

RIV090903 Response to Comments Memorandum

To:	Southern California Association of Governments Transportation Conformity Working Group
CC:	Aaron Burton, California Department of Transportation Frances Segovia, County of Riverside Azan Junaid, County of Riverside Jan Bulinski, County of Riverside
Prepared By:	Keith Lay Senior Air Quality and Climate Change Specialist ICF Deepak Kaushik Associate Vice President Iteris, Inc.
Date:	July 18, 2025
Subject:	Cajalco Road Widening and Safety Enhancement Project – Response to Comment Letter from the San Geronio Chapter of the Sierra Club (dated June 22, 2025) FTIP ID# RIV090903

Introduction

The Riverside County Transportation Department (County), in cooperation with the California Department of Transportation (Caltrans), proposes to widen Cajalco Road, or a combination of Cajalco Road and El Sobrante Road, between Temescal Canyon Road to the west and Interstate 215 (I-215) to the east. Caltrans, as assigned by the Federal Highway Administration (FHWA), is the lead agency under the National Environmental Policy Act (NEPA). The County is the lead agency under the California Environmental Quality Act (CEQA). The proposed project is located in Riverside County, California, and covers a distance of approximately 15.7 miles. In general, Cajalco Road through the project area is a two-lane undivided roadway with one 12-foot lane in each direction and shoulders of varying widths.

The purpose of this memorandum is to address comments that were raised in the June 22, 2025 letter from the San Geronio Chapter of the Sierra Club (Attachment 1).

Response to Comments

The Sierra Club letter contained two comments on the PM [Particulate Matter] Hot Spot Analysis Interagency Review Form for the Cajalco Road Widening Project (State Clearing House [SCH] number 2011091015 – RIV090903). The full text of the comments, including tables and figures, is included in the attached letter (Attachment 1).

Comment #1. 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 list 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.

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.

Response #1. The Traffic Operations Validation Memorandum (Iteris, June 2, 2025) that was prepared for the Project included a supplemental traffic analysis for the Cajalco Road Widening and Safety Enhancement Project at key intersections along Cajalco Road. This supplemental analysis was performed to validate the traffic results included in the Draft Environmental Impact Report/ Environmental Impact Statement (DEIR/EIS). The analysis utilized traffic counts collected in 2025 to establish the current traffic conditions. The design year (2048) scenario in the analysis utilized the most up-to-date travel-demand forecasting model employed in the County of Riverside, to evaluate traffic, which is the Riverside County Model (RIVCOM). Using RIVCOM, traffic forecasts were developed assuming that the CETAP facility (both the portions located west of I-215 and east of I-215) would not be built, to determine the impact on traffic along Cajalco Road should CETAP not be constructed. Thus, traffic intended for Cajalco Road would not be re-routed to other high-capacity facilities, presenting a more realistic projection of future volumes. The results of the LOS evaluation showed that the new future year 2048 with project traffic operations are projected to generally be consistent with the LOS results projected in the 2021 DEIR/EIS’s future year 2044 with project scenario, with overall vehicle delay lower than those presented in the 2021 DEIR/EIS.

Comment #2. 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 2025. 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
 - 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 2023 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.

Response #2. Recent growth in land use (such as warehousing) between 2014 and 2025 is captured in the Traffic Operations Validation Memorandum, referenced in Response #1, using recently collected 2025 intersection traffic counts. These traffic counts included separate truck counts, which have been accounted for using a truck percentage per vehicle movement in the Synchro (traffic analysis) software used to calculate intersection levels of service (LOS). Further, to account for projected/planned warehouse growth in the design year 2048 scenario, the RIVCOM model was utilized. RIVCOM is the current travel-demand forecast model used in the County.

