



**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL  
IMPACT REPORT AND SCOPING MEETING FOR FIRST MARCH  
LOGISTICS PROJECT**

**December 15, 2021**

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 279  
Contact: Nathan Perez, Senior Planner

**SUBJECT: First March Logistics Project Draft Environmental Impact Report**

The City of Perris is commencing preparation of a Draft Environmental Impact Report (EIR) for the First March Logistics 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 starts on December 22, 2021 and ends on January 20, 2022.** Please send your written comments to the City staff contact identified above, and please include your name, address, and contact information in your correspondence. **A scoping meeting will be held on January 19, 2022, details provided under Section V. Future Public Meetings, below.**

**Project Title:** First March Logistics Project

**Project Applicant:** FR Natwar, LLC, a Delaware Limited Liability Company  
Michael Goodwin  
898 N Pacific Coast Highway, Ste. 175  
El Segundo, CA 90245

**Date:** December 16, 2021

**Signature:**

*Nathan Perez*  
Senior Planner

## I. PROJECT SITE LOCATION AND SETTING

The First March Logistics Project (Project) site is located in the northwest corner of the Perris Valley Commerce Center Specific Plan (PVCCSP; Specific Plan) planning area of the City of Perris, in Riverside County. The Project site encompasses approximately 27.56 acres and is generally located east of Interstate 215 (I-215), south of the County of Riverside and March Air Reserve Base/Inland Port Airport (MARB/IPA), west of Natwar Lane, and north of Nandina Avenue. The site is within Assessor's Parcel Numbers (APNs) 295-300-005 (portion) and -017 (portion) and 294-180-013, -028, -029, -030, and -032. The regional and local vicinity of the Project site are shown on Exhibit 1, *Regional and Local Vicinity* (attached at the end of this NOP).

The existing City of Perris General Plan land use designation and zoning for the Project site is Perris Valley Commercial Center Specific Plan (i.e., the PVCCSP) (City of Perris, 2013). The site is designated for Light Industrial and General Industrial uses in the PVCCSP. The light industrial zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials, and retail related to manufacturing. The general industrial zone provides for the development of basic industrial uses which may support a wide range of manufacturing and non-manufacturing uses, from large-scale warehouse and warehouse/distribution facilities to outdoor industrial activities and correlates with the "General Industrial" General Plan Land Use designation.

As shown on Exhibit 2, *Aerial Photograph*, the Project site is undeveloped and generally flat; elevations range from approximately 1,511 to 1,521 feet above mean sea level (amsl), descending gradually to the southeast. The site is characterized as disked and disturbed vacant land. An LED billboard was recently installed northwest of the site.

Land uses surrounding the Project site include vacant land to the north, MARB/IPA to the north and northeast; commercial/warehouse uses to the east, southeast, and south; I-215 to the west; and a water treatment facility to the west across the I-215. Areas to the east are designated as "General Industrial." Industries in this area are anticipated to be related to air-cargo support, due to its close proximity to MARB/IPA. High truck traffic volume is anticipated and the General Industrial designation wraps around the northerly boundary of the PVCCSP, bordering MARB/IPA. The Light Industrial designation covers the majority of the remaining PVCCSP area. According to the PVCCSP, this Project site is primarily intended to accommodate commercial and industrial uses and, as such, requires a greater need for established truck routes to serve existing and future businesses.

The Project site is located within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Project site is not located within any MSHCP designated Criteria Areas or Subunits. As such, the Project is not subject to Cell Criteria compliance under the MSHCP. The Project site does not fall within any Public/Quasi-Public or other MSHCP Conserved Lands. Public and private development projects that are carried out within the Mead Valley Area Plan, but outside of the Criteria Areas and Public/Quasi-Public Lands (e.g., such as this Project site), are permitted under the MSHCP subject to compliance with MSHCP policies that apply outside of Criteria Areas.

