difficult for trucks to traverse. See **Figure 2**. As mentioned above, trucks that are directed to roadways not optimal for truck traffic, like these surface streets, will result in additional roadway damage as well as increased noise pollution and safety concerns. The EIR makes no mention of the impact that the increased truck traffic will have on these surface streets.



Figure 2 - Truck Route Along Seaton Avenue

TRUCK STORAGE ALONG CAJALCO ROAD

The left-turn lane along Seaton Avenue for vehicles turning left onto westbound Cajalco Road is currently 35 feet long. However, the *Traffic Analysis* determined that traffic resulting from the Project would have a 95% queue length of 232 feet during the AM peak hour and 206 feet during the PM peak hour at that location. The *Traffic Analysis* states that the Project will include a 350 foot storage bay to accommodate this queue length, but no such improvement was included in the Project description or proposed as mitigation for the Project. Therefore, the intersection of Cajalco Road and Seaton Avenue cannot accommodate the additional traffic that will result from the Project unless the left turn lane on Seaton Avenue south of Cajalco Road is extended. If the additional storage length is not provided, the vehicles queuing will back up into the through lanes causing additional congestion and traffic safety concerns.

CAJALCO ROAD WIDENING PROJECT

The *Traffic Analysis* did not include any discussion of the pending Cajalco Road Widening Project and its projected impacts on the surrounding roadway network. The Cajalco Road Widening Project is planned to widen and realign Cajalco Road between Temescal Canyon Road, to the west, and I-215, to the east. Proposed enhancements include providing 4 lanes of roadway linking I-15 and I-215. The horizontal and vertical curves will be designed to increase the speed and capacity of the roadway.

In a study titled *Increasing Highway Capacity Induces More Auto Travel* published by the National Center for Sustainable Transportation in January 2023, see Appendix E, the findings concluded that increasing roadway capacity (such as by adding lanes) actually has a negative effect on the amount of time people spend driving, ultimately causing more delay. Adding capacity to a roadway resulted in increased average vehicle speeds and an initial decrease in travel times. However, over time, the initial decreased travel times incentivized travelers to utilize that route, which then increased the number of drivers along a roadway network, making congestion, air quality, and roadway hazard issues in the surrounding area worse. By omitting the Cajalco Road Widening Project from its analysis, the *Traffic Analysis* does not account for the added congestion, air quality, and safety impacts resulting from the Project in the context of a higher capacity Cajalco Road.

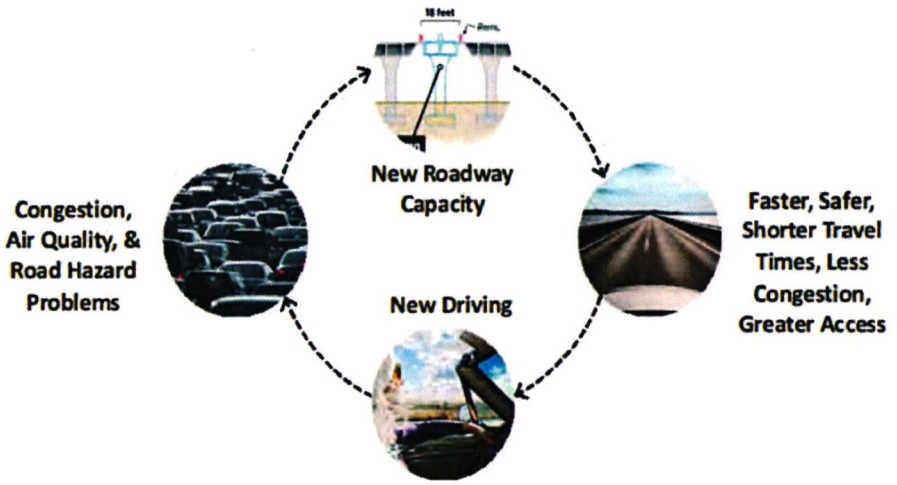


Figure 3 – Induced Travel Effect Due to Roadway Capacity Expansion

The EIR also fails to account for the increase in truck percentages that would result from the Cajalco Road Widening Project. Per the project documents, it was assumed that the improvements would increase the truck percentages along Cajalco Road by up to 1.62 precent. This additional truck traffic is not considered in the *Traffic Analysis*'s truck traffic projections.

The improvements proposed by the Cajalco Road Widening Project will improve the conditions of Cajalco Road between I-15 and I-215. Trucks traveling from the Port of Los Angeles and Long Beach that are destined for the Project would have a more direct route of travel. See **Figure 4**.

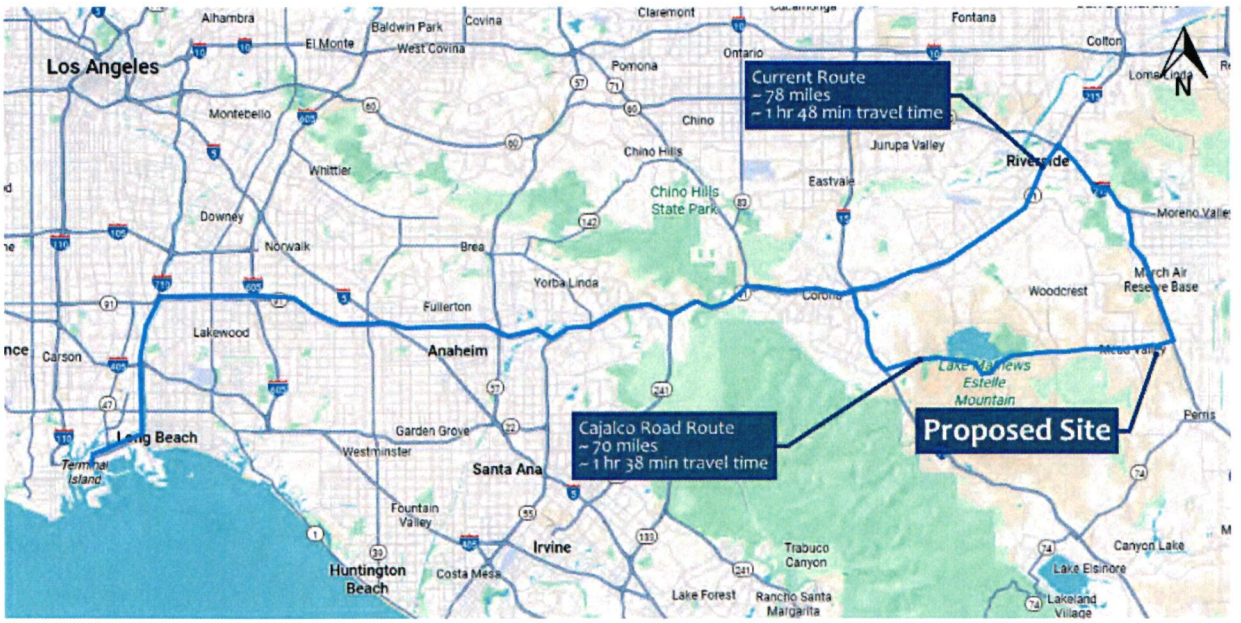


Figure 4 – Possible Routes

With the improvements the route would be approximately 8 miles shorter and depending on the time of day approximately 10 minutes faster in travel time. This would account for the increase in truck traffic along Cajalco Road, which was not accounted for in the EIR.

Appendix A – High Cube Warehouse Trip Generation Study (WSP, January 29, 2019)

Lokahi

A

Technical Memorandum

To: Daniel Ramirez-Cornejo, Program Manager, WRCOG

From: Billy Park, Supervising Transportation Planner, WSP

Subject: **TUMF High-Cube Warehouse Trip Generation Study**

Date: January 29, 2019

Background

High-cube warehousing is emerging as an important development type in the Inland Empire. Studies such as Logistics & Distribution: *An Answer to Regional Upward Social Mobility*[1] and *Multi-County Goods Movement Action Plan*[2] suggests that this trend is likely to increase over time due to the Inland Empire's relative abundance of suitable sites compared to coastal counties.

A recurring analytical problem for the analyses of traffic impacts associated with proposed high-cube warehouses is the lack of reliable data regarding the number and vehicle mix of trips generated by this land development type. Specifically:

- The *2003 Fontana Truck Trip Generation Study*, which has been used for years by agencies in the Inland Empire, is based on the older type of high-cube warehouse. Newer warehouses generally are larger (often over 1 million square feet), much more automated, and generate far fewer trips per square foot.
- The use of overly-conservative estimates has produced results that were unreasonable when compared to actual field conditions. For example, the Environmental Impact Report (EIR) for the Skechers high-cube warehouse building in Moreno Valley included traffic forecasts that were substantially higher than the actual post-construction trip generation for both cars and trucks. Overstated forecasts are misleading to decision makers and could result in oversized infrastructure that could itself have environmental consequences, creates an undue burden on development, and could even have adverse legal consequences for the agencies involved.
- In 2011 the Commercial Real Estate Development Association, also known by its former acronym NAIOP, commissioned a trip generation study of high-cube warehouses focused on large highly-automated warehouses in the Inland Empire. NAIOP had hoped that their study, which found trip-gen rates considerably lower than previous studies, would be used in CEQA analyses going forward. However, concerns about potential bias by the sponsoring party have placed into question the validity of the study results. Similarly, a study commissioned by SCAQMD was viewed as possibly having an anti-development bias.
- Finally, in 2015 NAIOP and SCAQMD jointly sponsored a trip-gen study for high-cube warehouses through a respected neutral party, the Institute of Transportation Engineers (ITE). The report for this study, *High-Cube Warehouse Vehicle Trip Generation Analysis*, was completed in 2016.

The joint NAIOP/SCAQMD/ITE study resulted in a consensus on the trip generation rates to be used for the most common type of high-cube warehouse, a category they call "transload and short-term storage". The findings of the joint study generally indicated the trip generation rates for this use as being consistent with the trip generation rates for the broader category of high-cube warehouses as described by ITE in the 9th Edition of the *Trip*

[1] *Logistics & Distribution: An Answer to Regional Upward Social Mobility*, Dr. John Husing for SCAG, June 2004
[2] *Multi-County Goods Movement Action Plan*, Wilbur Smith Associates, August 2008

Generation Manual. However, the report did not settle the issue of trip generation rates for two other specific types of high-cube warehouses:

> *"The single data points for fulfillment centers and parcel hubs indicate that they have significantly different vehicle trip generation characteristics compared to other HCWs. However, there are insufficient data from which to derive useable trip generation rates."*

The purpose of this technical memorandum is to gather sufficient data to develop reliable trip generation rates for fulfillment centers and parcel hubs for use in traffic impact studies in the Inland Empire.

Methodology

Number of Sites: The study team reviewed ITE's *Trip Generation Handbook 2nd* Edition, Chapter 4 of which describes how to perform a trip generation study that meets ITE's standards (which improves the defensibility of the results if they are used for CEQA analyses). ITE recommends that at least three sites, and preferably five, be surveyed for a given land use category. Based on the review of candidate sites identified by Western Riverside Council of Governments (WRCOG) staff, it was recommended that data be collected at a total of 16 sites for the purposes of this study.

Independent Variables: ITE's Trip Generation Manual measures the size of proposed developments using more than a dozen different independent variables, such as students (for schools), acres (for parks), etc. All High-Cube related categories in both 9th and 10th Editions of the Trip Generation Manual are reported in Square Foot Gross Floor Area (GFA) measured in thousands of square feet (TSF), which is also the independent variable used for the TUMF program. Some other ITE employment categories use employment as the independent variable, as does SCAG in its Sustainable Communities Strategy. WRCOG provided GFA for all sites and employment data for eight fulfillment centers and one parcel hub site.

The ITE *Trip Generation Manual* typically reports trip generation rates two ways; namely as the average rate and using the "best fit" mathematical relationship between the number of trips generated and the independent variable. R-squared, also known as the coefficient of determination, is used to measure how well the best fit equations match the surveyed traffic counts. The *Trip Generation Manual* recommends that the best fit equation only be used when the R^2 is greater than or equal to 0.50 and certain other conditions being met; otherwise the average rate should be used.

Data Collection

WRCOG provided a list of recommended trip generation study sites after reviewing potential sites within the Inland Empire with its member agencies. The list included 11 fulfillment centers and 5 parcel hub sites as follows:

Fulfillment Centers

1. Walmart: 6750 Kimball Ave, Chino, CA 91708
2. Amazon: 24208 San Michele Rd, Moreno Valley, CA 92551
3. Lineage Logistics: 1001 Columbia Ave Riverside, CA 92507
4. P&G: 16110 Cosmos Street, Moreno Valley, CA 92551
5. Big 5: 6125 Sycamore Canyon Blvd, Riverside, CA 92507
6. Nestle USA: 3450 Dulles Drive, Jurupa Valley, CA
7. Home Depot: 11650 Venture Drive, Jurupa Valley, CA
8. ACT Fulfillment Center: 3155 Universe Drive, Jurupa Valley, CA
9. Petco: 4345 Parkhurst Street, Jurupa Valley, CA
10. Komer: 11850 Riverside Drive, Jurupa Valley, CA
11. Ross: 3404 Indian Ave Perris, CA 92571

Parcel Hubs

12. UPS: 15801 Meridian Pkwy, Riverside, CA 92518
13. FedEx: 330 Resource Dr, Bloomington, CA 92316
14. FedEx Freight: 12100 Riverside Drive, Jurupa Valley, CA
15. UPS Chain Logistics: 11811/11991 Landon Drive, Jurupa Valley, CA
16. DHL: 12249 Holly St N, Riverside, CA 92509

Traffic counts were collected at all of these sites. These were 72-hour driveway counts collected using video cameras for three-midweek days starting June 26, 2018. Video collection was determined to be preferable to collection data by means of machine counts, which can be problematic for driveways where vehicles are maneuvering at slow speeds. Video counts provide the ability for human viewers to review the captured footage to classify vehicles into 5 types (car, large 2-axle, 3-axle, 4-axle, and 5+ axle truck). The three-day average was calculated and used for the purposes of this study.

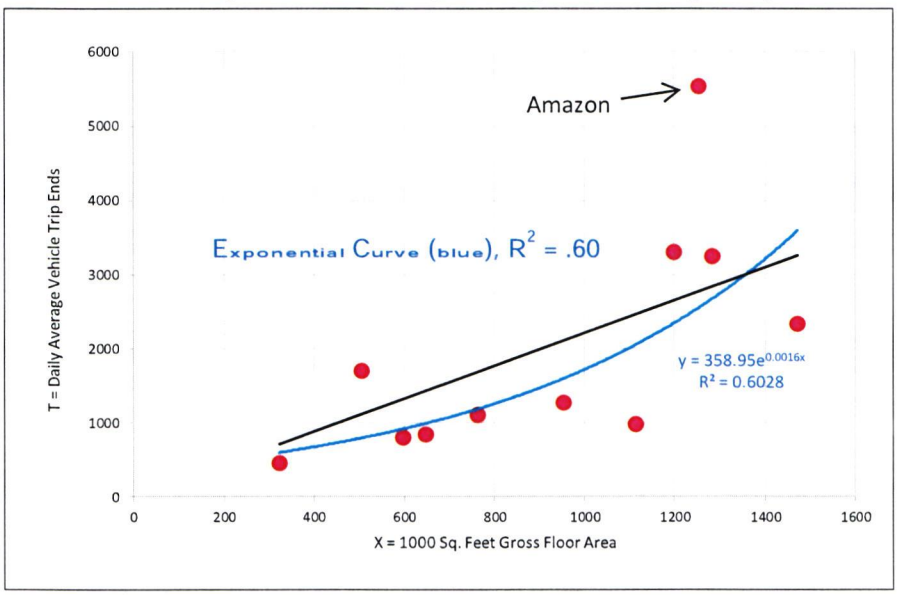
Fulfillment Centers

By Building Size

Exhibit 1 displays a data plot of daily vehicle trips for the 11 fulfillment centers against building size as the independent variable. The average trip generation rate for fulfillments centers (see black line in Exhibit 1) was found to be 2.2 trips/TSF, compared to the 1.4 trips/TSF found for conventional high-cube warehouses in the ITE/SCAQMD/NAIOP study (i.e. about 50% higher).

Exhibit 1 denotes one outlier data point representing the Amazon site in the upper right of the chart. As shown, the average daily trips generated at this facility is over 50% higher than the trips generated at the two sites of similar size (Walmart and Ross), which appears indicative of a greater frequency of same day e-commerce deliveries from Amazon to individual consumers.

Exhibit 1: Data Plot for Daily Total Vehicle Trip Ends against Building Size (Fulfillment Center)



The best fit equation was an exponential relationship with R^2 of 0.60 (i.e. high enough to meet the criteria of acceptability). This is shown as a blue line in Exhibit 1. An exponential relationship, meaning that the larger the building the higher the trip generation rate, is quite unusual.

Exhibit 2 takes a deeper look at this by showing the daily vehicle trip generation rates for each of the 11 surveyed fulfillment centers sorted by the smallest to the largest building size from left to right. As shown, small sites tend to generate fewer trips per thousand square feet, but higher percentage of trucks. On the other hand, largest sites tend to generate a higher number of car trips, but fewer truck trips. So not only is the overall trip generation rate affected by building size, the vehicle mix is affected as well.

Exhibit ■ Hvy Trucks ■ Light/Med Trucks □ Cars **t Center**

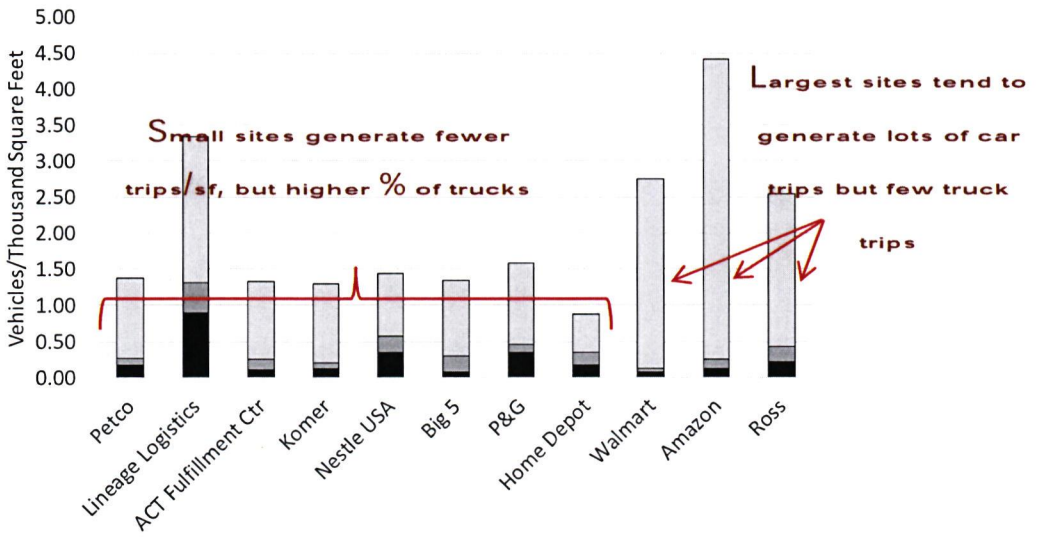


Exhibit 3 and

Exhibit 4 show data plots for AM and PM peak hour vehicle trip ends against building size (respectively). The fitted curves had a low R^2, and so we recommend using the average rate.

Exhibit 3: Data Plot for AM Peak Hour Vehicle Trip Ends against Building Size (Fulfillment Center)

Amazon →

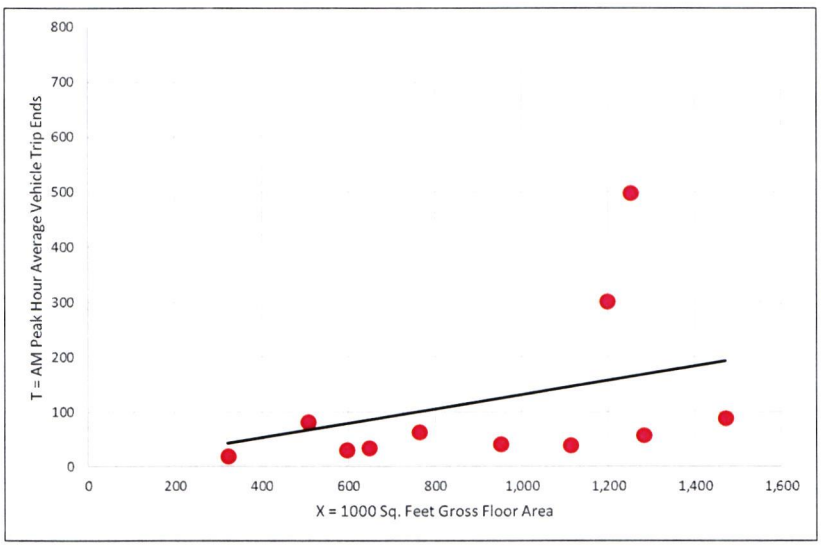


Exhibit 4: Data Plot for PM Peak Hour Vehicle Trip Ends against Building Size (Fulfillment Center)

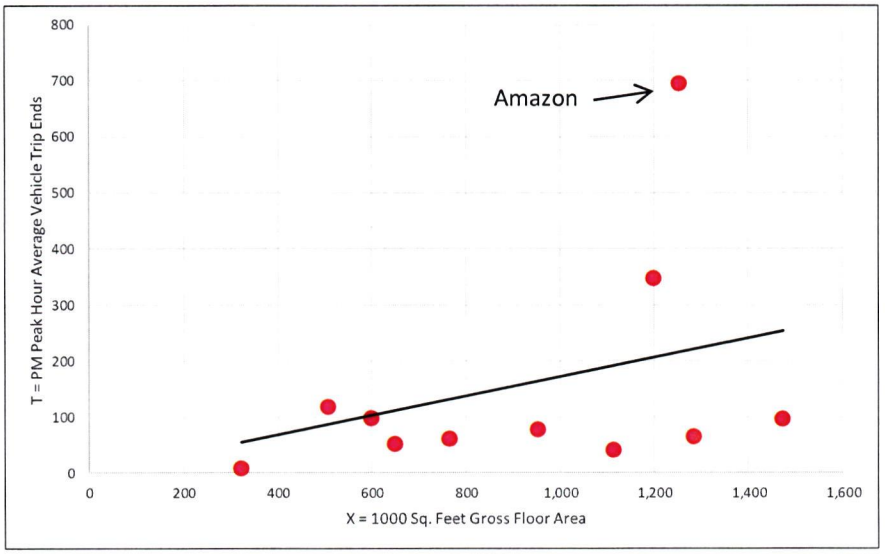
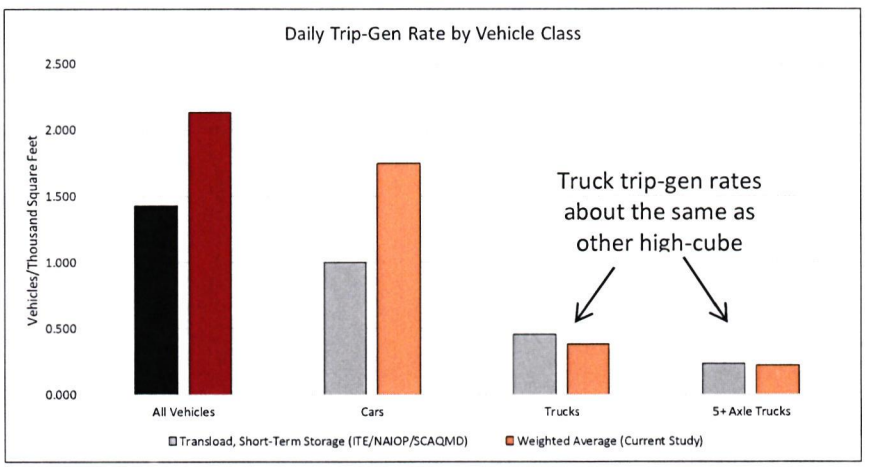


Exhibit 5 compares the average trip generation rates of 11 fulfillment centers with the rates found for conventional transload and short-term storage warehouses in the 2016 high-cube warehouse trip generation study[3] by SCAQMD/NAIOP/ITE. As shown, the fulfillment centers generate more daily vehicle trips than conventional warehouse facilities although trucks are roughly the same. This means that the additional trips by fulfillment centers are entirely due to additional car traffic, which is almost double the rate of car trips generated by conventional warehouses.

Exhibit 5: Conventional Warehouse vs Fulfillment Centers



Visual observation of the fulfillment center sites indicates the higher trip generation rates for cars appears to be mostly due to the use vans and passenger cars as delivery vehicles, particularly for the larger facilities operated by retailers such as Amazon and Walmart.

[3] *High-Cube Warehouse Vehicle Trip Generation Analysis*, Institute of Transportation Engineers, 2016

Exhibit 6 summarizes the AM and PM peak hour trip rates and the daily rates for fulfillment centers based on the findings of this study, and compares the results to rates for conventional transload and short-term storage warehouses.

Exhibit 6: Summary of Trip Generation Rates per Thousand Square Feet of Gross Floor Area for Fulfillment Centers

Vehicle Class	AM Peak Hour		PM Peak Hour		Daily	
	Conventional Warehouse*	Fulfillment Center	Conventional Warehouse	Fulfillment Center	Conventional Warehouse	Fulfillment Center
Cars	0.057	0.103	0.086	0.144	1.000	1.750
2-4 Axle Trucks	0.009	0.008	0.013	0.011	0.221	0.162
5-Axle Trucks	0.015	0.011	0.010	0.010	0.233	0.217
Total	0.082	0.122	0.108	0.165	1.432	2.129
% Higher than Conventional		49%		52%		49%

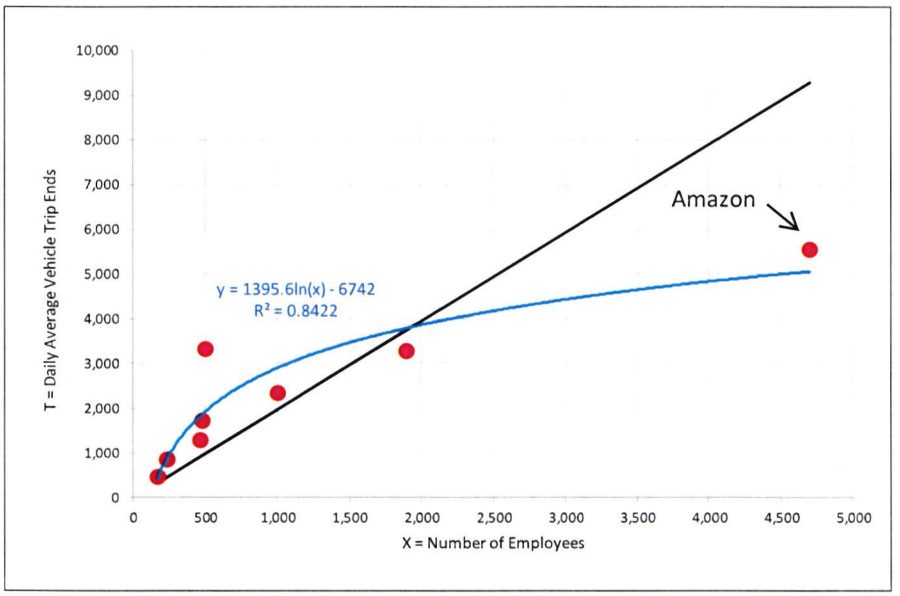
* Transload, Short-Term Storage category in 2016 TIE/ NAIOP/ SCAQMD study

By Employee

The WRCOG contacted the surveyed fulfillment centers and obtained employment data for eight of the eleven sites. Exhibit 7 shows a data plot for those eight sites for daily total vehicle trip ends against the number of employees. The best fit equation was logarithmic function which had an R^2 of 0.84, indicating a very good fit. Notably, the Amazon site, which was an outlier for trip generation based on floor area (see Exhibit 1), correlates more closely to other sites when employment is used instead. The average trip generation rate for fulfillments centers (represented by the black line in Exhibit 7) was found to be 2.0 trips/TSF

No comparison was made to any previous rates per employees because none of the previous high-cube warehouse related trip generation studies included correlation of trips with employment data.

Exhibit 7: Data Plot for Daily Total Vehicle Trip Ends against Employee (Fulfillment Center)



The data plots for the AM and PM peak hour total vehicle trip ends against the number of fulfillment center employees are shown in Exhibit 8 and Exhibit 9. The best fit equations are linear regressions (shown with black lines) which show a good R^2 for both the AM and PM peak periods.

Exhibit 8: Data Plot for AM Peak Hour Total Vehicle Trip Ends against Employee (Fulfillment Center)

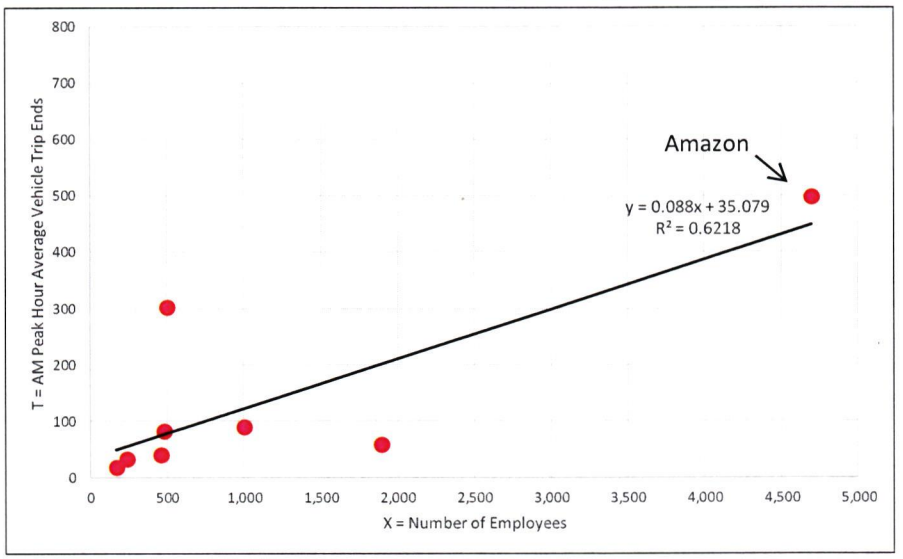


Exhibit 9: Data Plot for PM Peak Hour Total Vehicle Trip Ends against Employee (Fulfillment Center)

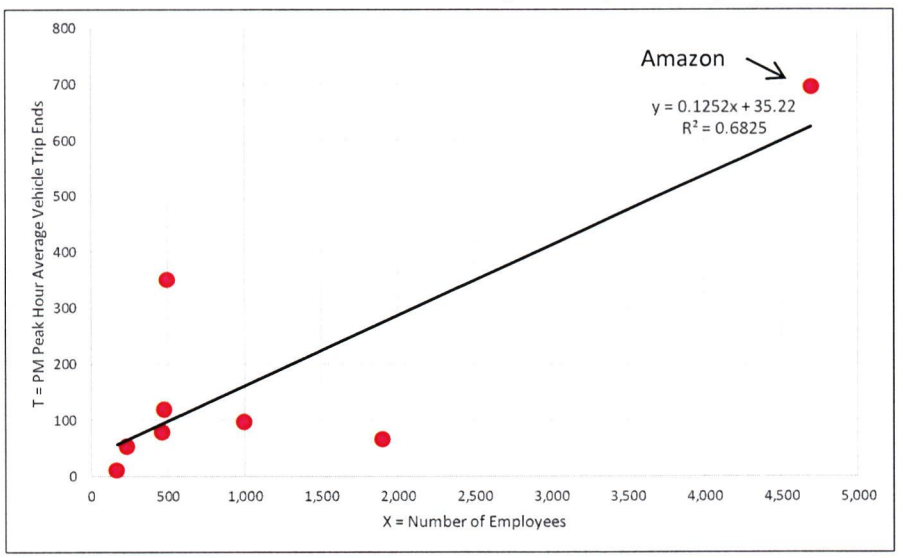


Exhibit 10 summarizes the AM and PM peak hour trip rates and the daily rates for trip generation per employee at fulfillment centers based on the findings of this study.

Exhibit 10: Summary of Trip Generation Rates per Employee for Fulfillment Centers

Vehicle Class	AM Peak Hour	PM Peak Hour	Daily
Cars	0.102	0.139	1.673
2-4 Axle Trucks	0.006	0.008	0.125
5-Axle Trucks	0.009	0.008	0.178
Total	0.118	0.155	1.977

Parcel Hubs

By Building Size

Exhibit 11 displays daily vehicle trip generation rates by building size for each of five parcel hub sites. They are sorted by the smallest to the largest building size from left to right. In this case the small sites generate significantly more trips of every kind than the larger sites, which is the opposite to the pattern observed for fulfillment centers.