Model runs utilizing the latest version of RIVCOM were conducted to determine the projected truck traffic percentage along Cajalco Road under the 2045 With Project (i.e., including construction of the Project) scenario assuming the CETAP facility (west of I-215 and east of I-215) would not be built, as well as under current conditions. The results of the model runs showed that the daily truck percentages on Cajalco Road, approximately 2 to 3 percent, are forecast to remain at generally the same percentages as the truck percentages under baseline scenario conditions within the RIVCOM. Thus, truck volumes on the Cajalco Road corridor are still anticipated to increase with the project (given that overall non-truck traffic would increase as well), but not to levels that are different than the current proportion of trucks versus total roadway traffic that currently exists.

Attachment 1

June 22, 2025, Comment Letter from San Geronio Chapter of the Sierra Club



SAN GORGONIO CHAPTER

Moreno Valley/Box Springs Group

SENT VIA EMAIL

June 22, 2025

Chair Schoenewald
Lijin Sun, Senior Regional Planner
Karen Calderon, Senior Regional Planner
Transportation Conformity Working Group

Email: kcalderon@scag.ca.gov; sunl@scag.ca.gov

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>

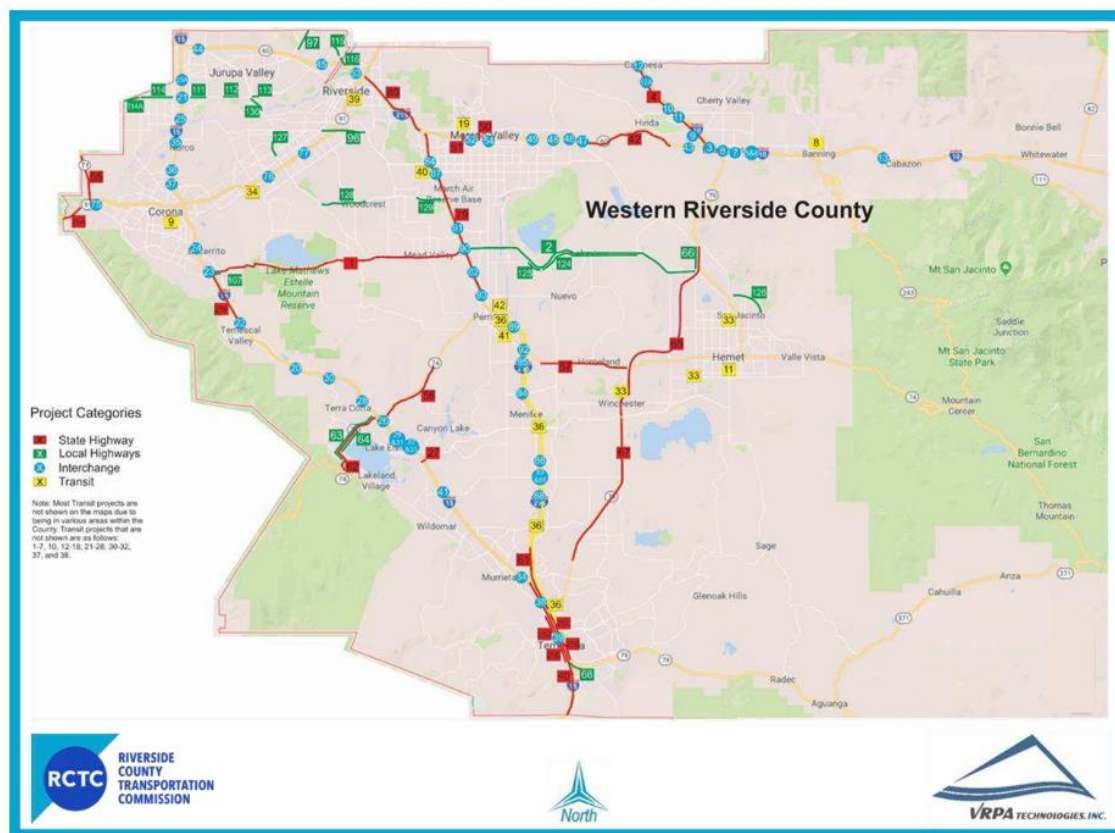
³ <https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-2019-elements-Ch04-Circulation-072720v2.pdf>

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.

