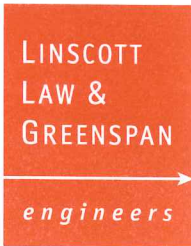


Attachment 1



MEMORANDUM

To: Mr. Steve Hayes
City of Riverside

Date: April 7, 2013

From: Keil D. Maberry, P.E. *KDM*
Daniel A. Kloos, P.E. *DAK*
LLG Engineers

LLG Ref: 2.13.3364.1

Subject: TIA Peer Review
The World Logistics Center Traffic Study, Moreno Valley

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As requested, Linscott, Law & Greenspan, Engineers (LLG) is pleased to provide our peer review comments on *The World Logistics Center Traffic Impact Analysis Report*, prepared by Parsons Brinckerhoff, dated January 2013. As we understand it, The World Logistics Center Project is a plan for the development of modern high-cube logistics warehouse distribution facilities on approximately 3,814 acres of land in the City of Moreno Valley, California. The following summarizes our comments on the traffic study for your consideration.

General Comment

As it relates to the potential traffic impact of the proposed World Logistics Center on the City of Riverside, it is our finding that the traffic impacts primarily consist of two components; 1) employment-based traffic [approximately 25,000 potential auto trips per day (round trips) through the City via the freeway and arterial network] that will utilize the arterial network through the City of Riverside, and 2) truck-based traffic [approximately 12,000 truck trips per day (round trips)] that will utilize the adjacent SR-91/I-215 Freeway through the City of Riverside. As a result, it is imperative that the traffic impact analysis for WLC adequately analyze and provide tangible mitigation measures that will provide corridor-wide benefits for both employees and trucks.

Inadequate Transportation Assumptions

- It is not clear how and when the traffic analysis considered the Mid County Parkway project as a future transportation improvement.
- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Figure 3 on Page 6 – Cumulative Projects. From review of this figure, the traffic study did not include Gless Ranch Center in the cumulative background traffic setting. Gless Ranch Center is a 420,000 square foot (SF) shopping center located on the southwest quadrant of Van Buren Boulevard and Barton Street in the City of Riverside. Gless Ranch Center is forecast to generate approximately 12,945 daily trips, 325 AM peak hour trips and 1,231 PM peak hour trips. This project is anticipated to generate more than 50 project trips during the PM peak hour at several intersections that are also key study intersections analyzed for The World Logistics Center Project. These common key study intersections include the following City of Riverside locations:

Philip M. Linscott, PE (1924-2000)
Jack M. Greenspan, PE (Ret.)
William A. Law, PE (Ret.)
Paul W. Wilkinson, PE
John P. Keating, PE
David S. Shender, PE
John A. Boarman, PE
Clare M. Look-Jaeger, PE
Richard E. Barretto, PE
Keil D. Maberry, PE

- No. 79 – Trautwein Road at Alessandro Boulevard
- No. 95 – Alessandro Boulevard at Arlington Avenue/Chicago Avenue
- No. 96 – Alessandro Boulevard at Century Avenue
- No. 97 – Alessandro Boulevard at Via Vista Drive
- No. 98 – Alessandro Boulevard at Canyon Crest Drive

Failing to include Gless Ranch Center in the cumulative background setting may understate the impacts of The World Logistics Center Project. An explanation as to why this cumulative project was not included.

- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Tables 1, 2 and 3 on Pages 7-9 – Cumulative Projects. Cumulative Project numbers 10, 14, 15, 23 and 81 are missing from the tables. However, some of these numbers are shown in Figure 3 (i.e. #14 and #15). Please clarify.
- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Page 10 – Roadway Network Assumptions. Please clarify whether or not the “financially constrained project list improvements” are fully funded. The TIA should also be updated to clearly state which planned improvements are included in the analysis (i.e. intersection location, type of improvement, funding source and timing of improvement).
- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Page 27 – Traffic Counts. A quick comparison of the existing traffic count data for the intersection of Alessandro Boulevard at Arlington Avenue/Chicago Avenue indicates that the traffic counts utilized in The World Logistics Center are significantly lower for this location than what was utilized in the Gless Ranch Center TIA. As shown in Table 1, the total intersection AM peak hour volumes and PM peak hour volumes utilized in the World Logistics Center TIA for this location are approximately 5% lower in the AM peak hour and 20% lower in the PM peak hour than the volumes utilized in the Gless Ranch Center TIA.