Exhibit 11: Daily Trip Generation Rates at Parcel Hubs

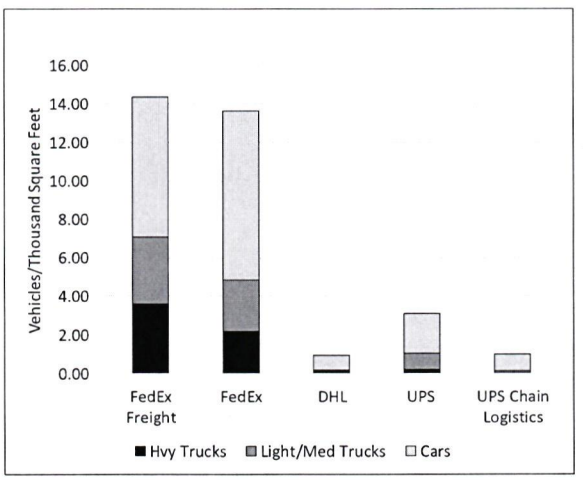


Exhibit 12 shows a data plot of daily vehicle trips of five parcel hubs against building size. As shown, a linear best fit was negative. During the collection of traffic data, construction activity was observed at the FedEx site potentially tainting the validity of these data to represent typical trip generation characteristics. To determine if the trip generation at this site was contributing to the poor data correlation, Exhibit 13 displays the same daily data plot without the FedEx site. The linear best fit shows a positive slope, but remains almost flat effectively indicating no correlation between the daily trips and building size based on the analysis of these sites.

The basic premise of the ITE trip generation approach is that the number of trips generated by a project is proportional to its size. That premise does not hold true for the parcel hubs in this sample and so no meaningful trip generation rates could be determined based on the data collected in support of this study. It should be recognized that a sample size of four or five sites represents the minimum recommended by ITE for valid trip generation studies, and for this reason, it is recommended that additional sites would need to be investigated and included in the data set to develop a more definitive finding on trip generation rates. Furthermore, it may be appropriate to determine the specific function at each site, due to the disparity between the rates observed at the FedEx sites versus the other three sites. It is likely that the function served by the respective sites is significantly different, as reflected in the trip generation rates, thereby necessitating reclassification of these uses for comparative purposes.

Exhibit 12: Data Plot for Daily Total Vehicle Trip Ends against Building Size (Parcel Hubs)

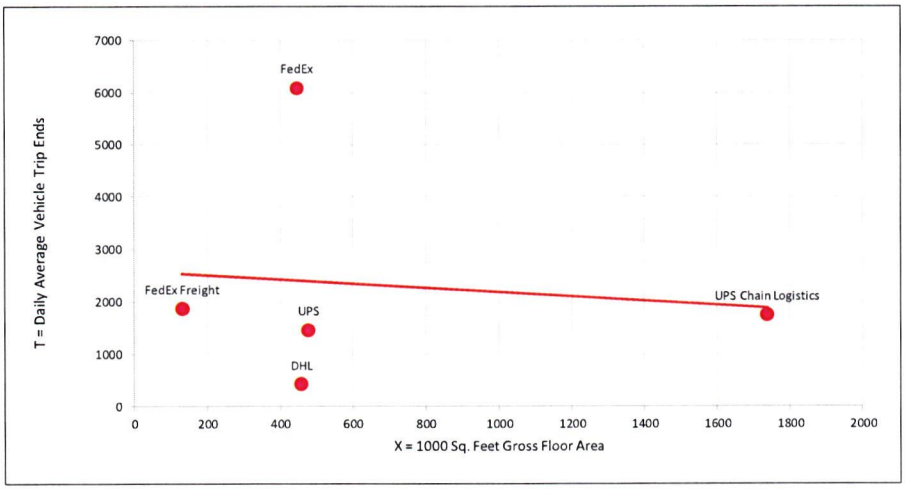
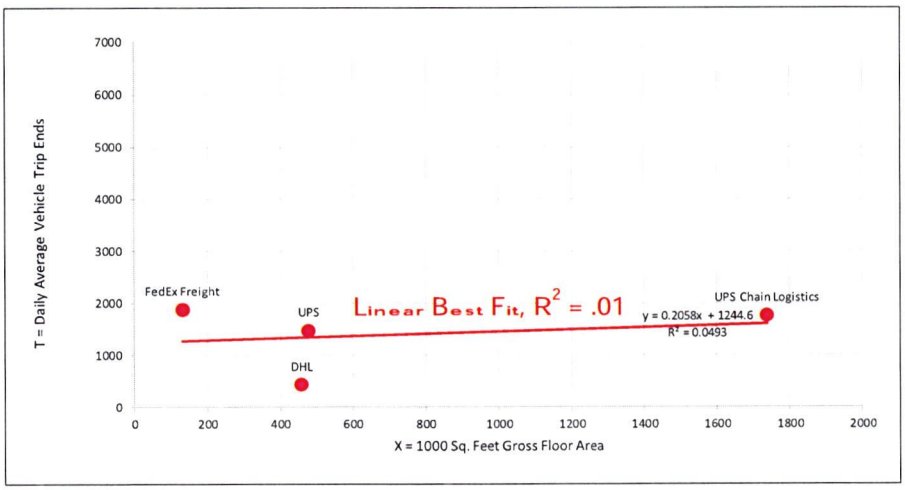


Exhibit 13: Data Plot for Daily Vehicle Trip Ends against Building Size without Construction Site



Conclusions

Our survey of 11 fulfillment centers produced trip generation rates based on the gross floor area of the sites that satisfies ITE's standards for use. The findings of the study indicate that the daily trip generation rates for fulfillment centers is approximately 2.1 trips per thousand square feet of gross floor area, which is roughly 50% higher than the comparable rate for conventional transload and short term storage warehouses previously defined in the ITE *Trip Generation Manual* Version 10. The results of the study further indicate that the higher rates were entirely due to more cars traffic at these sites; the trip generation rates for trucks was found to comparable to those at conventional warehouses.

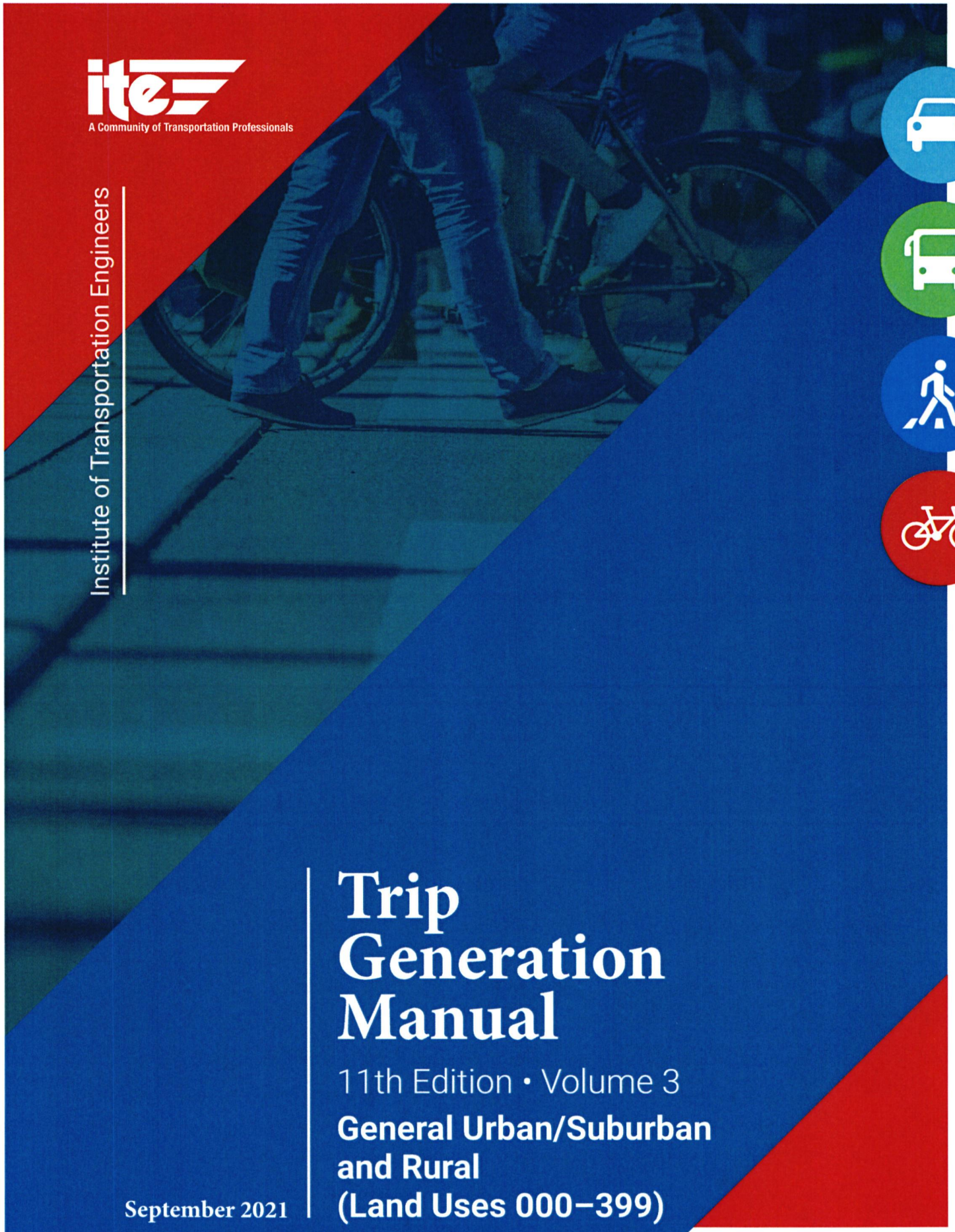
Employment data were available for eight out of 11 fulfillment center sites. This provided the ability to determine trip generation rates per employee. The study results indicate that that trip generation for fulfillment centers is approximately 2.0 trips per employee. The study also found that the trip generation rate per employee correlated more closely that the trip generation rate per thousand square feet of gross floor area.

The data from the five parcel hubs did not show any statistically meaningful relationship between trips and building size. Therefore, no trip generation rate could be calculated. However, the data collected at these sites may provide a useful basis for further comparison with additional sites to provide more data points for analysis.

Appendix B – Institute of Transportation Engineers Trip Generation Manual, 11th Edition, Land Use Code 157 High-Cube Cold Storage Warehouse

Lokahi

B



ite
A Community of Transportation Professionals

Institute of Transportation Engineers

Trip Generation Manual

11th Edition • Volume 3

General Urban/Suburban and Rural (Land Uses 000–399)

September 2021

Land Use: 157
High-Cube Cold Storage Warehouse

Description

A high-cube warehouse (HCW) is a building that typically has at least 200,000 gross square feet of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. A typical HCW has a high level of on-site automation and logistics management. The automation and logistics enable highly-efficient processing of goods through the HCW. A high-cube warehouse can be free-standing or located in an industrial park.

A high-cube cold store warehouse has substantial temperature-controlled environments for frozen food and other perishable products.

A high-cube warehouse may contain a mezzanine. In a HCW setting, a mezzanine is a free-standing, semi-permanent structure that is commonly supported by structural steel columns and that is lined with racks or shelves. The gross floor area (GFA) values for the study sites in the database for this land use do NOT include the floor area of the mezzanine. The GFA values represent only the permanent ground-floor square footage.

The amount of office/employee welfare space that is provided within a HCW can be highly variable but is typically an insignificant portion of the overall building square footage. Within the trip generation database, common values are between 3,000 and 5,000 square feet for a Cold Storage HCW and between 5,000 and 10,000 square feet for Transload, Fulfillment Center, and Parcel Hub HCW (all of which are less than one percent of total GFA for a site). Therefore, for the trip generation data plots, any office space that is part of the normal operation of the warehouse is included in the total GFA.

Warehousing (Land Use 150), high-cube transload and short-term storage warehouse (Land Use 154), high-cube fulfillment center warehouse (Land Use 155), and high-cube parcel hub warehouse (Land Use 156) are related land uses.

Additional Data

The High-Cube Warehouse/Distribution Center-related land uses underwent specialized consideration through a commissioned study titled "High-Cube Warehouse Vehicle Trip Generation Analysis," published in October 2016. The results of this study are posted on the ITE website at http://library.ite.org/pub/a3e6679a-e3a8-bf38-7f29-2961becdd498.

The sites were surveyed in the 2000s and the 2010s in California.

Source Numbers

619, 941, 942, 943

High-Cube Cold Storage Warehouse
(157)

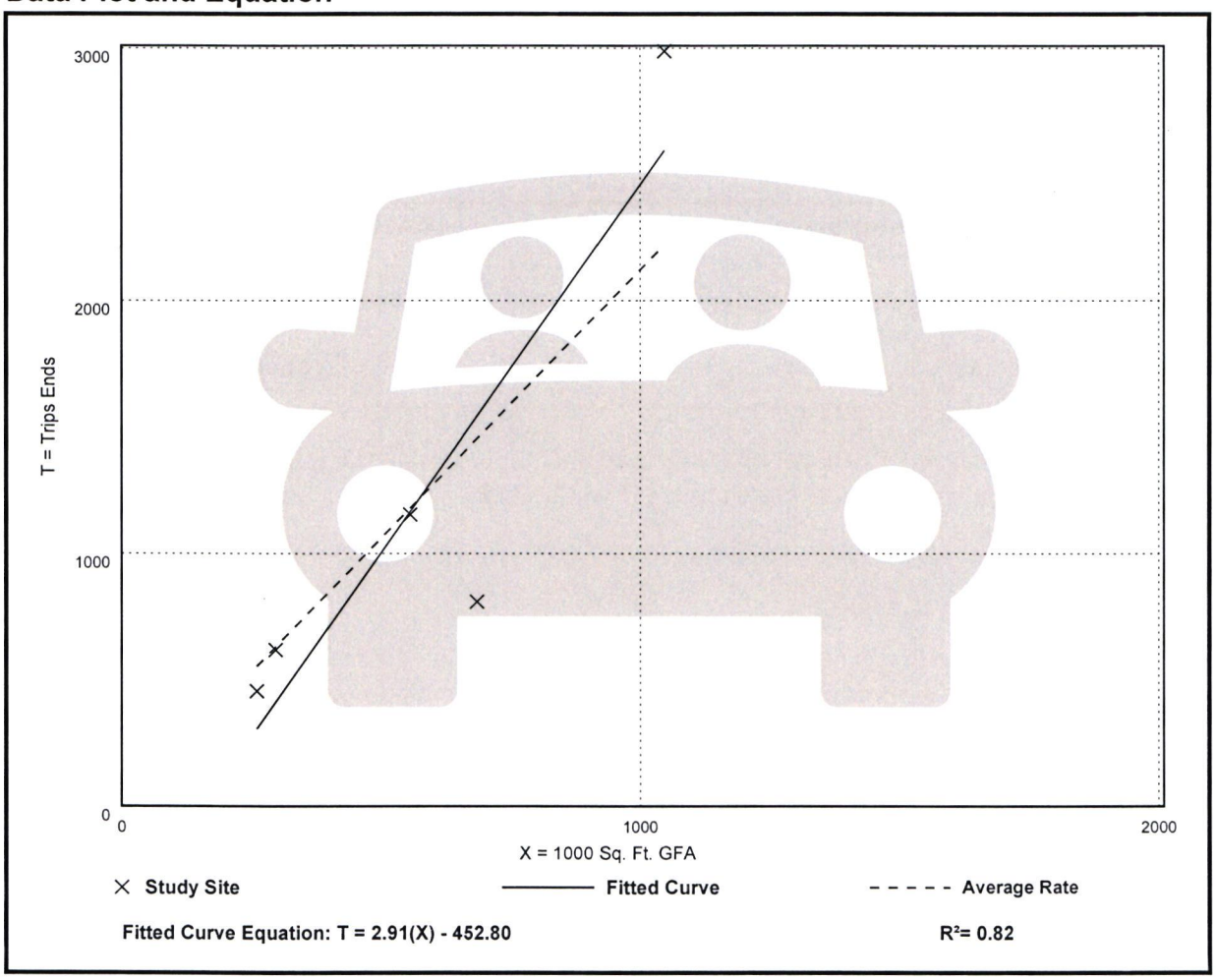
Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 5
Avg. 1000 Sq. Ft. GFA: 569
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
2.12	1.18 - 2.85	0.73

Data Plot and Equation



Fitted Curve Equation: T = 2.91(X) - 452.80

R^2= 0.82

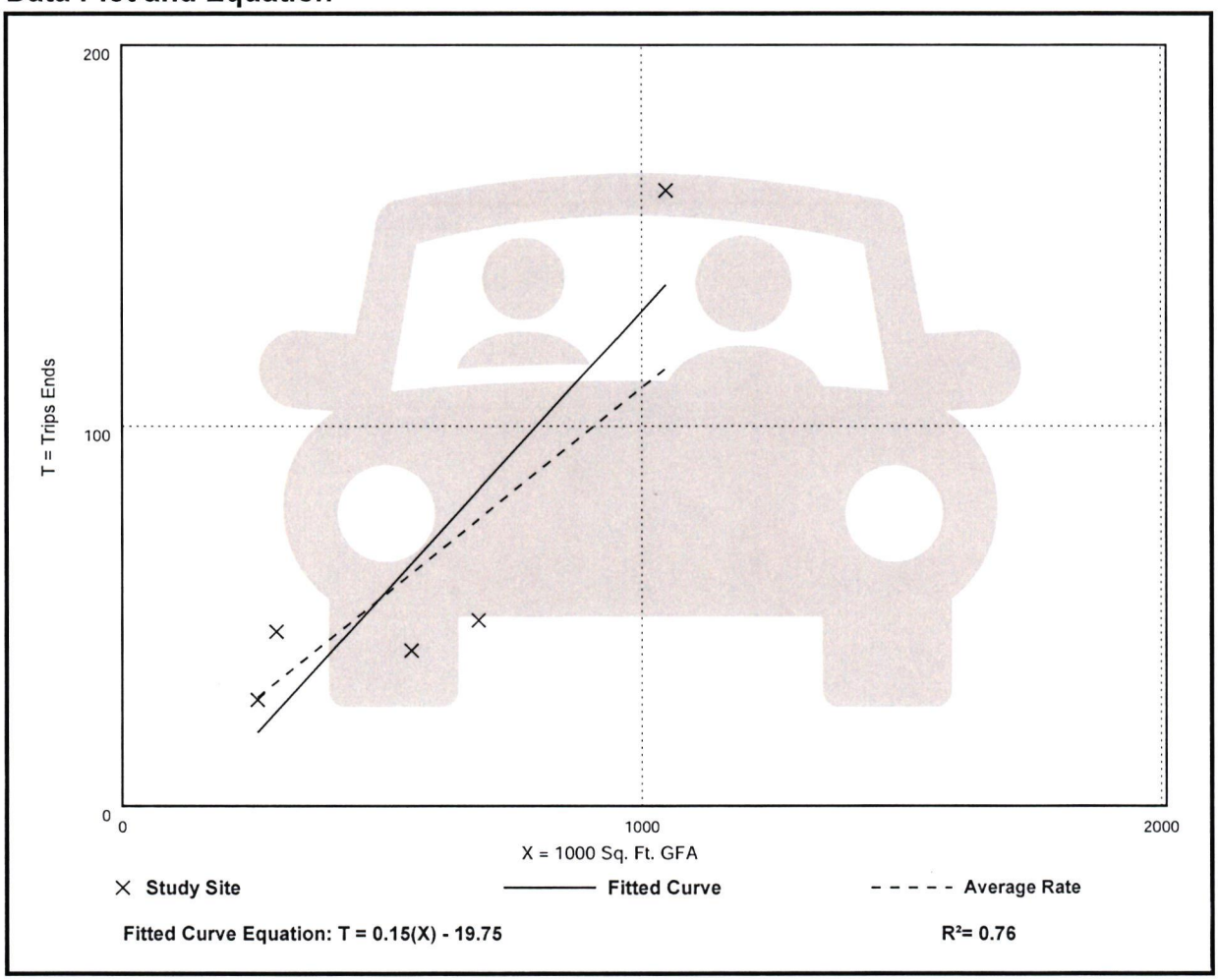
High-Cube Cold Storage Warehouse
(157)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: General Urban/Suburban
Number of Studies: 5
Avg. 1000 Sq. Ft. GFA: 569
Directional Distribution: Not Available

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.11	0.07 - 0.15	0.04

Data Plot and Equation



Fitted Curve Equation: T = 0.15(X) - 19.75

R^2= 0.76

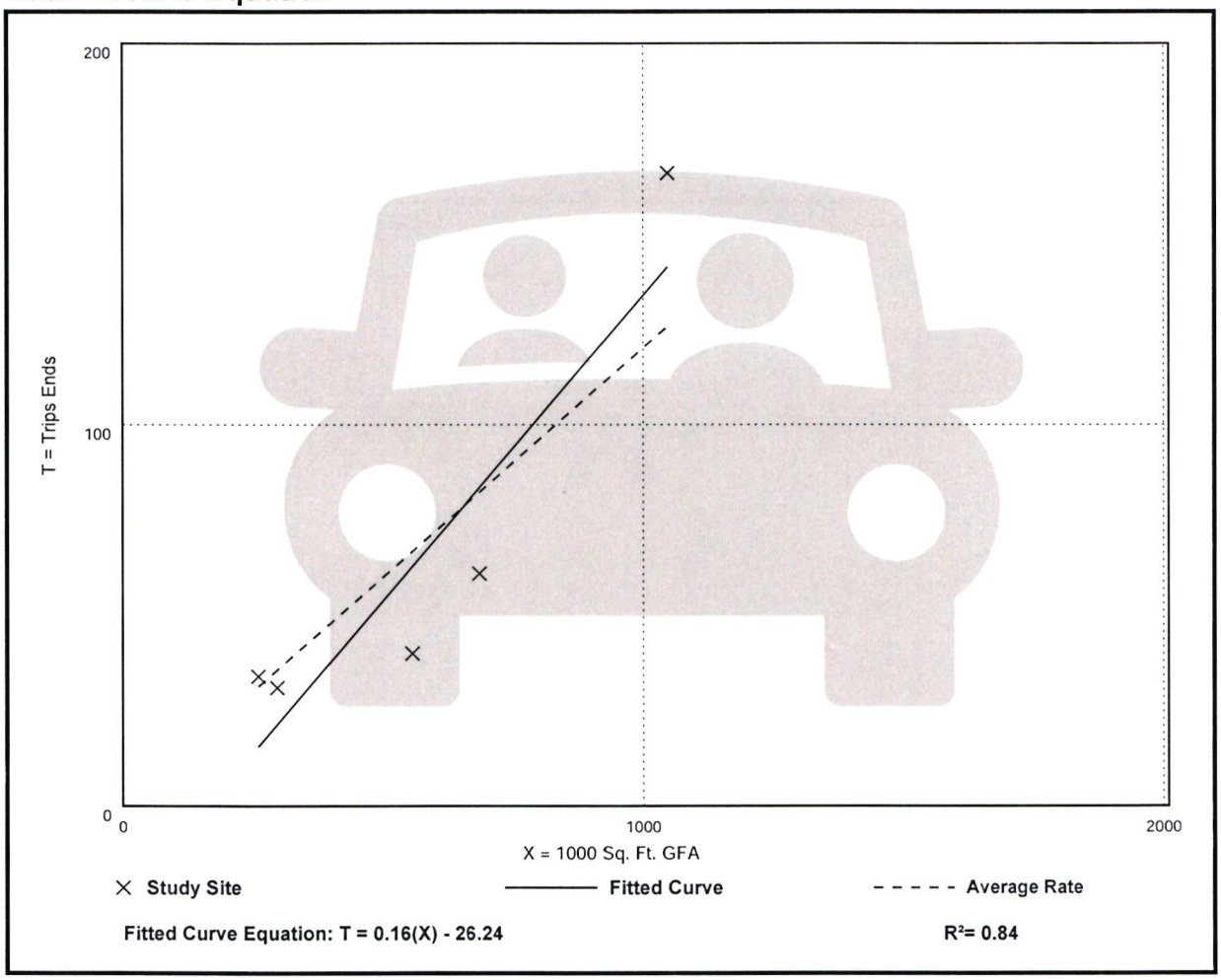
High-Cube Cold Storage Warehouse
(157)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: General Urban/Suburban
Number of Studies: 5
Avg. 1000 Sq. Ft. GFA: 569
Directional Distribution: Not Available

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.12	0.07 - 0.16	0.04

Data Plot and Equation



Fitted Curve Equation: T = 0.16(X) - 26.24

R^2= 0.84

Appendix C – San Diego Municipal Code Land Development Code Trip Generation Manual

Lokahi

C

San Diego Municipal Code

Land Development Code

Trip Generation Manual

Revised May 2003

Printed on recycled paper

This information, document, or portions thereof, will be made available in alternative formats upon request.

TABLE 1 (Continued)

May 2003

TRIP GENERATION RATE SUMMARY
(WEEKDAY)

LAND USE	DRIVEWAY [1] [2] VEHICLE TRIP RATE	CUMULATIVE [8] VEHICLE TRIP RATE	PEAK HOUR AND IN/OUT RATIO AM (IN:OUT)	PM (IN:OUT)
LODGING [3]				
Hotel (w/convention facilities/restaurant)	10 trips/room; 300 trips/acre	10 trips/room; 300 trips/acre	6% (6:4)	8% (6:4)
Motel	9 trips/room; 200 trips/acre	9 trips/room; 200 trips/acre	8% (4:6)	9% (4:6)
Resort Hotel	8 trips/room; 100 trips/acre	8 trips/room; 100 trips/acre	5% (6:4)	7% (6:4)
MILITARY BASE [3]	2.5 trips/employee (military or civilian)	2.5 trips/employee (military or civilian)	9% (9:1)	10% (6:4)
OFFICE				
Commercial Office [6]	Ln(T) = 0.756 Ln(x) + 3.95; 450 trips/acre	Ln(T) = 0.756 Ln(x) + 3.95; 450 trips/acre	13% (9:1)	14% (2:8)
Corporate Headquarters/Single Tenant Office	10 trips/1,000 sq. ft.	10 trips/1,000 sq. ft.	15% (9:1)	15% (1:9)
Department of Motor Vehicles	180 trips/1,000 sq. ft.; 900 trips/acre	18 trips/1,000 sq. ft.	6% (6:4)	11% (4:6)
Government Office (Civic Center):	30 trips/1,000 sq. ft.		9% (9:1)	12% (3:7)
Less than 100,000 sq. ft.		20 trips/1,000 sq. ft.	9% (9:1)	12% (3:7)
100,000 sq. ft. or more		16 trips/1,000 sq. ft.	9% (9:1)	12% (3:7)
Medical Office:	50 trips/1,000 sq. ft.; 500 trips/acre		6% (8:2)	10% (3:7)
Less than 100,000 sq. ft.		20 trips/1,000 sq. ft.	6% (8:2)	10% (3:7)
100,000 sq. ft. or more		16 trips/1,000 sq. ft.	6% (8:2)	10% (3:7)
Post Office:				
Distribution (central/walk-in only)	90 trips/1,000 sq. ft.	76 trips/1,000 sq. ft.	5%	7%
Community (without mail drop lane)	200 trips/1,000 sq. ft.; 1,300 trips/acre	168 trips/1,000 sq. ft.; 1,092 trips/acre	6% (6:4)	9% (5.5)
Community (with mail drop lane)	300 trips/1,000 sq. ft.; 2,000 trips/acre		7% (5:5)	9% (3.7)
Less than 100,000 sq. ft.		168 trips/1,000 sq. ft.; 1,092 trips/acre	7% (5:5)	7% (6:4)
100,000 sq. ft. or more		252 trips/1,000 sq. ft.; 1,680 trips/acre	7% (5:5)	8% (7:3)
RECREATION				
Bowling Center	30 trips/lane; 300 trips/acre	30 trips/lane; 300 trips/acre	7% (7:3)	10% (4:6)
Golf Course	600 trips/course; 40 trips/hole; 8 trips/acre	600 trips/course; 40 trips/hole; 8 trips/acre	6% (8:2)	9% (3:7)
Marina	4 trips/berth; 20 trips/acre	4 trips/berth; 20 trips/acre	3% (3:7)	7% (6:4)
Movie Theater	80 trips/1,000 sq. ft.; 1.8 trips/seat	80 trips/1,000 sq. ft.; 1.8 trips/seat	0.3%	8% (7:3)
Park:				
Beach, Ocean or Bay	600 trips/1,000 ft. shoreline; 60 trips/acre	600 trips/1,000 ft. shoreline; 60 trips/acre	- -	11% (4:6)
Developed	50 trips/acre	50 trips/acre	4%	8%
Undeveloped	5 trips/acre	5 trips/acre	4%	8%
Racquetball/Tennis/Health Club	40 trips/1,000 sq. ft.; 40 trips/court; 300 trips/acre	40 trips/1,000 sq. ft.; 40 trips/court; 300 trips/acre	4% (6:4)	9% (6:4)
San Diego Zoo	115 trips/acre	115 trips/acre	- -	- -
Sea World	80 trips/acre	80 trips/acre	- -	- -
Sport Facility:				
Indoor	30 trips/acre	30 trips/acre	- -	- -
Outdoor	50 trips/acre	50 trips/acre	- -	- -

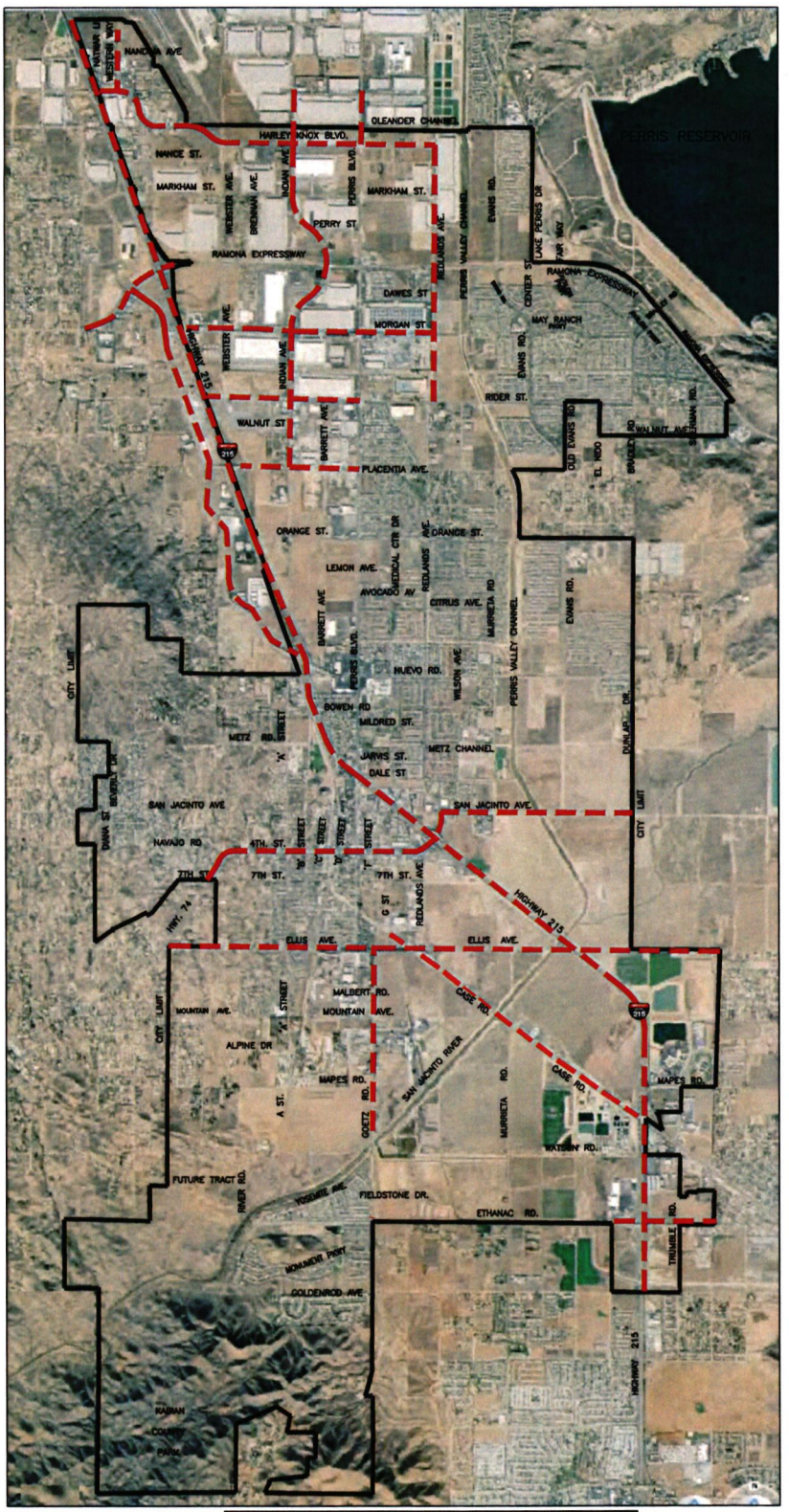
Appendix D – City of Perris Truck Routes Map

Lokahi

D

CITY OF PERRIS TRUCK ROUTES

CITY COUNCIL APPROVED JULY 26, 2022 - EFFECTIVE AUGUST 26, 2022



N.T.S.

