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RE: 4.1-1: RIV090903 - for SCAG TCWG July 22, 2025 meeting - Cajalco Road Widening and Safety Enhancement Project

Dear Chair Schoenewald, TCWG members, Staff,

These comments are submitted on behalf of the Center for Biological Diversity on the Cajalco Road Widening and Safety Enhancement Project. The Center is concerned about the potential truck traffic impacts as well as the impacts to imperiled species and their habitats. These issues are summarized below and are explained in more detail in the attached Sierra Club - Moreno Valley/Box Springs Group's letter as well as our previous comments on the Draft Environmental Impact Report. Specifically, we urge the Transportation Conformity Working Group to validate the traffic model inputs as 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. We also urge the Transportation Conformity Working Group to push for increased mitigation measures for the many imperiled species that would be impacted by this project.

The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. These comments are submitted on behalf of the Center's 1.7 million staff, members, and supporters throughout California and beyond, many of whom live throughout southern California and enjoy visiting, studying, photographing, and hiking in the open spaces.

I. The Project Would Significantly Increase Truck Traffic and Thus Be A Project of Air Quality Concern

There are two serious deficiencies in the Travel Analysis models used to project future truck traffic growth along the proposed roadway, which are critical for the determination that the Project is Of Air Quality Concern.

The first flaw relates to how the Traffic Demand Model is underestimating future passenger vehicle and truck volumes by at least a factor of 2. We believe the RIVCOM traffic demand model is using the same facility twice to allocate future traffic volumes based on the

assumption that a second parallel east-west facility will be built to siphon off those traffic volumes. However, there is not firm commitment that this facility will ever be built and thus the base model inputs are inaccurate.

The second flaw relates to the traffic analysis from the Draft Environmental Impact Report (DEIR), which uses out of date traffic volumes from 2014 and does not account for induced truck VMT from land-use changes. Specifically, the land allocated to warehouses has more than doubled at the eastern terminus since the 2014 traffic analysis. 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. The induced freight VMT associated with these land-use changes is not included in the RIVCOM model estimates and therefore, the estimates dramatically undercount the potential impact of the project.

II. The Project Would Significantly Impact Imperiled Species and Their Habitats and These Impacts Are Not Sufficiently Mitigated.

The proposed Project's footprint lies within a biologically sensitive area that includes potential habitat for 32 federal and state-listed special status. The impressive diversity of rare species found across the landscape near the proposed Project site indicates that the proposed project site is part of a larger ecologically intact and functioning unit. The Project will likely lead to direct and indirect impacts on these nearby biological resources, all of which should be thorough analyzed and evaluated in the EIS/EIR. Potential impacts include but are not limited to those associated with permitted and unpermitted recreational activities, the introduction of non-native plants, additional lighting, noise, pollution, creation of potential barriers to wildlife connectivity and the loss and disruption of essential habitat due to edge effects.

Current analysis relies on merely stating that the proposed project will comply with the MSHCP, and that this compliance does not present a significant impact to the numerous special status species located within the project area. This is no substitute for the required analysis. In reality, the Project will have significant impacts on numerous specific species, including, but not limited to the Arroyo toad, California Coastal Gnatcatcher, Least Bell's Vireo, burrowing owl, numerous bat species, Stephens' Kangaroo Rat, Round-Leaved Filaree and Paniculate Tarplant.

I. The Project Is Inconsistent with Existing Habitat Conservation Plans.

The proposed project would occur on lands conserved and used to offset impacts of development for three overlapping HCPs: the Stephens' Kangaroo Rat HCP, the Lake Mathews Multiple Species HCP, and the Western Riverside County Multiple Species HCP. The proposed project and the lack of appropriate mitigation fails to comply with the requirements of these HCPs. While it is recognized that the proposed project alternative impacts the same piece of land that each of the HCPs relies on for conservation, the DEIR/S fails to adequately analyze impacts separately based each plans unique requirements.

II. Conclusion

The project modeling presented in the conformity project summary underestimates total future vehicle trips by at least a factor of 2 because of its use of out of date input data and lack of consideration of surrounding land-use changes. We believe the Cajalco Road Widening is a project of air quality concern and insist on proper accounting of the future travel demand volumes on this major truck route expansion. We are also very concerned with the impacts to imperiled species and the inadequate analysis and mitigation currently being undertaken. We strongly encourage the Transportation Conformity Working Group to validate both the future travel demand volumes and the impacts to imperiled species before providing a recommendation on the project.

Thank you for the opportunity to submit these comments.

Sincerely,

Elizabeth Reid-Wainscoat
Campaigner
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