



**NOTICE OF PREPARATION AND SCOPING MEETING
IDI Rider 2 & 4 High Cube Warehouses and
Perris Valley Storm Drain Channel Improvement Project
Draft Environmental Impact Report**

October 15, 2019

To:
(Potential Responsible, Trustee,
Federal and Local Agencies, and nearby
Property owners)

From:
City of Perris
135 North "D" Street
Perris CA, 92570

CEQA LEAD AGENCY:

City of Perris
Planning Division
135 North "D" Street
Perris, CA 92570
(951) 943-5003 ext. 252
Contact: Mary Blais, Contract Planner

SUBJECT: IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Draft Environmental Impact Report

- Development Plan Review (DPR) (Case No. 19-00004) for the Rider 2 & 4 Warehouses
- Tentative Parcel Map (TPM) 37437 (Case No. 19-05058) for the Rider 2 Warehouse
- TPM 37438 (Case No. 19-05096) for the Rider 4 Warehouse
- Environmental Impact Report (Case No. 19-05180)

The City of Perris is commencing preparation of a Draft Environmental Impact Report (EIR) for the IDI Rider 2 & 4 Warehouses and Perris Valley Storm Drain (PVSD) Channel Improvement Project (referred to herein as the Project), and has released this Notice of Preparation (NOP) per the requirements of the California Environmental Quality Act (CEQA). The City wants to know the views of your agency as to the scope and content of the environmental information germane to your agency's statutory responsibilities. As a responsible or trustee agency, your agency may need to use the EIR prepared by the City when considering issuance of a permit or other approval for the Project. Information gathered during the NOP comment period will be used to shape and focus future analyses of potential environmental impacts.

A description of the Project, its location, and potential environmental effects, is attached. The City of Perris has determined that an EIR is required and no Initial Study will be prepared (see State CEQA Guidelines, Sections 15060 and 15081).

NOP COMMENT PERIOD:

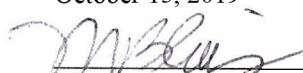
The City invites you to submit written comments describing your specific environmental concerns. If you are representing a public agency, please identify your specific areas of statutory responsibility, if applicable. Written comments are desired at the earliest possible date, but due to the time limits mandated by State law, your response must be sent no later than 30 days after receipt of this notice. **The NOP public comment period begins on October 16, 2019 and ends on November 14, 2019. A public scoping meeting is scheduled for 6:00 p.m., November 6, 2019 in the City Council Chambers of the City of Perris, 101 North "D" Street.** Please send your written comments to the City staff contact identified above, and please include your name, address, and contact information in your correspondence.

Project Title: IDI Rider 2 & 4 Warehouses and Perris Valley Storm Drain Channel Improvement Project

Project Applicant: Mr. Steve Hollis
IDI Logistics
840 Apollo Street, Ste. 100
El Segundo, CA 90245

Date: October 15, 2019

Signature:


Mary Blais, Contract Planner

I. PROJECT SITE LOCATION AND SETTING

The IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain (PVSD) Channel Improvement Project (Project) area is located in the southeast portion of the Perris Valley Commerce Center Specific Plan (PVCCSP) area, in the City of Perris, in Riverside County. The Project area encompasses approximately 94.7 acres, and includes the Rider 2 site, the Rider 4 site, and the PVSD Channel Improvement area. The Project area is generally located north of Rider Street, east of Redlands Avenue, and south of Morgan Street; an approximately 3,490-foot segment of the PVSD Channel forms the eastern Project boundary. The regional and local vicinity of the Project area are shown on Exhibit 1 (attached at the end of this NOP).

The Project consists of the following three primary components, which are shown on Exhibit 2, Conceptual Site Plans, and described in Section III, Project Description, below:

- **Rider 2 High Cube Warehouse.** The Rider 2 site¹ encompasses approximately 38.3 net acres and is located south of the Colorado River Aqueduct (CRA) (the CRA is within Metropolitan Water District [MWD] property), north of Rider Street, east of Redlands Avenue, and west of the PVSD Channel.
- **Rider 4 High Cube Warehouse.** The Rider 4 site² encompasses approximately 26.7 net acres and is south of Morgan Street, north of the MWD property, east of Redlands Avenue, and west of the PVSD Channel.
- **PVSD Channel Improvement.** The PVSD Channel improvement area³ encompasses 29.7 acres and extends along the PVSD Channel from an area approximately 100 feet north of Morgan Street to an area approximately 120 feet south of Rider Street. The PVSD Channel forms the eastern boundary of the PVCCSP area.

The existing General Plan land use designation and zoning for the Project area is Specific Plan (i.e., the PVCCSP) (City of Perris, 2013). The Rider 2 and Rider 4 sites are designated for Light Industrial uses in the PVCCSP, and the PVSD Channel is designated for the Future Perris Valley Storm Drain (Perris, 2018).

As shown on Exhibit 3, Aerial Photograph, the Rider 2 and Rider 4 sites are undeveloped and generally flat; elevations range from approximately 1,430 to 1,450 feet above mean sea level (amsl), descending gradually to the southeast. These sites can generally be characterized as disked and disturbed vacant land that was historically utilized for agricultural purposes. Morgan Street is unimproved along the northern boundary of the Rider 4 site; Redlands Avenue is under construction along the western boundaries of the Rider 2 and Rider 4 sites (estimated to be completed in October 2019); and Rider Street is partially improved along the southern boundary of the Rider 2 site. The PVSD is an engineered flood control channel that is mowed and maintained on an annual basis by the Riverside County Flood Control & Water Conservation District (RCFC&WCD).

The land uses surrounding the Project area include undeveloped vacant land to the north of the Rider 2 site; industrial uses to the west of the Rider 2 and Rider 4 sites (including the Rider 3 warehouse under construction to the west Rider 2 warehouse site); vacant land, non-conforming residential uses, and the Southern California Edison (SCE) Bunker Substation to the south, across Rider Street; and Morgan Park to the northeast. Vacant land within the New Horizons Specific Plan area is located to the east (across the PVSD Channel), and is planned to be developed with a City of Perris park. The CRA extends underground within the MWD easement between the Rider 2 and Rider 4 sites and connects to the PVSD Channel.

¹ Includes Assessor Parcel Numbers (APNs) 303-170-004, -005, -011 and -014.

² Includes APNs 303-160-002, -003, -007, -009, and -010. APN 303-160-016 includes a parcel currently owned by the Eastern Municipal Water District.

³ Includes APNs 303-160-008, and 303-170-016 and -017.

The Project area is within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and is not within an MSHCP Criteria Cell, Core or Linkage Area, or Mammal or Amphibian Survey Area. The Project area is in the Criteria Area Plant Species Survey Area, Narrow Endemic Plant Species Survey Area, and Burrowing Owl Survey Area. Additionally, the PVSD Channel improvement area is a water feature that is mapped as Public/Quasi-Public (PQP) Conserved lands. The Rider 2 and Rider 4 sites include disturbed/developed and ruderal vegetation types. The PVSD Channel improvement area includes the following vegetation/land use types: developed, ruderal (upland), ruderal (channel), disturbed emergent marsh, and disturbed southern riparian scrub. The PVSD Channel improvement area contains areas under the jurisdiction of the U.S. Army Corps of Engineers (Corps), Regional Water Quality Control Board (RWQCB), and California Department of Fish Wildlife (CDFW). MSHCP Riparian/Riverine area in the Project area occurs wholly within the PVSD Channel improvement area and is identical to that of CDFW jurisdiction.

The Project area is located approximately two miles southeast of March Air Reserve Base/Inland Port (MARB/IP), is within the MARB/IP Airport Influence Policy Area, and is within the City's Airport Overlay Zone. Specifically, the Rider 2 site is within the Outer Horizontal Surface and Approach/Departure Clearance Surface of the Federal Aviation Regulations (FAR), Part 77 (Imaginary Surfaces), and Compatibility Zone C1 (Primary Approach/Departure Zone) and Zone D (Flight Corridor Buffer) of the 2014 MARB/IP Airport Land Use Compatibility Plan (ALUCP). The Rider 4 site is within the Outer Horizontal Surface, Transitional, Conical Surface, and Primary Approach/Departure Clearance Surface of the FAR, Part 77 (Imaginary Surfaces), and Compatibility Zone D of the 2014 MARB/IP ALUCP.

II. PROJECT BACKGROUND

On January 10, 2012, the City of Perris City Council adopted the PVCCSP, which was prepared pursuant to the authority granted to the City by California Government Code, Title 7, Division 1, Chapter 3, Article 8, Sections 65450 to 65457. On the same date, the City also adopted Ordinance No. 1284, adopting Specific Plan Zoning for properties within the PVCCSP area. The PVCCSP land uses allow for the development of approximately 3,500 acres which consist of industrial, commercial, and office uses, as well as public facilities. The PVCCSP has been subsequently amendment eight times, with Amendment No. 8 occurring in July 2018. In conjunction with its approval of the PVCCSP, the City complied with CEQA by preparing and certifying the *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report* (PVCCSP EIR) (State Clearinghouse No. 2009081086) (Perris, 2011).