LEGEND:

- TRUCK ROUTES
- PERRIS CITY LIMITS

Appendix E – Increasing Highway Capacity Incudes More Auto Travel

UC Davis
Policy Briefs

Title
Increasing Highway Capacity Induces More Auto Travel

Permalink
https://escholarship.org/uc/item/3q21f88p

Authors
Volker, Jamey
Handy, Susan

Publication Date
2023

DOI
10.7922/G22805Z9

eScholarship.org Powered by the California Digital Library
University of California

National Center for Sustainable Transportation

POLICY BRIEF

Increasing Highway Capacity Induces More Auto Travel

Jamey Volker and Susan Handy
University of California, Davis

January 2023

Issue

Building additional roadway capacity—via constructing entirely new roadways or extending or adding lanes to existing roadways—is often proposed as a solution to traffic congestion and even as a way to reduce greenhouse gas (GHG) emissions. The logic for the latter is that increasing roadway capacity increases average vehicle speeds, which improves vehicle fuel efficiency and reduces per-mile emissions of GHGs and local air pollutants. But that logic relies on the flawed assumption that the amount that people drive does not change when the time it takes to drive places changes. In fact, the amount that people drive does respond to changes in driving times.

The basic economic principles of supply and demand explain this phenomenon. Adding capacity increases the average travel speed on the roadway (at least in the short term), improves travel time reliability, makes driving on the roadway safer or less stressful, or provides access to previously inaccessible areas. All of these reduce the perceived "cost" of driving. And when the cost of driving goes down, the quantity of driving goes up (Figure 1).

Empirical research demonstrates that as roadway supply increases, vehicle miles traveled (VMT) generally do, too. This is the "induced travel" effect—a net increase in VMT across the roadway network due to an increase in roadway capacity, which ultimately erodes any initial increases in travel speeds and causes increased GHG emissions.

Researchers at the University of California, Davis reviewed the empirical research on induced travel to understand the likely effects of adding roadway capacity in a variety of contexts.

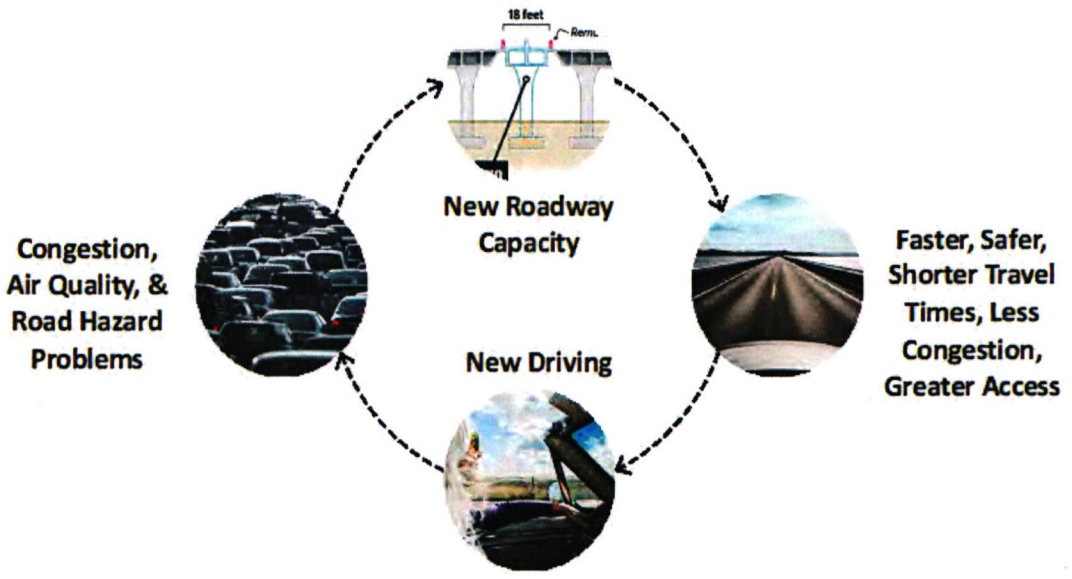


Figure 1. A conceptual illustration of the induced travel effect in response to roadway capacity expansion

Key Research Findings

The quality of the evidence linking highway capacity expansion to increased VMT is high. All 12 studies reviewed used time-series data and sophisticated statistical techniques to estimate the effect of increased capacity on VMT. All studies also controlled for other factors that might also affect VMT, such as population changes, income changes, geographic effects, and time period effects. Most studies were from the US, but studies from other countries produced similar findings.

A roadway capacity expansion of 10% is likely to increase VMT by 3% to 8% in the short-run and 8% to 10% or more in the long-run. Increased capacity can lead to increased VMT in the short-run in several ways: if people shift from other modes to driving, if people shift from carpooling to driving solo, if drivers make longer trips (by choosing longer routes and/or more distant destinations), or if drivers make more frequent trips. In the longer term, increased capacity can lead people to live farther away from where they work (or vice versa), cause businesses to relocate to more distant locations, and even spur commercial or residential growth in the region. The reviewed studies indicate that the full impact of capacity expansion on VMT materializes within 3 to 10 years. The studies mostly focused on major roadways (including interstates, other freeways and expressways, principal arterials, and minor arterials) and show a potentially greater effect for interstates. Expansions of collector streets and local roads are also likely to induce VMT, though the empirical evidence as to the relative magnitude of the effect is limited.

Capacity expansion leads to a net increase in VMT, not simply a shift in VMT from one road to another. Is it possible that the additional traffic on the new or widened highway is simply traffic that shifted from slower and more congested roads, meaning that overall VMT does not actually increase? The evidence suggests a resounding "no." For example, one study found "no conclusive evidence that increases in state highway lane-miles have affected traffic on other roads," while a more recent study concluded that "increasing lane kilometers for one type of road diverts little traffic from other types of roads."

The available empirical evidence suggests that new high-occupancy vehicle (HOV) and high-occupancy toll (HOT) lanes might have similar induced travel effects as general-purpose lane expansions. One recent study looked at two projects that added HOV lanes and one that added an HOT lane and showed that the additions resulted in increased traffic flows at similar levels to new general-purpose lanes. Other available evidence tends to support this conclusion. However, more research is needed to better understand any differences in effect between general-purpose, HOV, HOT, and traditional toll lanes.

Induced travel happens in rural and uncongested areas, too. Research shows that induced travel occurs in both urban and rural areas and on roadways with different levels of existing congestion. Indeed, induced travel can be expected to occur anytime a project increases average travel speed, improves travel time reliability, makes driving on the roadway perceptibly safer or less stressful, or provides access to previously inaccessible areas. However, the induced travel effect might be slightly smaller in rural areas, at least in the short run. Conversely, the limited available evidence indicates that relative increases in VMT following roadway expansion may be smaller in metropolitan areas with higher baseline levels of congestion than in those with less congestion.

More Information

This policy brief is drawn from "Updating the Induced Travel Calculator," a report from the National Center for Sustainable Transportation, authored by Jamey Volker and Susan Handy of the University of California, Davis. The full report can be found on the NCST website at https://ncst.ucdavis.edu/project/induced-travel-calculator-improvements.

For more information about the findings presented in this brief, contact Jamey Volker at jvolker@ucdavis.edu.

The National Center for Sustainable Transportation is a consortium of leading universities committed to advancing an environmentally sustainable transportation system through cutting-edge research, direct policy engagement, and education of our future leaders. Consortium members: University of California, Davis; University of California, Riverside; University of Southern California; California State University, Long Beach; Georgia Institute of Technology; and the University of Vermont.

Visit us at ncst.ucdavis.edu

Follow us:

DOI: 10.7922/G22805Z9

Attachment L

Cajalco Commerce Center Project
Riverside County Public Hearing

Tuesday, October 21, 2025

9:30 AM

4080 Lemon Street, First Floor, Riverside, CA 92501

Support the Cajalco Commerce Center in Mead Valley
Join us in showing your support for the proposed Cajalco Commerce Center by attending this important public hearing.

Transportation Provided
A shuttle will depart at 8:00 AM from the Mead Valley Community Center:
21091 Rider Street, Perris, CA 92570

Lunch Included
Snacks, drinks, and lunch will be provided to all attendees in support of this vital project.

For more information, please call 951-268-4528.

CAJALCO COMMERCE CENTER
PROPOSED ARCHITECTURAL DESIGN



Flores, Kate

From: Acquia Mail
Sent: Monday, October 20, 2025 9:44 AM
To: tonytorres1214@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 20, 2025

Submitted values are:

First Name
Tony

Last Name
Torres

Address (Street, City and Zip)
N/A

Phone
323-804-5696

Email
tonytorres1214@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below

23.1

Support

Do you need a Spanish translator?
No

Flores, Kate

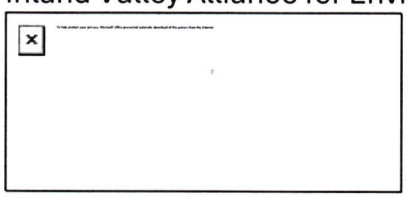
From:	Franco <inlandvalleyalliance@gmail.com>
Sent:	Monday, October 20, 2025 8:55 AM
To:	Clerk of the Board; Brady, Russell; Mcamacho@rivco.org; Supervisor Medina - 1st District; District 5; Office of 2nd District Supervisor; District3; District 4 Supervisor V. Manuel Perez
Cc:	Michael McCarthy; Ana Gonzalez; Jen L; Karla Cervantes Pacheco
Subject:	Re: Public comment for the Cajalco Commerce Center 10-21-25 item 23.1
Attachments:	pettition opposing cajalco commerce center updated .pdf

Good morning,

Here is a follow up comment for item 23.1 cajalco commerce center. Attached we have the updated petition from residents opposing this warehouse project. 175 local residents urge the board to deny the project as it stands and remove the warehouse component from this project . Please email receipt the county has received this and submitted this copy of the petition and my previous email with our letter and comments on this project for the public hearing on Oct 21st.

Thank you ,

Franco Pacheco
Inland Valley Alliance for Environmental Justice



https://www.inlandvalleyalliance.org/

On Fri, Oct 17, 2025 at 4:14 PM Franco <inlandvalleyalliance@gmail.com> wrote:

> Hello,
>
> Attached is a letter for item 23.1 from local residents in Mead Valley and community groups. We urge the board to vote NO on approving this project as it stands. The negative impacts from this project will be devastating to Mead Valley and the county has not taken into consideration the cumulative impacts of already approved, existing, and pending projects. As a resident here in Mead valley we have already felt the increases in truck traffic, air pollution and empty promises from these types of projects. We already have more than enough warehouses in Mead Valley. There are an estimated 10 warehouses for lease and an additional 38 for lease in Perris. We have the highest amount of warehouse space per resident in the Inland Empire. These projects are targeting our communities at a disproportionate rate.The county's own standard requires higher levels of protections due to Mead Valley being considered an environmental justice community. The EIR clearly states that the impacts of this project will be devastating. Also removing housing and not replacing the units is going against state mandates as well as County of Riverside goals to create housing as we are in the middle of a housing

23.1

crisis. Attached is a petition from residents urging the board to deny the Cajalco Commerce Center and remove the warehouse component from the project. We will send an updated copy on Oct 20th due to community members showing interest in signing this petition.

Thank you and careful consideration,

--

Franco Pacheco
Inland Valley Alliance for Environmental Justice



https://www.inlandvalleyalliance.org/

PETITION OPPOSING CAJALCO COMMERCE CENTER

MEAD VALLEY COALITION FOR CLEAN AIR
INLAND VALLEY ALLIANCE FOR EJ

With this petition we urge the Riverside County board of supervisors to **deny** the Cajalco Commerce Center

MEETING DATE

10/21/25

LOCATION

Riverside Board of Supervisors
4080 Lemon Street

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
1	Jon Larratt-Smith	310.425-9110	jlarrattsmith@gmail.com	yes	yes
2	Catherine Ross	909-810-0561	otheremailforgriffin@gmail.com	yes	yes
3	Isabella Diaz	714-803-4506	isabelladiaz291291@gmail.com	Yes	Yes
4	Yo Xiao	9098935474	ssccw8893@gmail.com	yes	Yes
5	August Olague	(951)9066038	augieolague@gmail.com	yes	Yes
6	Leanna Beesley	9514545455	leannabeesley5@gmail.com	yes	yes
7	Alison Dl	9512 7517		Yes	Yes
8	Edi Zermeno	951-296-4110	ezermeno23@gmail	yes	yes, of course
9	Vivian Felix	9092949291	vivianfelix2013@gmail.com	Yes	Yes!
10	Shawn Darby	9095585963	Shawne.darby@Gmail.com	No	yes SB
11	Victor Sebastian	760-968-6425	vmartin369@icloud.com	Yes	Yes
12	Itaiar	951-470-8506	Irobleroa@studentRccd.edu		
13	Lily Santos	714 408 3224	lilysantos04@icloud.com	yes	yes
14	Brissa Osuna	951-756-9502	Brissaosuna314@gmail	yes	yes!!
15	Mia Castillo	951-224-1897	mia06568@gmail.com	yes	yes
16	Adrian Mazariegos	951 505-7512	amazariego1@student.Rccd.edu		
17	Mariel Vasquez	9095270613	mariel Vasquez66@gmail	yes	yes
18	Kathie Mahony	951-217-8755	crwbabe@aol.com	Y	Y
19	Roman Davison	951-591-0121	romanadavison2003@gmail.com	yes	yes
20	Hector Palomares	909 224 9555	iw2006@Hotmail.com	yes	yes
21	Ashley Chavez	951-220-5799	ashleychavez.1022@gmail.com	yes	YES!

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
22	Ofelia Dorotea	909553[illegible]	ofeliadorotea38@gmail.com	✓	✓
23	Vanessa Armenta	951-496-2148	Vanessaarmenta.e@gmail.com	✓	✓
24	Rafael Armenta	8055729454	Rafael Armenta.contact@gmail.com	✓	✓
email copy * 25	Sophie Weiss	760-715074	sophie.weiss@rccd.edu	✓	✓
26	Michael McDonald	// //	// //	✓	✓
27	Travis Mason	909 241 6619	Travismason@verizon.net		✓
28	Sierra Mason	909 241-6774	ccmason.awesome@gmail.com		✓
29	CODY VONG		vvong2@student.rccd.edu	✓	✓
* 30	Ashley Marin	951 565 5271	a.marin06@icloud.com	✓	✓
* 31	PAULA MARIN	(951)384-5529	p.marin@icloud.com	✓	✓
32	Nathan Ellett	951-675-4852	nathan.j.ellett@gmail.com	✓	✓
33	Jessica Solares	951-252-5860	jessicasolares143@gmail.com	✓	✓
34	Renny Gonzalez	714-588-2148	Rennyhdel1123066 gmail.com	✓	✓
35	[redacted]				
36	Margaret Ross	909 2888187	m.h.ll.ross@gmail.com	✓	✓
37	Vincent Vargas	951 743 4462	vvargas23@gmail	✓	✓
38	Gissell Morfin	9402418638	morfingissell@gmail.com		✓
39	Angeline Molina	951-502-7701	Angelinemolina@icloud.com	✓	✓
40	Aaron Lujan	909-642-[illegible]	AaronLujano9@gmail		✓
41	Leslie Constantine	909-218-1780	Leslieconstantine05@gmail.com	✓	✓
gmail/ 42	Renata Bravo	909-678[illegible]	crisreny20@gmail.com	✓	✓
★ 43	Justin Harrell	5624455205	justinharrell10@gmail.com		✓
44	Isadora Taylor	9093368183	doce.isadora@gmail.com		✓
★ 45	Landon Nielsen	9515317140	landonnielsen73@gmail.com		
46	Alonzo	213-420-3515	arforbes120@gmail.com	✓	✓
47	Christina Weyant-Torres	951-255-2740	christina.weyant@gmail.com		✓
48	Jan Andres	909 936 7411	jan.andres@rcc.edu		✓
PC4EJ 49	Tania Gonzalez	909-2758792	tania.g@pc4ej.org		

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
		951 9568748	Solis 0415 Elvira@Icio		
50	Elvira Anacleto			Yes	Yes
51	Debbie WALSH			Yes	Yes
52	Jordan Hnizdil			Yes	Yes
53	victoria camarena	951 2303916	vncama@outlook.com	Yes	Yes!
54	Juan Terrones			Yes	Yes
55	David Hernandez	951-317-8563		Yes	Yes
56	Caroline Martinez	(951)657-6096		yes	yes
57	Steve Martinez	(951)657 6096		yes	yes
58	Patricia Healey	951-203-4632		yes	yes
59	Dani Tanner	9168345565		no	yes
60	Raquel Escalante	951-772-4734		Yes	Yes
61	Joel Escalante	951-453-8215		Yes	Yes
62	Ruby Robina Gadrid	951-207-6666	benavidex.ruby@gmail.com	Yes	yes
63	Esmeralda	951-227-0976		Yes	Yes
64	Javier Benavida	951-933-9318	Jbenavidez34@yahoo	Yes	yes
65	Salvador Lopez	(951) 237-20-35		Yes	Yes
66	Rogelio Ramirez	951 229-4362		Yes	yes
67	EVA Bravo	951-515-5795			
68	Keven L.	951-425-3442	kevenlopez1224@gmail.com		Yes
69	Lynculno Cooper	951-567-0708			
70	Patricia Garcia	951-355-6959			Yes
71	Maria S. Lizarraga	(951)487-5879	sollizarraga72@gmail		
72	Franco Pacheco	9517967757	Pachecofranco005@gmail.com	✓	✓
73	Karla Cervantes	9518929416	karlacervantespacheco@gmail.com	✓	✓
74	Karla Avelar	9515525503		yes	yes
75	Mauro Cervantes	9515525695		yes	yes
76	Christina Cervantes	(951) 440-2055		yes	yes
77	Maria Pacheco	(951)322-9110		yes	yes

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
78	Rosa Reyes	951) 261-2114		Yes	
79	Elizabeth Anguo	(951) [redacted] 956-9299		yes	
80	Cristina Diaz	951-730 9719			
81	Cynthia Hernandez	951 350 2757		Yes	Yes
82	Maria Ulloa	909 7162132		Yes	Yes
83	Rafael Sanchez	951 489-6385		Yes	Yes
84	Mirna Sanchez	951 489-6385		Yes	Yes
85	Karla Orsel Rubio	951-5636696		yes	yes
86	Adriana Serratos	(323) 216-4055		Yes	Yes!!
87	Alejandro Diaz	310-864-8487		Yes	Yes
88	Elva Gutierrez	(951)564-6664		Yes	Yes
89	Julie Lopez	951-490-9772		Yes	Yes
90	Angela Villa	951 830 3316		Yes	Yes
91	Elizabeth Churchill	951-226-2986		Yes	yes
92	Rigoberto Gastelum	619-484-0640		Yes	Yes
93	RAFAEL CARVARI	951 8096407		Yes	Yes
94	Amy Castrejon	951-956-8999		Yes	Yes
95	Rocio Cantabrana	951-385-2100		Yes	Yes
96	Dawson Villavicencio	951-254-2362		Yes	Yes
97	Azucena Paez-Herrera	951-500-1164		yes	yes
98	Salma Herrera	951-230-0254		yes	yes
99	Samuel-Paul Rawls	951-710-7330		yes	yes
100	Vivian Guedes	(909) 635-9683		Yes	yes
101	Fernando Carreon	(951) 503-5581		yes	yes
102	Veronica Carreon	951-840-0538		yes	yes
103	Brenda Martinez	951-230-[redacted]4360		yes	yes
104	Camelia Martinez	951 796 9399		Yes	Yes
105	Johanna Torres	(951) 657-7395		Yes	Yes

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
106	Marie Robles (95)	449-3287	marieerobles2@ymail.com	Yes	Yes
107	Rose Ramirez	951-575-8700		yes	yes
108	Maria Herrera	9512315273		yes	yes
109	Anai Calderon	9515343716		yes	yes
110	Pedro H Calderon	9514345519			
111	~~Nena Morales~~	951 943-9384		Yes	Yes
112	Mari Franco	951 ~~63-6552~~ 736 6352		Yes	Yes
113					
114					
115					
116					
117					
118					
119					
120					
121					
122					
123					
124					
125					
126					
127					
128					
129					
130					
131					
132					
133					

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
360	ANTEC MARTINEZ	951 455 1660	martinezvasquez1@gmail.com	Yes	Yes
361	Eder Montejano	951 742 4474	Eder montejano716@gmail.com	yes	yes
362	Colleen Conroy	9619567	Colleenconroy1@gmail	Y	Y
363	Michael Bixler	951 801	targetspotsmike@gmail	Y	Y.
364	Marlo Salinas	480 562 7688	salinasmarlo@yahoo.com	Yes	Yes
365	[illegible]	951 591-2183		YES	YES
366	Juan Torres	9519071685		yes	yes
367	Eileen Torres	951 7212419	eileen8@gmail.com	yes	yes
368					
369					
370					
371					
372					
373					
374					
375					
376					
377					
378					
379					
380					
381					
382					
383					
384					
385					
386					

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
303		(951			
	Maria Castañeda	358-7882		✓	✓
304	Vicky Sanchez	951-830-3851		✓	✓
305	[illegible]	951 479 70 73		✓	✓
306	REGINALD COLEMAN	(951) 746 9856			✓
307	Jose Medina	9512106151		✓	✓
308	[illegible]	951 210 6171		✓	✓
309	PAUL Rollen	951 345 7382		✓	✓
310	EVA Bravo	951-515-5495			
311	Himelda Sanchez	(323) 289 0787		✓	✓
312	Roberto Sanchez	323-329-0483		✓	✓
313	Cynthia Benmen	cynthia 951-317 6206		✓	✓
314	Juan Benmen	951 822003@yahoo.com 314-4878		✓	✓
315	Maria S. Lizarraga	(951) 487-5879		✓	✓
316	PAUL Stevens	(909) 238-7064		✓	✓
317	Susan Stevens	951-662-1949			✓
318	JoAnna Huerta	jhue313 @lasierra.edu 951-818-0101			✓
319	Maria Lopez	951-2872645			✓
320	Iovani Lopez	(951) 400-9894		✓	✓ Lyovani16@gmail.com
321	ROSA Arrabales	(951) 213-5072		✓	✓
322	Yuliyi Miranda	(714) 349 9397	aguapelife 2460 gmail	✓	✓
323	Angelique castellanos	(951) 482 4884	tpbysange169@gmail.com	✓	✓
324	Sandy Varela	(951) 550-9634		yes	yes
325	Lizeth Esqueda	951-973-3447		yes	yes
326	Lucilo Pacheco	951 694-2625		✓	✓
327	Antonia Anaya	(951) 987-1482		✓	✓
328	Kate Puente	(707) 259-9119		✓	✓
329	Pearl Perez	(951) 230-7407		✓	✓
330	Jeanette Ponce	951 692 1530		✓	✓

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
416	Norma Palacio	(951) 261-4970	Palaciosnorma8@gmai.com	Yes	Yes
417	Juan Palacios	(951) 858-7939		Yes	Yes
418	Teresa Villarreal		tpbyteresa67@yahoo.com	Yes	Yes
419	Jocelyn Ramirez	714) 809 1165	Jcnorez6305@gmail.com	Yes	Yes
420	Adam Ramirez	510 605 5333	cadambremirez@gmail.com	Yes	Yes
421				Yes	
★ 422	Jose R Bravo	951-355-4355		Yes	Yes
★ 423	Ana Torres	(714)391-7836		yes	yes
424	Zoila Ambrosio	(951)422-8049		Yes	Yes
425	Rosario Juárez	(951-210-0294			yes
426	Maria Casas	951 940-09-81			Yes
427	Dan Valenzuela	951-704-2833		yes	yes
★ 428	Crystal Castro	(951)750-3676		yes	Yes
429	Diana Lorenzo	(714)478-5916		yes	yes
430	Reyna Gomez	(951)570-6170		yes	yes
431	Emily Rodriguez	(951)598-3900		yes	yes
432	Elva Blanco	(951)503-9011		yes	yes
433	Viviana Perona	(951) 807-0591		yes	Yes
434	Brian Perona	(951) 575-8712		yes	yes
435	Kally Franco	(951)-434-3651		Yes	Yes
436	Veronica Quiñonez	909-268-1019		yes	yes
437	James Castrejon	(951)385-2100		Yes	Yes
438	Erica Alfaro	909 827 8481		Yes	Yes
439	Oscar Arellano	(909)231-7567		Yes	Yes
440	Stephanie Burns	7143139387		yes	yes
441	Mark Burns	9515263699		yes	yes
442	Cisi Carreon	951-5910942		yes	yes
	Guillermo Carreon	951 5910943		yes	yes

Flores, Kate

From: griffin ross <otheremailforgriffin@gmail.com>
Sent: Monday, October 20, 2025 4:18 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Catherine Ross
92505

23.1

Flores, Kate

From:	Mursal Rahimi <mursalrahimi87@gmail.com>
Sent:	Tuesday, October 21, 2025 8:41 AM
To:	Clerk of the Board
Cc:	Supervisor Medina - 1st District; Office of 2nd District Supervisor; District3 Information; District 4 Supervisor V. Manuel Perez; District 5
Subject:	Comment for the Cajalco Commer Center Project

Dear Supervisors,

I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to vote no on the over 1 million square foot warehouse that will lead to the following and more:

- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

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

23.1

Flores, Kate

From: Fatima Rodriguez <fatirodri0817@icloud.com>
Sent: Tuesday, October 21, 2025 8:41 AM
To: Clerk of the Board
Cc: Supervisor Medina - 1st District; Office of 2nd District Supervisor; District3 Information; District 4 Supervisor V. Manuel Perez; District 5
Subject: Comment for the Cajalco Commer Center Project

Dear Supervisors,

I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to vote no on the over 1 million square foot warehouse that will lead to the following and more:

- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

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

Sent from my iPhone

23.1

Flores, Kate

From: Acquia Mail
Sent: Tuesday, October 21, 2025 7:56 AM
To: heycindy9@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 21, 2025

Submitted values are:

First Name
Cindy

Last Name
Oliva

Address (Street, City and Zip)
20151 oleander ave

Phone
9514359788

Email
heycindy9@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below

23.1

Support

Do you need a Spanish translator?
No

Comments
I support this project. The current area is full of homeless and crime. We need a park in the community for the youth as well as jobs.

Flores, Kate

From: Beverly Rojas <berverlybeev@icloud.com>
Sent: Tuesday, October 21, 2025 8:44 AM
To: Clerk of the Board
Cc: Supervisor Medina - 1st District; Office of 2nd District Supervisor; District3 Information; District 4 Supervisor V. Manuel Perez; District 5
Subject: Comment for the Cajalco Commer Center Project

Dear Supervisors,

I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to vote no on the over 1 million square foot warehouse that will lead to the following and more:

- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality
-The impact on the people that live in perris and the school that are next to the 215 freeway
- I don't live in next to the 215 but when I go I want to walk in a free area As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

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

Flores, Kate

From: David <davidbsal2007@gmail.com>
Sent: Tuesday, October 21, 2025 8:49 AM
To: Clerk of the Board
Cc: Supervisor Medina - 1st District; Office of 2nd District Supervisor; District3 Information; District 4 Supervisor V. Manuel Perez; District 5
Subject: Regarding the Cajalco Commerce Center Project

Dear Supervisors,

"I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to vote no on the over 1 million square foot warehouse that will lead to the following and more:

- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air."

Many of my peers drive on this road day to day, many of those same peers complain about the warehouses, the amount of traffic, and the air quality being visibly bad. In a place like Riverside county, we cannot afford to have another mega warehouse in such a busy and narrow road with much traffic already.

I am currently doing a research project. Doing this project opened my eyes on how detrimental these warehouses are to our health. The asthma rates on babies go up, yes... babies.. People who can't even control where they live.

Please consider how this will affect our, the people you represent, day to day lives.

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

Sincerely, David

Flores, Kate

From:	Rhea Feliciano <feliciano.rhea12@gmail.com>
Sent:	Tuesday, October 21, 2025 8:55 AM
To:	Clerk of the Board
Cc:	Supervisor Medina - 1st District; Office of 2nd District Supervisor; District3 Information; District 4 Supervisor V. Manuel Perez; District 5
Subject:	Comment for the Cajalco Commer Center Project

Dear Supervisors,

My name is Rhea Sanchez, and I live in **Moreno Valley**. I'm a **mother of two children** and a **college student** trying to build a better future for my family. I'm writing to ask you, from the heart, to **please vote NO** on the Cajalco Commerce Center project in Mead Valley.

As a parent, I worry about what this huge warehouse will bring — more diesel trucks, more traffic, and more dirty air. Our children already breathe some of the worst air in the country, and this project will only make it worse. The **American Lung Association** has said that Riverside County already suffers from serious air pollution. Please don't let it get worse.

This project means:

- Destroyed homes and lost peace in our neighborhoods
- Harm to our local wildlife and open spaces
- More pollution and health problems for our families
- Roads filled with trucks and unsafe for our kids

We don't need another warehouse that harms our air and health. We need parks, clean spaces, and safe streets where our children can play and grow. Families like mine already feel the impact of over-industrialization every day. Please think about the long-term effects this will have on our kids and their future.

I hope you will stand with the families of Mead Valley and Moreno Valley. Please protect our community, our air, and our children's health by **voting NO** on this project.

Thank you for your time and for listening to a mother's concern.

Sincerely your,

Rhea Sanchez

(A mother of two kids and a student of Moreno Valley College)

Sent from my iPhone

Flores, Kate

From: Gissele Lizarraga <gisseledalila@yahoo.com>
Sent: Tuesday, October 21, 2025 8:57 AM
To: Clerk of the Board
Cc: Supervisor Yxstian Gutierrez; Office of 2nd District Supervisor; District3 Information; District 4 Supervisor V. Manuel Perez; District 5
Subject: Comment for the Cajalco Commer Center Project

Dear Supervisors,

I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to vote no on the 1 million square foot warehouse that will lead to the following and more, I currently live in Moreno Valley and these are my concerns,

- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality
-Decline of health of residental
-Traffic

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

I have been a resident of Moreno Valley since the age of 8, and I am now 29 with two children of my own. I have been able to see this city in its true beauty when there was nothing but open space and open fields. The moment the warehouses began going up the traffic started, the skies became darker from the pollution and our lungs became smush.

The moment commerce is prioritzed over the lives of your residents, thats when real concern starts happening and peoples lives are negativey impacted.
The patterns do not lie and the majority of these warehouses are being put in the low income areas with majority of the population being minorities, that is unethical and should never have been allowed to begin with.

This would be detrimental to the lives of the senior citizens, adults, and children and all the wildlife living thier day to day lives, we just want to live long happy lives with our children, this would stop us from that.

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

Yahoo Mail: Search, Organize, Conquer

Flores, Kate

From: Brady, Russell
Sent: Tuesday, October 21, 2025 9:01 AM
To: Debbie Walsh; Setser, Jennifer; District 5; Supervisor Medina - 1st District; Office of 2nd District Supervisor; District 4 Supervisor V. Manuel Perez; District3; Clerk of the Board
Subject: RE: Cajalco Warehouse Project Agenda Item 23.1

Comments received and will be provided to the Board for their consideration.

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025

RIVERSIDE COUNTY PLANNING DEPARTMENT

How are we doing? Click the Link and tell us

From: Debbie Walsh <abilene149@gmail.com>
Sent: Monday, October 20, 2025 8:02 PM
To: Setser, Jennifer <JSetser@RIVCO.ORG>; District 5 <District5@rivco.org>; Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District3 <District3@Rivco.org>; Brady, Russell <rbrady@RIVCO.ORG>; Clerk of the Board <COB@RIVCO.ORG>
Subject: Cajalco Warehouse Project Agenda Item 23.1

The Rural Association of Mead Valley and RAGLM are adamantly opposed to the Cajalco Commerce Center in Mead Valley.

Please find the attached letter opposing this project. Please add this letter to the administrative record.

Debbie Walsh

Flores, Kate

From: Andrea Pedroza <aandrea1812@icloud.com>
Sent: Tuesday, October 21, 2025 9:03 AM
To: Clerk of the Board
Cc: Supervisor Medina - 1st District; Office of 2nd District Supervisor; District3 Information; District 4 Supervisor V. Manuel Perez; District 5
Subject: Comment for the Cajalco Commer Center Project

Dear Supervisors,

I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to vote no on the over 1 million square foot warehouse that will lead to the following and more:

- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

In addition, I am currently a resident in Perris and I am constantly seeing big warehouses in my city and have seen more negative impacts than the positive ones. Firstly, one of the main impacts people said warehouses would do is provide jobs however it has been shown through the CalEnviroScreen census tract that in these cities filled with warehouses unemployment has been the most common. This is interesting as I compared it to cities with little to no warehouses that had almost no unemployment within the populations. For example in the city of Perris where I live there is a 88% unemployment rate. That is way more than half the population which is ironic seeing how there are about 35 warehouses in Perris that are supposed to be giving jobs to our population. These statistics show how there is more harm being done and not the cities of the inland empire such as Perris, Moreno Valley, and San Bernardino are receiving all receiving the consequences of having warehouses. Our cities have become full of warehouse to provide material goods to other cities creating a polluted and unethical environment that families live in. I am only 17 and already see and have been educated on warehouses and their affects. We want cities that favor the people and their health both physical and mental.