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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>

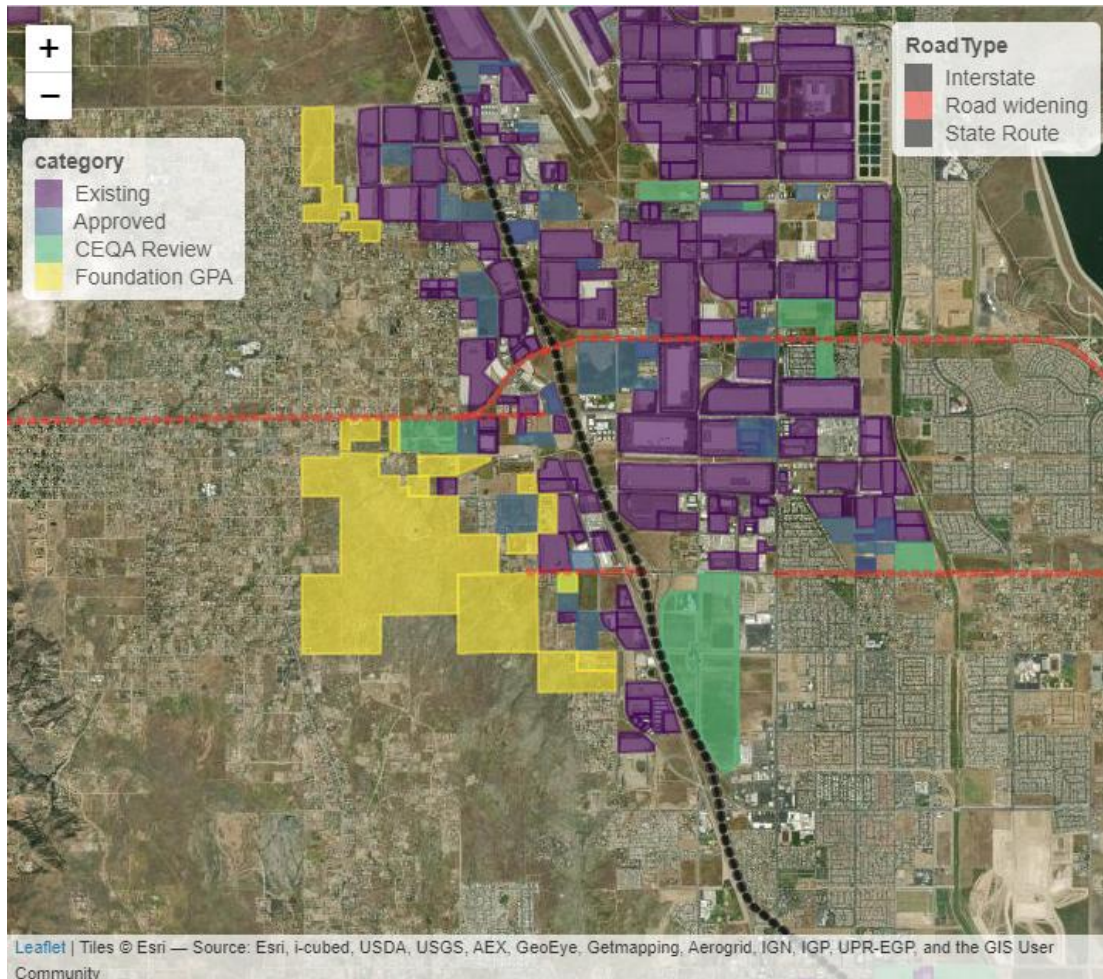


Figure 3. Warehouse projects and industrial rezones within a few miles of the terminus of the Cajalco project. Data on Foundation General Plan Amendments from Planning Department.⁶

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>