The Project site is located directly south and southeast of MARB/IPA, which covers approximately 7,000 acres. The site is within the MARB/IPA Airport Influence Policy Area, and the City's Airport Overlay Zone. Specifically, the Project 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 B2 (High Noise Zone) of the 2014 MARB/IPA Airport Land Use Compatibility Plan (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. As of the date that this NOP was published, the PVCCSP has been subsequently amended 10 times, with Amendment No. 10 occurring in September 2021. 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 Perris Valley Master Drainage Plan (PVMDP) was adopted by the Riverside County Flood Control & Water Conservation District (RCFC&WCD) in July 1987, 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 a 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**

As shown on Exhibit 3, *Conceptual Site Plan*, the Project consists of two industrial buildings, for a total of 559,005 square feet. Building 1 consists of a 419,034-square-foot industrial building with 411,034 square feet of warehouse and 8,000 square feet of office while Building 2 consists of a 139,971-square-foot industrial building with 131,971 square feet of warehouse and 8,000 square feet of office. The buildings would allow for either high-cube, non-refrigerated or high-cube cold warehouse/distribution uses, or manufacturing. The Project would be constructed in two phases: 1) Building 1 on 20.2 acres and a detention basin on 6.4 acres (between Natwar Lane and Western Way) would be constructed by 2023 and 2) Building 2 would replace the detention basin by 2027. The buildings would be up to 51-feet-high, 45-foot clear. 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/IPA ALUCP relative to uses within Compatibility Zone B2.

Vehicular access to the Project would be provided from one driveway off of Western Way and three driveways off of Natwar Lane, which under existing conditions is shared by JR Pipeline Inc and Greenrock Materials Inc (south of the site). A future east-west roadway connecting to MARB/IPA will be constructed adjacent to the northern boundary of the Project site; the roadway would not be developed as part of the Project. No access to/from the Project site would occur off the MARB roadway.

Automobile and truck trailer parking would be provided in excess of parking requirements outlined in the PVCCSP, which requires 156 automobile parking stalls. The Project would provide 167 automobile parking stalls and 170 trailer parking stalls. Automobile parking would be provided on the north and south side of

Building 1, the west side of Building 2, and along the eastern boundary adjacent to Building 2. Trailer parking would be provided on the east and west of Building 1 and the south of Building 2. A total of 77 loading docks would be provided on the east and west sides of Building 1 facing Natwar Lane and I-215, respectively. Additionally, a total of 16 loading docks would be provided on the south side of Building 2.

Landscaped parkways would be provided adjacent to Natwar Lane and the I-215. Walls and fences would be provided on site as required for screening, privacy, and security. Walls will be screened through the use of berms and landscaping.

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 and south of the Project site.

#### 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.
- Development Plan Review (DPR) (Case No. DPR20-00004) for the site plan and building elevations.
- Tentative Parcel Map (Case No. 37965)

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:

- **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.
- **Eastern Municipal Water District.** Approval of water and sewer improvement plans.
- **Other Utility Agencies.** Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.

## **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, where 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, public services (schools, parks, other public facilities), recreation, 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 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 559,005 sf of warehouse/distribution uses, which are allowed under the General Industrial and Light Industrial Specific Plan land use designation. Based on this generation factor, the Project could employ approximately 543 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 (543 employees) represents approximately 0.9 percent of the total employment generation anticipated in the Specific Plan area. Further, this represents approximately 2 percent of the City’s projected employment base by 2045 as presented in the Southern California Association of Governments (SCAG) *2020-2045 Regional Transportation/Sustainable Communities Strategy (RTP/SCS)* (26,400 employees; SCAG, 2020). 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. Therefore, the Project would not directly or indirectly generate substantial unplanned population growth in the area.