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

Thank you
Andrea Pedroza
Orange Vista High School

Flores, Kate

From: Jimena Lopez <jimena.lop1219@gmail.com>
Sent: Tuesday, October 21, 2025 9:07 AM
To: Clerk of the Board
Cc: Supervisor Medina - 1st District; Office of 2nd District Supervisor; District3 Information; District 4 Supervisor V. Manuel Perez; District 5
Subject: Comment for the Cajalco Commer Center Project

Dear Supervisors,

I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to vote no on the over 1 million square foot warehouse that will lead to the following and more:

- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

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

Flores, Kate

From: Acquia Mail
Sent: Tuesday, October 21, 2025 9:11 AM
To: laddyteddy7o47@yahoo.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 21, 2025

Submitted values are:

First Name
Andrea

Last Name
Del Valle

Address (Street, City and Zip)
20600 OLEANDER AVE

Phone
9518708112

Email
laddyteddy7o47@yahoo.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below

Oppose

Do you need a Spanish translator?
No

Comments
As a mead valley resident, I oppose to more warehouses in mead valley! The traffic and pollution is terrible. I moved to mead valley and purchased my home because it was rural and had ranch quite community! It's no longer safe for people to ride horses! Kids or families do not feel safe because of all the traffic that comes in to our community! I want mead valley rural, safe for my animals and for my children!

Flores, Kate

From: Chris Hannon <chrishannon25@gmail.com>
Sent: Tuesday, October 21, 2025 10:27 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Chris Hannon
92506

Boydd, April

From: William Landa <wisaiahlanda@gmail.com>
Sent: Friday, October 17, 2025 10:54 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Additionally, the uptick in Valley Fever cases in the area (a life threatening fungal infection) is being caused by rampant construction tilling land with the fungus. Extra unnecessary construction will only aggravate this problem.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
William Landa
92518

Item 23.1
10/21/2025

Boydd, April

From: Veronica Juarez <vjuarez0326@gmail.com>
Sent: Friday, October 17, 2025 10:48 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice Community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. The 215 freeway between Perris and Riverside is evidence of the burden our communities experience on a daily basis. No more warehouses!

Sincerely,
Veronica Juarez
92508

Boydd, April

From: Gayle Dicarlantonio <gayledmail@gmail.com>
Sent: Friday, October 17, 2025 10:46 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
G DiCarlantonio
92507

Boydd, April

From: TOM PARKINSON <tbckp@aol.com>
Sent: Friday, October 17, 2025 10:42 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!
Please drive our roads and highways that we all drive on the daily and see how this is such a burden for our community. No more big rig trucks.

Sincerely,
Brenda Parkinson 92508

Sent from Brenda's IPhone

Boydd, April

From: roberto munoz <rbmunz@gmail.com>
Sent: Friday, October 17, 2025 10:42 AM
To: Clerk of the Board
Subject: cajalco commerce center

I'm not support this project.

Boydd, April

From: lishkawex@aol.com
Sent: Friday, October 17, 2025 10:38 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors, Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents. Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses! Sincerely,
<name> <zip code>
Elizabeth Wexler
92508

Boydd, April

From: Andrea Wood <andrea.wood@ucr.edu>
Sent: Friday, October 17, 2025 10:34 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

There is already a surplus of available warehouses in Riverside County that remain vacant. Dedicating more land to this use is wasteful and detrimental to our neighborhoods.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Andrea Wood
Riverside 92521

Boydd, April

From: Michele Muehls <michelebello@hotmail.com>
Sent: Friday, October 17, 2025 10:31 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Thank you for taking the time to read this.
Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Michele Muehls
Sent from my iPhone

Boydd, April

From: Karen Jakpor <kmjakpor@gmail.com>
Sent: Friday, October 17, 2025 10:29 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

I am a physician concerned about environmental health who lives in Riverside County. I have personally been hospitalized numerous times due to the disastrous air quality in our region.

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Karen Jakpor, MD
92504

Boydd, April

From: Gary Mares III <garymaresiii@gmail.com>
Sent: Friday, October 17, 2025 10:28 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, and ongoing pollution those warehouses have created, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Gary Mares
92508

Boydd, April

From: Tom Radulski <tradulski@gmail.com>
Sent: Friday, October 17, 2025 11:02 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,Thomas Radulski
<name>
<zip code>92508

Boydd, April

From: Trish Welbourne <twelbournewhite@gmail.com>
Sent: Friday, October 17, 2025 11:12 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

This is really ridiculous that you are supposed to be representing us, the residents of this community and all you do is ignore our wishes. Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,

Patricia Welbourne
92508

Boydd, April

From: Josie Sosa <josie.sosa@gmail.com>
Sent: Friday, October 17, 2025 11:15 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,

Josie Sosa
92508

Boydd, April

From: Connie Ransom <ransomrealart@gmail.com>
Sent: Friday, October 17, 2025 11:25 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

The physical and mental health of all residents of the County rests in your hands.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Connie Ransom
92507

Connie Ransom

Boydd, April

From: Enn Magi <troutquilt@sbcglobal.net>
Sent: Friday, October 17, 2025 11:25 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Time to take a stand and stop approving warehouses. Warehouses will be your legacy in the community and not a proud one in my opinion.

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Nancy Magi
92506

Nancy
Sent from my iPhone

Boydd, April

From: Jon and Sandi Cabrera <josa6@hotmail.com>
Sent: Friday, October 17, 2025 11:30 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

When I open Redfin to look at houses and look under air quality - it lists Riverside as an extreme level 9-10 on unhealthy air quality. Is that something we should be proud of or something we should be working to clean up?
Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Sandi Cabrera 92508

Sent from my iPhone

Boydd, April

From: Kevin Heinemann <kevinheinemann@gmail.com>
Sent: Friday, October 17, 2025 11:35 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Kevin Heinemann
92508

Boydd, April

From: Joe Aklufi <jaklufi@gmail.com>
Sent: Friday, October 17, 2025 12:07 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,

Joseph S. Aklufi
Riverside 92506

Boydd, April

From: Michael Delpit <mdelpit56@gmail.com>
Sent: Friday, October 17, 2025 12:09 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Michael Delpit
92508

Boydd, April

From: Jonathan Peaslee <jpeaslee24@gmail.com>
Sent: Friday, October 17, 2025 12:25 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Jonathan Peaslee
92508

Boydd, April

From: Lenora Mitchell <rageturner@gmail.com>
Sent: Friday, October 17, 2025 12:35 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Lenora Mitchell
92508

Boydd, April

From: Christine Heinemann <caheinemann@gmail.com>
Sent: Friday, October 17, 2025 12:52 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Christine Heinemann
92508

Christine Heinemann

Boydd, April

From: Abby Banning <h2oabby@gmail.com>
Sent: Friday, October 17, 2025 1:13 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Abigail Banning
92508

Boydd, April

From: Josephine Sanchez <soccerjoey64@gmail.com>
Sent: Friday, October 17, 2025 1:37 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Josephine Sanchez
92508

Boydd, April

From: greg garnier <gcg8821@gmail.com>
Sent: Friday, October 17, 2025 1:52 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1

Dear County Board of Supervisors,

Why build more warehouses that will go empty?

Vote No on the Cajalco Commerce Center.

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
greg garnier
92508

Boydd, April

From: Lynn L <lynnreneelarsen@gmail.com>
Sent: Friday, October 17, 2025 2:15 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Dr. Lynn Larsen, Riverside, CA

Boydd, April

From: matt silveous <mattsilveous1812@gmail.com>
Sent: Friday, October 17, 2025 2:49 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,

Matt
92508

Boydd, April

From: Mary Anne S. <stoever8@gmail.com>
Sent: Friday, October 17, 2025 2:55 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region.

Please do not approve of any more warehouses!

Sincerely,
Mary Anne Stoever
92506

Boydd, April

From: Ann Marchand <ann.marchand1@gmail.com>
Sent: Friday, October 17, 2025 3:18 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Supervisor Medina this is your district and you should prove you care about your constituents **NO MORE WAREHOUSES**!!

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Ann Marchand
former 92506

Boydd, April

From: bettysbag@charter.net
Sent: Friday, October 17, 2025 3:24 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Please listen to your residents.

Sincerely,
Betty Hao
92508

Boydd, April

From: Sue Nipper <markel221@gmail.com>
Sent: Friday, October 17, 2025 3:43 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

We appreciate your support to stop The Grove warehouses. Please do it again with this Cajalco project. The families of Mead family do not need this extra burden in their neighborhoods.

Sincerely,
Susan Nipper
92508

Boydd, April

From:	Franco <inlandvalleyalliance@gmail.com>
Sent:	Friday, October 17, 2025 4:15 PM
To:	Clerk of the Board; Brady, Russell; Mcamacho@rivco.org; Supervisor Medina - 1st District; District 5; Office of 2nd District Supervisor; District3; District 4 Supervisor V. Manuel Perez
Cc:	Michael McCarthy; Ana Gonzalez; Jen L; Karla Cervantes Pacheco
Subject:	Public comment for the Cajalco Commerce Center 10-21-25 item 23.1
Attachments:	petition.pdf; Franco Pacheco letter of oposition to item 23.1 10-21-25 riverside bos meeting.pdf

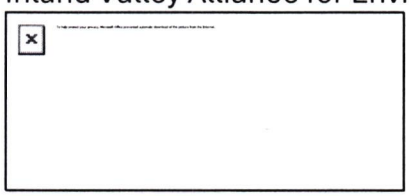
Hello,

Attached is a letter for item 23.1 from local residents in Mead Valley and community groups. We urge the board to vote NO on approving this project as it stands. The negative impacts from this project will be devastating to Mead Valley and the county has not taken into consideration the cumulative impacts of already approved, existing, and pending projects. As a resident here in Mead valley we have already felt the increases in truck traffic, air pollution and empty promises from these types of projects. We already have more than enough warehouses in Mead Valley. There are an estimated 10 warehouses for lease and an additional 38 for lease in Perris. We have the highest amount of warehouse space per resident in the Inland Empire. These projects are targeting our communities at a disproportionate rate.The county's own standard requires higher levels of protections due to Mead Valley being considered an environmental justice community. The EIR clearly states that the impacts of this project will be devastating. Also removing housing and not replacing the units is going against state mandates as well as County of Riverside goals to create housing as we are in the middle of a housing crisis. Attached is a petition from residents urging the board to deny the Cajalco Commerce Center and remove the warehouse component from the project. We will send an updated copy on Oct 20th due to community members showing interest in signing this petition.

Thank you and careful consideration,

--

Franco Pacheco
Inland Valley Alliance for Environmental Justice



https://www.inlandvalleyalliance.org/

Franco Pacheco
Inland Valley Alliance for Environmental Justice
10-17-25

Riverside County Board of Supervisors
Vote no on Cajalco Commerce Center Project (ITEM 23.1)
4080 Lemon Street, Riverside, CA 92501

Dear Riverside County Board of Supervisors:

I am writing to express my strong opposition to Cajalco Commerce center project, which proposes approximately 66 acres in Mead Valley to facilitate the development of the Cajalco Commerce Center. This project would convert land currently designated for residential and agricultural/commercial use into industrial zoning, paving the way for a 1,003,510 square-foot warehouse and associated infrastructure. This proposal raises serious concerns under the California Environmental Quality Act (CEQA) and broader land use principles:

Incompatible Land Use: The proposed industrial zoning directly abuts existing residential neighborhoods, threatening community character, safety, and livability. The shift from RC-VLDR and A-1-1 to I-P zoning undermines the intent of the Mead Valley Area Plan, which prioritizes rural preservation and low-density development.

Air Quality and Health Impacts: The EIR acknowledges significant emissions from truck traffic and warehouse operations, including diesel particulate matter and greenhouse gases. These pollutants pose disproportionate risks to vulnerable populations, including children, immuno-compromised people and seniors living nearby.

Traffic and Infrastructure Strain: With 76 loading docks on each side of the warehouse, the project will generate substantial truck traffic on Cajalco Expressway, Seaton Avenue, and Decker Road, which are not designed for heavy industrial use. This raises safety concerns and threatens roadway integrity.

Viable and Community-Driven Alternatives: Rather than facilitating a massive industrial project that disrupts the surrounding area, the County should consider community-oriented alternatives that support the local economy, enhance quality of life, and preserve open space. These could include affordable housing that meets regional RHNA targets/state mandates, urban agriculture zones, or a rural innovation hub integrating education, green jobs, and environmental stewardship. Such uses would be more compatible with Mead Valley's existing character and address long-standing environmental justice concerns.

Loss of Open Space, Agricultural Land, and Housing: This project would permanently eliminate farmland and open space, contrary to the County's stated goals of preserving agricultural heritage and natural resources. The proposed park that is associated with this project would not be considered a sensitive receptor and would end up being surrounded by the other proposed logistic projects that are seeking approval during this GPA cycle. This project also removes existing housing without replacing the units as required by law.

Environmental Justice and Disproportionate Burden: Mead Valley is recognized as a disadvantaged unincorporated community and an environmental justice (EJ) area, as acknowledged by Riverside County officials. Warehousing development has increasingly targeted EJ communities like Mead Valley, where residents, predominantly people of color, face elevated exposure to pollution, noise, and traffic without commensurate investment in infrastructure or services. Under CEQA and California's EJ policies, such communities warrant heightened protection, not intensified industrial encroachment. Approving this rezoning would perpetuate environmental racism and undermine the County's stated commitment to equity and public health. We urge the planning commission to deny the Cajalco Commerce project and instead pursue land use strategies that align with the General Plan's vision for rural communities, protect public health, and uphold environmental justice.

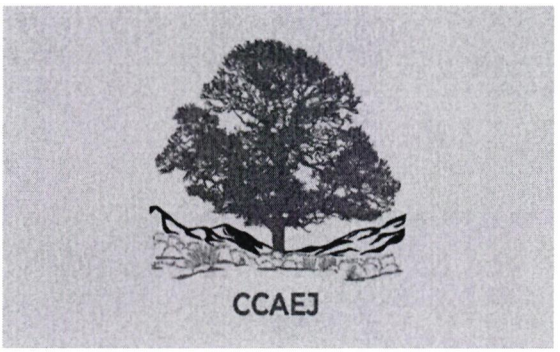
Petition and Additional Community Comments: We have also attached a petition signed by Riverside County residents opposing this project. Specifically, the warehouse component. Residents who have signed oppose the project as it stands because of the significantly harmful effects this warehouse will have as cited in the Environmental Impact Report. We will send another updated copy of the petition on October 20th. Residents urge the board to deny this project and encourage the developer to remove the warehouse component and replace it with a more suitable component that brings much needed benefits to the area. Currently Mead Valley has the highest amount of industrial warehouse space per sq feet, per resident and continuing to allow these harmful projects in our rural community is unethical and a civil rights issue due to the consistent targeting of removing housing in favor of industrial land in a largely Latino community and a historically African American community. This is not happening at this large of a scale anywhere else in Riverside County. This project will also be used to justify over 1,000 acres of land to be converted to even more warehousing projects which will be disastrous for frontline communities as well as the entire region. Approving this project will also risk grants and funding for infrastructure related to the Metro Link Project that is meant to make parts of Mead Valley a transit-oriented community, specifically in the area where the Cajalco Commerce Center is being proposed. By allowing this project to continue would be irresponsibly dedicating space in an industry that has lost over 21,000 jobs in logistics since 2022. We need diverse, well-paying jobs that secure a positive, healthy future for Mead Valley and surrounding communities. Not just for the next year, but for decades to come. We kindly urge the Board of Supervisors to deny this project as it stands.

Franco Pacheco
Mead valley Resident and co-founder of
Inland Valley Alliance for Environmental Justice

Karla Cervantes
Founder of
Mead Valley Coalition for Clean Air

Jennifer Larratt-Smith
Chair, Riverside Neighbors Opposing Warehouses (R-NOW)

Ana Gonzalez
CCEAJ Executive Director



PETITION OPPOSING CAJALCO COMMERCE CENTER

MEAD VALLEY COALITION FOR CLEAN AIR INLAND VALLEY ALLIANCE FOR EJ	MEETING DATE	LOCATION
With this petition we urge the Riverside County board of supervisors to **deny** the Cajalco Commerce Center	10/21/25	Riverside Board of Supervisors 4080 Lemon Street

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
1	Jon Larratt-Smith	310.425.9110	jlarrattsmith@gmail.com	yes	yes
2	Catherine Ross	909-810-0564	otheremailforgriffin@gmail.com	yes	yes
3	Isabella Diaz	714-803-4506	isabelladiaz291296@gmail.com	Yes	Yes
4	Yo Xiao	9098935474	ssccw8893@gmail.com	yes	Yes
5	August Olague	6511906 6038	augieolague@gmail.com	yes	Yes
6	Leanna Beasley	9514515455	leannabeasleys@gmail.com	Yes	Yes
7	Alison Dl	9512 8171		Yes	Yes
8	Edi Zermeno	951-296-4110	ezermeno23@gmail	yes	yes, of course
9	Vivian Felix	9092949291	vivianfelix2013@gmail.com	Yes	Yes!
10	Shawn Darby	9095855963	Shawne.darby@Gmail.com	No	yes SB
11	Victor Sebastian	760-968-6425	vmartin369@icloud.com	Yes	Yes
12	Itaiar	951-470 8506	Irobleroa@studentRccd.edu		
13	Lily Santos	714 408 3224	lilysantos04@icloud.com	yes	yes
14	Brissa Osuna	951-756-9502	Brissaosuna314@gmail	yes	yes!!
15	Mia Castillo	951-224-1897	mia06568@gmail.com	yes	yes
16	Adrian Mazariegos	951 505-7512	amazariego1@student.Rccd.edu		
17	Mariel Vasquez	9095270613	mariel Vasquez66@gmail	yes	yes
18	Kathie Mahony	951-217-8755	crwbahe@aol.com	Y	Y
19	Roman Davison	951-591-0121	romanadavison2003@gmail.com	yes	yes
20	Hector Palomares	909 204 9555	jcw2006@outlook.com	yes	yes
21	Ashley Chavez	951-220-5799	ashleychavez.1022@gmail.com	yes	YES!

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
22	Ofelia Dorotheo	909553 9020	ofeliaDorotheo382@gmail.com	✓	✓
23	Vanessa Armenta	951-496-2048	VanessaPacheco.co@gmail.com	✓	✓
24	Rafael Armenta	8055729454	RafaelArmenta.contact@gmail.com	✓	✓
email copy * 25	Sophie Weiss	760 715079	sophie.weiss@rccd.edu	✓	✓
26	Michael McDonald	" "	" "	✓	✓
27	Travis Mason	909 241 6619	Travismason@verizon.net		✓
28	Sierra Mason	909 241-6774	ccmason.awesome@gmail.com		✓
29	CODY VONG		vvong2@student.rccd.edu	✓	✓
* 30	Ashley Marin	951 505 5271	a.marin06@icloud.com	✓	✓
* 31	PAULA MARIN	(951)384-5529	p.marin@icloud.com	✓	✓
32	Nathan Ellett	951-675-4852	nathan.j.ellett@gmail.com	✓	✓
33	Jessica Solares	951-252-5860	jessicasolares143@gmail.com	✓	✓
34	Renny Gonzalez	714-588-2248	Rennyhalel1123066 gmail.com	✓	✓
35	~~Margaret~~				
36	Margaret Ross	909 2888187	m.hill.ross@gmail.com	✓	✓
37	Vincent Vargas	951 743 4462	vvargas23@gmail	✓	✓
38	Gissell Morfin	8402418638	morfingissell@gmail.com		✓
39	Angeline Molina	951-502-7701	AngelineMolina@icloud.com	✓	✓
40	Aaron Lujan	909-642-5551	AaronLujan09@gmail		✓
41	Leslie Constantino	909-2181780	Leslieconstantino05@gmail.com	✓	✓
email 42	Renate Bravo	909-678694	crisreny20@gmail.com	✓	✓
* 43	Justin Harrell	5624455205	justinharrell101@gmail.com		✓
44	Isadora Taylor	9053368183	doce.isadora@gmail.com		✓
* 45	Landan Nielsen	9515317140	landannielsen73@gmail.com		
46	Al Wefo	315-430-3598	arforbes12@gmail.com	✓	✓
47	Chris Weyant-Forbes	951-255-2740	christina.weyant@gmail.com	✓	✓
48	Jan Andres	909 9367417	jan.andres@rcc.edu		✓
PC4EJ 49	Tania Gonzalez	909-2758792	tania.g@pc4ej.org		

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
50	Elvira Anacleto	951 9568748	Solis0415 Elvira@Icloud	Yes	Yes
51	Debbie Walsh			Yes	Yes
52	Jordan Winzell			Yes	Yes
53	Victoria Camarena	951 230 3914	vncama@outlook.com	Yes	Yes!
54	Juan Terrones			Yes	Yes
55	David Hernandez	951-317-8563		Yes	Yes
56	Caroline Martinez	(951)657-6096		yes	yes
57	Steve Martinez	(951)657-6096		yes	yes
58	Patricia Healey	951-203-4632		yes	yes
59	Dani Tanner	9168345565		no	yes
60	Raquel Escalante	951-772-4734		Yes	Yes
61	Joel Escalante	951-453-8215		Yes	Yes
62	Ruby Robina Ladia	951-207-6666	benavidex.ruby@gmail.com	Yes	Yes
63	Esmeralda	951-227-0976		Yes	Yes
64	Javier Benavida	951-933-9318	Jbenavidez3@yahoo	Yes	Yes
65	Salvador Lopez	951) 237-20-35		Yes	Yes
66	Rogelio Ramirez	951 229-4366		Yes	Yes
67	EVA Bravo	951-515-5795			
68	Keven L.	951-425-3442	KevenLopez1224@gmail.com		Yes
69	Lynn/no Cooper	951-567-0708			
70	Patricia Garcia	951-355-6959			Yes
71	Maria S. Lizarraga	(951)487-5879		sollizarraga72@gmail	
72	Franco Pacheco	9517967757	PachecoFranco05@gmail.com	✓	✓
73	Karla Cervantes	9518929416	KarlaCervantesPacheco@gmail.com	✓	✓
74	Karla Avelar	9515525503		Yes	Yes
75	Mauro Cervantes	9515525695		Yes	Yes
76	Christina Cervantes	(951) 440-2055		Yes	Yes
77	Maria Pacheco	(951)322-9110		Yes	Yes

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
78	Rosa Reyes	(951)264-2114		Yes	
79	Elizabeth Anguo (951)	[redacted] 956-92[redacted]		yes	
80	Cristina Diaz	951-730-9719			
81	Cynthia Hernandez	951/350-2757		Yes	Yes
82	Maria Ulloa	9097162132		Yes	Yes
83	Rafael Sanchez	951 489-6385		Yes	Yes
84	Mirna Sanchez	951 489-6385		yes	yes
85	Karla Oziel Rubio	951-5636696		yes	yes
86	Adriana Serratos	(323) 216-4055		Yes	Yes!!
87	Alejandro Diaz	310-864-8487		Yes	Yes
88	Elva Gutierrez	(951)564-6664		Yes	Yes
89 ★	Julie Lopez	951-490-9772		Yes	Yes
90	Angela Villa	951 830 3316		Yes	Yes
91	Elizabeth Churchill	951-226-2986		Yes	yes
92	Rigoberto Gastelum	619-484-0640		Yes	Yes
93	Rafael Chavez	951 8096407		Yes	Yes
94	Amy Custryon	951-956-8999		Yes	Yes
95	Rocio Cantabrana	951-385-2100		Yes	Yes
96	Dawson Villavicencio	951-258-2362		Yes	Yes
97	Azulena Paez-Herrera	951-500-1164		yes	yes
98	Salma Herrera	951-230-0254		yes	yes
99	Samuel-Paul Rawls	951-710-7330		yes	yes
100	Jivian Guedes	(909) 635-9683		Yes	yes
101	Fernando Carreon	(951) 503-5581		yes	yes
102	Veronica Carreon	951-840-0538		yes	yes
103	Brenda Martinez	951-230-[redacted]4360		yes	yes
104	Camelia Martinez	951 796 83 99		Yes	Yes
105	Johanna Torres	(951) 657-7385		Yes	Yes

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
106	Marie Robles	(951) 449-3287	marieerobless92@gmail.com	yes	yes
107	Rose Ramirez	951-575-8700		yes	yes
108	Maria Herrera	9512315273		yes	yes
109	Anai Calderon	9515343716		yes	yes
110	Pedro H Calderon	9514345519			
111	[illegible]	951 943-9384		yes	yes
112	Mari Franco	951 ~~63-652~~ 26 6352		yes	yes
113					
114					
115					
116					
117					
118					
119					
120					
121					
122					
123					
124					
125					
126					
127					
128					
129					
130					
131					
132					
133					

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
360	ANGEL MARTINEZ	951 4551660	martinezlouzangel@gmail.com	Yes	Yes
361	Eder Montejines	951 742 9479	Eder Montejines71@gmail.com	yes	yes
362	Colleen Conroy	9619567 7069	Colleenconroy4@gmail	Y	Y
363	Michael Bixler	951 801 4233	targetspot2mike@gmail	Y	Y.
364	Marilu Salinas	480 562 7688	salinasmarilu@yahoo.com	Yes	Yes
365	GUADALUPE TORRE	951 591-2183		YES	YES
366	Juan Torres	9519071685		yes	yes
367	Eileen Torres	951 7221249	eileen8@gmail.com	yes	yes
368					
369					
370					
371					
372					
373					
374					
375					
376					
377					
378					
379					
380					
381					
382					
383					
384					
385					
386					

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
303	Maria Castañeda	1951 258-78-82		✓	✓
304	Vicki Sanchez	951-830-3851		✓	✓
305	[illegible]	951 4797073		✓	✓
306	REGINALD COLEMAN	(951) 7469856			✓
307	Jose Medina	9512106151		✓	✓
308	[illegible]	9512106151		✓	✓
309	Paul Kollen	9513459382		✓	✓
310	EVA Bravo	951-515-5795			
311	HIMELDA SANCHEZ	(323) 2890787		✓	✓
312	ROGELIO SANCHEZ	323-329-0483		✓	✓
313	Cynthia Benmen	cynthia 951-317 6206		✓	✓
314	Juan Benmen	951 314-4878	822003@yahoo.com	✓	✓
315	Maria S. Lizarraga	(951) 487-5879		✓	✓
316	PAUL Stevens	(909) 238-7064		✓	✓
317	Susan Stevens	951-662-1949			✓
318	JoAnna Huerta	jhue313@lasierra.edu	951-818-0101		✓
319	Maria Lopez	951-2872645			✓
320	Yovani Lopez	(951) 400-9894		✓	✓ Lyovany60@gmail.com
321	ROSA Arrabales	(951) 213-5072		✓	✓
322	Tulgi Minella	(714) 397-9397	agapelife24@gmail	✓	✓
323	Angelique castellanos	(951) 4824884	+pbyange169@gmail.com	✓	✓
324	Sandy Varela	(951) 550-9634		yes	yes
325	Lizeth Esqueda	951-973-3447		yes	yes
326	Lucilo Pacheco	951 694-2625		✓	✓
327	Antonia Anaya	(951) 987-1482		✓	✓
328	Nate Puente	(707) 289-9119		✓	✓
329	Pearl Perez	(951) 230-7407		✓	✓
330	Jeanette Ponce	951 4921530		✓	✓

#	NAME	PHONE	EMAIL	RIVERSIDE COUNTY RESIDENT	REMOVE THE WAREHOUSE FROM THE PROJECT
416	Norma Palacios	(951) 261-4970	Palaciosnorma8@gmai.com	Yes	Yes
417	Juan Palacios	(951) 858-7939		Yes	Yes
418	Teresa Villarreal		tpbyteresa67@yahoo.com	Yes	Yes
419	Jocelyn Ramirez	714) 809 1165	Jcnorez6305@gmail.com	Yes	Yes
420	Adam Ramirez	510 605 5333	adambramirez@gmail.com	Yes	Yes
421				Yes	
★ 422	Jose R Bravo	951-355-4355		Yes	Yes
★ 423	Ana Torres	(714)391-7836		yes	yes
424	Zoila Ambrosio	(951)422-8049		Yes	Yes
425	Rosario Juárez	(951-210-0294			yes
426	Maria Casas	951 940-09-81			Yes
427	Dan Valenzuela	951-704-2833		yes	yes
★ 428	Crystal Castro	(951)750-3676		yes	Yes
429	Diana Lorenzo	(714)478-5916		yes	yes
430	Reyna Gomez	(951)570-6170		yes	yes
431	Emily Rodriguez	(951)598-3900		yes	yes
432	Elva Blanco	(951)503-9011		yes	yes
433	Viviana Perona	(951) 807-0591		yes	yes
434	Brian Perona	(951) 575-8712		yes	yes
435	Kally Franco	(951)-434-3651		Yes	Yes
436	Veronica Quiñonez	909-268-1019		yes	yes
437	[illegible] James Castrejon	(951)385-2100		Yes	Yes
438	Erica Alfaro	9098278481		Yes	Yes
439	Oscar Arellano	(909)231-7567		Yes	Yes
440	Stephanie Burns	7143139387		yes	yes
441	Mark Burns	9515263699		yes	yes
442	Cisi Carreon	951-5910942		yes	yes
	Guillermo Carreon	9515910943		yes	yes

Boydd, April

From: LaDonna Ardary <ladonnaardary@icloud.com>
Sent: Friday, October 17, 2025 4:42 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
LaDonna
92508

LaDonna Ardary
Sent from my iPhone

Boydd, April

From: The Harvilla Family <harvilla4@msn.com>
Sent: Friday, October 17, 2025 4:49 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is overrun with warehouses. The proposed Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need more warehouses in our region.

No more warehouses!

Sincerely,

George Harvilla
92508

Boydd, April

From: Shirley <fungyinandjoseph@gmail.com>
Sent: Friday, October 17, 2025 9:35 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Shirley Ng & Raymond Or
CA 92508

Boydd, April

From: Aaron Bushong <aaron.bushong@verizon.net>
Sent: Friday, October 17, 2025 8:44 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors:

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents. Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Thank you,
Aaron Bushong
92508

Boydd, April

From: John Viafora <jrviafora@gmail.com>
Sent: Friday, October 17, 2025 8:34 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
John Viafora
Indigo Point, Orange Crest
92508
Sent from my iPhone

Boydd, April

From: K Doty <dkdoty2@gmail.com>
Sent: Friday, October 17, 2025 8:01 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. I respectfully ask that you listen to us, your constituents! No more warehouses!

Sincerely,
Kristy Doty
92508

Boydd, April

From: Jill M Ansley <a-lfamily@msn.com>
Sent: Friday, October 17, 2025 6:48 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Stephen P. Ansley
92508

Boydd, April

From: Ira and Rajean Long <longfam6@att.net>
Sent: Friday, October 17, 2025 6:00 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Ira and Rajean Long
Mission Grove, 92506

Boydd, April

From: Michael Hampton <hampton2005@gmail.com>
Sent: Friday, October 17, 2025 5:56 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Michael Hampton
92506

Boydd, April

From: Jeannine Sabel <j9sabel@gmail.com>
Sent: Friday, October 17, 2025 5:29 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Jeannine Sabel
92506

Boydd, April

From: Roseann Reynolds <roseannreynolds1@gmail.com>
Sent: Saturday, October 18, 2025 8:57 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses! It's time to put tge people first!

Sincerely,
Roseann 92518

Boydd, April

From: Nicolette Rohr <nicolette.rohr@gmail.com>
Sent: Saturday, October 18, 2025 9:21 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Nicolette Rohr
Riverside, 92506

Boydd, April

From: Acquia Mail
Sent: Saturday, October 18, 2025 10:06 AM
To: joey58brenda59@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 18, 2025

Submitted values are:

First Name
Joey

Last Name
Silva

Phone
3235436162

Email
joey58brenda59@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

Do you need a Spanish translator?
No

Boydd, April

From: Acquia Mail
Sent: Saturday, October 18, 2025 10:08 AM
To: silviaandrade877@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 18, 2025

Submitted values are:

First Name
Silvia

Last Name
Andrade

Phone
3239943832

Email
silviaandrade877@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

Do you need a Spanish translator?
No

Boydd, April

From: Acquia Mail
Sent: Saturday, October 18, 2025 10:10 AM
To: brenda.montes2122@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 18, 2025

Submitted values are:

First Name
Brenda

Last Name
Montes

Phone
3232738186

Email
brenda.montes2122@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

Do you need a Spanish translator?
Yes

Boydd, April

From: Acquia Mail
Sent: Saturday, October 18, 2025 10:11 AM
To: lilia9639@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 18, 2025

Submitted values are:

First Name
Lilia

Last Name
Lopez

Phone
5625130698

Email
lilia9639@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

Do you need a Spanish translator?
No

Boydd, April

From: Acquia Mail
Sent: Saturday, October 18, 2025 10:14 AM
To: reinadominguez113@yahoo.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 18, 2025

Submitted values are:

First Name
Reina

Last Name
Dominguez

Phone
3239215118

Email
reinadominguez113@yahoo.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

Do you need a Spanish translator?
No

Boydd, April

From: Acquia Mail
Sent: Saturday, October 18, 2025 10:15 AM
To: reydominguez19@yahoo.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 18, 2025

Submitted values are:

First Name
Robert

Last Name
Dominguez

Phone
3238051422

Email
reydominguez19@yahoo.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

Boydd, April

From: Acquia Mail
Sent: Saturday, October 18, 2025 10:16 AM
To: rebecadominguez9110@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 18, 2025

Submitted values are:

First Name
Rebeca

Last Name
Dominguez

Phone
3235237043

Email
rebecadominguez9110@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

Do you need a Spanish translator?
No

Boydd, April

From: Acquia Mail
Sent: Saturday, October 18, 2025 10:17 AM
To: arriagainc.84@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 18, 2025

Submitted values are:

First Name
Jelani

Last Name
Arriaga

Phone
5629223185

Email
arriagainc.84@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

Do you need a Spanish translator?
No

Boydd, April

From: E E_____Ha__ <eestrella25@msn.com>
Sent: Sunday, October 19, 2025 9:51 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Stop with the warehouses! Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Elisa Estrella-Hahn
92508

Boydd, April

From: Acquia Mail
Sent: Saturday, October 18, 2025 10:33 AM
To: lizy.lopez125@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 18, 2025

Submitted values are:

First Name
Lizy

Last Name
Lopez

Phone
3236291220

Email
lizy.lopez125@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below
Support

Boydd, April

From: footer-foulest.9e@icloud.com
Sent: Saturday, October 18, 2025 10:59 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Brian Wardle
92508

Boydd, April

From: elissacuriel <elissacuriel@gmail.com>
Sent: Saturday, October 18, 2025 2:58 PM
To: Clerk of the Board; District 5
Cc: Supervisor Medina - 1st District; Office of 2nd District Supervisor; District3 Information; District 4 Supervisor V. Manuel Perez; District 5
Subject: Comment for the Cajalco Commer Center Project

Dear Supervisors,

I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to vote no on the over 1 million square foot warehouse that will lead to the following and more:

- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

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

Sent from my Galaxy

Boydd, April

From: Melody Clark <melodyeclark@icloud.com>
Sent: Sunday, October 19, 2025 2:36 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote NO on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. Please, No More Warehouses!