The proposed Rider 2 and Rider 4 warehouses are within the larger Rider Logistics Center in the City of Perris. The Rider 1 and 3 warehouses were previously approved and it is estimated that construction of these warehouses will be complete in October 2019. Rider 1 was originally approved in 2007 (DPR 06-0365) and is 492,282 square feet (sf). Rider 3 was originally approved in 2009 (DPR 06-0432) and is 643,263 sf. It should also be noted that in 2008 development of a smaller warehouse was approved on the Rider 2 site (378,521 sf compared to the currently proposed 806,371 sf warehouse).

The Perris Valley Master Drainage Plan (PVMDP) was adopted by the RCFC&WCD in July 1987, was revised in June 1991, and addresses drainage infrastructure required for the 38-square-mile Perris Valley area (RCFC&WCD, 1991). The infrastructure plans associated with the PVCCSP involve modifications to the PVMDP. The Perris Valley Channel Master Drainage Plan (PVCMDP) was adopted in October 1989 and addresses drainage needs along the PVSD Channel, which flows to the San Jacinto River (RCFC&WCD, 1989). The PVCMDP serves as long-term guide to the design and construction of the ultimate channel, and identifies the sizing and location of local drainage facilities to be constructed by developers and others within the area. The PVCCSP also anticipates the construction of other adopted PVMDP facilities to accommodate the 100-year storm flows in the area.

III. PROJECT DESCRIPTION

The Project involves the construction and operation of two industrial buildings (Rider 2 and Rider 4) totaling 1,373,449 sf, and the construction and subsequent operation and maintenance of improvements to the PVSD Channel along the eastern portion of the Project site. These primary Project components to be evaluated in the Draft EIR are described below.

Rider 2 and Rider 4 High Cube Warehouses

As shown on Exhibit 2, the proposed Rider 2 building would be 806,351 sf and the proposed Rider 4 building would be 567,098 sf; each building would accommodate high-cube, non-refrigerated warehouse/distribution uses. The buildings would be up to 44-feet 10-inches high. The warehouses would be constructed as “speculative” buildings; that is, there is not a specific tenant identified at this time. It is anticipated that the buildings could operate 24 hours a day, seven days a week.

The Project has been designed to be in compliance with the applicable Standards and Guidelines and permitted uses outlined in the PVCCSP, including but not limited to landscape, setback, lot coverage, floor to area ratio (FAR), architectural elements, light and glare requirements, vehicular circulation, non-vehicular circulation, parking, and drainage facilities. The Project has also been designed to comply with applicable requirements of the 2014 MARB/Inland Port ALUCP relative to uses within Compatibility Zones C1 and D.

Access to the Rider 2 site would be provided from new driveways along Redlands Avenue and Rider Street, and access to the Rider 4 site would be provided from new driveways along Redlands Avenue, Morgan Street and Sinclair Street. In addition to the driveway access improvements, the Project would include site adjacent intersection and roadway improvements. Rider Street would be constructed to its ultimate half-section width as a Secondary Arterial (94-foot right-of-way) and Morgan Street would be constructed to its ultimate half-section width as a Local Street (60-foot right-of-way). Redlands Avenue is being constructed to its ultimate full-width as a Secondary Arterial as part of the Rider 1 and Rider 3 projects. The intersection locations that require improvements will be determined based on the Project-specific traffic analysis, but the locations would include the Redlands Avenue intersections with Morgan Street, Sinclair Street, and Rider Street. Automobile and truck trailer parking would be provided in excess of parking requirements outlined in the PVCCSP.

Landscaped parkways would be provided along adjacent roadways; Redlands Avenue, Markham Street, and Rider street are designated as a Major Roadway Visual Corridors in the PVCCSP. Walls and fences would be provided on site as required for screening, privacy, and security. Additionally, extensive landscaping would be provided along the eastern site boundaries to screen views of the proposed buildings from planned park uses and existing residential uses to the east.

South of the Rider 4 site, the Project includes an approximately 90-foot greenbelt, north of and outside the MWD right-of-way. The greenbelt would include a meandering 15-foot wide decomposed granite trail, landscaping and a turnaround, consistent with the requirements outlined in the PVCCSP for the “MWD Trail.” The Project would also comply with the PVCCSP employee amenities guidelines by providing employee break areas, as required.

The Project would include the installation of on-site storm drain, water quality, water, sewer, electric, natural gas, and telecommunications infrastructure systems to serve the proposed warehouse uses. The on-site utility infrastructure would connect to existing utilities in the vicinity of the Project site or new utility lines that would be installed in the roadways adjacent to the Project site. PVCMDP Lateral G-2 would be

constructed as an open channel within the greenbelt area south of Rider 4 site and would connect underground to the PVSD Channel to the east, and to the portion of the Lateral G-2 constructed under Redlands Avenue as part of the Rider 3 project to the west.

PVSD Channel Improvements

The proposed improvements to the PVSD Channel entail Phase 1 of a larger channel improvement project, which would ultimately extend north to just past Ramona Expressway and south of Rider Street. Phase 1 of the proposed PVSD Channel improvements begins approximately 100 feet north of Morgan Street. The PVSD Channel in this area would transition to a 550-foot-wide channel. The proposed PVSD Channel right-of-way would be up to 580-foot-wide and would include 15-foot wide access roads on each side until it reaches the CRA. The Project has been designed to protect the CRA and associated existing MWD manholes in place. Downstream of the CRA, the PVSD Channel would be deepened and would transition with an engineered drop structure at the MWD easement to a 440-foot-wide channel with a 56-foot-wide by 5-foot-deep low flow channel. In this area, the proposed PVSD Channel right-of-way would be 495 feet wide and would also include 15-foot wide access roads on each side. The PVSD Channel would be earthen except in the vicinity of the engineered drop structure and Rider Street bridge, where it would have concrete side slopes. Erosion protection features would be installed, and existing storm drain inlets that tie into the PVSD would be reconstructed as part of the Project.

The existing Rider Street crossing over the PVSD Channel includes one travel lane in each direction, with a painted median and shoulders, and is supported by a reinforced concrete box (RCB) culvert. The existing crossing would be replaced and widened to allow for two travel lanes and a sidewalk in each direction, and a median, consistent with its designation as a Secondary Arterial. The proposed bridge span is approximately 235 feet long by 74 feet wide. The PVSD Channel would be soft-bottomed, and the bridge would be supported by concrete piers spaced at 30-foot intervals (on center).

Construction Activities

Construction of the Project is expected to begin in the fall 2020 and be complete by the fall of 2021. Construction of the PVSD Channel improvements would involve excavation and would require approximately 180,000 cubic yards (cy) of soil export. The soil would be exported to the Rider 2 and Rider 4 sites using scrapers, which eliminates the need for trucks to haul the soil. It is anticipated the earthwork would balance within the Project area.

IV. REQUIRED PERMITS/ACTIONS

Pursuant to the provisions of CEQA and the State CEQA Guidelines, the City of Perris is the Lead Agency and is charged with the responsibility of deciding whether or not to approve the Project. The Project is consistent with the land use designations of the PVCCSP and City of Perris General Plan; therefore, no General Plan Amendment, Specific Plan Amendment, or zone change is required.

The following approvals and permits are required from the City of Perris to implement the Project:

- Certification of the EIR with the determination that the EIR has been prepared in compliance with the requirements of CEQA (Case No. 19-05180).
- Development Plan Review (DPR) (Case No. 19-00004) for the Rider 2 and Rider 4 site plans and building elevations.
- Tentative Parcel Map (TPM) No. 37437 for the Rider 2 site (Case No. 19-05058) to merge five existing parcels into one parcel and one lettered lot for dedication to the RCFC&WCD; and, vacate

all or portions of the rights-of-way of three unimproved streets (Redlands Avenue, Kitching Street, and Adams Street).

- Tentative Parcel Map (TPM) No. 37438 for the Rider 4 site (Case No. 19-05096) to merge four existing parcels into one parcel and one lettered lot for dedication to the RCFC&WCD; and, vacate all or portions of the rights-of-way of two unimproved streets (Kitching Street and Sinclair Street).

Other non-discretionary actions anticipated to be taken by the City at the staff level as part of the Project include:

- Review and approval of all off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval;
- Review all on-site plans, including grading and on-site utilities; and
- Approval of a Final Water Quality Management Plans (FWQMP) to mitigate post-construction runoff flows.