- **Public Services.** The PVCCSP EIR Initial Study concluded that implementation of development allowed by the PVCCSP, which includes the Project, would result in less than significant impacts to public services. The Project does not include any residential land uses and, therefore, is not expected to result in a demand for recreational facilities and other public facilities/services, including libraries, community recreation centers, post offices, public health facilities, and/or animal shelters. Additionally, the Project would not directly generate students and is not expected to indirectly draw students to the area within the Val Verde Unified School District. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public school facilities, park facilities, and other park facilities. Impacts would be less than significant.
- **Recreation.** As identified in the PVCCSP EIR Initial Study, the City requires that large projects provide an on-site recreational amenity. As required by Section 8.2 of the PVCCSP, the Project would provide employee amenities and would not result in or accelerate the physical deterioration of existing neighborhood and regional parks or recreational facilities. This is due to the fact that the Project does not involve the development of residential uses and that the proposed industrial use would not create an increase in the use of such facilities. Accordingly, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities, and would not require the construction of new or expanded recreational facilities. Impacts would be less than significant.
- **Wildfire.** According to Exhibit S-16, Wildfire Constraint Areas, of the City of Perris General Plan Safety Element, the Project site 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 site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City (CalFire, 2019). The Project site 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 would alter the existing visual character of the Project site and would introduce new sources of light during construction and operation. The intent of the PVCCSP is to provide high quality industrial, commercial, and office land uses to serve the existing and future residents and businesses of the City of Perris. The plan will promote recognition throughout the region for its aesthetic cohesiveness, superior land planning, and architectural design. The PVCCSP seeks to unify the area's character and develop a business community that fosters long-term economic success. Through the utilization of an established set of Guidelines, it is the City's intent to strike a balance between the creation of industrial developments that are aesthetically pleasing, while respecting the basic industrial use and function of the PVCCSP. Potential impacts to aesthetics (including light and glare) will be addressed in the Draft EIR.
- **Agriculture and Forestry Resources.** Pursuant to CEQA Section 21060.1, agricultural land means Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, as defined by the U.S. Department of Agriculture land inventory and monitoring criteria as modified for California. The State CEQA Guidelines Appendix G thresholds of significance used by the City of Perris for CEQA purposes states that a significant impacts to agriculture could occur if a project was to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. Based on the California Department of Conservation's (DOC's) 2016 Farmland Mapping and Monitoring Program (FMMP), the Project site is primarily designated as Farmland of Local Importance with small portions of the Project site designated as "Urban and Built-Up Land" (FMMP, 2019). The Project site 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. However, potential impacts to agriculture and forestry resources will be addressed in the Draft EIR.
- **Air Quality.** The Project site 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 site is within the Western Riverside County MSHCP area. The Draft EIR will identify existing biological resources at the Project site 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 in the significance of previously unknown historical or archaeological resources, or human remains. Therefore, these issues will be studied in more detail in the Draft EIR and applicable Mitigation Measures from the PVCC Specific Plan will be implemented.
- **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 site is 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 City of Perris adopted its Climate Action Plan on February 23, 2016. 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 site is not within 1/4-mile of a school; the nearest school is approximately 1.6 miles to the northwest. The Draft EIR will evaluate the potential safety and noise impacts related to the Project's proximity to MARB/IPA and consistency with applicable provisions of the MARB/IPA ALUCP. The potential to impair or interfere with an adopted emergency response plan will also be addressed. As identified previously, the Project site 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 Project site. During Phase 1, all Project off-site runoff from Building 1 would be discharged to a public storm drain system that will drain into the temporary detention basin. Once the future proposed storm drain is constructed, the detention basin will not be required and runoff from Building 1 and 2 would discharge to the northeast portion of the sites. Flows will continue south on Western Way to Nandina. The public storm drain system ultimately connect east to the future storm drain along the MARB/IPA western boundary. 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 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 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/IPA 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 City of Perris Municipal Code, Section 7.34.040 establishes noise standards for construction and operational activities. The potential for exposure of Project occupants to noise from MARB/IPA will also be addressed. According to the Draft EIR for the City of Perris, (Environmental Impact Report City of Perris General Plan 2030 State Clearinghouse # 2004031135) the Project site is located in an area with the heaviest air traffic volumes with convergence of aircraft take offs and landings where noise levels are highest. The MARB/IP ALUCP, Map MA-1, indicates that the Project site is located within Compatibility Zones B-2, and the Table MA-1 Compatibility Zone Factors indicates that this area is considered to have a high noise impact, and is mostly within or near the 60 to 70 dBA CNEL noise contour boundaries. Noise impacts will be addressed in the Draft EIR.
- **Public Services.** The Draft EIR will address the potential increase in demand for public services resulting from the Project (i.e., police protection and fire protection), and whether there is a need for new or physically altered government facilities, which could cause significant physical environmental impacts.
- **Transportation.** The City of Perris adopted its Transportation Impact Analysis Guidelines for CEQA, which includes guidance for conducting the required VMT analysis, on June 9, 2020. 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 will also evaluate the potential of the Project to conflict with CEQA Guidelines Section 15064.3(b), which requires that transportation 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 potential impacts related to tribal cultural resources directly related to California Native American tribes that populated the area where the Project site 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, will be addressed in the Draft EIR. The Draft EIR will determine the availability of water supply 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.

