



SAN GORGONIO CHAPTER

Moreno Valley/Box Springs Group

SENT VIA EMAIL

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RE: Item 4.1-4: RIV090903 - Cajalco Road Widening and Safety Enhancement Project – SCH #2011091015;

Dear Chair Schoenewald, TCWG members, Staff,

Thank you for the opportunity to provide comments on the Reviews of PM Hot Spot Analysis Interagency Review Form on the Cajalco Road Widening Project. SCH # 2011091015 – RIV090903. Please notify us of any future hearing notices or project updates on this project.

The Project aims to widen Cajalco Road from 2-lanes to 4-lanes in for 15.7 miles between I-15 and I-215, with an eventual ultimate design of a 6-lane state highway with no active transportation modes. The Conformity Hot Spot Analysis was previously reviewed by the committee on April 22, 2025 and was sent back to staff by CARB comments on discrepancies between model future year comparisons between two travel-demand models (RIVTAM and RIVCOM).

In our review, the Sierra Club Box Springs Group found two serious deficiencies in the Travel Analysis models used to project future truck traffic growth along the proposed roadway, which is critical for the 40 CFR Part 93.123(b)(1) determination that the Project is Of Air Quality Concern. Specifically, this project is a new highway project that significantly increases diesel vehicle trips along this corridor, and the RIVCOM and RIVTAM models both drastically underestimate the future volumes due to two critical modeling flaws. A summary is here with detailed explanations below.

1. The Traffic Demand Model is siphoning significant projected future volumes onto the 'CETAP' facility (RTP ID: 3C01MA01). That project is an older (~2000) 6-lane state highway version of the 4-lane Cajalco Road Widening Project. Therefore, we believe the RIVCOM traffic demand model is using the same facility twice to allocate future traffic volumes. A second parallel east-west facility will not be built to siphon off those traffic volumes (both

light-duty and heavy-duty trucks) and therefore the base model inputs are erroneous – underestimating future passenger vehicle and truck volumes by at least a factor of 2.

2. The traffic analysis from the Draft Environmental Impact Report (DEIR) is stale (using 2014 traffic volumes), uses inaccurate alignment of freeway ramps based on old project alignments, and does not include adequate analysis of induced truck VMT from land-use changes. Specifically, warehouse area has more than doubled at the eastern terminus since the 2014 traffic analysis¹. Additionally, multiple thousands of acres of land-use rezones are under consideration at Riverside County Planning Department on both the east- and west-terminus of the project. This is induced freight VMT and is not included in the RIVCOM model estimates.

Full details are included below. However, we ask that the Transportation Conformity Working Group validate the traffic model inputs as adequate for determining future estimated truck volumes. We believe the Cajalco Road Widening Project is a POAQC because of its clear intent as a new truck state highway to link I-15 to I-215.

The traffic demand model is double-counting the project

The project Draft EIR and conformity review mentions volumes being siphoned onto a future CETAP facility RPT ID: 3C01MA01. This facility is listed in Connect SoCal 2024 financially constrained project list² as a ‘new east-west corridor between I-215, south of Lake Mathews, north of SR-74, and I-15.’ That is the same general location as the Cajalco Road widening.

Table 2. Financially Constrained Projects

COUNTY	SYSTEM	LEAD AGENCY	RTP ID	ROUTE #	ROUTE NAME	FROM	TO	DESCRIPTION	COMPLETION YEAR	PROJECT COST (\$1,000'S)
RIVERSIDE	STATE HIGHWAY	RIVERSIDE COUNTY TRANSPORTATION COMMISSION	RIV180104	10	I-10/HIGHLAND SPRINGS	275' N/O THE W/B OFF/ON RAMP	250' S/O THE E/B OFF/ON RAMP	IN WESTERN RIVERSIDE COUNTY IN THE CITIES OF BANNING AND BEAUMONT: I-10/HIGHLAND SPRINGS IC IMPROVEMENTS - IMPROVE EXISTING W/B OFF RAMP AND W/B ON RAMP	2029	\$85,000
RIVERSIDE	STATE HIGHWAY	RIVERSIDE COUNTY TRANSPORTATION COMMISSION (RCTC)	32005012		SR-60	I-15	TO I-215/SR-91 INTERCHANGE	CONSTRUCT 4 EXPRESS LNS (2 LN EA DIR) FROM I-15 TO I-215/SR-91 INTERCHANGE.	2036	\$381,000
RIVERSIDE	STATE HIGHWAY	RIVERSIDE COUNTY TRANSPORTATION COMMISSION (RCTC)	3C01MA01		EAST-WEST CORRIDOR	I-15	I-215	CETAP: PROVIDE NEW EAST-WEST TRANSPORTATION CORRIDOR BETWEEN I-15 IN THE WEST, I-215 IN THE EAST, SOUTH OF LAKE MATHEWS IN THE NORTH, AND SR 74 IN THE SOUTH.	2045	\$2,367,661