Approvals and permits that may be required by other agencies include:

- **U.S. Army Corps of Engineers.** Section 404 permit for any impacts to areas within the PVSD Channel determined to be under the jurisdiction of the Corps.
- **State of California Department of Fish and Wildlife.** Streambed Alteration Agreement pursuant to Section 1602 of the California Fish and Game Code for any impacts to areas within the PVSD Channel determined to be under the jurisdiction of the CDFW.
- **Regional Water Quality Control Board.** A National Pollutant Discharge Elimination System (NPDES) permit to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened. Additionally, a Section 401 Water Quality Certification for any impacts to areas within the PVSD Channel determined to be under the jurisdiction of the RWQCB.
- **Metropolitan Water District.** A lease agreement with MWD for implementation of the PVSD Channel improvements within MWD's right-of-way.
- **Riverside County Flood Control & Water Conservation District.** Encroachment permit for construction in RCFC&WCD right-of-way, and approval of the PVSD Channel improvement plans.
- **Eastern Municipal Water District.** Approval of Water Supply Assessment and water and sewer improvement plans.
- **South Coast Air Quality Management District (SCAQMD).** Permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants, such as HVAC units.
- **Other Utility Agencies.** Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.

V. PROBABLE ENVIRONMENTAL EFFECTS OF THE PROJECT

The PVCCSP EIR is a program EIR, and project-specific evaluation in a later-tier environmental document for individual development projects within the Specific Plan area was anticipated. As stated in Section 15168(d)(3) of the State CEQA Guidelines, “The program EIR can focus an EIR on a subsequent project to permit discussion solely of new effects which had not been considered before”. As such, the environmental analysis for the Project will be based on, or “tiered” from, the analysis presented in the PVCCSP EIR, when applicable.

The PVCCSP EIR analyzes the direct and indirect impacts resulting from implementation of the allowed development under the PVCCSP. Measures to mitigate, to the extent feasible, the significant adverse project and cumulative impacts resulting from that development are identified in the EIR. In conjunction with certification of the PVCCSP EIR, the City of Perris also adopted a Mitigation Monitoring and Reporting Program (MMRP). Additionally, the PVCCSP includes Standards and Guidelines to be applied to future development projects in the Specific Plan area. The City of Perris requires that future development projects in the Specific Plan area comply with the required PVCCSP Standards and Guidelines and PVCCSP EIR mitigation measures as outlined in the MMRP and that these requirements are implemented in a timely manner. Relevant Standards and Guidelines and PVCCSP EIR mitigation measures that are incorporated into the Project will be listed for each topical issue in the EIR.

The Draft EIR for the Project will contain a detailed Project Description, a description of the existing environmental setting of the Project sites and surrounding areas, analysis of Project-specific environmental impacts, analysis of cumulative impacts, identification of additional Project-specific mitigation measures required to reduce potentially significant impacts, and an analysis of alternatives to the Project that could reduce one or more of the potentially significant impacts of the Project.

Based on currently available information, and as discussed below, the City has determined that the Project would have no impacts or less than significant impacts related to mineral resources, population and housing, and wildfire. Therefore, no further analysis of these environmental topics will be provided in the Draft EIR.

- **Mineral Resources.** Figure OS-6 of the Riverside County General Plan and the California Department of Conservation’s Mineral Land Classification for the area shows that the Project site is located within Mineral Resource Zone 3 (MRZ-3). MRZ-3 represents areas where the available geologic information indicates that mineral deposits exist or are likely to exist; however, the significance of the deposit cannot be evaluated from available data (County of Riverside, 2015, Figure OS-6; DOC, 2011). In addition, the California Department of Conservation does not show oil, gas, or geothermal fields underlying the site; and no oil or gas wells are recorded on or near the site in the Division of Oil, Gas, and Geothermal Resources (DOGGR) Well Finder (DOC, 2019). No sites within the City of Perris City limits have been designated as locally important mineral resource recovery sites in the City of Perris General Plan or the Riverside County General Plan (Perris, 2005). Accordingly, no impact to the availability of a regionally or locally important mineral resource would occur. No impacts are anticipated.
- **Population and Housing.** The Project site is currently undeveloped; and construction of the Project would not require the construction of replacement housing and would not displace any existing housing or residents. The Project does not involve the development of residential uses and would not directly increase the resident population, but the Project would create jobs and increase employment in the City of Perris. The extent to which the new jobs created by a Project are filled by existing residents is a factor that tends to reduce the growth-inducing effect of a Project. The Project would create short-term jobs during the construction phase. These short-term positions would be filled by workers who, for the most part, would already reside in the local area;

therefore, construction of the Project would not generate a substantial temporary or permanent increase in population within the Project area.

Table 4.8-E, Development Intensity and Employment Projections, of the PVCCSP EIR, identifies average employment generation factors for the allowed development types identified in the PVCCSP. As this relates to industrial uses, one employee per 1,030 sf is estimated for Light Industrial floor space. The Project consists of the construction and operation of up to 1,373,449 sf of warehouse/distribution uses, which are allowed under the Light Industrial Specific Plan land use designation. Based on this generation factor, the Project could employ approximately 1,333 new employees. The PVCCSP EIR estimates that implementation of the land uses allowed under the PVCCSP would result in the generation of approximately 56,087 jobs/employees in the area (see Table 4.8-E under Section 4.8, Land Use and Planning, and the discussion of “Growth Inducing Impacts” in Section 5 of the PVCCSP EIR). Therefore, the employment generation estimated for the Project (1,333 employees) represents approximately 2.3 percent of the total employment generation anticipated in the Specific Plan area. Further, this represents approximately 4.1 percent of the City’s projected employment base by 2040 as presented in the Southern California Association of Governments (SCAG) 2016 *Regional Transportation/Sustainable Communities Strategy (RTP/SCS)* (32,200 employees) (SCAG, 2016). Additionally, similar to the short-term construction jobs, it is anticipated that these new warehouse/distribution positions would be filled by workers who would already reside in the local area. The Project would involve the installation of utilities necessary to connect to existing infrastructure systems adjacent to or in the vicinity of the Project site and would involve improvements to adjacent roadways, consistent with the PVCCSP. Additionally, the Project would involve the construction of PVSD Channel improvements consistent with the PVCMDP. Therefore, the Project would not directly or indirectly generate substantial unplanned population growth in the area.

- **Wildfire.** According to Exhibit S-16, Wildfire Constraint Areas, of the City General Plan Safety Element, the Project area is not located in or near an area identified as being a “Wildfire Hazard Area” (Perris, 2016). Additionally, according to the California Department of Forestry and Fire Protection’s (Cal Fire) Fire and Resources Assessment Program (FRAP), the Project area is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City (CalFire, 2019). The Project area is located within the limits of the City of Perris, and is therefore not within a State Responsibility Area (SRA), which is the land where the State of California is financially responsible for the prevention and suppression of wildfires. Therefore, the Project would have no impacts related to wildfires.

The analysis to be provided in the forthcoming Draft EIR, and the supporting technical studies to be included in the Draft EIR, will address the following environmental topics due to the potential for significant impacts, and mitigation measures will be identified, if necessary:

- **Aesthetics.** The Project, which is in a non-urbanized area, would alter the existing visual character of the Project area and would introduce new sources of light during construction and operation. The Draft EIR will evaluate the potential for the Project to have an adverse effect on a scenic vista, to degrade the visual character of the area character, and to create potential light and glare impacts. The Project site is not within a State scenic highway, which will be discussed in the Draft EIR.
- **Agriculture and Forestry Resources.** Based on the California Department of Conservation’s (DOC’s) 2016 Farmland Mapping and Monitoring Program (FMMP), the Rider 2 and Rider 4 sites include Farmland of Statewide Importance, and PVSD Channel area includes Farmland of

Local Importance (FMMP, 2019). The Draft EIR will address the potential environmental impacts of the Project related to agriculture resources based on the sites' background agricultural and soils classification systems and sites' surrounding history. The Project area is not within an area subject to the California Land Conservation Act of 1965 (Williamson Act), is not zoned for agricultural or forestry uses, and does not include forestry resources, which will be discussed in the Draft EIR.