## **V. FUTURE PUBLIC MEETINGS**

Notice is hereby given that the City of Perris will hold a Draft EIR scoping meeting for the general public and any interested agencies. The Scoping meeting will be held during the regularly scheduled Planning Commission meeting on **January 19, 2022, at 6:00 p.m.** The scoping meeting will be held **in the City Council Chambers of the City of Perris, 101 North “D” Street.** 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).

## **VI. 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:

Nathan Perez, Senior Planner  
City of Perris Planning Division  
135 North “D” Street  
Perris, California 92570  
Email: NPerez@cityofperris.org  
(951) 943-5003 Ext 279

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

## VII. 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 September 2021 (Amendment No. 10) (Perris, 2021)
- *Perris Valley Commerce Center Final Environmental Impact Report*, SCH No. 2009081086, certified January 10, 2012 (Perris, 2012)

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.conservation.ca.gov/pub/dmg/pubs/sr/SR\\_143/PartVI/SR\\_143\\_PartVI\\_Text.pdf](ftp://ftp.conservation.ca.gov/pub/dmg/pubs/sr/SR_143/PartVI/SR_143_PartVI_Text.pdf)

California Department of Conservation (DOC), Division of Oil, Gas, and Geothermal Resources (DOGGR). 2019 (December 13, access date). Division of Oil, Gas, and Geothermal Resources Well Finder. Sacramento, CA: DOC DOGGR. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.25920/33.86715/17>.

California Department of Conservation (DOC), Farmland Mapping and Monitoring Program (FMMP). 2019. (December 13, access date). California Important Farmland Finder. Sacramento, CA: FMMP. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

California Department of Forestry and Fire Protection (CalFire). 2019. (December 13, access date). 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. <https://www.cityofperris.org/departments/development-services/general-plan>.

———. 2013 (January 3, updated). General Plan Map. Perris, CA: The City: <https://www.cityofperris.org/home/showpublisheddocument?id=457>.

———. 2016 (August 30). General Plan Safety Element. Perris, CA: The City. <https://www.cityofperris.org/home/showpublisheddocument?id=465>.