TABLE 1
TRAFFIC COUNT COMPARISON

Key Study Intersection: Alessandro Boulevard at Arlington Avenue/Chicago Avenue				
Movements	AM Peak Hour		PM Peak Hour	
	Dec. 2011 WLC TIA	Nov. 2010 Gless Ranch TIA	Dec. 2011 WLC TIA	Nov. 2010 Gless Ranch TIA
NBL	1,153	1,414	608	1,066
NBT	1,566	1,559	748	872
NBR	435	276	158	156
SBL	178	213	386	546
SBT	428	421	1,467	1,462
SBR	22	34	24	14
EBL	35	41	33	26
EBT	449	592	566	855
EBR	575	675	1,022	1,037
WBL	118	107	467	593
WBT	567	582	663	775
WBR	229	186	311	306
Total	5,755	6,100	6,453	7,708

- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Page 78, Table 24. More detail needs to be provided in Table 24 so the Phase I and Phase II project trip generations can be verified. It is not clear as to how the PCE factors were applied to each proposed project land use (Phase I or Phase II).
- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Pages 79 and 81 – Project Trip Distribution. Figures should be added to the report showing the detailed project trip distribution patterns for passenger cars and trucks. These figures need to be provided so the project assignment to the key study intersections and/or freeway segments can be verified.
- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Pages 277-279, Figure 35. Comparing the lane geometrics assumed in the Year 2035 No-Project traffic condition to existing traffic conditions indicates that

intersection improvements have been assumed to be completed by the Year 2035 at the following City of Riverside locations.

- Arlington Avenue at Horace Street (#93) – A 3rd eastbound and 3rd westbound through lane has been included at this location. Only two eastbound and two westbound through lanes currently exist at this location.
- Arlington Avenue at Victoria Avenue (#94) – A 3rd eastbound and 3rd westbound through lane has been included at this location. Only two eastbound and two westbound through lanes currently exist at this location.
- Alessandro Boulevard at Chicago Avenue (#95) – A 3rd eastbound through lane has been included at this location. Only two eastbound through lanes currently exist at this location.

The traffic study needs to be revised accordingly to clearly indicate the funding source for these improvements. Only improvements that are fully funded should be considered and utilized.

- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Pages 310-312, Figure 36. Comparing the lane geometrics assumed in the Year 2035 Plus-Project traffic condition to existing traffic conditions indicates that intersection improvements have been assumed to be completed by the Year 2035 at the following City of Riverside locations.
 - Arlington Avenue at Horace Street (#93) – A 3rd eastbound and 3rd westbound through lane has been included at this location. Only two eastbound and two westbound through lanes currently exist at this location.
 - Arlington Avenue at Victoria Avenue (#94) – A 3rd eastbound and 3rd westbound through lane has been included at this location. Only two eastbound and two westbound through lanes currently exist at this location.
 - Alessandro Boulevard at Chicago Avenue (#95) – A 3rd eastbound through lane has been included at this location. Only two eastbound through lanes currently exist at this location.

The traffic study needs to be revised accordingly to clearly indicate the funding source for these improvements. Only improvements that are fully funded should be considered and utilized.

- The traffic impact analysis does not include a daily roadway segment analysis, which is recommended for this project considering that the AM and PM peak hours only consist of 13.7% of the project's daily traffic generation forecast. Furthermore, since it is likely that east-west traffic will be diverted from the SR-60/I-215 onto parallel arterials in the City of Riverside, it is recommended that

Martin Luther King Boulevard and Van Buren Boulevard be included in the ADT analysis. Should the analysis reveal significant traffic impacts, appropriate mitigation measures should be identified, such as contributions to the City of Riverside's Traffic Signal Mitigation Fee program. In addition, given that 86.3% of the project's traffic generation occurs outside the typical AM and PM peak hours and has not been analyzed in combination with the fact that the project will be the single largest trip generator in the City of Moreno Valley, it is recommended that the *Peak Hour of Generator* also be analyzed.