- **Air Quality.** The Project area is located in the South Coast Air Basin (Basin). Air quality in the Basin is administered by the South Coast Air Quality Management District. Impacts related to the following topics will be addressed in the forthcoming Draft EIR: consistency with the Air Quality Management Plan for the Basin; the potential for a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under applicable air quality standards; the potential exposure of sensitive receptors to substantial pollutant concentrations, including mobile source health risk impacts; and potential for the other emissions (such as those leading to odors adversely affecting a substantial number of people).
- **Biological Resources.** As previously identified, the Project area is within the Western Riverside County MSHCP area. The Draft EIR will identify existing biological resources at the Project sites and will address potential impacts to sensitive species, sensitive natural communities, riparian habitat and protected wetlands; and, wildlife movement. The Project's consistency with the City's Urban Forestry Ordinance (Ordinance 1262), and the Western Riverside County MSHCP will also be addressed in the Draft EIR.
- **Cultural Resources.** During construction of the Project, ground-disturbing activities could encounter and cause a substantial adverse change the significance of previously unknown historical or archaeological resources, or human remains. Potential impacts to cultural resources will be addressed in the Draft EIR.
- **Energy.** The Project will consume energy resources during construction and operation. The Draft EIR will address the potential for the Project to result in the wasteful, inefficient, or unnecessary consumption of energy resources, and whether the Project would conflict with state or local plans for renewable energy or energy efficiency.
- **Geology and Soils.** The Draft EIR will address the geological, soil, and seismic hazards having the potential to impact the Project and Project occupants. The Project sites are in an area with high paleontological sensitivity, and the potential to impact paleontological resources will be addressed in the Draft EIR.
- **Greenhouse Gas Emissions.** The potential for the Project to generate greenhouse gas (GHG) emissions during construction and operation, either directly or indirectly, that may have a significant impact on the environment will be addressed in the Draft EIR. Furthermore, the Draft EIR will include an evaluation of consistency of the Project with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs.
- **Hazards and Hazardous Materials.** The Draft EIR will address potential hazards during construction and operation of the Project, and the potential for exposure of construction workers and Project occupants to hazardous materials. The Project area is not within 1/4 -mile of a school; the nearest school is approximately 0.3 mile to the east, which will be addressed in the Draft EIR. The Draft EIR will evaluate the potential safety and noise impacts related to the Project's proximity to the MARB/IP Airport and consistency with applicable provisions of the MARB/IP

ALUCP. The potential to impair or interfere with an adopted emergency response plan will also be addressed. As identified previously, the Project area is not in a wildfire hazard area; therefore, no further analysis of the potential for wildland fires will be provided in the Draft EIR.

- **Hydrology and Water Quality.** The Draft EIR will address the potential for the Project to violate water quality standards and to degrade water quality during construction and operation. Project features included in the Project-specific Water Quality Management Plan (WQMP) to treat and/or limit the entry of contaminants into the storm drain system will be identified in the Draft EIR. The Project would increase the amount of impervious surface on the Rider 2 and Rider 4 sites. Changes to the drainage patterns will be identified in the Draft EIR and potential impacts from these changes related to erosion and siltation, the amount and rate of storm water runoff, flooding and impeding flood flows, and storm drain capacity will be addressed. The PVSD Channel improvement component of the Project will improve the overall flood protection in the area, which will also be addressed in the Draft EIR. The Draft EIR will also address the potential for release of pollutants from Project inundation, and the Project's consistency with the applicable water quality control plan and sustainable groundwater management plan.
- **Land Use and Planning.** The Project involves the construction and operation of light industrial warehouse uses and improvements to the PVSD Channel, and is consistent with the existing General Plan land use, PVCCSP, and zoning designations. The consistency of the Project with applicable General Plan goals and policies, the PVCCSP, and zoning will be addressed in the Draft EIR. Analysis of the Project's consistency with applicable provisions of the MARB/IP ALUCP, and SCAG's regional planning programs will also be provided. The Project would not divide an established community, which will be addressed in the Draft EIR.
- **Noise.** The Draft EIR will address the potential for construction-related and operational (stationary and mobile) noise increases to exceed applicable established noise standards, and the potential for vibration during construction and operation. The potential for exposure of Project occupants to noise from the MARB/IP Airport will also be addressed.
- **Public Services.** The Draft EIR will address the potential increase in demand for public services resulting from the Project (i.e., police protection, fire protection, schools, and parks and recreation), and whether there is a need for new or physically altered government facilities, which could cause significant physical environmental impacts.
- **Recreation.** The Draft EIR will address the potential for employees of the Project to increase the use of existing parks or recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. As previously identified, the Project involves the implementation of a trail between the Rider 2 and Rider 4 sites, and also includes the provision of employee amenities. The potential physical environmental impacts resulting from these facilities will be addressed in the Draft EIR.
- **Transportation.** The Draft EIR will address the potential for the Project to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. It should be noted that the City of Perris has not established a vehicle miles traveled (VMT) threshold of significance and is not yet requiring development projects, including the Project, to demonstrate compliance with CEQA Guidelines Section 15064.3(b), which requires that traffic impacts be measured based on VMT. The potential for the Project to increase hazards due to geometric design, and to result in inadequate emergency access will also be addressed in the Draft EIR.

- **Tribal Cultural Resources.** The Draft EIR will discuss impacts related to tribal cultural resources directly related to California Native American tribes that populated the area where the Project area is geographically located. The Draft EIR will also discuss the results of Native American consultation activities conducted by the City, as required by Assembly Bill (AB) 52.
- **Utilities and Service Systems.** The Project involves the installation of utility infrastructure needed to serve the Project (e.g., water, sewer, storm drains, electric, natural gas, telecommunications). The physical environmental impacts resulting from the installation of utility infrastructure on- and off-site, including the proposed PVSD Channel improvements, will be addressed in the Draft EIR. The Draft EIR will present the results of a Water Supply Assessment to be conducted by EMWD, and will address the capacity of EMWD's water treatment facilities. The solid waste generation from the Project during construction and operation will be estimated, and the Draft EIR will address the capacity of the local infrastructure for solid waste management, and whether the Project would comply with solid waste management regulations.

VI. FUTURE PUBLIC MEETINGS

As identified previously, the City of Perris will conduct a Draft EIR scoping meeting on November 6, 2019 during the regularly scheduled Planning Commission meeting. At the meeting, the City will provide background information on environmental impact reports, provide a brief overview of the Project and will solicit public input on environmental issues to be addressed in the Draft EIR and on items of public concern. Issues identified during the scoping meeting will be addressed in the Draft EIR (as appropriate).

VII. RESPONSE TO THIS NOTICE OF PREPARATION

Please provide written comments no later than 30 days from receipt of this Notice of Preparation. According to Section 15082(b) of the State CEQA Guidelines, your comments should address the scope and content of environmental information related to your agency's area of statutory responsibility. More specifically, your response should identify the significant environmental issues and reasonable alternatives and mitigation measures that your agency will need to have explored in the Draft EIR; and, whether your agency will be a responsible agency or a trustee agency, as defined by CEQA Code Sections 15381 and 15386, respectively. Please return all comments to the following address:

Mary Blais, Contract Planner
City of Perris Planning Division
135 North "D" Street
Perris, California 92570
Email: mblais@cityofperris.org
(951) 943-5003

The City of Perris appreciates your conscientious attention to this Notice of Preparation.

VIII. DOCUMENTS INCORPORATED BY REFERENCE AND REFERENCES

The following reports and/or studies are applicable to development of the Project site and are hereby incorporated by reference. The reports are available for review at the City of Perris Planning Division at

the address above.

- *Perris General Plan 2030 Environmental Impact Report*, SCH No. 2004031135, certified April 26, 2005 (Perris, 2005)
- *Perris Valley Commerce Center Specific Plan*, adopted January 10, 2012 and amended through July 2018 (Amendment No. 8) (Perris, 2018)
- *Perris Valley Commerce Center Final Environmental Impact Report*, SCH No. 2009081086, certified January 10, 2012 (Perris, 2011)

The following supporting documentation was used in preparing this NOP:

California Department of Conservation (DOC), Division of Mines and Geology (DOC DMG). 2011 (February 11). Special Report 143 – Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, San Bernardino Production-Consumption Region. Sacramento, CA: DOC DMG. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartVII/

California Department of Conservation (DOC), Division of Oil, Gas, and Geothermal Resources (DOGGR). 2019 (May 15, access date). Division of Oil, Gas, and Geothermal Resources Well Finder. Sacramento, CA: DOC DOGGR. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.35333/33.95744/11>

California Department of Conservation (DOC), Farmland Mapping and Monitoring Program (FMMP). 2019. California Important Farmland Finder. Sacramento, CA: FMMP. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

California Department of Forestry and Fire Protection (CalFire). 2019. FHSZ Viewer. Sacramento, CA: CalFire. <https://egis.fire.ca.gov/FHSZ/>.

Perris, City of. 2005 (April, approved). Comprehensive General Plan 2030. Perris, CA: the City. <http://www.cityofperris.org/city-hall/general-plan.html>.

———. 2013 (January 3, updated). General Plan Map. Perris, CA: the City: <http://www.cityofperris.org/city-hall/general-plan.html>.