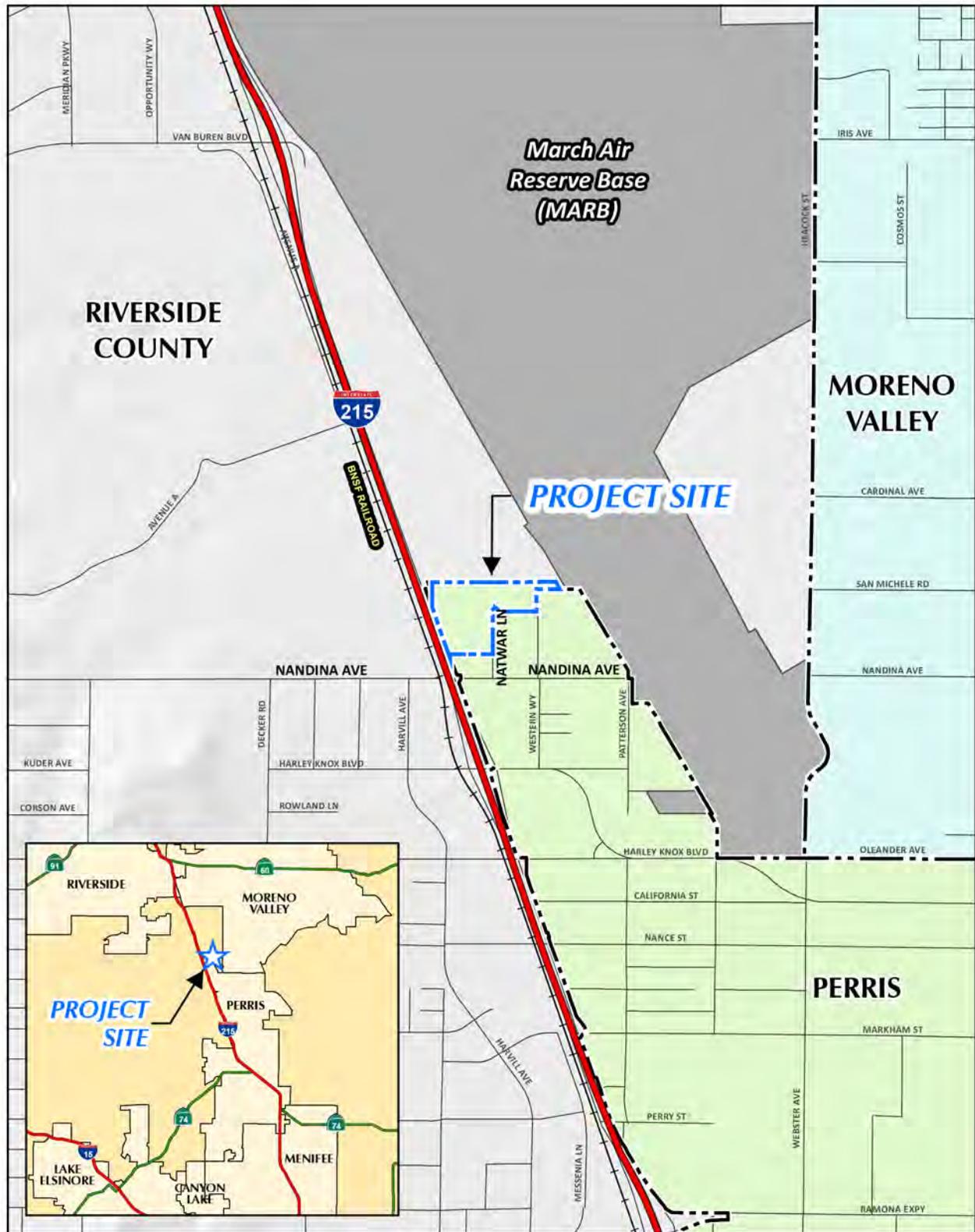
Riverside, County of. 2015 (December 8). County of Riverside General Plan: Multipurpose Open Space Element. Riverside, California: The County. [https://planning.rctlma.org/Portals/14/genplan/general\\_Plan\\_2017/elements/OCT17/Ch05\\_MOS\\_E\\_120815.pdf?ver=2017-10-11-102103-833](https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/elements/OCT17/Ch05_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>.

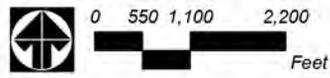
———. 1991 (June). Master Drainage Plan for Perris Valley Area. [http://rcflood.org/Downloads/Master%20Drainage%20Plans/Updated/Zone%204/Reports/PerrisValleyMDP\\_report.pdf](http://rcflood.org/Downloads/Master%20Drainage%20Plans/Updated/Zone%204/Reports/PerrisValleyMDP_report.pdf).

Southern California Association of Governments. (SCAG). 2020. 2020-2045 RTP SCS Demographics Growth Forecast Technical Report. Profile of the City of Perris. Riverside, CA: SCAG. [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_demographics-and-growth-forecast.pdf?1606001579](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579).