Sincerely,
Melody Clark
92506

Sent from my iPad

Boydd, April

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Sunday, October 19, 2025 5:20 PM
To: Supervisor Medina - 1st District; Office of 2nd District Supervisor; Clerk of the Board; Brady, Russell
Cc: District 4 Supervisor V. Manuel Perez; District3; District 5; George Hague
Subject: Cajalco Commerce Center - item 23.1 - Public Hearing - comment on record for SCH # 2023060799
Attachments: CajalcoCommerce_Board.pdf; IE IND Research Report 2025 Q3.pdf

Honorable Supervisors, Clerk, Mr. Brady,

Attached please find a comment letter on the Cajalco Commerce Center project and the most recent industrial warehouse report as public comments for Item 23.1 on the October 21, 2025 agenda.

No more warehouses.

Mike McCarthy, PhD
Riverside, CA 92508

Russell Brady
Project Planner
Riverside County Planning Department
Planning Hearing Secretary
Email: rbrady@rivco.org; planninghearings@rivco.org

RE: Public comment for the Cajalco Commerce Center – Item 23.1 on October 21, 2025 – SCH # 2023060799

Honorable Supervisors, Mr. Brady, County Clerk,

Thank you for the opportunity to provide comments on the final Environmental Impact Report (EIR) on the Cajalco Commerce Center ("Project") – SCH# 2023060799, Item 23.1.

The Cajalco Commerce Center will site a speculative 1,003,510 sq.ft. light industrial warehouse on the corner property of Seaton Avenue and Cajalco Road and a public 13 acre park south of Cajalco Road in the unincorporated community of Mead Valley in Riverside County. The Project has 26 single-family residential structures and a commercial building that will all be demolished. 60 acres of Rural Community-Very Low Density Residential will be rezoned to light industrial.

Responses to County Comments on Previous letters

The first part of this letter responds to the inadequate responses to the Planning Commission comment letters and DEIR comments. By reference I incorporate all other comment letters that have been previously addressed.

1. The Project continues to omits significant projects that have not been analyzed in the EIR or FEIR. In response to these previous claims, the County has asserted that we have not 'identified any specific cumulative impacts not addressed in the EIR. The EIR omits all foundation general plan amendments projects in process in Mead Valley, which include over 1,000 acres of cumulative residential to industrial rezones, over 25 additional residential structures being demolished. These projects are listed in Table 1 for completeness.

Table 1- List of foundation general plan amendments in progress that were not considered as part of the cumulative impacts assessment for housing, land-use, traffic, air pollution, and environmental justice impacts.

Community	CASE_ID	Applicant	Existing Land Use	Proposed Land Use	Residential Structures	Acres
Mead Valley	GPA230008	Thrifty Oil Co.	Very Low Density Residential (VLDR)	Light Industrial (LI)	1	9.6
Mead Valley	GPA240004	Rett Coluccio	Very Low Density Residential (VLDR)	Light Industrial (LI)	2	19.5
Mead Valley	GPA240005	John Grace	Very Low Density Residential (VLDR)	Light Industrial (LI) & Recreation (R)	26	64.4
Mead Valley	GPA240012	Rett Coluccio	Very Low Density Residential (VLDR)	Light Industrial (LI)	1	9.5
Mead Valley	GPA240022	Travis Duncan	Very Low Density Residential (VLDR)	Specific Plan (SP)	0	648.5
Mead Valley	GPA240023	Trip Hord	Very Low Density Residential (VLDR)	Light Industrial (LI)	0	104.6
Mead Valley	GPA240026	David Nazaryk	Rural Residential (RR)	Light Industrial (LI)	1	161.5
Mead Valley	GPA240027	Emily Golubow	Very Low Density Residential (VLDR)	Light Industrial (LI)	3	10.5
Mead Valley	GPA240042	Jack Herrill	Very Low Density Residential (VLDR)	Business Park (BP)	9	17.8
Mead Valley	GPA240049	Tyler Banton	Very Low Density Residential (VLDR)	Business Park (BP)	3	19.1
Mead Valley	GPA240059	Jeremy Mape	Very Low Density Residential (VLDR) & Light Industrial (LI)	Light Industrial (LI)	0	8.6
Mead Valley	GPA240063	Scott Smith	Estate Density Residential (EDR)	Business Park (BP)	8	66.5
Mead Valley	GPA240082	Rett Coluccio	Very Low Density Residential (VLDR)	Light Industrial (LI)	3	14.9

2. The Lead Agency incorrectly determines that demolishing 26 residential structures is not a significant impact. It continues to assert that (1) the county primarily looks to look at the 40,647 dwelling units required at the county level (2), the demolished structures are not within the Mead Valley Area Plan housing inventory planned sites, and (3) the county did a flawed consistency analysis in Appendix K. We agree that the County needs to check these three categories, but this is missing the forest for the trees. The County has a duty under its housing policy to check consistency at both the County level and at the local community level, as specified under displacement risk policies and the goal to affirmatively further fair housing. Mead Valley is being discriminated in its housing inventory being rezoned for industrial, especially given the extent of existing warehouse burden which is the highest in the Inland Empire. No other area of the county has the extent of industrial rezoning proposed. Adjacent unincorporated communities like Woodcrest, Good Hope, and Lake Mathews are not being rezoned for industrial development, and the diminished number of homes and land in Mead Valley is textbook environmental injustice. Details follow.
    a. County Housing Policies that contradict demolishing homes and rezoning 60 acres of residential land.
        i. H 1.1: Maintain an adequate supply of appropriately zoned land to accommodate housing needs of existing and future residents.
        ii. H 1.5: Encourage the development of higher-density, multifamily housing in locations where adequate infrastructure and public services are planned or are available (including transit stations).
        iii. H 3.2: The County should advocate for revisions to State laws that will make affordable housing easier to achieve, including but not limited to issues related to requiring the payment of prevailing wage, burdensome California Environmental Quality Act (CEQA) requirements adversely affecting housing production, tax code reform, and tools and funding for affordable housing while recognizing the need to maintain the integrity of existing residential communities.
        iv. H 3.7: The County should pursue all available federal, state, and local funds to assist in housing rehabilitation and preservation of at-risk units
        v. H 5.4: The County shall strive to disperse affordable housing projects throughout the county, while ensuring that affordable housing development occurs in areas

with appropriate access to infrastructure, services, and necessary community amenities, wherever feasible.

vi. H 5.6: The County shall collaborate with community partners to increase residential low-resource areas access to transit, environmental, economic, and educational opportunities.

b. Demolishing 26 residential structures is about 0.56% of the 4,601 housing units in Mead Valley. Displacing 100 residents is 0.51% of the 19,600 residents of the community. These effects are very large on such a small community. For comparison, the recent Altadena and Palisades fires destroyed approximately 12,000 homes[1], which is about 0.33% of the 3.598 million housing units in LA County.

c. While the County housing inventory is treated in RHNA as largely spatially interchangeable, it is not the case that a house in the Eastern Coachella Valley is equivalent to or interchangeable with Mead Valley. Mead Valley has an 'area plan capacity' of 1,350 units in the adopted Housing Element, Table P-32 and P-33. Demolishing 26 units and rezoning 60 acres of residential land reduces the local housing inventory by at least 3% from a single project.

d. The project inaccurately concludes that the project will not 'displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.' The Project documents estimate that 100 residents will be displaced from the demolished housing. As mentioned earlier, 100 residents is 0.5% of the population of Mead Valley. The Project is only compared to the entire County inventory the 'fully entitled' houses that have not yet been built in the County as its inventory comparison.

e. The community of Mead Valley has built an average of 20 residential structures from 2019-2024 according to the State's HCD housing dashboard[2] and shown in **Figure 1**. This project is demolishing over a year of new housing; that is clearly significant on a local level.

f. The County identifies Mead Valley as a community at risk for housing displacement in Figure P-32 in its adopted housing element.

g. The County is significantly behind in its RHNA targets, especially for low-income housing. For 2021 through 2024, the County has only completed 9,837 units of housing out of its 40,000+ unit goal. Less than 350 units of low, very low, or extremely low-income housing units have been built, with more than 90% of housing built in the above moderate income category. As such, the County demolishing low-income housing has a significant impact on the low-income housing category.

h. Lastly, the County fails to demonstrate that the existing housing on site is not low-income housing. In fact, the Appendix I site report states that many of the housing units on site are not permanent structures but 'RV homes, RV mobile homes, shanty town' and other mobile or unpermitted housing occupied by 'vagrants or squatters.'

    i. Appendix I – "Two additional detailed site reconnaissance visits were performed on November 1, 2023, by Natalia Delgadillo, and November 9, 2023, by Jack Packwood, of Group Delta. Each property was visited by Group Delta personnel. It should be noted that there is an elevated level of **vagrancy**, unleashed dogs, drug and alcohol use, and other conditions at various locations onsite that make detailed site reconnaissance on

---

[1] https://www.gov.ca.gov/2025/07/07/six-months-after-the-la-fires-nations-fastest-residential-cleanup-nears-completion-as-governor-newsom-signs-streamlining-executive-order-joins-local-leaders-to-unveil-blueprint-for-rebuildi/

[2] https://www.hcd.ca.gov/housing-open-data-tools/apr-dashboard - accessed October 16, 2025

ii. some parcels difficult, if not impossible, under current conditions. Even with the temporary presence of the Riverside County Sherrif, the site reconnaissance had to be conducted under expedited working conditions. On some parcels, the degree of debris was simply to great and thus impossible to inspect all conditions under safe working conditions, particularly in **areas where vagrants or squatters** were currently living." A couple of annotated images from Appendix I are included as Figure 2.

iii. We note that new non-permanent structures were included such as RVs and 'shanty town' structures were included in the displacement analysis in the DEIR. These residents are likely lower income households that will require replacement housing and relocation assistance per county policy H-32 and payments to displaced tenants per AB 98 as adopted by the County in its Good Neighbor and Logistics Policy.

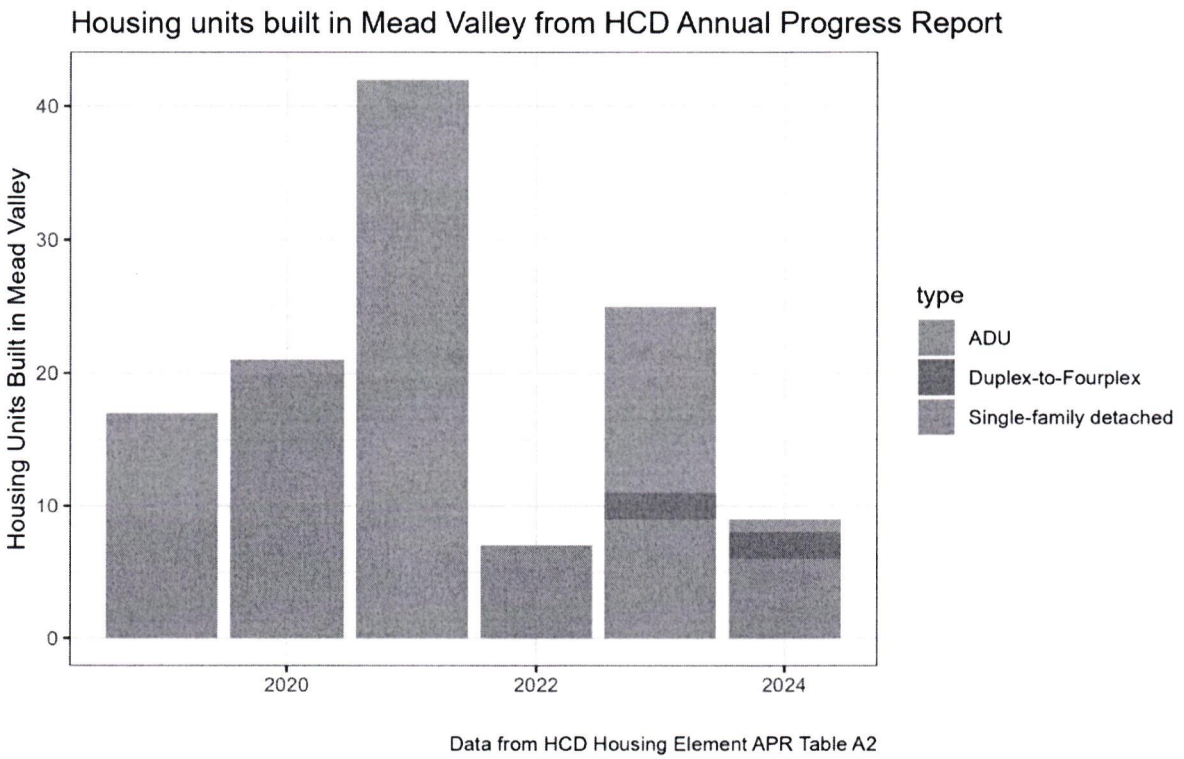


Figure 1. Number of Mead Valley residential units built by year from HCD Annual Progress Report Table A2.



Photograph Number 2:

APN 317-080-008

Abandoned cars and RVs

View to the south of APN317-080-007.



Photograph Number 3:

APN 317-080-008

In-use RV and single-family house. Trash accumulation on the back.

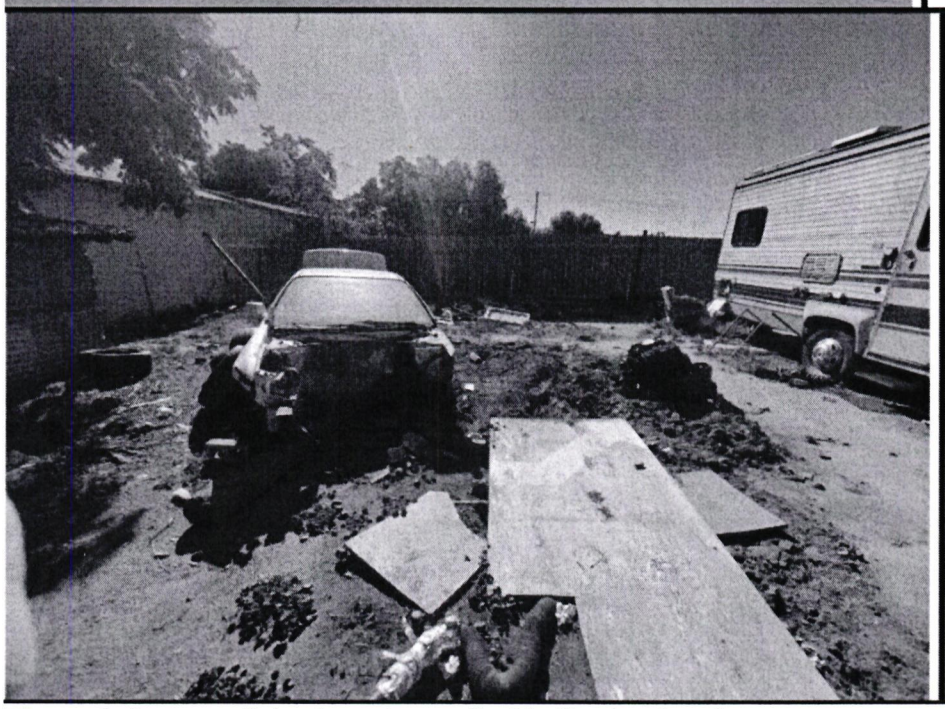
View to the southeast from the northwestern end.



Photograph Number 10:

APN 317-080-022, 317-080-019, 317-080-020

Representative view of debris-filled area with squatters.



Photograph Number 18:

APN 317-080-027

One of two suspected make-shift septic systems. Disabled car and debris. Occupied RVs, shed, and garage.

Figure 2. Images of site from Appendix I indicating low-income non-permanent housing on site that will displace additional residents not accounted for in analysis.



Photograph Number 18:

APN 317-080-027

One of two suspected make-shift septic systems. Disabled car and debris. Occupied RVs, shed, and garage.

3. The County asserts that the AB 98 compliance analysis was 'only for informational purposes and it is therefore not obligated to do it correctly and address the missing pieces where the project is not compliant such as 2:1 housing replacement, truck routes, and tenant protections. As a result, the Lead Agency is providing misinformation for decision-makers and the public and we note that for the administrative record that the project is noncompliant and the cherry-picking of the Lead Agency in which AB 98 provisions to include is misleading.
4. The County acknowledges that it has not analyzed the recreational park's siting in an industrial corridor by the County planning agency and the surrounding foundation general plan amendments for projects GPA 240004 to the east, 240027 to the south, and 240022 to the north, west, and south. Obviously, recreational parks for children shouldn't be sited in an industrial corridor. The Lead Agency fails to analyze for this. The adjacent warehouses and proposed surface pit mine are likely to adversely affect the air quality, noise, and usability of a recreational park and should be appropriately analyzes as negative impacts for the sensitive receptor of a recreational park. Given that the park is the community benefit, its siting is of critical importance and locating in an industrial corridor is incompatible with the County's adopted Healthy Communities and Environmental Justice policies HC 1.1, HC1.2, HC2.1, HC2.2, HC3.2, HC6.2, HC9.1, HC9.5, HC10.2, HC 10.7, HC 14.1, HC 14.2, HC 16.8, HC 18.7, HC 18.9, HC 18.12 and HC 22.4.
5. The agency is required to assess compatibility with the RCTC transit oriented communities' strategies under the County's circulation, housing, and healthy community policies. Demolishing homes is inconsistent with state and county policy to increase transit ridership by densifying communities around transit hubs. Specifically, it is inconsistent with policies HC3.1, HC3.2, HC5.4, HC 6.1, HC6.2, HC6.3, HC9.1, HC9.5, HC14.2, HC16.10, and HC18.7 in the Healthy Communities element, Housing policies H1.5, H5.4, and H5.6, and Circulation

policies C1.1, C1.7, C3.8 (no truck routes through community centers), C11.2, C11.3, C11.4 (new development near transit corridor), C12.1, C12.5 (transit oasis), and C12.6 (community center).

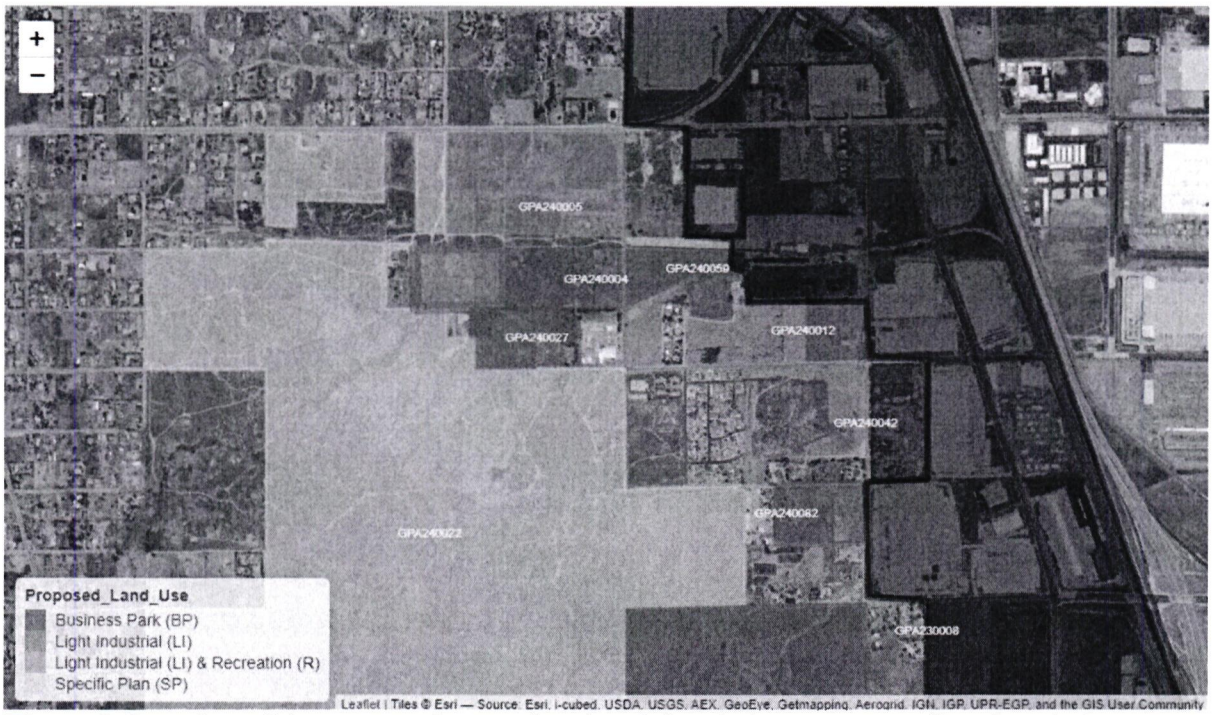


Figure 3. Location of the proposed recreational park in relation to surrounding foundation general plan amendment projects that are all industrial warehouses or quarries incompatible with a sensitive receptor area.

6. The County asserts that warehouse megaprojects such as Stoneridge Commerce Center and the World Logistics Center do not need to be included because they are too far from the project at 5 miles and 8 miles away and do not directly contribute to traffic on Cajalco Road. This, of course, ignores those project air pollution, traffic, and housing impacts on the region. In contrast, the County asserts that housing units in Mecca CDP in the Eastern Coachella Valley are interchangeable with Mead Valley and count towards mitigating displacement risk and the total housing inventory, despite being 70 miles away. If the housing displacement is somehow a regional county-wide issue then the warehouses within an easy 10-mile commute should also be included in this analysis for their impacts on jobs and pollution. This is extremely important to consider as a regional issue because the regional warehouse impacts are all accruing to the same major freight corridors on the 215/60.
7. The County asserts that the list of cumulative impacts should be frozen as of the date of the NOP, which was in June 2023. However, I look at it in a different way. The cumulative impacts of the additional 1,100 acres of residential rezones is **Significant New Information** that requires recirculation of the draft EIR as specified under § 15088.5. The additional 1,100 acres of residential rezones to industrial under the Foundation General Plan Amendment is new information, not available at the NOP period, which is a significant impact. The community is being deprived of the opportunity to comment on these as cumulative impacts by the County's own admission. Therefore, this requires recirculation of the draft EIR with a

full disclosure of all cumulative impacts from residential rezone projects in Mead Valley. Moreover, the additional projects of New Perris Commerce Cetner, Perris Valley Towne Center, Ethanac Logistics Center, etc. are also new cumulatively considerable impacts. The sheer number of projects within 10 miles that have been added is itself evidence that recirculation is required as the Cumulative Impacts Analysis is clearly a woeful underestimate.

8. Mead Valley disproportionate burden of warehousing is incompatible with adding more warehouses, as indicated by the Healthy Communities policies HC10.7, HC 14.2, and most explicitly HC 15.8 that creates a cap on the number of pollution sources within EJ communities. As Mead Valley is the most burdened community for warehousing impacts, a cap on new warehouses is the obvious remedy. Additionally, policy HC 18.12 prioritizes safe and affordable housing in EJ communities while at the same time minimizing the displacement of existing residents, considering Housing Element goal 2, Action 2.1h.
9. The County asserts that No Net Loss policies should be narrowly interpreted and ignores that the project is literally parcel adjacent to urbanized areas to both the east and west of the project. It is an urbanized area 'hole' and the adjacent should be sufficient to trigger the consideration of replacement housing.

New information

Failure to Affirmatively Further Fair Housing via Discriminatory Practices

In addition to the previous responses to the County, it is important to note the cumulative impacts of the foundation general plan amendments. The Project is part of the County's Foundation General Plan Amendment process, an 8-year planning cycle to amend the General Plan holistically. Mead Valley community received 15 of the 76 proposed projects for general plan amendments in the County, and 13 of those 15 projects sought industrial rezones from residential. The entire rest of the county had 6 out of the remaining 61 projects general plan amendments for business park, light industrial, or specific plans that would allow warehouse land uses. In other words, Mead Valley has over 60% of the total possible industrial rezone projects in the unincorporated County and has 80% of its project seeking industrial rezones, whereas other parts of the county are at a ratio of 10% of projects seeking industrial rezones. Cumulatively, the combined projects would increase the industrial area within Mead Valley from 13.3% to 22.8% of the land use. An industrial land corridor map displayed at a town hall meeting in Mead Valley indicated a doubling of the industrial corridor area to approximately 3,170 acres which would make at least 100 other residential housing units non-conforming uses as shown in **Figure 4.**

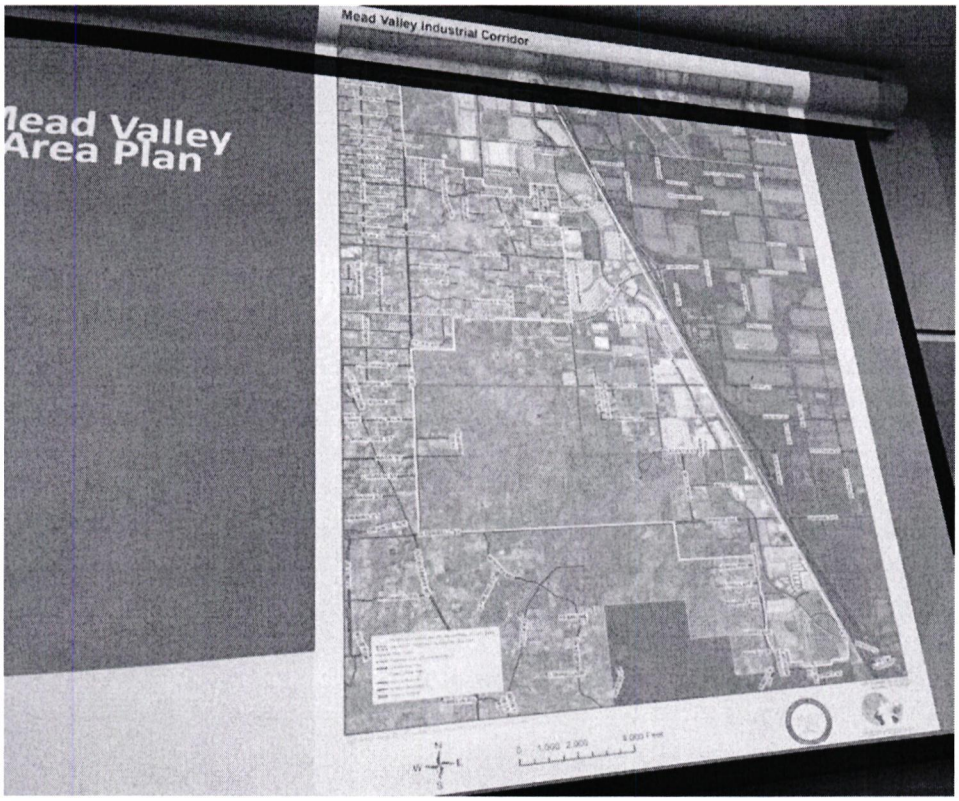


Figure 4. Image of proposed new industrial corridor area in Mead Valley displayed at Town Hall October 15, 2025 by Riverside County staff and elected officials.

Mead Valley's population of 19,600 is 82.5% Hispanic, with 75% of the community speaking Spanish at home and 39% being foreign born[3]. There are 4,300 households. Most of Mead Valley is designated as disadvantaged by the State and County. Nearby unincorporated communities of Woodcrest, Nuevo, and Lake Mathews have either residential, commercial, or no projects proposed in the Foundation General Plan Amendment Cycle; none have any industrial rezoning.

The County improperly asserts that the project is needed more than homes to address the County imbalance in the jobs/housing ratio (see Section 4.15 – housing and land use). However the relative ratio of jobs/housing in the County as-a-whole is the incorrect metric since most unincorporated communities are not within the job's radius of this warehouse project. The appropriate metric is the ratio of jobs/housing **in Mead Valley.** Mead Valley has one of the highest ratios of jobs/housing in the whole unincorporated County, as shown in Table P-3 of the Housing Element – with 2018 estimates of 8,039 employed population and 4,717 housing units for a jobs:housing ratio of 1.74. Western Riverside County's ratio is 101,364 employed population and 78,231 housing units for a ratio of 1.29, while the unincorporated County as a whole is 120,100 employed population and 106,558 housing units, for a ratio of 1.13. SCAG states that a job-housing ratio should be 1.36 jobs per housing unit is considered a balanced housing ratio; Mead Valley's job-housing ratio in the housing element Table P-3 is 1.74, which is considered by SCAG to be a 'jobs-rich' area, not a housing-rich area. In contrast, nearby Woodcrest has a jobs-housing ratio of 1, which is jobs-poor, but has no industrial zoning or residential structures under consideration for demolition.

[3] https://datausa.io/profile/geo/mead-valley-ca/

Every comment made in the response to comments that cites the 'jobs-housing balance' in the County is therefore inaccurately applied. Eastern Riverside County has a poor jobs-housing balance but is 50 miles away. Mead Valley in 2018 was a jobs-rich area. However, in 2018, Mead Valley had only begun its industrial warehousing boom with 209 acres of warehouses built (~5 million square feet). Today in 2025, that number climbed to almost 250% to 693 acres of built warehouses in the industrial corridor, providing thousands of additional jobs while the population went from 19,925 residents in 2018 to 19,588 in 2023 – losing population.

Thus, in contrast to the assertions by the County, this area needs homes and doesn't need jobs. It is other unincorporated communities that needs jobs and don't need more residential structures. This is all according to its own housing element.

Table P-3 Population, Households, and Employment Distribution, 2018

Planning Area	Population	% of Total	Housing Units	% of Total	Households	% of Total	Employed Population	% of Total
Unincorporated Communities in the Western County								
Aguanga CDP	835	0.3%	554	0.5%	337	0.4%	411	0.3%
Anza CDP	3,151	1.0%	1,313	1.2%	1,041	1.2%	1,158	1.0%
Cabazon CDP	3,367	1.1%	1,030	1.0%	973	1.1%	1,286	1.1%
Cherry Valley CDP	7,755	2.5%	2,946	2.8%	2,836	3.1%	3,275	2.7%
Coronita CDP	3,138	1.0%	769	0.7%	738	0.8%	1,659	1.4%
East Hemet CDP	20,679	6.8%	6,269	5.9%	5,766	6.4%	8,509	7.1%
El Cerrito CDP	5,471	1.8%	1,524	1.4%	1,464	1.6%	2,345	2.0%
El Sobrante CDP	13,966	4.6%	4,055	3.8%	4,055	4.5%	6,908	5.8%
French Valley CDP	33,818	11.1%	8,808	8.3%	8,539	9.4%	14,877	12.4%
Good Hope CDP	9,173	3.0%	2,341	2.2%	1,977	2.2%	3,832	3.2%
Green Acres CDP	2,542	0.8%	728	0.7%	666	0.7%	1,017	0.8%
Highgrove CDP	4,986	1.6%	1,477	1.4%	1,382	1.5%	2,568	2.1%
Home Gardens CDP	11,442	3.7%	3,108	2.9%	3,059	3.4%	5,268	4.4%
Homeland CDP	7,326	2.4%	2,326	2.2%	2,100	2.3%	2,925	2.4%
Idyllwild-Pine Cove CDP	2,459	0.8%	4,142	3.9%	1,145	1.3%	1,271	1.1%
Lakeland Village CDP	13,170	4.3%	3,814	3.6%	3,558	3.9%	5,919	4.9%
Lake Mathews CDP	6,848	2.2%	1,977	1.9%	1,895	2.1%	3,363	2.8%
Lake Riverside CDP	1,049	0.3%	397	0.4%	317	0.4%	391	0.3%
Lakeview CDP	2,566	0.8%	590	0.6%	549	0.6%	1,174	1.0%
March ARB CDP	1,150	0.4%	755	0.7%	492	0.5%	272	0.2%
Meadowbrook CDP	3,033	1.0%	995	0.9%	888	1.0%	1,298	1.1%
Mead Valley CDP	19,925	6.5%	4,717	4.4%	4,382	4.8%	8,039	6.7%
Nuevo CDP	7,033	2.3%	1,954	1.8%	1,852	2.0%	1,954	1.6%
Romoland CDP	2,227	0.7%	543	0.5%	520	0.6%	543	0.5%
Temescal Valley CDP	26,709	8.7%	8,551	8.0%	8,084	8.9%	8,551	7.1%

Table 2 - Table P-3 from County Housing element[4].