———. 2016 (August 30). General Plan Safety Element. Perris, CA: The City. http://www.cityofperris.org/city-hall/general-plan/Safety_Element.pdf.

Riverside, County of. 2015 (December 8). County of Riverside General Plan: Multipurpose Open Space Element. Riverside, California: the County. https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/elements/OCT17/Ch05_MOS_E_120815.pdf?ver=2017-10-11-102103-833.

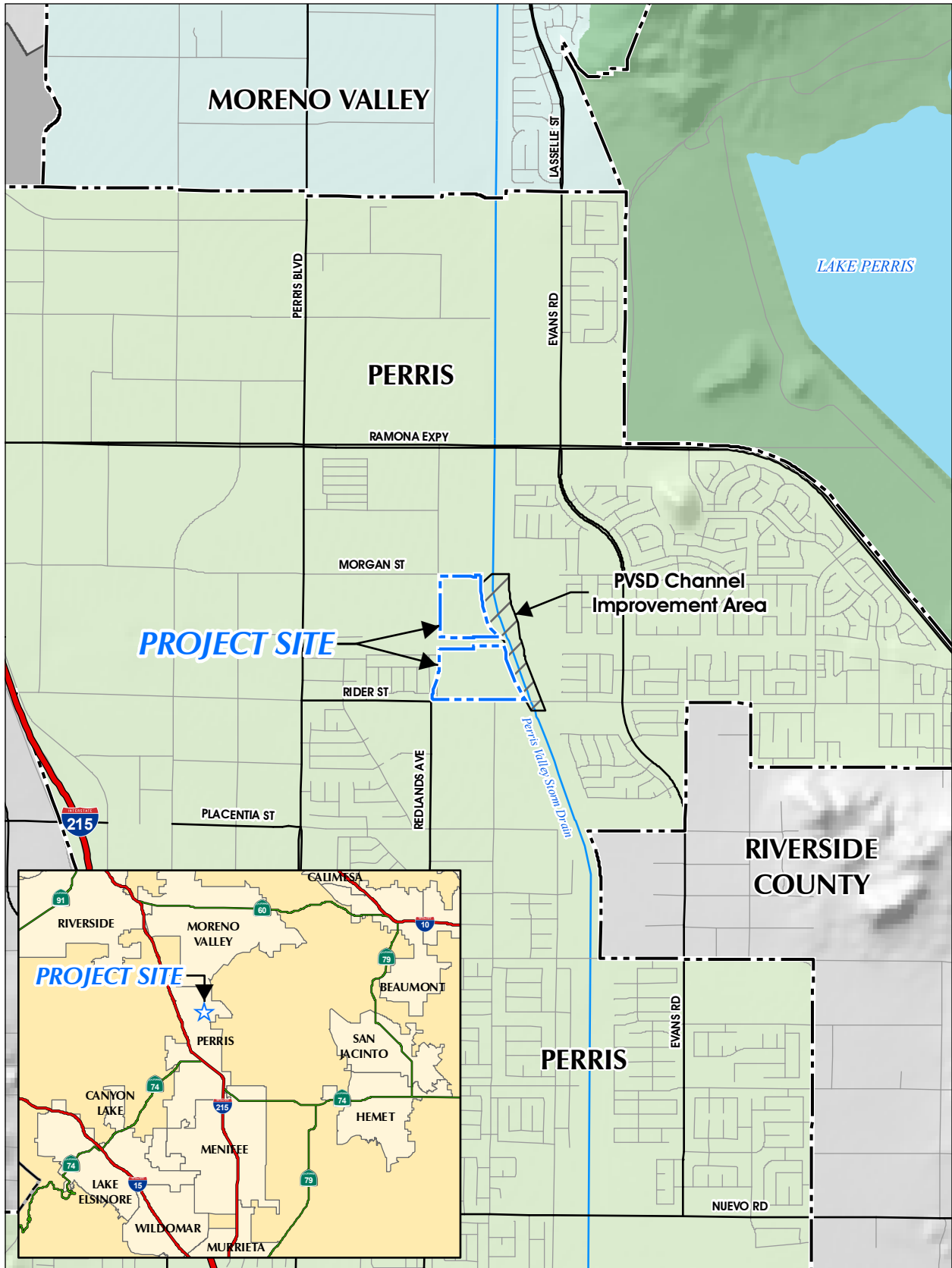
Riverside County Flood Control and Water Conservation District (RCFC&WCD). 1989. (October). Master Drainage Plan for the Perris Valley Channel. <http://rcflood.org/Downloads/Master%20Drainage%20Plans/Updated/Zone%204/Reports/PV%20Channel%20MDP%20report.pdf>.

———. 1991 (June). Master Drainage Plan for Perris Valley Area. <http://rcflood.org/Downloads/Master%20Drainage%20Plans/Updated/Zone%204/Reports/Perris>

ValleyMDP_report.pdf.

Southern California Association of Governments. (SCAG). 2016. 2016-2040 RTP SCS Demographics Growth Forecast Appendix. Profile of the City of Perris. Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf

IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project
Notice of Preparation



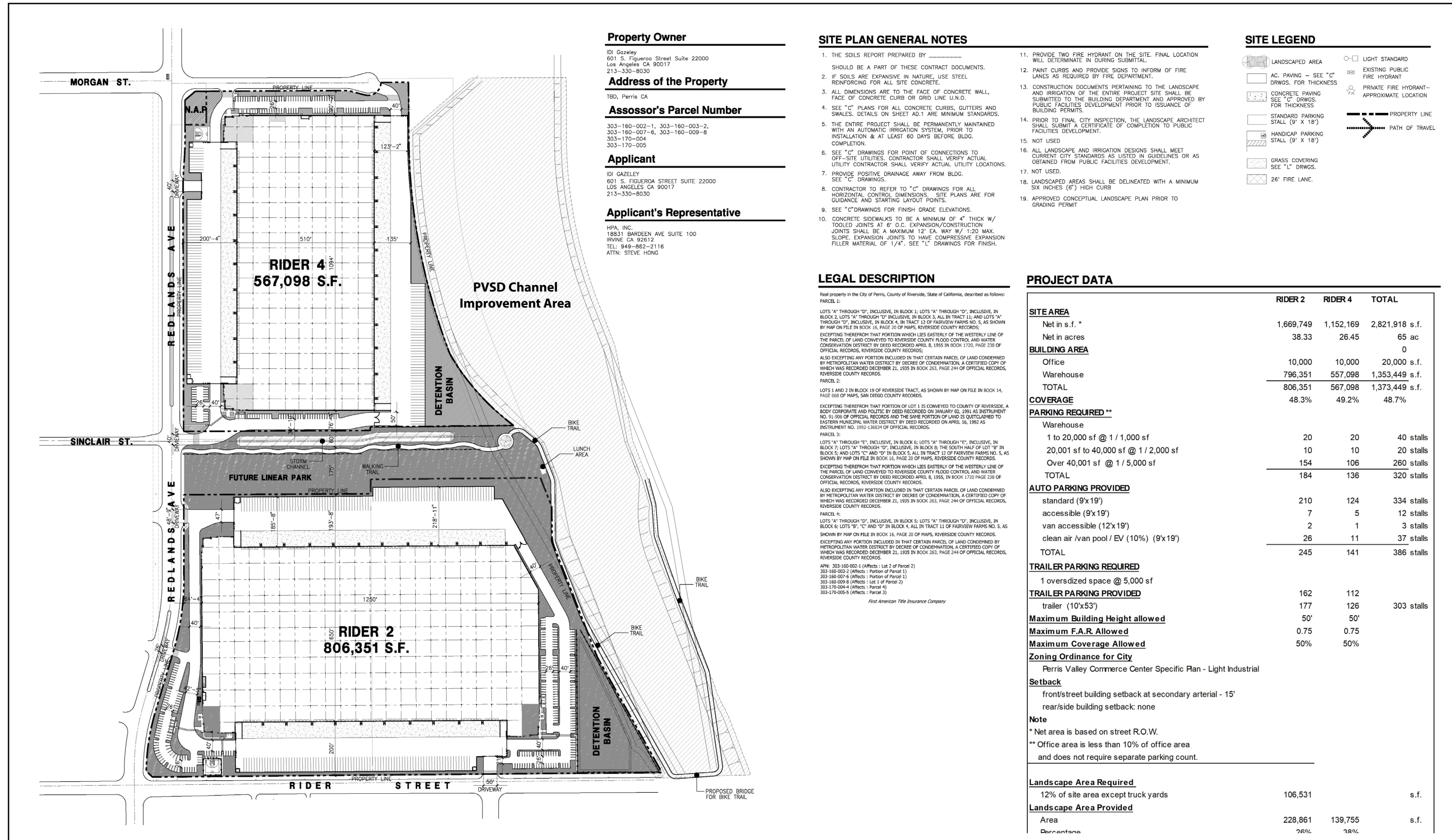
Source(s): RCTLMA (2019)



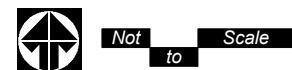
Exhibit 1

Project Location

Lead Agency: City of Perris



Source(s): HPA (10-08-2019)



IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project
Notice of Preparation



Source(s): Nearmap Aerial (2019), RCLMA (2019)

Exhibit 3



Aerial Photograph

Lead Agency: City of Perris

ATTACHMENT A

Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

California Air Resources Board (CARB) staff recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommend by CARB staff, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits such that emission reductions achieved equal or exceed that of a Tier 4 engine.
4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NO_x standard starting in the year 2022.¹

¹ In 2013, CARB adopted optional low-NO_x emission standards for on-road heavy-duty engines. CARB staff encourages engine manufacturers to introduce new technologies to reduce NO_x emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model years 2010 and later. CARB's optional low-NO_x emission standard is available at: <https://www.arb.ca.gov/msprog/onroad/optionnox/optionnox.htm>.