The County of Riverside General Plan Circulation Element³ identifies CETAP east-west as a “Hemet to Corona/Lake Elsinore corridor” as shown below from p. C-23.

¹ <https://radicalresearch.shinyapps.io/WarehouseCITY/>

² <https://scag.ca.gov/sites/default/files/2024-05/23-2987-tr-project-list-final-040424.pdf>

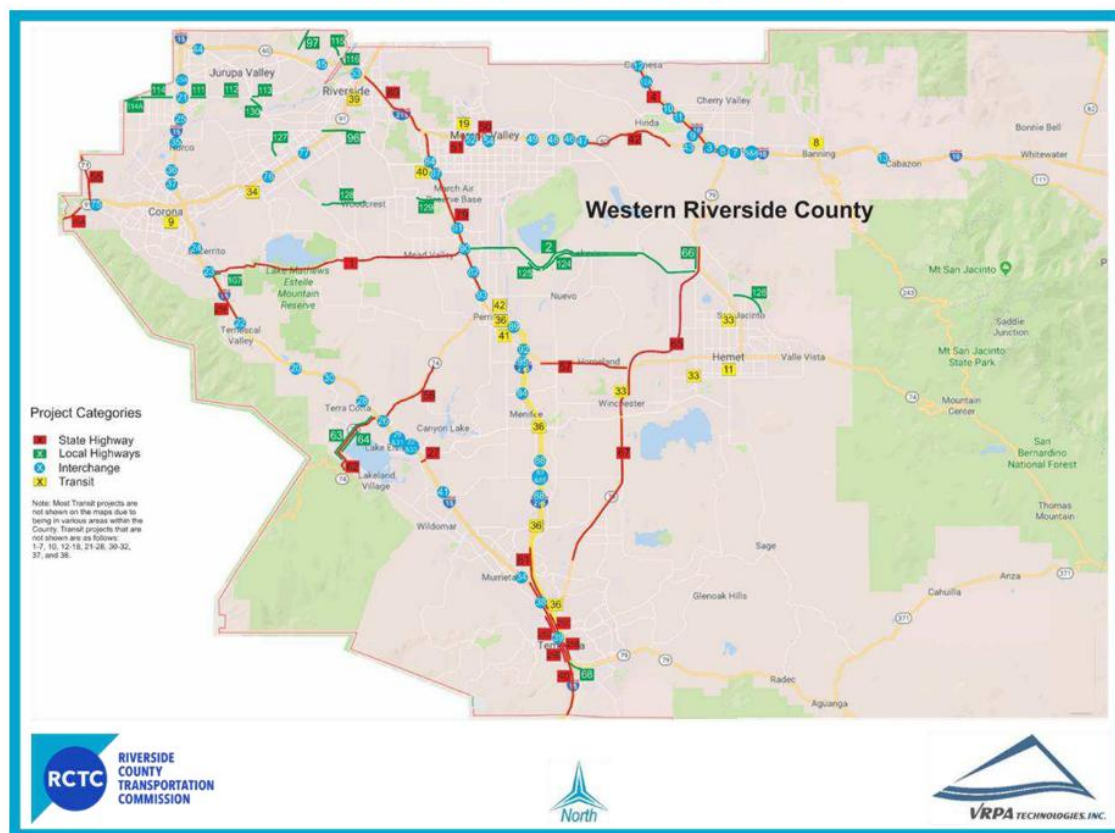
³ <https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-2019-elements-Ch04-Circulation-072720v2.pdf>