Inadequate Geographic Scope

- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Page 2, Footnote #1. The report states that very little traffic associated with the proposed Project would utilize the section of the I-215 Freeway between the SR-60 Freeway and Perris Boulevard because of freeway congestion. The report also states that due to this congestion that project traffic will utilize surface street routes. The TIA needs to state how many project trips may utilize this section of freeway, so an appropriate fair-share contribution can be calculated and contributed by the World Logistics Center Project for future improvements.
- Given the forecast auto traffic volume that will traverse through the City of Riverside and surrounding communities, combined with the proposed Cajalco Road Improvement Project that will attract east-west regional traffic, Cajalco Road should be included in the analysis. Should the analysis reveal significant traffic impacts, appropriate mitigation measures should be identified.

Inadequate Mitigation Measures

- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Section 12 Mitigation Measures - It is not clear why the mitigation measures for the cumulative condition only recognizes the Year 2035 condition and not the Year 2017 and Year 2022 cumulative conditions. This may reduce the potential mitigation measures that would be recommended if the interim year condition(s) can be mitigated, but not the Year 2035 condition.
- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Tables 77 - The recommended mitigation measure for Intersection No. 95 (Alessandro Boulevard at Arlington Avenue/Chicago Avenue) is feasible. The EBR turn lane can be physically accommodated without significantly affecting any residential property. In addition, there are alternate feasible mitigation measures that could be considered, such as a 3rd Northbound Left (“NBL”) and/or a 3rd Westbound Left (“WBL”).

- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013) - The mitigation measures identified in Table 80 for Intersections Nos. 94 and 95 do not match the recommended mitigation measures in Table 69.
- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Table 80 - While implementation of all recommended mitigation measure for Intersection No. 95 (Alessandro Boulevard at Arlington Avenue/Chicago Avenue) may not be feasible, there are additional feasible mitigation measures that could be considered, such as a 3rd NBL, 3rd WBL or 3rd Westbound Through (“WBT”) and 3rd Eastbound Through (“EBT”) or 3rd Eastbound Right (“EBR”). These improvements may mitigate the Year 2017 and/or Year 2022 condition.
- Fundamentally, the addition of approximately 12,000 truck trips (not PCE trips) per day to the I-215/SR-60 Freeway through the City of Riverside necessitates the addition of a corridor wide lane improvement to mitigate the impact on auto traffic similar to the traffic conditions on the I-710 Freeway in South Los Angeles County.
- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Table 78 – Direct Impacts to Freeways and Mitigation: Freeway segment Nos. F-24, F-27, F-42, W-21, W-22, W23, and W-25, which are identified as not feasible, are feasible based on our review of existing conditions in the field. In addition, consideration should be given to the installation of ramp metering along the SR-60/I-215 Freeway corridor as freeway mitigation, which can provide significant benefit to the freeway mainline operation.
- Draft EIR Appendix I (Traffic Impact Analysis Report – January 2013): Table 81 – Direct Impacts to Freeways and Mitigation: Freeway segment Nos. F-19, F-46, F-42, F-49, W-21, W-22, and W-25 EB SR-60, which are identified as not feasible, are feasible based on our review of existing conditions in the field. In addition, consideration should be given to the installation of ramp metering along the SR-60/I-215 Freeway corridor as freeway mitigation, which can provide significant benefit to the freeway mainline operation.
- In light of the repeated infeasibility claims throughout the report regarding the addition of the recommended mitigation measure to provide a mixed-flow lane on the SR-60/I-215 and SR-91 Freeways, it is recommended that a mitigation measure be included that would require the Project to fund a Project Study Report (PSR) and Project Report (PR) through the Riverside County Transportation Commission (RCTC), with the City of Riverside included in the process, to develop an improvement project to add one mixed-flow lane and/or special truck lane in each direction on SR-60/I-215 Freeway between the I-15 Freeway and Gilman Springs Road as well as on the SR-91 Freeway between the SR-60/I-215 and the I-15 Freeway.