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB staff is available to assist in implementing this recommendation.

Recommended Operation Measures

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration and cryogenic transport refrigeration are encouraged and can also be included lease agreements.²
3. Include contractual language in tenant lease agreements that requires all TRUs entering the project site be plug-in capable.
4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
5. Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the Project site be zero-emission.
6. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.
7. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later today, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.

². CARB's Technology Assessment for Transport Refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf.

8. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,³ Periodic Smoke Inspection Program (PSIP),⁴ and the Statewide Truck and Bus Regulation.⁵
9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site.
10. Include contractual language in tenant lease agreements that limits on-site TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted and the health impacts fully mitigated.
11. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

³ In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: <https://www.arb.ca.gov/cc/hdghg/hdghg.htm>.

⁴ The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: <https://www.arb.ca.gov/enf/hdvp/hdvp.htm>.

⁵ The regulation requires newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

Notice of Preparation

October 16, 2019

To: Reviewing Agencies

Re: IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement
SCH# 2019100297

Attached for your review and comment is the Notice of Preparation (NOP) for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Mary Blais
Perris, City of
135 N. "D" Street
Perris, CA 92570

with a copy to the State Clearinghouse in the Office of Planning and Research at state.clearinghouse@opr.ca.gov. Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019100297/2>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Lead Agency

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

2019100297

Project Title: IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement

Lead Agency: City of Perris Contact Person: Mary Blais, Contract Planner
 Mailing Address: 135 North "D" Street Phone: (951) 943-5003 ext. 252
 City: Perris Zip: 92570 County: Riverside

Project Location: County: Riverside City/Nearest Community: Riverside
 Cross Streets: Rider Street/Redlands Avenue, Morgan Street/Redlands Avenue Zip Code: 92571
 Longitude/Latitude (degrees, minutes and seconds): 33 ° 50 ' 00 " N / 117 ° 12 ' 49 " W Total Acres: Approx. 95
 Assessor's Parcel No.: See attached APN list Section: 8 Twp.: 4S Range: 3W Base: San Bern.
 Within 2 Miles: State Hwy #: 215 Waterways: Perris Valley Storm Drain
 Airports: March Air Reserve Base Railways: N/A Schools: May Ranch Elementary

Document Type:

CEQA: NOP Draft EIR NEPA: NOI Other: Joint Document
 Early Cons Supplement/Subsequent EIR EA Final Document
 Neg Dec (Prior SCH No.) Draft EIS Other: _____
 Mit Neg Dec Other: _____ FONSI

Local Action Type:

General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Use Change Other: _____

Governor's Office of Planning & Research

OCT 16 2019

STATE CLEARINGHOUSE

Development Type:

Residential: Units _____ Acres _____
 Office: Sq.ft. _____ Acres _____ Employees _____
 Commercial: Sq.ft. _____ Acres _____ Employees _____
 Industrial: Sq.ft. 1,373,449 Acres 65 Employees 56,087
 Educational: _____
 Recreational: _____
 Water Facilities: Type _____ MGD _____
 Transportation: Type _____
 Mining: Mineral _____
 Power: Type _____ MW _____
 Waste Treatment: Type _____ MGD _____
 Hazardous Waste: Type _____
 Other: Perris Valley Storm Drain Channel Improvements

Project Issues Discussed in Document:

Aesthetic/Visual Fiscal Recreation/Parks Vegetation
 Agricultural Land Flood Plain/Flooding Schools/Universities Water Quality
 Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Archeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
 Biological Resources Minerals Soil Erosion/Compaction/Grading Growth Inducement
 Coastal Zone Noise Solid Waste Land Use
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Cumulative Effects
 Economic/Jobs Public Services/Facilities Traffic/Circulation Other: GHG Emissions

Present Land Use/Zoning/General Plan Designation:

Undeveloped; GP and Zoning - Specific Plan; Perris Valley Commerce Center Specific Plan (Light Industrial)

Project Description: (please use a separate page if necessary)

The Project involves the construction and operation of two high-cube warehouse industrial buildings (Rider 2 and Rider 4) totaling 1,373,449 sf, and the construction and subsequent operation and maintenance of improvements to the PVSD Channel along the eastern portion of the Project site.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

November 8, 2019

Kenneth Phung
Planning Manager
City of Perris - Planning Division
135 North D Street
Perris, California 92570

Dear Kenneth Phung:

Thank you for providing California Air Resources Board (CARB) staff with the opportunity to comment on the Notice of Preparation (NOP) for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2019100297. The Project consists of the construction and operation of two non-refrigerated warehouse/distribution buildings totaling approximately 1,373,449 square feet within the City of Perris (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

CARB staff is concerned about the air pollution and health risk impacts that would result should the City approve the Project to build the proposed warehouse buildings. Freight facilities, such as warehouse and distribution facilities, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.

Existing residences are located east, south, southwest, and northwest of the Project site, with the closest residences situated approximately 675 feet from the Project's eastern boundary. In addition to residences, three schools (May Ranch Elementary School, Avalon Elementary School, and Sierra Vista Elementary School) and a daycare center (Tiffany's Tinker Tots Day Care) are located within two miles of the Project. The communities near the Project are surrounded by existing toxic diesel emission sources, which include existing warehouses and other industrial uses and vehicular traffic along Interstate 215 (I-215). Due to the Project's proximity to residences, schools and a daycare center already disproportionately burdened by multiple sources of pollution, CARB staff is concerned with the potential cumulative health impacts associated with the construction and operation of the Project.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece

of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel emissions generated during the construction and operation of the Project would negatively impact the community, which is already disproportionately impacted by air pollution from existing freight facilities.

Through its authority under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). Communities that score within the top 25 percent of the census tracts are exposed to higher concentrations of air pollutants and have a higher Pollution Burden.¹ CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, communities near the Project score within the top 5 percent of the census tracts. Therefore, CARB urges the City to ensure that the Project does not adversely impact neighboring disadvantaged communities.

The Project, as proposed in the NOP, will not include refrigerated storage. The operation of cold storage warehouses would include trucks with transportation refrigeration units (TRU)² that emit significantly higher levels of toxic diesel emissions, oxides of nitrogen (NO_x), and greenhouse gases than trucks without TRUs. CARB staff urges the City to include in the DEIR a Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project site. Alternatively, the City can include a condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use. If the City does allow TRUs within the Project site through an amendment to the Projects conditional use permit, CARB staff recommends the City require all loading/unloading docks and trailer spaces to be equipped with electrical hookups for trucks with TRUs or auxiliary power units.³ In addition, the Project's health impacts should be evaluated in a recirculated health risk assessment (HRA).

¹ Pollution Burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution.

² TRUs are refrigeration systems powered by diesel internal combustion engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

³ An auxiliary power unit (APU) is a device on a vehicle that provides energy for functions other than propulsion.

In addition to the health risk associated with operations, construction health risks should be included in the air quality section of the DEIR and the Project's HRA. Construction of the Project would result in short-term diesel emissions from the use of both on-road and off-road diesel equipment. The Office of Environmental Health Hazard Assessment's (OEHHA) guidance recommends assessing cancer risks for construction projects lasting longer than two months. Since construction would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project site during construction.

The HRA prepared in support of the Project should be based on the latest OEHHA guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments),⁴ and the South Coast Air Quality Management District's CEQA Air Quality Handbook.⁵ The HRA should evaluate and present the existing baseline (current conditions), future baseline (full build-out year, without the Project), and future year with the Project. The health risks modeled under both the existing and the future baselines should reflect all applicable federal, state, and local rules and regulations. By evaluating health risks using both baselines, the public and City planners will have a complete understanding of the potential health impacts that would result from the Project.