The Hemet to Corona/Lake Elsinore corridor was refocused by RCTC in 2009 to actively study and design alignments connecting Interstate 215 easterly to State Highway 79. The refocused alignment is also called the Mid County Parkway. Figure C-1 has been updated to reflect the alignments under study for the Mid County Parkway. As part of the refocusing action, RCTC removed from consideration all alignments within the westerly portion of the Hemet to Corona/Lake Elsinore corridor connecting Interstate 215 to Interstate 15 and this portion of the corridor is not being actively studied as of 2011. Nonetheless, the westerly portion of the Hemet to Corona/Lake Elsinore Corridor is still anticipated to be needed in the future and has been retained by RCTC in its Regional Transportation Plan for the area generally bounded by Lake Mathews and the City of Riverside to the north and State Highway 74 to the south so that future east/west transportation improvements connecting Interstate 215 and Interstate 15 are not precluded.

Figure 1 (red line – project 1) shows the alignment of the CETAP east-west highway from the RCTC 2019 Long Range Transportation Study. The CETAP alignment is identical to the proposed Alternative 1 from the Cajalco road widening project; it is NOT a separate parallel facility. It is the long-term 6-lane state highway version of the current proposed 4-lane project. There are no other long-term projects shown in the long-term strategic plan that are a separate parallel facility.

Figure 1. Future project locations from RCTC Long-Range Transportation Study (2019). The alignment of the Cajalco Road project is the location of the CETAP state highway ID: 3C01MA01 – project 1 in Appendix A.

Figure ES-2 - Project Locations – Western Riverside County



The traffic analysis for the project DEIR and the conformity analysis is **double-counting** the Cajalco road widening and CETAP facility as separate projects and is therefore underestimating future traffic volumes. Please redo all the traffic analysis for this project that double counts traffic volumes using inaccurate RIVCOM model inputs. All traffic analysis that includes the ‘CETAP corridor analysis’ is invalid. Only the ‘Without CETAP corridor’ analysis is possible, with the corresponding higher traffic volumes as shown in **Table 3.6-16** from the DEIR; these traffic volumes are and Level-of-Service ratings are higher and more congested than those identified in Table 2 in the TCWG Project summary. Truck volumes will increase by between 80-350% along the new route with thousands of extra truck trips daily.

Table 3.6-16. Traffic Volumes and Level of Service – Forecast Year (2044) No-Build Alternative and Build Alternative 1 Conditions without CETAP

Roadway Segment	No-Build Alternative (2044) w/o CETAP		Build Alternative 1 (2044) w/o CETAP	
	Volume (ADT)	LOS	Volume (ADT)	LOS
Cajalco Road between Temescal Canyon Road and La Sierra Avenue	21,050	F	41,990	F
Cajalco Road between La Sierra Avenue and Lake Mathews Drive	11,340	B	33,630	E
Cajalco Road between Lake Mathews Drive and El Sobrante Road	11,440	B	31,590	D
El Sobrante Road east of La Sierra Avenue	-	-	21,300	F
Cajalco Road between El Sobrante Road and Gavilan Road	29,800	F	52,560	F
Cajalco Road between Gavilan Road and Harley John Road	32,540	F	58,550	F
Cajalco Road between Harley John Road and Day Street	31,430	F	54,970	F
Cajalco Road east of Day Street	33,230	F	49,890	F

Sources: Caltrans 2017; Iteris 2018.
Note: Shaded cells represent unacceptable LOS (LOS standard exceeded).

Model Land-Use does not account for Induced Freight VMT

Western Riverside County has undergone significant growth and changes since the DEIR traffic analysis base year of 2014. The Traffic analysis for the DEIR is based on stale traffic volumes and analysis of 2014 base year conditions that are inappropriate for a 2025 conformity analysis for three reasons.