In addition, the jobs-housing balance argument is especially inaccurate given the large numbers of adjacent warehouses adjacent to Mead Valley. March JPA, Perris, Moreno Valley, Riverside, and Menifee all have significant existing warehouses, entitled warehouses, and under environmental review warehouse as repeated *ad nauseum*. Tearing down 26 residential homes to build yet another warehouse is ridiculous.

[4] https://planning.rctlma.org/sites/g/files/aldnop416/files/2024-07/County%20of%20Riverside%206th%20Cycle%20Housing%20Element.pdf

Speculative Warehouse

The project assumes, without justification, that a speculative warehouse will provide jobs and economic value to the community. However, there are significant headwinds in the logistics industry right now, including global tariffs, increasing vacancies, decreasing rents, and accelerating automation. As a result, it is imperative that the economic justification for a 'speculative' warehouse with no tenant is justified.

Colliers Q3 2025 industrial real estate reports that net absorption of warehouse space was negative in the IE, vacancies are at the highest rate in more than 10 years, and there is 49.3M square feet of vacant rental space available – a factor of 50x higher than the Q1 2022 vacancies. See attachment.

CommercialCafe[5] and Commercial Search[6] provide for lease industrial real estate listings by community and it shows 10 industrial buildings available in Mead Valley – and 38 in the greater Perris area. Developers will claim this is only smaller buildings, but over 20 industrial buildings over 400,000 sf were vacant within 10 miles of the project site.

The project is being dumped into a harsh economic environment and the project has no tenant – it is a speculative warehouse – a gamble. All of the purported benefits of the project are speculative and dependent on a logistics industry turnaround during a time of rising international tariffs[7] with Asia-Pacific trade partners.

Specifically, the project is claiming it is necessary to expand goods movement, supply chain uses, and light industrial buildings in Mead Valley for 'employment-generating' purposes while providing no guarantee that the project will not be a dark warehouse full of robots independent of human labor[8]. Robots don't pay taxes and aren't employed.

Conclusion

We hope that you take the time to review and address these comments with the seriousness they deserve. This project should be rejected in favor of a medium or high-density residential rezone to take advantage of the planned Mead Valley Metrolink Transit Hub mobility station. This is a jobs-rich community that needs more housing to take advantage of the rich existing jobs situation in Mead Valley, not more warehouses.

Sincerely,

Michael McCarthy, PhD
Sierra Club
Moreno Valley/Box Springs Group
Co-Conservation Chair
Email: mikem@radicalresearch.llc

---

[5] https://www.commercialcafe.com/commercial-real-estate/us/ca/mead-valley/

[6] https://www.commercialsearch.com/commercial-real-estate/us/ca/mead-valley/

[7] https://fortune.com/2025/10/19/trump-trade-war-not-looking-to-destroy-china-tariffs-xi-jinping-rare-earth-export-controls/

[8] https://envistacorp.com/blog/dark-warehouse-advantages-disadvantages/

P.O. Box 1325
Moreno Valley, CA 92556-1325

Q3 2025 | INDUSTRIAL

Inland Empire

OVERALL VACANCY RATE
7.5% ▲ YOY ▲ Forecast

NET ABSORPTION (SF)
-222K ▼ YOY ▲ Forecast

UNDER CONSTRUCTION (SF)
6.7M ▼ YOY ▼ Forecast

OVERALL ASKING LEASE RATES (NNN)
$1.05/SF ▼ YOY ▼ Forecast

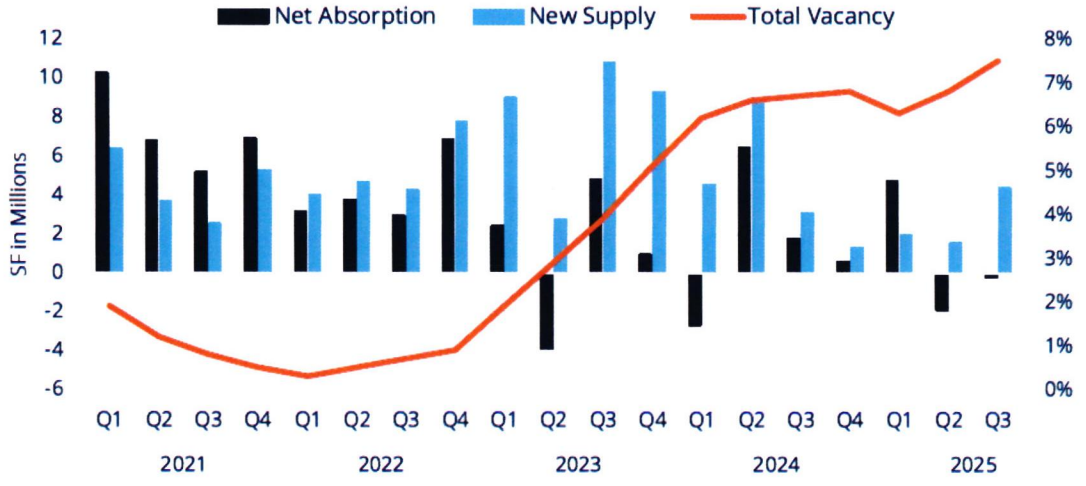
MARKET TRENDS

- Vacancy climbs 70 basis points to 7.5% as net absorption remains in red figures at -222K SF.
- Construction activity drops below 10M SF for the first time in twelve years.
- Average asking rent continues downward trend, dropping $0.03 (-2.6%) quarter-over-quarter and $0.59 (-36%) from the peak in Q2 2023.
- 4.4M SF of new supply was added during the quarter, pushing availability up 40 basis points to a 14-year high of 11.2%.
- Gross Activity recorded 11.7M SF of transactions in Q3, bringing the year-to-date total to 36M SF, the highest three-quarter total since 2022.
- 49.3M SF currently sits vacant in the Inland Empire, a stark contrast to the 1.9M SF posted in Q1 2022.

HISTORIC COMPARISON

	Q3 2024	Q2 2025	Q3 2025
Total Inventory (SF)	646,046,861	651,516,417	656,003,077
New Supply (SF)	3,115,678	1,549,053	4,385,492
Net Absorption (SF)	1,773,292	-1,898,994	-221,508
Overall Vacancy Rate	6.7%	6.8%	7.5%
Under Construction (SF)	12,004,176	10,669,105	6,675,213
Overall Asking Lease Rates (NNN)	$1.22	$1.08	$1.05

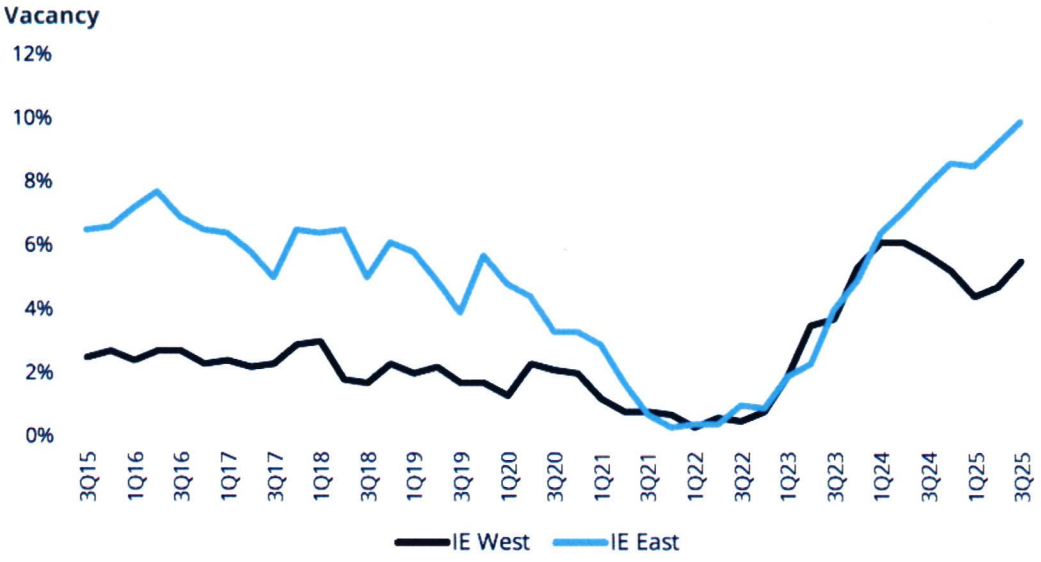
MARKET GRAPH



Key Statistics

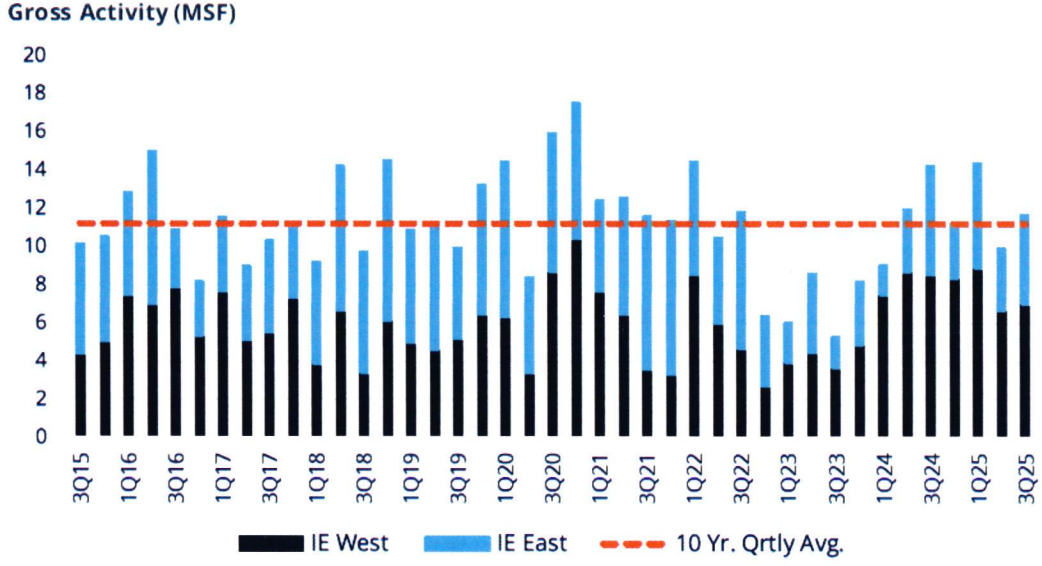
Vacancy & Availability

Vacancy in the Inland Empire rose 70 basis points to 7.5%, following a 50-basis-point increase in the prior quarter. In the West, despite positive net absorption, vacancy climbed 80 basis points as 3M SF of new supply hit the market. In the East, vacancy increased 70 basis points to 9.9%, driven by negative absorption and 1.4M SF of new deliveries. Availability mirrored the trend in the West, rising 100 basis points to 9.6%, while the East edged down 20 basis points to 13.1%. Sublease availability declined to 14.9M SF, down 185K SF from Q2 and 3.6M SF below the Q1 2024 peak. The number of large vacant blocks over 200,000 SF grew from 74 to 79, totaling 33.8M SF. Vacancy remains elevated in the 100,000–249,999 SF and 250,000–499,999 SF size ranges, at 8.5% and 11.6%, respectively, underscoring continued softness in the lower tranches of the big-box segment.



Net Absorption & Gross Activity

Despite 11.7M SF of gross activity, new move-ins could not outpace move-outs in Q3, with net absorption registering -221,508 SF. The West posted 388K SF of positive net absorption with 2.3M SF positive year-to-date. In the East, demand stayed in the red at -610K SF, though year-to-date absorption is still positive at 357K SF. Gross activity has surpassed 36M SF in 2025, marking the highest total through the first three quarters since 2022. Thirty-one leases over 100,000 SF were signed, accounting for 78% of all Inland Empire leasing activity. With tariff policies becoming clearer and interest rate cuts on the horizon, demand in the region is expected to remain strong as companies grow more comfortable making long-term commitments.

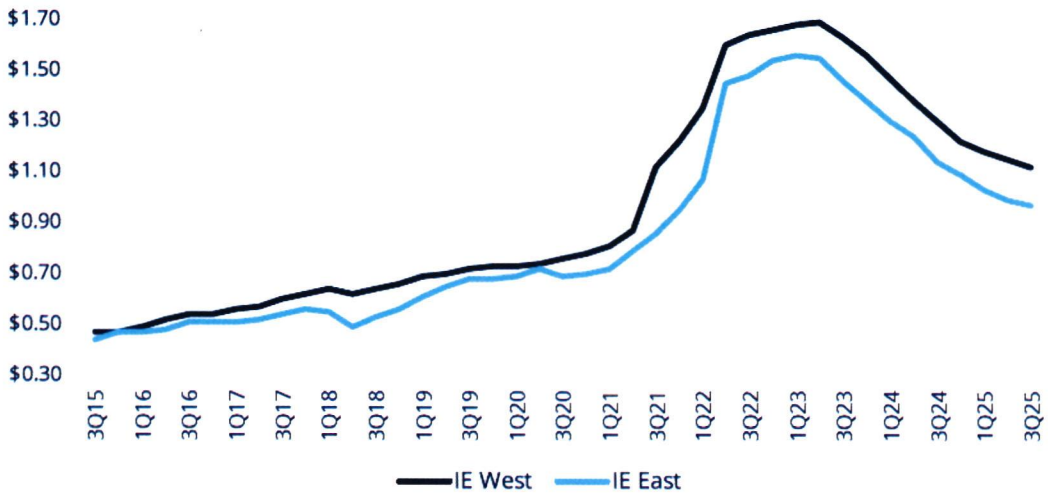


Key Statistics

Rental Rates

Average asking rents in the Inland Empire declined for the ninth consecutive quarter, falling to $1.05 NNN per square foot in Q3 2025. Rents are now down 36% from the Q2 2023 peak of $1.64. The West slipped $0.03 to $1.12, while the East fell $0.02 to $0.97, returning to levels last seen three years ago. This correction reflects a market still normalizing after the pandemic-era surge, as rising availability and tenant caution continue to temper rent growth. Despite two years of declines, asking rents remain 50% above pre-pandemic levels, underscoring the market's long-term strength even as current conditions favor occupiers. With vacancy at 7.5% and an availability rate of 11.2%, the Inland Empire remains several quarters away from any potential rent growth.

Avg. Direct NNN Asking Rent



Construction

Developers remain cautious, as construction starts have slowed significantly since mid-2024. Year-to-date starts total 2.2M SF, with 35% pre-leased. Currently, 6.7M SF is underway, with 4.6M SF, or 70%, scheduled to deliver within the next six months. Q3 2025 marks the first quarter since Q1 2013 in which construction activity has dipped below 10M SF. Just three years ago, the region peaked at 42.6M SF of construction activity. Since then, total deliveries have amounted to 65M SF. There are 12 buildings over 100,000 SF underway, three of which are pre-leased, totaling 2.5M SF. Since 2019, the Inland Empire has delivered 138M SF of warehouse and distribution space, reinforcing its position as the nation's premier distribution market.

Development Activity (MSF)



Significant Sale Activity

ADDRESS	SIZE SF	SALE PRICE	PRICE PSF	BUYER	SELLER
22491 Harley Knox Blvd, Perris	648,375	$90.6 Million	$260	Cabot Properties	Sares Regis Group
Banana & Rose Commerce Center, Fontana	332,793	$83.5 Million	$251	Bridge Logistics Properties	Hillwood
7190 Jurupa Ave, Riverside	111,725	$20.0 Million	$179	Orbis Real Estate Partners	Mirae Asset Global Investments
168 Spruce Ave, Rialto	81,455	$21.0 Million	$258	New Legend Inc.	Lippert Components
510 Magnolia Ave, Ontario	63,206	$19.3 Million	$305	ABA Industry Inc.	Hot Focus Inc.

Significant Lease Activity

ADDRESS	SIZE SF	LEASE TYPE	SUBMARKET	LESSEE	LESSOR
5690 Industrial Pkwy, San Bernardino	844,311	New Lease	East	IDC Logistics	Alere Property Group
13052 Jurupa Ave, Fontana	827,578	New Lease	West	Elogistek	Principal
2825 Jurupa St, Ontario	612,083	New Lease	West	JCR Logistics	Link Logistics
300 Tippecanoe Ave, San Bernardino	600,240	New Lease	East	Kuhmo Tires	Clarion Partners
13423 Santa Ana Ave, Fontana	484,643	New Lease	West	Western Post	EQT Real Estate

Significant Developments

ADDRESS/PROJECT NAME	SIZE SF	SUBMARKET	EST. COMPLETION	DEVELOPER	STATUS
World Logistics Center	950,530	East	Q4 2025	Highland Fairview	BTS
North Rialto Distribution Center	468,563	East	Q2 2026	Clarion Partners/BLP	Under Construction
Almond Distribution Center	275,560	West	Q2 2026	Brookfield Properties	Under Construction

Industrial Submarket Statistics

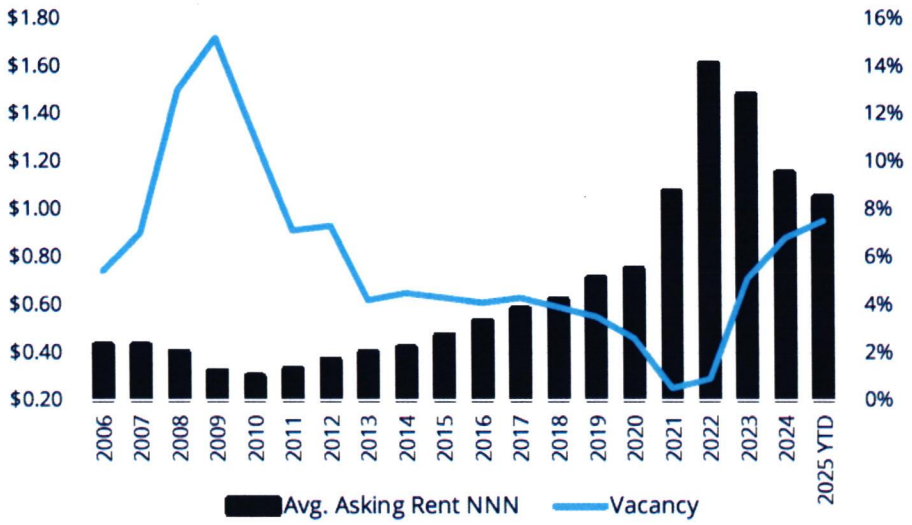
SUBMARKET	TOTAL INVENTORY SF	NEW SUPPLY CURRENT QTR	U/C SF	VACANCY RATE	VACANCY RATE PRIOR QTR	AVAIL RATE	USER SALES SF	NEW LEASING SF	GROSS ACTIVITY CURRENT QTR	GROSS ACTIVITY YTD	NET ABSORP CURRENT QTR	NET ABSORP YTD	AVG DIRECT ASKING RATE (NNN)
West Inland Empire													
Chino	56,240,122	0	0	4.2%	2.5%	7.2%	98,308	954,153	1,052,461	4,420,450	-912,028	-388,047	$1.14
Fontana	72,732,969	1,814,822	593,465	5.8%	4.8%	7.5%	78,340	1,862,324	1,940,664	4,104,054	939,126	1,477,384	$1.08
Jurupa Valley / Eastvale	52,475,465	0	0	6.3%	5.0%	14.0%	0	478,267	478,267	1,505,059	-642,043	-793,914	$1.12
Ontario	124,581,257	1,192,456	2,776,631	5.0%	5.0%	8.7%	11,067	3,086,774	3,097,841	10,663,245	1,120,365	2,646,368	$1.13
Rancho Cucamonga	43,363,245	0	151,455	6.8%	6.4%	13.2%	0	452,458	452,458	1,863,950	-117,067	-651,955	$1.13
Subtotal	**349,393,058**	**3,007,278**	**3,521,551**	**5.5%**	**4.7%**	**9.6%**	**187,715**	**6,833,976**	**7,021,691**	**22,556,758**	**388,353**	**2,289,836**	**$1.12**
East Inland Empire													
Banning / Beaumont	12,456,487	0	0	8.1%	8.1%	16.6%	0	0	0	0	0	1,017,845	$0.70
Colton	8,095,152	417,809	182,123	6.1%	2.5%	11.7%	15,908	251,398	267,306	732,049	115,663	535,686	$1.03
Corona	31,566,251	0	0	4.9%	4.7%	6.8%	52,782	363,517	416,299	1,398,734	17,955	411,770	$0.99
Moreno Valley	32,750,862	0	983,040	9.3%	9.9%	12.5%	0	228,487	228,487	538,744	186,534	-1,268,826	$0.91
Perris	46,784,079	429,823	855,330	14.3%	11.0%	18.2%	24,030	277,130	301,160	3,169,394	-1,177,719	1,234,933	$0.99
Redlands / Loma Linda	30,468,751	208,000	356,791	10.6%	9.8%	11.5%	40,454	64,398	104,852	1,170,297	-64,122	-461,252	$0.91
Rialto	44,331,419	261,632	547,471	8.5%	9.0%	13.9%	12,000	1,214,384	1,226,384	2,140,072	499,705	69,530	$1.04
Riverside	56,477,345	60,950	200,227	9.3%	7.6%	13.1%	120,450	226,740	347,190	994,593	-953,858	-819,416	$1.03
San Bernardino	43,679,673	0	28,680	11.8%	13.5%	12.6%	0	1,823,637	1,823,637	3,394,152	765,981	-362,935	$0.93
Subtotal	**306,610,019**	**1,378,214**	**3,153,662**	**9.9%**	**9.2%**	**13.1%**	**265,624**	**4,449,691**	**4,715,315**	**13,538,035**	**-609,861**	**357,335**	**$0.97**
Inland Empire Overall													
Total	**656,003,077**	**4,385,492**	**6,675,213**	**7.5%**	**6.8%**	**11.2%**	**453,339**	**11,283,667**	**11,737,006**	**36,094,793**	**-221,508**	**2,647,171**	**$1.05**
Historic Comparison													
Q2 2025	651,516,417	1,549,053	10,669,105	6.8%	6.3%	10.8%	457,483	9,480,382	9,937,865	24,357,170	-1,898,994	2,868,679	$1.08
Q1 2025	649,515,513	1,964,007	10,776,883	6.3%	6.8%	10.1%	296,367	14,122,938	14,419,305	14,419,305	4,767,673	4,767,673	$1.10
Q4 2024	647,292,401	1,321,839	12,265,678	6.8%	6.7%	10.3%	248,945	10,985,496	11,234,441	46,596,779	604,226	6,197,588	$1.15
Q3 2024	646,046,861	3,115,678	12,004,176	6.7%	6.6%	10.4%	623,369	13,671,538	14,294,907	35,362,338	1,773,292	5,593,362	$1.22
Q2 2024	642,652,125	8,962,976	16,057,150	6.6%	6.2%	10.7%	563,579	11,442,939	12,006,518	21,067,431	6,457,669	3,770,308	$1.31
Q1 2024	634,870,487	4,548,848	20,795,112	6.2%	5.1%	10.2%	418,042	8,642,871	9,060,913	9,060,913	-2,687,361	-2,687,361	$1.40

Industrial Submarket Statistics

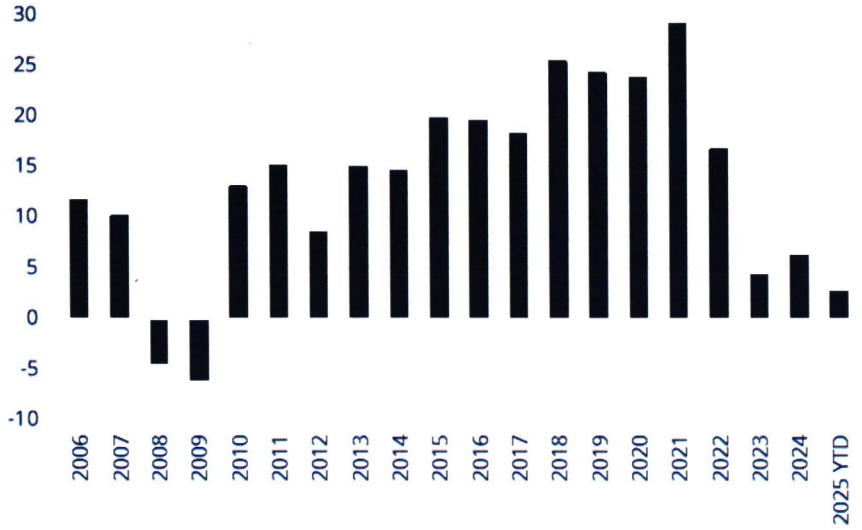
BUILDING SIZE RANGE	TOTAL INVENTORY SF	NEW SUPPLY CURRENT QTR	U/C SF	VACANCY RATE	VACANCY RATE PRIOR QTR	AVAIL RATE	USER SALES SF	NEW LEASING SF	GROSS ACTIVITY CURRENT QTR	GROSS ACTIVITY YTD	NET ABSORP CURRENT QTR	NET ABSORP YTD	AVG DIRECT ASKING RATE (NNN)
West Inland Empire													
10,000- 19,999	15,424,778	0	33,248	1.9%	2.0%	3.2%	11,067	130,184	141,251	431,663	30,838	-22,762	$1.19
20,000 - 39,999	22,569,235	0	39,628	2.9%	3.1%	4.9%	113,442	233,069	346,511	1,233,592	29,602	148,544	$1.24
40,000 - 69,999	25,024,984	46,092	188,444	3.8%	3.7%	8.5%	63,206	359,842	423,048	1,116,925	89,157	6,663	$1.14
70,000 - 99,999	17,696,804	0	73,509	5.6%	5.1%	7.5%	0	542,807	542,807	1,284,272	-84,197	135,551	$1.10
100,000- 249,999	74,627,292	357,453	396,484	6.5%	6.0%	11.2%	0	1,889,603	1,889,603	6,479,126	-65,473	1,602,842	$1.11
250,000- 499,999	86,021,626	254,677	635,520	5.9%	4.7%	9.3%	0	1,754,167	1,754,167	6,487,036	-763,257	-467,684	$1.11
500,000+	108,028,339	2,349,056	2,154,718	5.8%	4.8%	11.1%	0	1,924,304	1,924,304	5,524,144	1,151,683	886,682	$1.15
Subtotal	**349,393,058**	**3,007,278**	**3,521,551**	**5.5%**	**4.7%**	**9.6%**	**187,715**	**6,833,976**	**7,021,691**	**22,556,758**	**388,353**	**2,289,836**	**$1.12**
East Inland Empire													
10,000- 19,999	12,704,262	0	0	2.4%	2.4%	4.4%	121,956	114,808	236,764	455,091	-1,193	-29,420	$0.99
20,000 - 39,999	16,801,469	0	222,341	3.1%	3.2%	4.9%	77,308	174,228	251,536	606,816	26,728	37,069	$1.03
40,000 - 69,999	18,154,954	60,950	184,631	7.1%	6.4%	10.3%	66,360	205,266	271,626	907,593	-8,560	294,752	$1.06
70,000 - 99,999	13,138,779	0	0	7.9%	8.1%	12.4%	0	167,577	167,577	855,257	27,927	386,656	$0.95
100,000- 249,999	46,142,066	208,000	115,476	11.7%	11.5%	14.8%	0	825,447	825,447	2,630,860	159,243	843,785	$0.96
250,000- 499,999	55,123,159	1,109,264	825,354	20.6%	20.3%	26.0%	0	690,431	690,431	2,948,839	689,002	486,329	$0.99
500,000+	144,545,330	0	1,805,860	7.1%	6.1%	9.9%	0	2,271,934	2,271,934	5,133,579	-1,503,008	-1,661,836	$0.93
Subtotal	**306,610,019**	**1,378,214**	**3,153,662**	**9.9%**	**9.2%**	**13.1%**	**265,624**	**4,449,691**	**4,715,315**	**13,538,035**	**-609,861**	**357,335**	**$0.97**
Inland Empire Overall													
10,000- 19,999	28,129,040	0	33,248	2.1%	2.2%	3.8%	133,023	244,992	378,015	886,754	29,645	-52,182	$1.09
20,000 - 39,999	39,370,704	0	261,969	3.0%	3.2%	4.9%	190,750	407,297	598,047	1,840,408	56,330	185,613	$1.16
40,000 - 69,999	43,179,938	107,042	373,075	5.2%	4.9%	9.2%	129,566	565,108	694,674	2,024,518	80,597	301,415	$1.09
70,000 - 99,999	30,835,583	0	73,509	6.6%	6.4%	9.6%	0	710,384	710,384	2,139,529	-56,270	522,207	$0.97
100,000- 249,999	120,769,358	565,453	511,960	8.5%	8.0%	12.6%	0	2,715,050	2,715,050	9,109,986	93,770	2,446,627	$1.05
250,000- 499,999	141,144,785	1,363,941	1,460,874	11.6%	10.7%	15.8%	0	2,444,598	2,444,598	9,435,875	-74,255	18,645	$1.03
500,000+	252,573,669	2,349,056	3,960,578	6.6%	5.6%	10.4%	0	4,196,238	4,196,238	10,657,723	-351,325	-775,154	$1.06
Total	**656,003,077**	**4,385,492**	**6,675,213**	**7.5%**	**6.8%**	**11.2%**	**453,339**	**11,283,667**	**11,737,006**	**36,094,793**	**-221,508**	**2,647,171**	**$1.05**

Historical Statistics

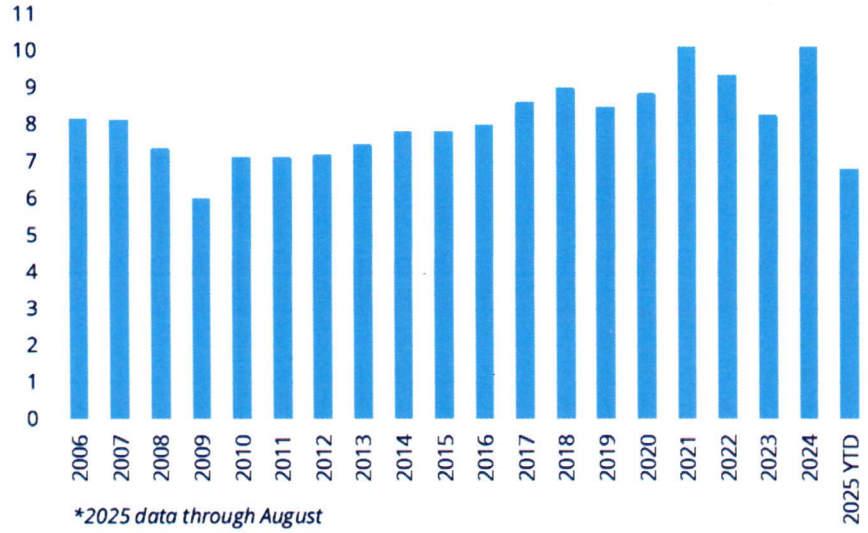
Historical Rent vs. Vacancy



Historical Annual Net Absorption (MSF)

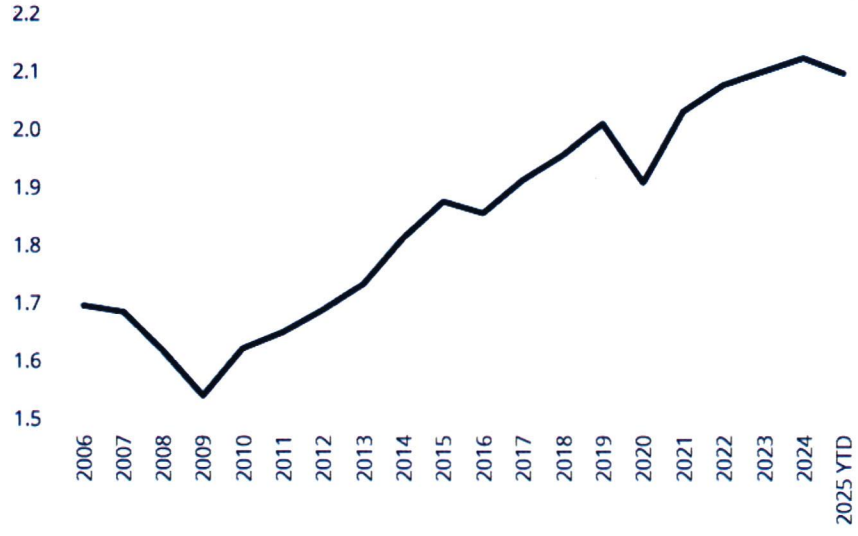


Port of L.A. & Long Beach Loaded Imports (TEUs in Millions)



**2025 data through August*

Inland Empire Employment (Jobs in Millions)



Market Criteria

Colliers' statistical tracked set for the Inland Empire includes all single and multi-tenant industrial properties above 10,000 square feet. Heavy manufacturing and data center facilities are excluded from the total tracked inventory.