To reduce the exposure of toxic diesel emissions in disadvantaged communities already disproportionately impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel and NO_x emission exposure to all neighboring communities, as well as the greenhouse gases that contribute to climate change. CARB encourages the City and applicant to implement the measures listed in Attachment A of this comment letter to reduce the Project's construction and operational air pollution emissions.

CARB staff appreciates the opportunity to comment on the NOP for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period.

⁴ Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>.

⁵ SCAQMD's 1993 Handbook can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

Kenneth Phung
November 8, 2019
Page 4

If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, at (916) 440-8242 or via email at stanley.armstrong@arb.ca.gov.

Sincerely,


Richard W. Corey
Executive Officer

Attachment

cc: See next page.

Kenneth Phung
November 8, 2019
Page 5

cc: State Clearinghouse
P.O. Box 3044
Sacramento, California 95812

Mary Blais
Contract Planner
City of Perris - Planning Division
135 North D Street
Perris, California 92570

Morgan Capilla
NEPA Reviewer
U.S. Environmental Protection Agency
Air Division, Region 9
75 Hawthorne Street
San Francisco, California 94105

Carlo De La Cruz
Sierra Club
714 West Olympic Boulevard, Suite 1000
Los Angeles, California 90015

Lijin Sun
Program Supervisor - CEQA
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Andrea Vidaurre
Center for Community Action and Environmental Justice
P.O. Box 33124
Riverside, California 92519

Stanley Armstrong
Air Pollution Specialist
Exposure Reduction Section
Transportation and Toxics Division



November 8, 2019

VIA EMAIL: MBLAIS@CITYOFPERRIS.ORG

Mary Blais
City of Perris
135 "D" Street
Perris, CA 92570

Dear Ms. Blais:

NOTICE OF PREPARATION FOR THE IDI RIDER 2 & 4 HIGH CUBE WAREHOUSES
AND PERRIS VALLEY STORM DRAIN CHANNEL IMPROVEMENT PROJECT DRAFT
ENVIRONMENTAL IMPACT REPORT, SCH# 2019100297

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation (NOP) for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain (PVSD) Channel Improvement Project Draft Environmental Impact Report (DEIR). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

Project Description

The project involves the construction and operation of two industrial buildings (Rider 2 and Rider 4) totaling 1,373,449 square feet, and the construction and subsequent operation and maintenance of improvements to the PVSD Channel along the eastern portion of the project site.

The project area is located in the southeast portion of the Perris Valley Commerce Center Specific Plan area, in the City of Perris, in Riverside County. The project area encompasses approximately 94.7 acres, and includes the Rider 2 site, the Rider 4 site, and the PVSD Channel Improvement area. The project area is generally located north of Rider Street, east of Redlands Avenue, and south of Morgan Street. Currently the project site is designated as Farmland of Statewide Importance as defined by the Department of Conservation's Farmland and Mapping Program.¹

Department Comments

¹ Department of Conservation, Farmland Mapping and Monitoring Program, California Important Farmland Finder, 2019, <https://maps.conservation.ca.gov/DLRP/CIFF/>

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.² All mitigation measures that are potentially feasible should be included in the project's environmental review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

As the courts have shown³, agricultural conservation easements on land of at least equal quality and size can mitigate the project impacts in accordance with CEQA Guideline § 15370. The Department highlights agricultural conservation easements because of their acceptance and use by lead agencies as an appropriate mitigation measure under CEQA. Agricultural conservation easements are an available mitigation tool and should always be considered; however, any other feasible mitigation measures should also be considered.

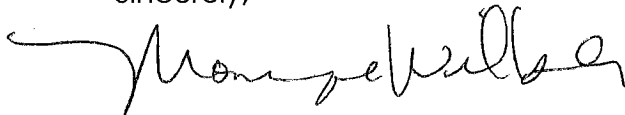
Conclusion

The Department recommends the following discussion under the Agricultural Resources section of the DEIR:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Proposed mitigation measure for all impacted agricultural lands within the proposed project area.

Thank you for giving us the opportunity to comment on Notice of Preparation for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner at (916) 324-7347 or via email at Farl.Grundy@conservation.ca.gov.

Sincerely,



Monique Wilber
Conservation Program Support Supervisor

² Public Resources Code section 21002.

³ *Masonite Corp. v. County of Mendocino* (2013) 218 Cal.App.4th 230, 238.



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Acting Director
5796 Corporate Avenue
Cypress, California 90630



Gavin Newsom
Governor

November 5, 2019

Ms. Mary Blais
Contract Planner
City of Perris
Planning Division
135 North "D" Street
Perris, California 92570

NOTICE OF PREPARATION, IDI RIDER 2 & 4 HIGH CUBE WAREHOUSES AND PERRIS VALLEY STORM DRAIN CHANNEL IMPROVEMENT

Dear Ms. Blais:

The Department of Toxic Substances Control (DTSC) received your Notice of Preparation for preparing an Environmental Impact Report (EIR) for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project (Project), located at the southeast corner of Morgan Street and Redland Avenue, Perris.

The project proposes to construct two warehouses and improve the Perris Valley Storm Drain system in an area that was historically used for agricultural purposes.

DTSC recommends that the EIR should also address the potential impacts associated with releases of agricultural related chemicals (such as herbicides, pesticides and metals) to soil due to the historical site use. DTSC recommends a site investigation to verify whether agricultural related chemicals remain in the soil. The investigation shall be conducted under a workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup.

DTSC appreciates the opportunity to review the Initial Study. Should you need any assistance in environmental investigation, please submit a request for Lead Agency Oversight Application which can be found at <https://dtsc.ca.gov/brownfields/voluntary-agreements-quick-reference-guide/>.

Ms. Mary Blais
November 5, 2019
Page 2

Should you have any questions regarding this letter, please contact me at (714) 484-5392 or by email at ChiaRin.Yen@dtsc.ca.gov.

Sincerely,



Chia Rin Yen
Environmental Scientist
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program

mv/cy/yg

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Ms. Yolanda M. Garza (via e-mail)
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program
Yolanda.Garza@dtsc.ca.gov

Brownfields Restoration and School Evaluation Team Reading File - Cypress

From: Reinertson, Adria@CALFIRE <Adria.Reinertson@fire.ca.gov>
Sent: Wednesday, November 13, 2019 1:15 PM
To: Mary Blais <mblais@cityofperris.org>
Subject: NOP Rider 2&4

Good afternoon Mary. I have reviewed the NOP for this case. Fire does not have any comments at this time though we would like to be included in the distribution of the EIR when ready. Thanks



Adria Reinertson

Deputy Fire Marshal/Office of the Fire Marshal
CAL FIRE/Riverside County Fire Department
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2300 Market St., Ste 150, Riverside, CA 92501
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■ Leadership ■ Competence ■ Integrity ■ Safety ■ Customer Service ■

The Office of the County Fire Marshal is committed to facilitating fire and life safety solutions by empowering its employees to serve our community through innovation and partnership.

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691 Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>



November 1, 2019

Mary Blais
Perris, City of
135 N. "D" Street
Perris, CA 92570

RE: SCH# 2019100297, IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project, Riverside County

Dear Ms. Blais:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. **Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. **Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. **Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. **Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. **Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. **Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. **Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. **Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. **Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. **Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. **Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Staff Services Analyst

cc: State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

mblais@cityofperris.org

Mary Blais, Contract Planner
City of Perris, Planning Division
135 North D Street
Perris, CA 92570

November 5, 2019

Notice of Preparation of a Draft Environmental Impact Report for the Proposed IDI Rider 2 and 4 Warehouses and Perris Valley Storm Drain Channel Improvement Project¹

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the Draft EIR upon its completion and public release. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the Draft EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files². These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

¹ The Proposed Project would include construction of two warehouses totaling 1,373,449 square feet and improvements to 3,490 linear feet of an existing storm drain channel on 94.7 acres.

² Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

Operation of the Proposed Project generates or attracts heavy-duty diesel-fueled vehicles. It is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance³ on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd/technical_advisory_final.PDF.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study

³ In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

(MATES IV), completed in May 2015, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions, and that the areas in Riverside County within the South Coast Air Basin have an average cancer risk of 223 in one million, and individual communities could have higher risks than the average if they are located near emission sources⁴. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks. Thus, cumulative impacts from warehouse projects in communities with existing industrial sources should be evaluated and disclosed.