- 1) Warehouse growth on the eastern terminus of the project has more than doubled the footprint of warehouses within 3 miles of the Cajalco-215 on-ramp from ~36M SQ FT in 2014 to over 79M SQ FT in 2025⁴. This has more than doubled truck volumes on I-215.
- 2) Significant additional warehouse growth is planned on the eastern terminus of the project, at least partially because of the long-planned Cajalco roadway expansion. **Figure 3** shows existing, approved, under CEQA review, and under County pre-review projects along the Cajalco – I-215 terminus. Thousands of acres of land are being rezoned from residential to industrial along this roadway and the adjacent Mid County Parkway. A reasonable list of projects to include that are ‘cumulatively considerable’ and ‘reasonably foreseeable’ within 2 miles of the project include:
 - a. Harvest Landing (SCH# 2024080337) – 288 acres of warehouses

⁴ <https://radicalresearch.shinyapps.io/WarehouseCITY/>

- b. Cajalco Commerce Center (SCH# 2023060799) and GPA 240005 – Rezone 50 acres from VLDR to Light Industrial
 - c. Ramona Gateway (SCH #2022040023) – Approved 47 acre warehouse project
 - d. Rider and Patterson Business Center (SCH#2022120110) – Approved 37 acre warehouse project
 - e. Harvill at Water Industrial (SCH #2022050490) – approved 20 acre warehouse project
 - f. Seaton Ave and Cajalco Rd Industrial project (SCH # 2022060441) – approved 17 acre warehouse project
 - g. BCI IV Harvill Industrial Center (SCH #2023030724) – approved 9 acre warehouse project
 - h. Patterson and Harvill Business Center (SCH #2024101276) – approved 5 acre warehouse project
 - i. GPA 240049 – Rezone 18 acres from VLDR to Business Park
 - j. GPA 240063 – Rezone 58 acres from VLDR to Business Park
 - k. GPA 240026 – Rezone 162 acres from Rural Residential to Light Industrial
 - l. GPA 240082 – Rezone 15 acres from VLDR to Light Industrial
 - m. GPA 240042 – Rezone 17 acres from VLDR to Business Park
 - n. GPA 240012 – Rezone 9.5 acres from VLDR to Light Industrial
 - o. GPA 240022 – Rezone 321.1 acres from Rural residential to Specific Plan
 - p. GPA 240027 – Rezone 10.5 acres from VLDR to Light Industrial
 - q. GPA 240004 – Rezone 19.5 acres from VLDR to Light Industrial
 - r. GPA 240059 – Rezone 8.5 acres from VLDR to Light Industrial
3. Projected Cajalco Road truck volumes and percentages are significantly lower than the freeway truck volumes and percentages on I-15 and I-215 freeway at either terminus, despite this project description as a bypass to the freight bottleneck at the I-215 and SR-60 interchange. Caltrans traffic Census 2023⁵ indicate high volumes of total traffic and trucks at the closest postmile measurements.
- a. I-15 and Cajalco road: 191,000 AADT, 12,200 truck AADT – 8% Truck
 - b. I-215 at Ramona Cajalco Expy: 139,000 AADT, 14,700 truck AADT – 11.1% Truck
 - c. In contrast, project truck volumes in the TCWG report Table 5 are projected as 4.5-5.8% throughout Cajalco road, despite the road being designed for ‘oversized trucks under the 1982 STAFAs standards for National Priority Freight Network facilities (see p.1-28 of DEIR). The projected truck percentages are a factor of 2 low.

In total, the failure to account for land-use changes over the last 10 years and the ongoing rezoning of land-use along this corridor, along with the underestimated truck volumes on major endpoints is resulting in complete failure to accurately project truck volumes.