Definitions

Availability Rate: Existing available SF divided by existing inventory.

Vacancy Rate: Existing vacant SF divided by existing inventory.

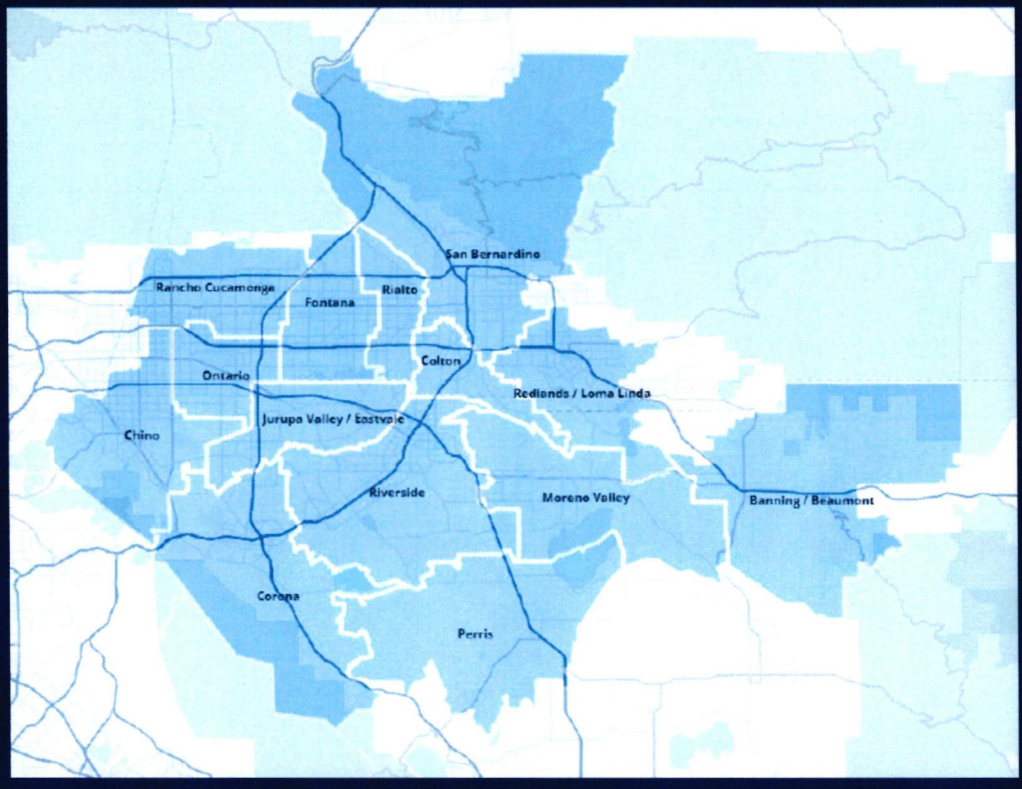
Gross Activity: Total new leases and user sales signed within a specific period.

Net Absorption: The net change in occupied SF quarter over quarter. New supply does not influence net absorption unless occupied upon completion.

Avg. Asking Rent: The average of all direct NNN rent weighted by direct available SF in each building.

New Supply: New construction delivered within a specific period.

Under Construction: A development that has officially broken ground and foundation work has begun.



Market Contacts

Matt Nelson
Senior Research Director
Greater Los Angeles
+1 949-724-5519
Matt.Nelson@colliers.com

Amanda Spangler
Senior Managing Director
Inland Empire/Orange County
+1 949-724-5513
Amanda.Spangler@colliers.com

This document/email has been prepared by Colliers for advertising and general information only. Colliers makes no guarantees, representations, or warranties of any kind, expressed or implied, regarding the information, including but not limited to, warranties of content, accuracy, and reliability. Any interested party should undertake their own inquiries as to the accuracy of the information. Colliers excludes unequivocally all inferred or implied terms, conditions, and warranties arising out of this document and excludes all liability for loss and damages arising therefrom. This publication is the copyrighted property of Colliers and/or its licensor(s). © 2025 Colliers Greater Los Angeles Inc. All rights reserved. This communication is not intended to cause or induce breach of an existing listing agreement.

Boydd, April

From: Mark Jessen <mclnjessen@gmail.com>
Sent: Sunday, October 19, 2025 8:38 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Mark Jessen
92508

Boydd, April

From: L S <nichole19161@gmail.com>
Sent: Monday, October 20, 2025 5:19 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Everyone knows the Inland Empire is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in Mead Valley, which we all know is an Environmental Justice community. The Cajalco Commerce Center will demolish existing homes during a housing crisis and cause further harm to the air quality, traffic, road conditions and safety of local residents.

Have you not driven on the 215? Constant big rigs spewing their toxins and boxing in smaller vehicles while they take up all lanes of the 215 and 60, not to mention how badly they've ruined all the roads in our area of Mead Valley, Perris, Moreno Valley and Riverside.

Please VOTE NO on the Cajalco Commerce Center. This area of the County is already burdened with more than our share of warehouses and we do NOT need another square inch of warehouses in our region. Enough is enough! Vote for your constituents' health, not the warehouse developers' greed.

Respectfully,

Laura Sandidge
92508

Boydd, April

From: James Castrejon <seahawktoon@gmail.com>
Sent: Tuesday, October 21, 2025 6:59 AM
To: Clerk of the Board
Subject: Vote No on Cajalco Commerce Center

Dear Board Members,

I urge you to **vote NO** on the Cajalco Commerce Center project.

Approving another warehouse project sends the message that Mead Valley is only suitable for industrial use, when in reality, it could be so much more. If we continue down this path, all companies will see that our area is an over-saturated warehouse zone, not a community worth investing in long-term.

Instead of filling valuable land with more warehouses, we should be encouraging development that brings lasting value — **offices, local businesses, mixed-use spaces, housing, and recreational areas** that serve residents and attract a broader range of industries.

Allowing this project to move forward as-is risks setting a precedent that limits our community's future potential.

If the warehouse component were removed and replaced with developments that truly benefit the people who live here, I would be much more supportive.

Please help us preserve and elevate Mead Valley's future, not limit it to warehouse waste.

Sincerely,

James Castrejon

10/21/2025
23.1

Boydd, April

From: Amy Castrejon <amy.cas1@gmail.com>
Sent: Tuesday, October 21, 2025 6:50 AM
To: Clerk of the Board
Subject: Opposition to Cajalco Commerce Center – Request to Vote No

Dear Board Members,

I respectfully urge you to vote **no** on the proposed Cajalco Commerce Center in Mead Valley.

Our community already struggles with the growing number of warehouses that sit empty or underutilized. Approving this project would further shift valuable land away from community-serving purposes like housing, parks, and recreational spaces that enhance residents' quality of life.

We do not want to see a precedent set that encourages more rezoning for warehouse developments in our area. These projects contribute to increased traffic, worsen air quality, and offer minimal long-term benefit to local residents.

If the warehouse component were removed, and efforts were made to create space for local businesses, green areas, or other resources that support public health and community well-being, I would be more open to the project.

Please consider the long-term needs of the Mead Valley community and vote no.

Thank you for your time and service.

Best regards,

Amy Castrejon

Mead Valley Resident

Boydd, April

From: Jairo Carbajal <perrisneighborsinaction@gmail.com>
Sent: Tuesday, October 21, 2025 6:00 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region.

Sincerely,

Yesenia Contreras
Jairo Carbajal
Perris Neighbors In Action

Boydd, April

From: Victoria Camarena <victoriancamarena@gmail.com>
Sent: Tuesday, October 21, 2025 7:32 AM
To: Clerk of the Board
Cc: Supervisor Medina - 1st District; Office of 2nd District Supervisor; District3; District 4 Supervisor V. Manuel Perez; District 5
Subject: Public Comment for BOS Meeting 10/21 on AGENDA ITEM 23.1

To whom it may concern:

My name is Victoria and I am a resident of Mead Valley. I am opposed to the Cajalco Commerce Center. This project will have significant and unavoidable impacts on air quality. Our community deserves better. Even with the last minute changes to the conditions of approval, this project does not provide enough for the community.

At the recent Mead Valley Townhall, residents came in numbers and voiced their concerns and frustrations over the rezonings of rural land for more warehouses. These GPAs are irresponsible and detrimental to the community. The developer lies at their "community meetings" and misinforms residents on the warehouse component of the project. And they neglect to include local grassroots organizations like Mead Valley Coalition for Clean Air in these meetings.

In addition, the approval of this project will create a domino effect of approval for all the other GPAs lined up in Mead Valley (which, of course, are rezones for business park and industrial). With workshops coming up to work on a Mead Valley Community Plan, I urge the supervisors to listen to the community's input before voting on this harmful project. The developer is offering mere crumbs when compared to the devastation this project would bring to the Mead Valley community. As a Mead Valley resident and a constituent of Riverside County, I urge you to vote NO on the Cajalco Commerce Center.

Regards,
Victoria Camarena
92570

Boydd, April

From: Acquia Mail
Sent: Monday, October 20, 2025 11:10 PM
To: zavalalydia.2007@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251021.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on October 20, 2025

Submitted values are:

First Name
Lydia

Last Name
Zavala

Address (Street, City and Zip)
23195 Wildwood Ln

Phone
(951) 796-5948

Email
zavalalydia.2007@gmail.com

Agenda Date
10/21/2025

Agenda Item # or Public Comment
23.1

State your position below

Oppose

Do you need a Spanish translator?
No

Comments
As a resident in Mead Valley who chose to live in a rural area we are opposed to more empty warehouses, more traffic, (it already takes me about 30 minutes to drop of my child to school) or potholed on our roads. We do not want our children getting sick from the exhaust and pollution from the big rigs. None of these warehouses benefit our community in any shape or form

Boydd, April

From: Debbie Walsh <abilene149@gmail.com>
Sent: Monday, October 20, 2025 8:02 PM
To: Setser, Jennifer; District 5; Supervisor Medina - 1st District; Office of 2nd District Supervisor; District 4 Supervisor V. Manuel Perez; District3; Brady, Russell; Clerk of the Board
Subject: Cajalco Warehouse Project Agenda Item 23.1
Attachments: OctBOSCajalcoCommereRAMVletter2025.pdf

The Rural Association of Mead Valley and RAGLM are adamantly opposed to the Cajalco Commerce Center in Mead Valley.

Please find the attached letter opposing this project. Please add this letter to the administrative record.

Debbie Walsh

RAMV
Debbie Walsh
PO Box 2244
Perris, CA 92572

October 20, 2025

Riverside County Board of Supervisors
P.O. Box 1409
Riverside, CA 92502-1409
rbrady@rivco.org

Riverside County Board of Supervisors
4080 Lemon Street
Riverside, CA 92501

***Re: Agenda Item** 23.1* **GENERAL PLAN AMENDMENT NO. 240005 (Foundation Component)**
Cajalco Commerce Center (Mead Valley Commerce Center)

Greeting Supervisors:

On behalf of concerned residents throughout the region, the Residents Association of Greater Lake Mathews (RAGLM) and the Rural Association of Mead Valley (RAMV) representing over 35,000 residents, please accept these comments in opposition to the Cajalco Commerce Center (Warehouse).

"Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts.
However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse." (Rob Bonta, Department of Justice, July 19, 2023).

A 1.2 million sq ft. warehouse just feet from this Project in the Industrial Corridor is sitting empty and cannot be subleased. Numerous other warehouses have been built on speculation and are empty within the Industrial Corridor already zoned for warehouses.

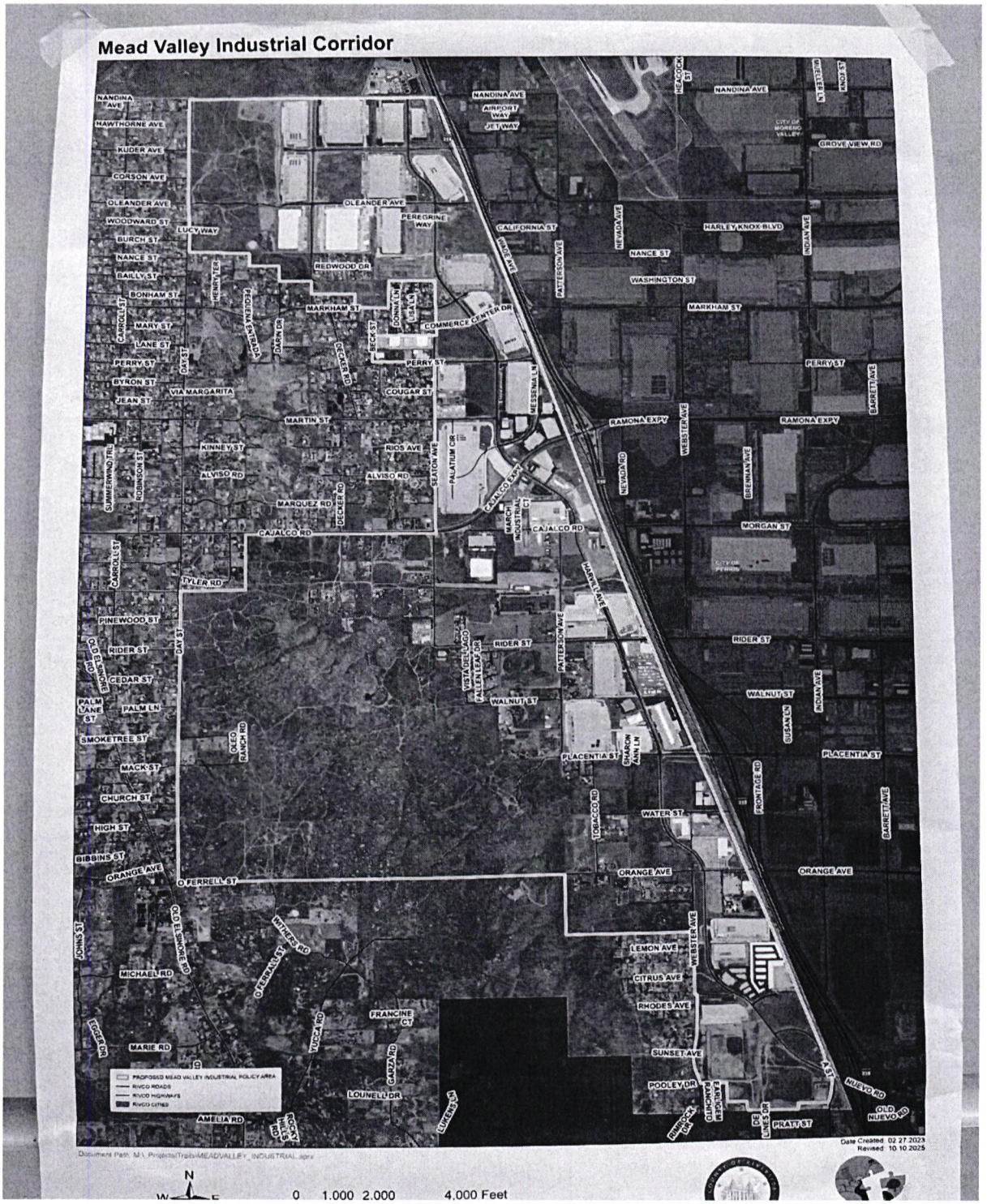
1. This warehouse project zoning is residential and commercial and located at Seaton and Cajalco. This project will remove valuable revenue and job creating commercial land depriving the residents of real job opportunities, not low income temporary warehouse jobs. The location of this commercial land is critical to the residents of Mead Valley. Types of business include: restaurants, strip malls and grocery stores. The EIR has not adequately addressed the removal of commercial property and replacing this with an Industrial warehouse.
2. This warehouse is outside of the current Industrial Corridor, in the residential community and required a Foundation General Plan Amendment. The EIR has not addressed the sprawl of Industrial warehouses into the residential community and effects on the entire community of pollution, truck traffic and Rancho lifestyle.

3. There is no significant justification to change the zoning from commercial and residential to Industrial. The EIR fails to justify the need and reasoning for changing the zoning from residential and commercial to Industrial especially when so many warehouses are now empty in Mead Valley.
4. The proposed warehouse requires 26 homes and families to be displaced. There is no justification in the EIR to remove 26 Ranch homes from the community.
5. This warehouse will open the door to numerous additional warehouses on 1100 acres nearby. Piece mealing is not allowed under CEQA. The EIR does not evaluate the additional warehouses within the 1100 acres nearby.
6. The County has been working on a **"NEW" Mead Valley Area Plan since February, 2023** and yet this "NEW" Mead Valley Area plan was not included in the EIR for the Mead Valley Commerce Center or the Cajalco Commerce Center. Even though this plan has been in the works for almost 2 years the Plan was first brought to the attention of the Mead Valley Community at the recent "Town Hall Meeting" on October 15, 2025.
   Exhibit A: Mead Valley Area Plan Map. The Town Hall consisted of a simple Power Point presentation on the Area Plan. No questions were allowed and no information was given.
7. The land for this project and thousands of acres nearby is prime habitat land for endangered and threatened animals such as the Burrowing Owl. The EIR does not include the cumulative impacts of this warehouse and the numerous other warehouses in the "new" Mead Valley Area Plan area.
8. This Property is near the Mott Rimrock Reserve and UCR Research Facility. Pollution, noise and lighting from this warehouse and nearby warehouses will impact the habitat living in the area. The additional impacts to habitat and destruction of habitat has not been adequately addressed in the EIR.
9. Mead Valley leads the list for the highest warehouses in the area per resident. How many more warehouses must this poor area of color endure? The Environmental Justice report has not adequately addressed this concern. The heath impacts to the Mead Valley residents and school children have not been adequately addressed.
10. This warehouse project is yet another warehouse with no tenant. Built on speculation while the industry continues to take a nose dive and empty warehouses explode. The EIR has not addressed the need for warehouses as so many are vacant.
11. Project is adjacent to the Colorado Aqueduct which is drinking water for Southern California. Blasting will need to take place near the aqueduct. Impacts from vibration from the trucks near the aqueduct over time have not been addressed in the EIR. The Colorado Aqueduct provides about 20% of the region's water supply and serves millions of people in Los Angeles and Orange County. Can we afford to risk the Aqueduct being damaged?
12. The EIR did not adequately analyze the truck routes and impacts from this warehouse. The EJ document States:
    "The Project is designed to route all truck traffic to driveways proposed along Seaton Avenue and along Cajalco Road/Cajalco Expressway to access Interstate 215 (I-215), and there are no existing or planned sensitive receptors along these segments of Seaton Avenue and Cajalco Road/Cajalco Expressway."
    The EIR does not property analyze truck traffic from this Project.
    (a) the project cannot route ALL truck traffic to the I-215 Freeway. That is impossible.
    (b) The current warehouses in Mead Valley along Harvill Ave. route trucks using Cajalco going west to the I-91 and back from the ports using Cajalco east.
    "There are no existing or planned sensitive receptors" is inaccurate. There are a number of sensitive receptors along Cajalco where the trucks will pass. This Project will route a substantial number of trucks onto Cajalco road going west past two elementary schools, a middle school and community library.

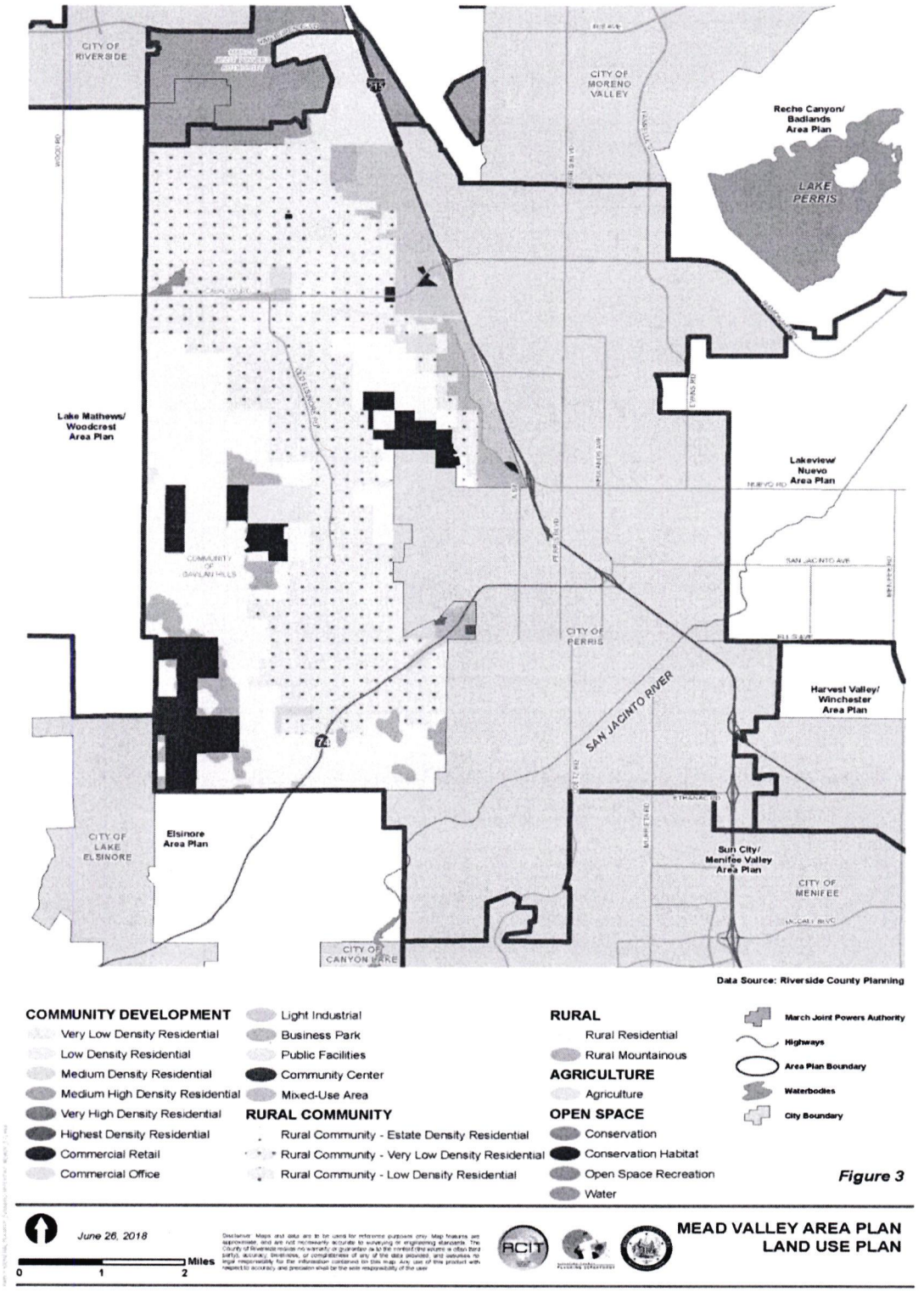
13. We do not need to add additional land to the current Industrial Corridor with so much land now empty and warehouses setting empty.

14. Mead Valley is an Environmental Justice Community similar to Bloomington where the majority of poor Hispanic families were uprooted, schools bulldozed and community destroyed in order to build massive warehouses under speculation. We do not need to repeat what happened in Bloomington.
15. The park may or may not be built. The warehouse is being built of speculation. The Park is a sensitive receptor. Plans for a "Park" just feet from the dock doors, next to the Colorado Aqueduct, at the end of the road is open to homeless camps and drug dealers. Hidden from view. This will not benefit the community, but the developer. There is a nice park located at the Mead Valley Community Center with a 24-7 security officer. That park needs to be expanded.
16. Cajalco Road will widen at Decker to add one more lane and then narrow at Seaton to one lane causing a bottleneck. The majority of the trucks from this project will use Cajalco West to the I-15. Few warehouse trucks access the I-215 from Cajalco going east.
17. This project is part of a large number of other Foundation GPS's getting ready for approval. Piecemealing these projects to get millions of square feet of warehouses approved.
18. This project and others that are part of the FGPA's will destroy valuable habitat land next to the Mott Rimrock Reserve.
19. The numerous Projects are being piecemealed instead of being considered as one project. The impacts to the community of Mead Valley cannot be evaluated as these projects come up individually.

“NEW” Proposed Mead Valley Area Plan

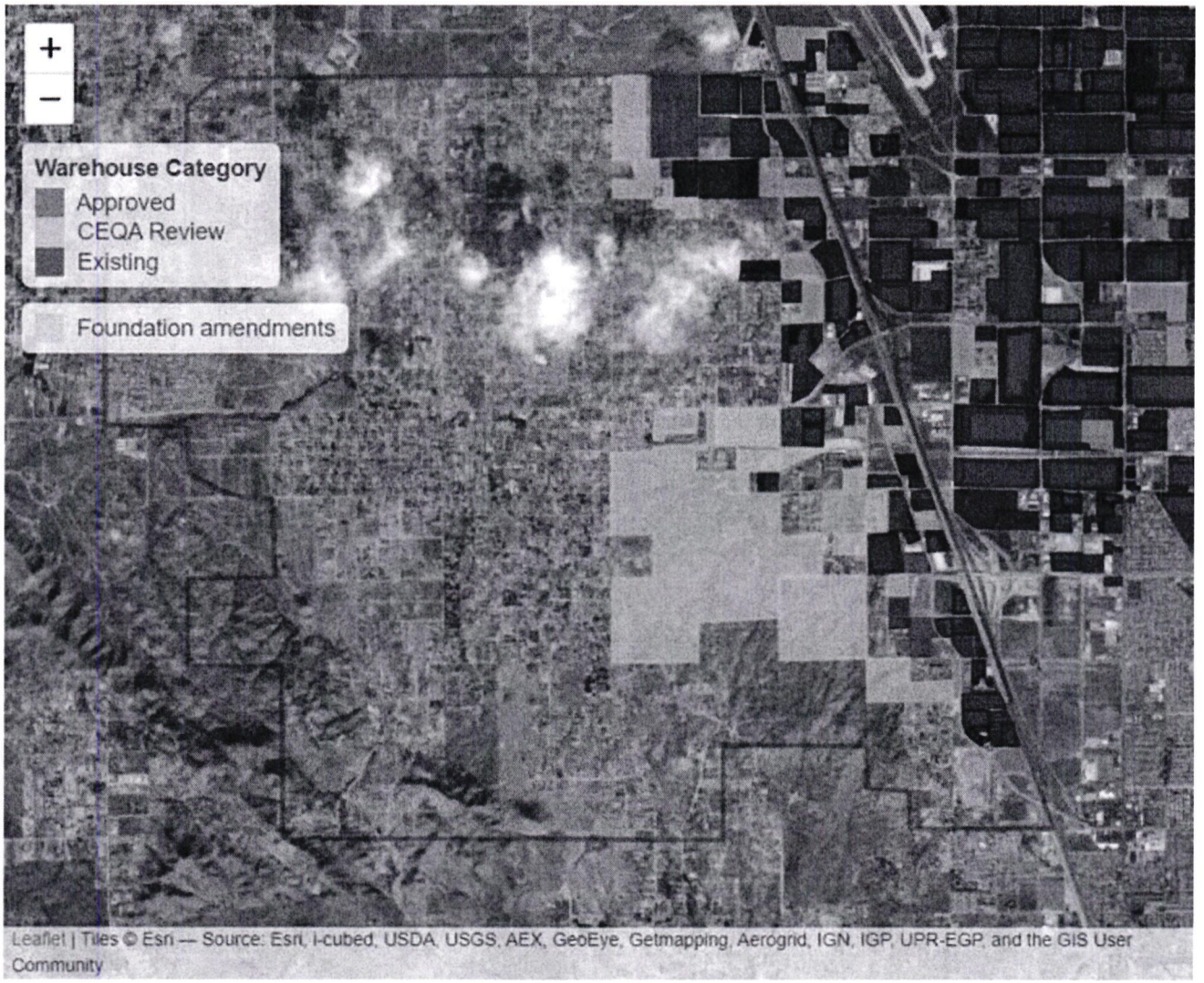


Current Adopted Mead Valley Area Plan Map



10.3.4 Planned Warehouses map for Mead Valley Foundation plan amendments

Figure 10.5



This Project did not provide the required findings necessary to change from rural and agriculture land uses to Industrial land use.

I. FINDINGS FOR FOUNDATION COMPONENT GENERAL PLAN AMENDMENT CANNOT BE MADE

No. 220003 should not be approved as the required findings for approving such an amendment are unsupported by substantial evidence and cannot be made. Zone change 220003 does not allow for a Foundation Component General Plan Amendment that is required by this Project. Foundation General Plan

Amendments are subject to an eight-year approval cycle. (Ord. 348 § 2.5 (B).) Pursuant to Ordinance 348 Section 2.5.

(1) That new conditions or circumstances disclosed during the review process justify modifying the General Plan;

(2) That the modifications do not conflict with the overall Riverside County Vision, and

(3) That they would not create an internal inconsistency among the elements of the General Plan.

These findings cannot be made for the site

A. No New Conditions or Circumstances Justify Modifying the General Plan

There is no support for the first required finding for approving a Foundation Component Amendment to the General Plan as there is no evidence of new circumstances or conditions relative to this site. The Foundation or any GPA should not be initiated.

B. The Modifications Conflict with the Overall Riverside County Vision, Mead Valley Area Plan, and General Plan

According the General Plan, "The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area."

The Rural Community Foundation Component is intended to identify communities and neighborhoods having a rural lifestyle, where animal-keeping uses and limited infrastructure (compared with Community Development areas) are prevalent. Rural Community areas will serve as transition areas between Community Development and Rural Foundation Components. Along these lines, the Very Low Density Residential land use designation provides for the development of detached single- family residential dwelling units and ancillary structures on large parcels, and the Rural Community Foundation Component encourages equestrian and other animal-keeping uses.

Hence, the area targeted for land use change is an area intended to act as a gradual transition between Community Development and Rural Foundation components of the General Plan. This would diminish Rural Community Foundation Component of the General Plan and degrade its application in this area. Zone Change 220003 would also permit Light Industrial uses to encroach further west to develop adjacent to higher density residential uses. In this way, this conflicts with the overall purpose of these Foundation Components and the General Plan.

- *"Is flexible so that it can be adjusted to accommodate future circumstances, yet provides a solid foundation of stability so that basic ingredients in the plan are not sacrificed."* Again, no new "future circumstances" justify undermining GP stability.
- *"Protects high-value environmental resources and private property rights - and develops the complex tools needed to do so."* Private property rights surrounding, and environmental resources on and surrounding, the Zone Change 220003 site (and entire Project site) are not being protected by this proposed amendment. Residences nearby the site will be harmed by intensified land uses, increased air pollutant emissions, traffic, noise, aesthetic, and other impacts that will harm both the environment and property values.
- *"Provides a long-term means for economic stability to be achieved through investment by a variety of interests: residential, agricultural, property owner, environmental, institutional, business community, labor, and others."* Zone Change 220003 would prefer the interests of the property owner over neighboring residential uses and agricultural zoning.
- *"Preserve crucial open space and transportation corridors, resulting in more compact and efficient development than would otherwise happen."* Zone Change 220003 would promote further sprawl west away from the I-215 transportation corridor.
- *"Provide a range of community design options to respond to varied lifestyle choices."* Zone Change 220003 would delete the adopted range of design options seeking to maintain rural uses in this area of the County.
- *"Put a focus on high quality, efficient growth that uses land resources efficiently."* Zone Change 220003 would promote further sprawl and inefficient growth.
- *"Provide a process for adjustment through General Plan reviews, in accordance with state law, at regular intervals or when triggered by key events."* No "new" condition or event has occurred justifying adjustment at this site.
- *"Corridors and areas are preserved for distinctive purposes: ...economic development, including agriculture; residences..."* Zone Change 220003 would blur distinct lines and fail to preserve residential and agricultural purposes. Furthermore, if agricultural uses would occur in areas zoned for agriculture near the site, County Ordinance 625.1 (right-to-farm ordinance) would not protect such uses unless they were in operation for at least 3 years before the proposed project is developed, potentially precluding agricultural activities on surrounding properties with agricultural zoning.
- *"The rich diversity of Riverside County's environmental resources; even those modified by human activities; is preserved and enhanced for the enjoyment of present and future generations."* Zone Change 220003 would not preserve blue line streams or rural uses at the site.
- *"New growth patterns no longer reflect a pattern of random sprawl. Rather, they follow a framework of transportation and open space corridors, with concentrations of development that fit into that framework. In other words, important open space and transportation corridors define growth areas."* Zone Change 220003 promotes growth of industrial warehouse uses outside the designated transportation corridor, to where such growth was planned to be limited.