Trip Rates for High Cube Warehouse Projects

The Proposed Project will include, among others, construction of two warehouses totaling 1,373,449 square feet on 94.7 acres. South Coast AQMD staff recommends the use of truck trip rates from the Institute of Transportation Engineers (ITE) for high cube warehouse projects located in South Coast AQMD (i.e. 1.68 average daily vehicle trips per 1,000 square feet and 0.64 average daily truck trips per 1,000 square feet). Consistent with CEQA Guidelines, the Draft EIR for the Proposed Project may use a non-default trip rate if there is substantial evidence supporting another rate is more appropriate for the air quality analysis.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 “Mitigating the Impact of a Project” of South Coast AQMD’s *CEQA Air Quality Handbook*. South Coast AQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- California Air Pollution Control Officers Association (CAPCOA)’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Additional mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions or near-zero emission on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB’s adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that

⁴ South Coast AQMD. May 2015. *Multiple Air Toxics Exposure Study in the South Coast Air Basin*. Accessed at: <http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf>

vendors, contractors, and/or haul truck operators commit to using 2010 model year⁵ trucks (e.g., material delivery trucks and soil import/export) that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks⁶. Include environmental analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. The Lead Agency should include the requirement of zero-emission or near-zero emission heavy-duty trucks in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.

- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this land use or higher activity level.
- Should the Proposed Project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)⁷. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, South Coast AQMD staff recommends the Lead Agency require the Proposed Project and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, South Coast AQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces

⁵ The CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

⁶ Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board, March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

⁷ Southern California Association of Governments. Accessed at: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>.

(including for trucks) include EV charging stations⁸. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should be appropriately sized to allow for future expanded use.

- Design the Proposed Project such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the Proposed Project such that any check-in point for trucks is well inside the Proposed Project site to ensure that there are no trucks queuing outside of the facility.
- Design the Proposed Project to ensure that truck traffic within the Proposed Project site is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the Proposed Project where trucks can rest overnight.
- Establish area(s) within the Proposed Project site for repair needs.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the Proposed Project and sensitive receptors.

Additional mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy including solar panels.
- Install the maximum possible number of solar energy arrays on the building roofs and/or on the project site to generate solar energy for the facility and/or EV charging stations.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Alternative

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits and South Coast AQMD Rules

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project. The assumptions in the air quality analysis in the certified Final EIR will be the basis for permit conditions and limits. For more information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385.

⁸ City of Los Angeles. Accessed at: http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD's Public Information Center at (909) 396-2001. Much of the information available through the Public Information Center is also available at South Coast AQMD's webpage at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

RVC191016-01

Control Number



November 14, 2019

Ms. Mary Blais, Contract Planner
City of Perris, Planning Division
135 North "D" Street
Perris, California 92570
Phone: (951) 943-5003 ext. 252
E-mail: mblais@cityofperris.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project [SCAG NO. IGR10041]

Dear Ms. Blais,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project in Riverside County. The proposed project consists of: constructing two industrial buildings to accommodate high-cube, non-refrigerated warehouse/distribution uses (Rider 2 and Rider 4) which will total 1,373,449 square feet (SF). The second element of this projects includes the construction and subsequent operation/maintenance of improvements to the Perris Valley Storm Drain (PVSD) Channel located along the eastern portion of the Project site.

When available, please send environmental documentation to SCAG's Los Angeles office in Los Angeles (900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017) or by email to au@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

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Transportation
Cheryl Viegas-Walker, El Centro

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
IDI RIDER 2&4 HIGH CUBE WAREHOUSE AND PERRIS VALLEY STORM DRAIN CHANNEL
IMPROVEMENT PROJECT [SCAG NO. IGR10041]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>

*SCAG does not yet have an agreed-upon security performance measure.

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscsc.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

The 2016 RTP/SCS also identifies a goods movement system in the SCAG region and develops strategies to address expected growth trends and demands in goods movement. For further information on the goods movement strategies, please see the Goods Movement Appendix of the 2016 RTP/SCS (http://scagrtpscsc.net/Documents/2016/final/f2016RTPSCS_GoodsMovement.pdf).

For further information on SCAG’s long-range comprehensive plan for the goods movement system in Southern California, please see “On the Move, Southern California Delivers the Goods” (http://www.freightworks.org/DocumentLibrary/CRGMPIS_Summary_Report_Final.pdf). For further information industrial development and warehousing in Southern California, please see “Industrial Warehousing in the SCAG Region” (<http://www.freightworks.org/DocumentLibrary/Industrial%20Warehousing%20Report%20-%20Revised%202018.pdf>).

DEMOGRAPHICS AND GROWTH FORECASTS

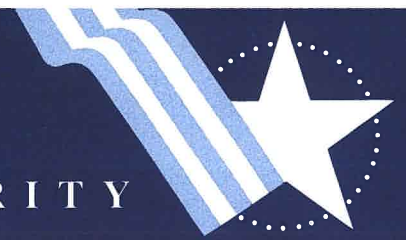
Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Perris Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	78,100	112,400	116,700
Households	6,458,000	7,325,000	7,412,300	21,800	31,500	32,700
Employment	8,414,000	9,441,000	9,871,500	23,000	31,200	32,200

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

MARCH JOINT POWERS AUTHORITY



October 22, 2019

Mary Blais
Contract Planner
City of Perris
Department of Community Development
Planning Division
135 North "D" Street
Perris, CA 92570

RE: Notice of Preparation
IDI Rider 2 & 4 High Cube Warehouses, Perris Valley Storm Drain Channel Improvement Project

Dear Miss Blais:

Thank you for the opportunity to comment on the above aforementioned project. March Joint Powers Authority staff has completed their review of the **Notice of Preparation for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project**. We have determined that the proposed project is not within the jurisdiction of the March Joint Powers Authority and have no further comment at this time. Please notify us on the release of the Draft EIR.

If you have any questions regarding our comments or need additional information, please feel free to contact me at (951) 656-7000, or by email at, smith@marchjpa.com. Thank you.

Sincerely,

Jeffrey M. Smith, AICP
Senior Planner
March Joint Powers Authority

From: Rull, Paul <PRull@RIVCO.ORG>
Sent: Monday, October 21, 2019 7:49 AM
To: Mary Blais <mblais@cityofperris.org>
Subject: IDI Rider 2&4 transmittal ALUC comments

Good Morning Mary,

Thank you for the transmitting the above reference project to ALUC for review. Please note that the project is located within Zones C1 and D of March Air Reserve Base/Inland Port Airport Influence Area and does not require ALUC review as the City's General Plan has been found consistent with the March Airport Land Use Compatibility Plan (and there are no legislative actions proposed). Therefore, City staff can perform the airport compatibility review.

If you have any questions, please feel free to contact me.

Paul Rull
ALUC Principal Planner



Riverside County Airport Land Use Commission
4080 Lemon Street, 14th Floor
Riverside, Ca 92501
(951) 955-6893
(951) 955-5177 (fax)
PRULL@RIVCO.ORG
www.rcaluc.org

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[County of Riverside California](#)

From: Mauricio Alvarez <malvarez@riversidetransit.com>
Sent: Wednesday, October 30, 2019 7:58 AM
To: Mary Blais <mblais@cityofperris.org>
Subject: IDI Rider 2 & 4 High Cube Warehouses

Good Morning Ms. Blais,

RTA has reviewed the plans for this project and have a few comments:

1. To confirm, there is ADA compliant, connected sidewalk planned on both Rider and Redlands streets.
2. A bus stop with ADA compliant, connected sidewalk on Redlands Ave far side Rider St.
 - a. There will be a traffic signal at Redlands & Rider, correct?

Thank you for considering these comments.

Mauricio Alvarez, MBA

Planning Analyst
Riverside Transit Agency
p: 951.565.5260 | e: malvarez@riversidetransit.com
[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)
1825 Third Street, Riverside, CA 92507

RINCON BAND OF LUISEÑO INDIANS

Cultural Resources Department

One Government Center Lane · Valley Center, California 92082 ·
(760) 297-2635 Fax:(760) 749-8901



November 12, 2019

Mary Blais
City of Perris
135 North D Street
Perris, CA 92570

Re: IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Draft Environmental Impact Report

Dear Ms. Blais,

This letter is written on behalf of the Rincon Band of Luiseño Indians. We have received your notification regarding the above referenced project. The identified location is within the Territory of the Luiseño people, and is also within Rincon's specific area of Historic interest.

Embedded in the Luiseño territory are Rincon's history, culture and identity. We do not have knowledge of cultural resources within or near the proposed project area. However, this does not mean that none exist. We recommend that an archaeological record search be conducted and ask that a copy of the results be provided to the Rincon Band. Additionally, we will be looking forward to the opportunity to comment on the Draft Environmental Impact Report, and ask that we will be notified as soon as it becomes available for review.

We are looking forward to further consult on this project. If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 297-2635.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resource Manager

Bo Mazzetti
Tribal Chairman

Tishmall Turner
Vice Chairwoman

Steve Stallings
Council Member

Laurie E. Gonzalez
Council Member

Alfonso Kolb
Council Member