⁵ <https://dot.ca.gov/programs/traffic-operations/census>

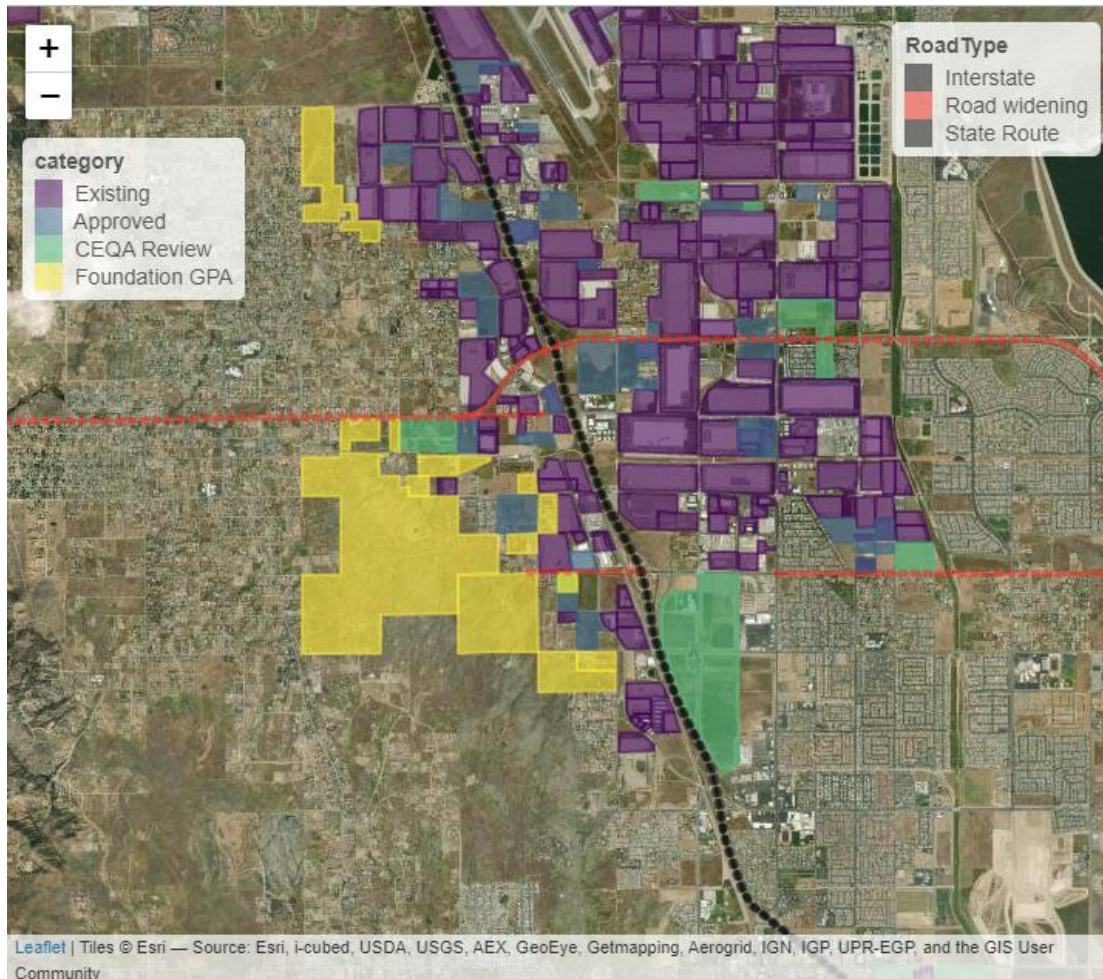


Figure 3. Warehouse projects and industrial rezones within a few miles of the terminus of the Cajalco project. Data on Foundation General Plan Amendments from Planning Department.⁶

Summary

The project modeling presented in the conformity project summary underestimates total future vehicle trips by at least a factor of 2 and truck volumes by at least a factor of 3. It uses stale and inaccurate input data and does not model land-use changes from induced freight VMT related to project accurate future truck volumes. In combination, these errors systematically biasing the travel demand model results low and giving an inaccurate estimate of the future impacts of this project, especially for truck volumes. We believe the Cajalco Road Widening is a POAQC and insist on proper accounting of the future travel demand volumes on this major truck route expansion.

Thank you for your attention to these issues.

Mike McCarthy, PhD
Co-Conservation Chair

⁶ <https://planning.rctlma.org/2024-general-plan-foundation-amendment-cycle#2741959481-4202596112>