- *"The extensive heritage of rural living conditions continues to be accommodated in areas committed to that lifestyle and its sustainability is reinforced by the strong open space and urban development commitments provide for elsewhere in the RCIP."* Zone Change 220003 would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Each of our rural areas and communities has a special character that distinguishes them from urban areas and from each other. They benefit from some conveniences such as small-scale local commercial services and all-weather access roads, yet maintain an unhurried, uncrowded life style. Rural residents accept the fact that they must travel some distance for more complete services and facilities."* Zone Change 220003 would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Land use and transportation decisions are made with an understanding of their impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes."* Zone Change 220003 and the Project proposed would locate high cube warehouses adjacent to low density and very low density residential uses without concern for the health and safety of residents, as discussed further below.
- *"Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan's performance."* Zone Change 220003 would permit the locating of significant additional diesel trucks and associated localized diesel PM emissions adjacent to residences.
- *"Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations."* Zone change 220003 would permit further westerly sprawl and development intensity away from infrastructure, increasing carbon emissions and reducing energy efficiency.
- *"Along with its emphasis on achieving community desires, Riverside County remains highly respected for its sensitivity to private property rights."* Approval of Zone Change 220003 would be insensitive to the private property rights of neighboring residents who relied on the GP stability, absent important changed circumstances, when deciding to invest in their properties.

A GPA and zone change from rural to Industrial for this Project conflicts with the General Plan Vision, any Foundation GPA should not be initiated.

II. THE PROJECT SHOULD BE DENIED WHERE IT WILL RESULT IN SIGNIFICANT ENVIRONMENTAL IMPACTS, INCLUDING SIGNIFICANT HEALTH RISKS FROM DEVELOPING DISTRIBUTION WAREHOUSES ADJACENT TO RESIDENTIAL USES

The "Project" necessitating zone change 220003 is a proposal to develop a industrial high-cube warehouse/ distribution centers totaling over 1 million square feet.

This Foundation Component General Plan Amendment application is thus just one part of a larger proposal to decimate land use planning in this area, and to develop a project which is completely contrary to adopted General Plan and Zoning designations..

The Commission has the opportunity to encourage upholding the General Plan by recommending this environmentally harmful and inconsistent Project not move forward as planned. Thorough consideration should be given to the following potentially significant environment impacts that will be caused by allowing the Project to move forward:

A. Health Risk Impacts from Light Industrial Land Use adjacent to Residential Uses.

The health risk impacts from initiating zone change 220003 and the proposed Project are of particular concern and provide a strong reason to deny initiation of zone change 220003. Because of the cancer risk and other impacts of diesel emissions on human health, SCAQMD, CARB, WRCOG, and others have recommending siting warehouses at least 1000 feet from residences and other sensitive receptors. ("Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning: a Reference for Local Governments within the South Coast Air Quality Management District," May 6, 2005, "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities," WRCOG Regional Air Quality Task Force, September 12,
2005.) This Project proposes to site warehouses adjacent to homes is inconsistent with this clear guidance.

The scope and breadth of health effects of diesel PM emissions are the subject of ongoing study. At present, diesel PM is known to cause cancer; immune system effects; reproductive, developmental, and endocrine effects; nervous system effects; and lung health problems, as recognized by the County in the General Plan. Immune system effects include increased allergic inflammatory responses and suppression of infection fighting ability. Diesel PM's reproductive effects include decreased sperm production, changes in fetal development, low birth weight and other harms. Diesel PM exposure may also cause impairment to the central nervous system.
(*See, The Health Effects of Air Pollution on Children*, Michael T. Kleinman, Ph.D, Fall 2000, < http://www.aqmd.gov/docs/default-source/students/health-effects.pdf >[1]; *Diesel and Health in America: the Lingering Threat*, Clean Air Task Force, February 2005, <http://www.catf.us/resources/publications/files/Diesel_Health_in_America.pdf>, *"Dirty Air Triggers More Heart Attacks than Cocaine,"* Kate Kelland, Reuters 2011, and *"Air Pollution Worse than Cocaine for Triggering Heart Attacks, says study,"* Press Association 2011.)

---

[1] Please consider electronic citations as though they were set forth in full herein. We are happy to provide hard copies of any document upon request.

SCAQMD has stated with regards to the health effects from diesel PM:

> "Diesel particles consist mainly of elemental carbon and other carbon-containing compounds... Diesel particles are microscopic...Due to their minute size, diesel particles can penetrate deeply into the lung. There is evidence that once in the lung, diesel particles may stay there for a long time.
>
> In addition to particles, diesel exhaust contains several gaseous compounds including carbon monoxide, nitrogen oxides, sulfur dioxide and organic vapors, for example formaldehyde and 1,3-butadiene. Formaldehyde and 1,3-butadiene have been classified as toxic and hazardous air pollutants. Both have been shown to cause tumors in animal studies and there is evidence that exposure to high levels of 1,3-butadiene can cause cancer in humans...
>
> Diesel emissions may also be a problem for asthmatics. Some studies suggest that children with asthma who live near roadways with high amounts of diesel truck traffic have more asthma attacks and use more asthma medication.
>
> Some human volunteers, exposed to diesel exhaust in carefully controlled laboratory studies, reported symptoms such as eye and throat irritation, coughing, phlegm production, difficulty breathing, headache, lightheadedness, nausea and perception of unpleasant odors. Another laboratory study, in which volunteers were exposed to relatively high levels of diesel particles for about an hour, showed that such exposures could cause lung inflammation." (*The Health Effects of Air Pollution on Children, supra.*)

Furthermore, infants, children, and the elderly are more susceptible to diesel PM and its associated health impacts. ("Studies Link Fine Particulate Exposure to Children's and Seniors' Health," July/August 2015 < http://www.aqmd.gov/docs/default-source/publications/aqmd- advisor/july-advisor-2015.pdf?sfvrsn=6 >) Recent studies have linked exposure to childhood allergies, aging of the brain, and higher death rates, among other things. (*Id.*) Other recognized effects of diesel PM on children include slowed lung function and growth, increased emergency room visits, increased incidences of asthma and bronchitis, crib death, asthma respiratory infections, allergic symptoms, and asthma hospitalizations. (*Diesel and Health in America: the Lingering Threat, supra.*) Importantly, this exposure to high pollutant levels in children occurs while their lungs are still developing, and therefore has more severe impacts on this sensitive group. (*The Health Effects of Air Pollution on Children, supra.*)

This increased susceptibility to air pollutant emissions for children has resulted in the California EPA Office of Environmental Health Hazard Assessment ("OEHHA") weighting cancer risk by a factor of 10 for exposures to carcinogens from birth to two years old, and by a factor of 3 for exposures from 2 years old to 15 years old. (*Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures*, California EPA OEHHA Air Toxicology and Epidemiology Branch, April 2009, p. 3. http://oehha.ca.gov/media/downloads/crnr/tsdcancerpotency.pdf)

This Project is proposed to be developed directly adjacent to residential uses in total disregard of good neighbor policies for land use siting and appropriate residential setbacks.

C. GHG Emissions

The proposed zone change intensifies the use of the site from very low density residential to light industrial. Increased intensity of site development from potentially 2 homes (1 acre minimum for VLDR) as currently planned to an additional 152 truck loading bays if zone change 220003 is approved (not even considering the whole Project) will significantly increase mobile GHG emissions.

D. Noise

The County's General Plan recognizes that mobile noise sources may be the most annoying noise producers in the community. (*See General Plan Noise Element)* Noise from traffic and truck trips will increase noise to adjacent residences with increased trip generation and truck use. (U.S. Department of Housing and Urban Development. (March 1985) The Noise Guidebook. https://.hudexchange.info/resource/313/hud-noise-guidebook/. [Noise level a function of distance, among other factors].)The reduced setback achieved by Zone Change 220003 of residential uses from industrial uses will significantly impact noise experienced by residents.

The health impacts of noise to area residents from this Project may also be significant. Suter, Dr. Alice H., Administrative Conference of the United States. (November 1991) Noise and Its Effects. http://www.northfriends.org/images/WLCcomments/Johnson%20and%20Sedlack%20Attachment%203.pdf.

E. Traffic/ Transportation

The Project would significantly increase local traffic in a residential area. The Project would also increase regional traffic on area freeways including I-215, SR-60, etc. where distribution warehouses in the Inland Empire regularly travel to/ from the ports of Los Angeles and Long Beach.

In addition, the conversion of minimal passenger vehicle trips to passenger vehicle and heavy- duty truck trips adds significantly to the need and cost of road repair. According to one study, a 40-ton truck does as much damage to the road as 9,600 passenger cars. ("*Overweight trucks damage infrastructure*" April Castro, USA Today, 2007 http://usatoday30.usatoday.com/news/nation/2007-09-10-3878428638_x.htm) Impacts to transportation infrastructure will be significantly increased by this Project.

Warehouses within 1000 feet of a sports park or school significantly harms people living near warehouses, children who may be using this proposed sports park, harming their environmental and quality of life and harming the entire community. **This will bring thousands of children to a place that causes serious harm such as asthma, lung and heart disease.**

The Riverside County General Plan is required and must protect the children under its jurisdiction. Forcing Mead Valley children to use this park because you have failed to build your own park is a disgrace to everyone who lives in Riverside County. Mead Valley is an Environmental Justice community and one of the poorest communities in the County. Mead Valley receives millions of dollars in EJ funding every year, but instead of building a nice park, money was spent on hundreds of trees. With the cost of water who can afford water for those trees. **What real benefit is this to the community? A real sports park closer to the local schools would be beneficial to the residents of our community.**

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per CARB guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[14]
- Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

B. The Modifications Conflict with the Overall Riverside County Vision, Mead Valley Area Plan and General Plan

According to the General Plan, "The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and

Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area."

.

Along these lines, the Very Low Density Residential land use designation provides for the development of detached single- family residential dwelling units and ancillary structures on large parcels, and the Rural Community Foundation Component encourages equestrian and other animal- keeping uses.

AIR QUALITY, ENERGY, GREENHOUSE GAS EMISSIONS AND HEALTH RISK ASSESSMENT IMPACT ANALYSIS.

In accordance with the CEQA requirements, the County does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the County and region will meet federal and state standards. Instead, the County relies on the expertise of the SCAQMD and utilizes the SCAQMD CEQA Handbook as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

The Environmental Justice Element of the General Plan:

Policies:

HC 14.1 When feasible, avoid siting homes and other sensitive receptors near known or anticipated sources of air pollution.

HC 14.2 When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors.

Health Risk Reduction

This category includes policies that work towards reducing unique and compounded health risks. The following policies address pollution exposure and access to food and encourages safe and sanitary homes and an environment conducive to engaging in physical activity.

Pollution Exposure Policies:

HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the Salton Sea and other bodies of water that impact air quality and water quality and seek and pursue opportunities to address impacts to the maximum extent possible, and make public the data and other information related to the status of the effort.

HC 16.2 Pursue funding and other opportunities from state, federal, and local government and non-government sources and allocate county general funds to improve public health and limit pollution exposure and promote efforts to ameliorate environmental justice constraints in environmental justice communities.

HC 16.3 Assist communities in seeking funding for community initiated clean air projects including the installation of on-site air monitoring equipment in areas of high exposure to air contaminants.

HC 16.4 Pursue funding to connect low-income residents and communities to municipal water and wastewater services. In the interim, seek financial assistance for septic system repair in order to limit groundwater contamination by poorly maintained septic systems or to provide for connections to wastewater systems as a viable alternative if such systems can be made readily available.

HC 16.5* Evaluate the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. Similarly, encourage sensitive receptors, such as housing, schools, hospitals, clinics, and childcare facilities to be located away from uses that pose potential hazards to human health and safety.

HC 16.6* When developing and siting large scale logistics, warehouse and distribution projects, address

the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019 and as may be subsequently amended.
HC 16.7 Evaluate public and private facilities for health hazards or major sources of contamination, identify, and implement alternatives for removal of contamination.
HC 16.8 Evaluate creating a cap or threshold on the number of pollution sources within EJ communities and make recommendations thereon.
HC 16.9 Explore the feasibility of creating a partnership with the South Coast Air Quality Management District (SCAQMD) to establish a mitigation program to reduce the impact of air pollution as well as assist with the implementation of air quality programs.
HC 16.10* Plan for compact development projects in appropriate locations, including in existing communities and the clustering of affordable and mixed income housing therein, that make the most efficient use of land and concentrate complementary uses in close proximity to transit or non-transit mobility options and advocate for expanded transit and non-transit mobility options to serve such areas.
HC 16.11 Implement development of bicycle and pedestrian facilities to reduce dependency on fossil fuel based transportation and pursue funding to implement mobility plans and projects.
HC 16.12 Plan and implement complete streets which include sidewalks, greenbelts, and trails to facilitate use by pedestrians and bicyclists where such facilities are well separated from parallel or cross through traffic to ensure pedestrian and cyclist safety and rehabilitate/expand existing to achieve same or similar design features.

HC 16.13 Provide buffer spaces and vegetative barriers between high-volume roadways/ transportation and train track corridors and sensitive land uses.

HC 16.14* Assure that sensitive receptors are separated and protected from polluting point sources, as feasible, including agricultural businesses that produce or use pesticides and chemical fertilizers.
HC 16.15* Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development through the use of barriers, distance, or similar solutions or measures from emission sources when possible.

HC 16.22* Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum County of Riverside General Plan.

HC 16.23* Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.

HC 16.24* Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria addressing noise, land, traffic and greenhouse gas emissions to avoid or minimize creating adverse conditions for adjacent communities.

HC 18.7* Discourage industrial, agricultural and other land uses that may pollute and cause health conflicts with residential land uses either directly or indirectly. Ensure that community members are properly notified and involved in the decision-making process for new land use proposals.

HC 18.8* Work with the development community including small property and mobile home park owners so new residential development, particularly for low income households, is designed to limit their exposure to high noise levels, pesticide and fertilizer exposure, dust pollution, and other potential impacts associated with adjacent industrial and agricultural uses.
HC 18.9* Encourage the location and design of new developments to visually enhance and not degrade the character of the surrounding area through consideration of the following concepts.

Riverside County General Plan Vision statements and concepts
CHANGE OF ZONE NO. 2200062 would permit Light Industrial uses to encroach west into the established rural residential developed community. In this way, this Project conflicts with the overall purpose of these Foundation Components and the General Plan.

This Project also conflicts with the following County Vision statements and Vision concepts:

- *"Is flexible so that it can be adjusted to accommodate future circumstances, yet provides a solid foundation of stability so that basic ingredients in the plan are not sacrificed."* Again, no new "future circumstances" justify undermining GP stability.
- *"Protects high-value environmental resources and private property rights - and develops the complex tools needed to do so."* Private property rights surrounding, and environmental resources on and surrounding, the Project site are not being protected by this proposed zone change. Residences nearby the site will be harmed by intensified land uses, increased air pollutant emissions, traffic, noise, aesthetic, and other impacts that will harm both the environment and property values.
- *"Provides a long-term means for economic stability to be achieved through investment by a variety of interests: residential, agricultural, property owner, environmental, institutional, business community, labor, and others."* The project would prefer the interests of the property owner over neighboring residential uses and agricultural zoning.
- *"Provide a range of community design options to respond to varied lifestyle choices."* The Project would delete the adopted range of design options seeking to maintain rural uses in this area of the County.
- *"The rich diversity of Riverside County's environmental resources; even those modified by human activities; is preserved and enhanced for the enjoyment of present and future generations."* The Project would not preserve blue line streams or rural uses at the site.
- *"New growth patterns no longer reflect a pattern of random sprawl. Rather, they follow a framework of transportation and open space corridors, with concentrations of development that fit into that framework. In other words, important open space and transportation corridors define growth areas."*
"The extensive heritage of rural living conditions continues to be accommodated in areas committed to that lifestyle and its sustainability is reinforced by the strong open space and urban development commitments provide for elsewhere in the RCIP." The Project would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Each of our rural areas and communities has a special character that distinguishes them from urban areas and from each other. They benefit from some conveniences such as small-scale local commercial services and all-weather access roads, yet maintain an unhurried, uncrowded life style. Rural residents accept the fact that they must travel some distance for more complete services and facilities."* The Project would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Land use and transportation decisions are made with an understanding of their*

impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes." The Project proposed would locate high cube warehouses adjacent to low density and very low density residential uses without concern for the health and safety of residents, as discussed further below.

- *"Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan's performance."* The Project would permit the locating of significant additional diesel trucks and associated localized diesel PM emissions adjacent to residences.
- *"Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations."* The Project would permit further westerly sprawl and development intensity away from infrastructure, increasing carbon emissions and reducing energy efficiency.
- *"Along with its emphasis on achieving community desires, Riverside County remains highly respected for its sensitivity to private property rights."* ***Change of Zone no.*** *2200062* (would be insensitive to the private property rights of neighboring residents who relied on the GP stability, absent important changed circumstances, when deciding to invest in their properties.

The Mead Valley Community Plan requires that this type of Project create an EIR to thoroughly mitigate all environmental elements for this type of industrial development.

General Plan Environmental Justice Element cannot be met with a Foundation GPA. A massive warehouse directly adjacent to hundreds ranch homes, which are north and south of the Project site.

II. THE PROJECT SHOULD BE DENIED WHERE IT WILL RESULT IN SIGNIFICANT ENVIRONMENTAL IMPACTS, INCLUDING SIGNIFICANT HEALTH RISKS FROM DEVELOPING DISTRIBUTION WAREHOUSES ADJACENT TO RESIDENTIAL USES AND A BUDDIST TEMPLE.

This Project application is thus just one part of a larger proposal to decimate land use planning in this area, and to develop a project, which is completely contrary to adopted General Plan and Zoning designations.

A. Health Risk Impacts from Light Industrial Land Use adjacent to Residential Uses.

The health risk impacts from initiating this Project and the proposed Project are of particular concern and provide a strong reason to deny this zone change. Because of the cancer risk and other impacts of diesel emissions on human health, **SCAQMD, CARB, WRCOG, and others have recommending siting warehouses at least 1000 feet from residences and other sensitive receptors.** ("Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning: a Reference for Local Governments within the South Coast Air Quality Management District," May 6, 2005, "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities," WRCOG Regional Air Quality Task Force, September 12, 2005.) This Project proposes to site warehouses adjacent to homes and a Buddhist Church. This is inconsistent with this clear guidance. This warehouse is proposed directly across the street from numerous homes. SCAQMD recommends all warehouses be sited 1000 feet from sensitive receptors.

E. Traffic/ Transportation

The Project would significantly increase local traffic in our rural community. The Project would also increase regional traffic on area freeways including I-215, SR-60, etc. where distribution warehouses in

the Inland Empire regularly travel to/ from the ports of Los Angeles and Long Beach. It would also increase traffic substantially on Cajalco Road that is already rated a transportation F and used by numerous Harvill and gridlocked most of the day.
In addition, the conversion of minimal passenger vehicle trips to passenger vehicle and heavy-duty truck trips adds significantly to the need and cost of road repair. According to one study, a 40-ton truck does as much damage to the road as 9,600 passenger cars. ("*Overweight trucks damage infrastructure*" April Castro, USA Today, 2007
http://usatoday30.usatoday.com/news/nation/2007-09-10-3878428638_x.htm) Impacts to transportation infrastructure will be significantly increased by this Project.

III. CONCLUSION

When taken as a whole, the significant environmental and human costs of considering approval of the proposed Project warrant its immediate denial. The Project does not meet the requirements for Environmental Justice, or a Zone Change. All of the trucks will NOT be going east on Cajalco from this project. The entire intersection at Seaton and Cajalco will need to be improved. Denial is especially deserved as little to no benefit to Mead Valley Residents would result-- distribution warehouse projects are notorious for under-delivering on job promises, particularly as automation of such facilities occurs. (*See, e.g.,* The Press Enterprise, Jack Katzanek (February 1, 2012)*"Moreno Valley: Sketchers' warehouse has caused net job loss,"*
http://www.pe.com/business/business-headlines/20120201-moreno-valley-skecherswarehouse-has-caused-net-job-loss.ece.)

The impacts of this project will be felt much further than Mead Valley. The entire region will be impacted. Truck traffic will be using Cajalco to El Sobrante, La Sierra, Washington, Wood, Markham, Clark and neighborhood streets.

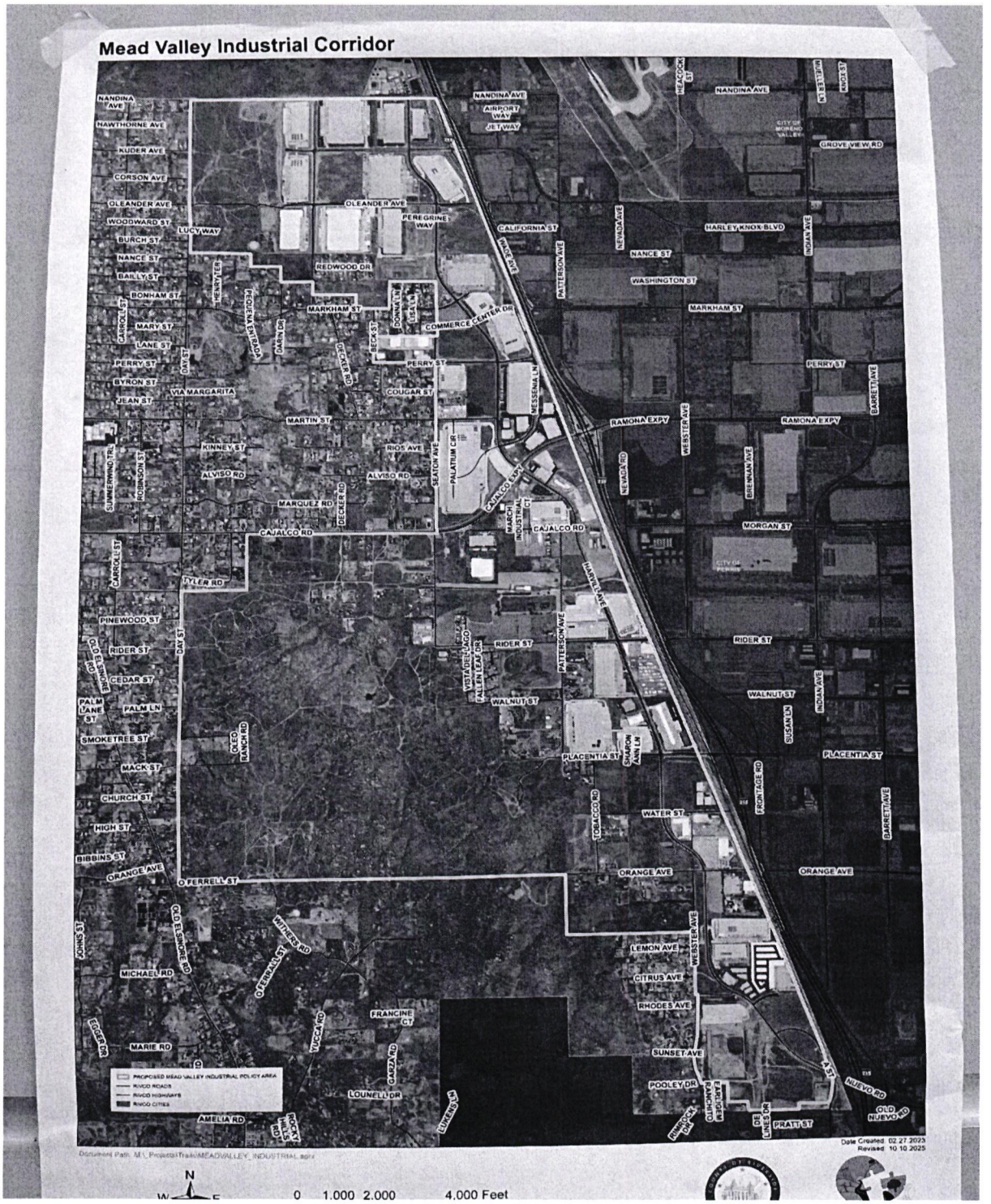
For each of these reasons detailed herein, I respectfully ask the Supervisors to deny this Project.

Sincerely,

Debbie Walsh

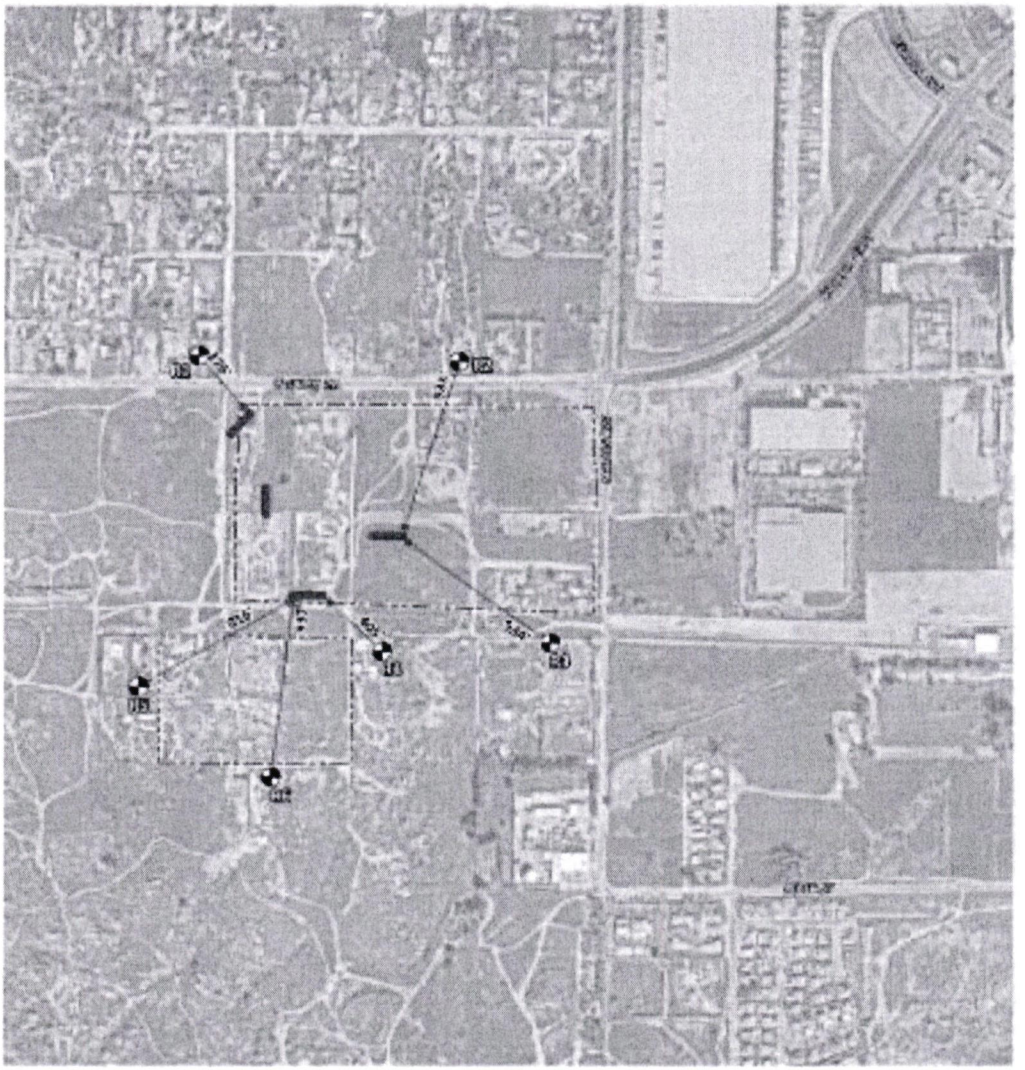
RAMV

Exhibit A

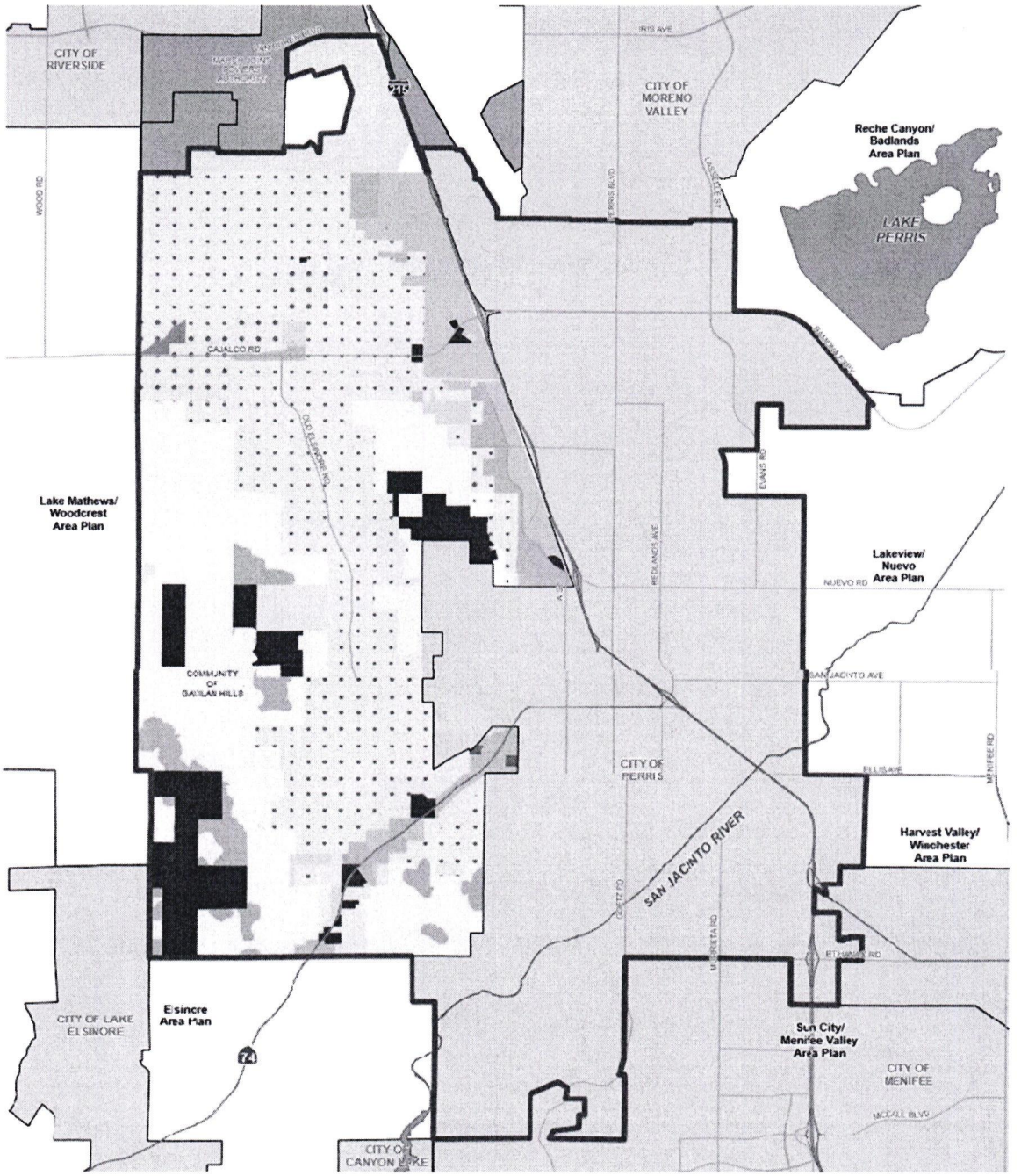


"New" Proposed Mead Valley Area Plan

Figure 4.13-6 Blasting Activity and Receiver Locations



(Urban Crossroads, 2024a, Exhibit 10-C)



Data Source: Riverside County Planning

COMMUNITY DEVELOPMENT
- Very Low Density Residential
- Low Density Residential
- Medium Density Residential
- Medium High Density Residential
- High Density Residential
- Very High Density Residential
- Highest Density Residential
- Commercial Retail
- Commercial Office
- Light Industrial
- Business Park
- Public Facilities
- Community Center
- Mixed-Use Area

RURAL COMMUNITY
- Rural Community - Estate Density Residential
- Rural Community - Very Low Density Residential
- Rural Community - Low Density Residential

RURAL
- Rural Residential
- Rural Mountainous

AGRICULTURE
- Agriculture

OPEN SPACE
- Conservation
- Conservation Habitat
- Open Space Recreation
- Water

- March Joint Powers Authority
- Highways
- Area Plan Boundary
- Waterbodies
- City Boundary

Figure 3

Land Use Map at Cajalco x Seaton showing the commercial land in red





No Trucks sign on Seaton.

Flores, Kate

From: Karn Gutz <karngutz@gmail.com>
Sent: Thursday, October 23, 2025 5:36 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote NO on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Griselda Garcia
92570

Flores, Kate

From: Margarita Curras-Collazo <margarita.curras@ucr.edu>
Sent: Thursday, October 23, 2025 11:27 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
Maggie Curras-Collazo
951-206-6117

Flores, Kate

From: Michael Delpit <mdelpit56@gmail.com>
Sent: Friday, October 24, 2025 2:21 AM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,

.
Michael Delpit
92508

Flores, Kate

From: Tom Radulski <tradulski@gmail.com>
Sent: Friday, October 24, 2025 12:02 PM
To: Clerk of the Board
Subject: Public Comment for Item 23.1 - Vote No on the Cajalco Commerce Center

Dear County Board of Supervisors,

Our region is already overrun with warehouses, so it is especially troubling that the County is considering upzoning a rural area to allow developers to build even more in the Environmental Justice community of Mead Valley. The Cajalco Commerce Center will demolish existing homes during a housing crisis and jeopardize the air quality, traffic, and safety of local residents.

Please vote no on the Cajalco Commerce Center. We are already burdened with more than our share and do not need another square inch of warehouses in our region. No more warehouses!

Sincerely,
<name>Thomas Radulski
<zip code>92508