



INLAND EMPIRE BIKING ALLIANCE

26 January 2021

Riverside County Planning Department
Attn: Phayvanh Nanthavongdouangsy, Project Planner
PO Box 1409
Riverside, CA 92502-1409

Re: Temescal Valley Commerce Center Notice of Preparation (SCH 2020120546)

Dear Phayvanh,

I am writing on behalf of the Inland Empire Biking Alliance, a local nonprofit dedicated to ensuring that people from all rolls of life have safe and convenient access to a place for all their travel by bike. This letter is in response to the Notice of Preparation for the Temescal Valley Commerce Center (“Project”) which has been proposed. After reviewing the documents provided, we have the following concerns which we would like to ensure are addressed as part of the EIR process.

Our first and biggest concern is for what impact the Project would have on the various trails which are planned for the vicinity. Per Figure 8: Temescal Canyon Area Plan Trails and Bikeway System of the Temescal Canyon Area Plan¹, a Community Trail, a Design Guidelines Trail, and a Historic Trail all pass by the Project site and would potentially be impacted by its construction. Similarly, Table 4a. Project Overview of the Western Riverside Council of Government’s Active Transportation Plan identifies a route named “I-15 Corridor via Temescal Canyon” which per the map presented in Figure 9: Regional Active Transportation Routes, would also pass through the vicinity of the Project². This regional trail is further refined by feasibility and the section by the Project is identified as being ideal for a shared use path.

We would like to ensure that the EIR addresses this fact and identifies how the Project would comply with Policy C 16.4 from the Circulation Element of the Riverside County General Plan³. The planned facilities need to at a minimum, accounted for in the site plan if not just outright constructed as part of the Project.

Additionally, we seek to make sure that biking is considered for addressing any Transportation impacts identified, including VMT impacts. Especially with the goal of the Project being a “last-mile” delivery facility, there are alternatives to trucks can be used for deliveries in the vicinity of the Project. We would encourage those options to be identified and explored as part of the EIR process.

¹ County of Riverside (2018). *Temescal Canyon area plan*. Retrieved online from https://planning.rctlma.org/Portals/14/genplan/2019/ap/TCAP_062618.pdf.

² Fehr & Peers (2018). *Western Riverside active transportation plan*. Retrieved online from <https://www.wrcog.us/DocumentCenter/View/3366/Final-WRCOG-ATP>. Western Riverside Council of Governments.

³ County of Riverside (2020). *Circulation element*. Retrieved online from https://planning.rctlma.org/Portals/14/genplan/2019/elements/Ch04_Circulation_072720v2.pdf.



INLAND EMPIRE BIKING ALLIANCE

Doing so would also help with Air Quality concerns by reducing motor vehicle usage. This also means that the portion of Temescal Canyon Road that is realigned through the Project site should be constructed to the appropriate standards. Last year, Caltrans released guidance to this effect to help agencies identify the best bike facility for a given situation based on the speed and volume of traffic⁴. This should be employed based on the design year of all roads being reconstructed to avoid creating substandard facilities in the present.

Finally, we want to ensure that the mitigation measures for the Project which are offsite do not degrade the experience of bicyclists in those locations. If intersections need to be widened or anything similar, it is imperative that doing so does not result in stuff like the removal of existing bike lanes or crosswalks or create a situation which would create any barriers to implementing a planned bike facility in the future. This includes making sure that the EIR process reviews the plans maintained by other jurisdictions to ensure compatibility and compliance.

In summary, it is important that the EIR process includes the appropriate scrutiny of the Project to ensure that it does not conflict with established plans for bike infrastructure in the area. Additionally, bicycle usage offers a favorable option to reduce various impacts which would be caused by the Project and we urge the study to help identify how this can be employed by the Project to keep down VMT and bring benefits to other things like greenhouse gas emission and air quality. Identifying the benefits from integrating them via study will ensure that those benefits can be fully realized.

Thank you for the time and opportunity to provide comment on this Project. If there are any additional questions or comments, please do not hesitate to reach out to have them answered.

Sincerely,

A handwritten signature in black ink, appearing to read "Marven E. Norman".

Marven E. Norman, Executive Director

⁴ Flournoy, M. (2020). *Contextual guidance for the selection of bicycle facilities*. Retrieved from <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smar t-mobility-and-climatechange/planning-contextual-guidance-memo-03-11-20-a11y.pdf>. California Department of Transportation (Caltrans).