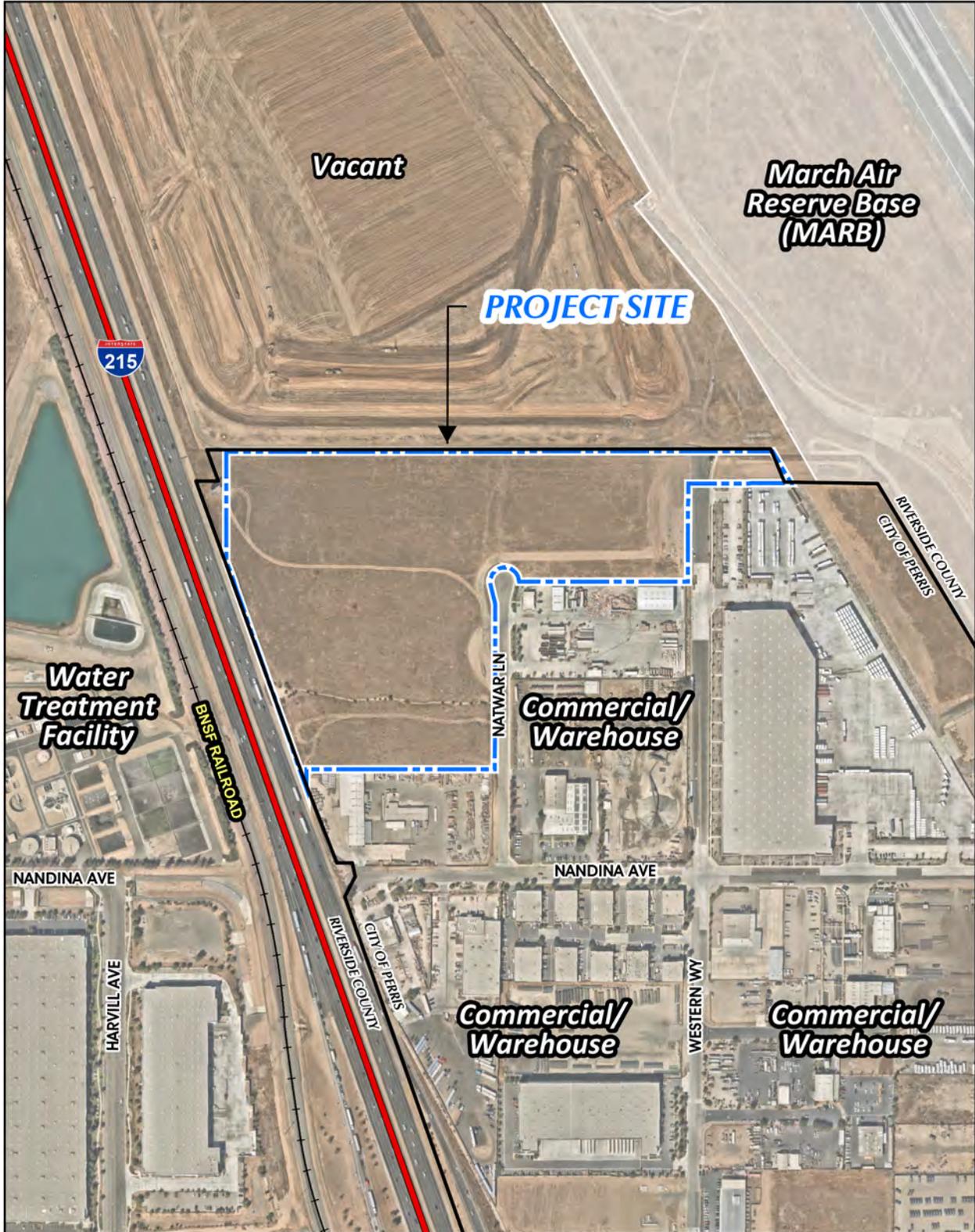


Source(s): ESRI, RCLMA (2021)

Exhibit 1

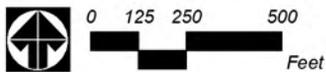


### Regional and Local Vicinity

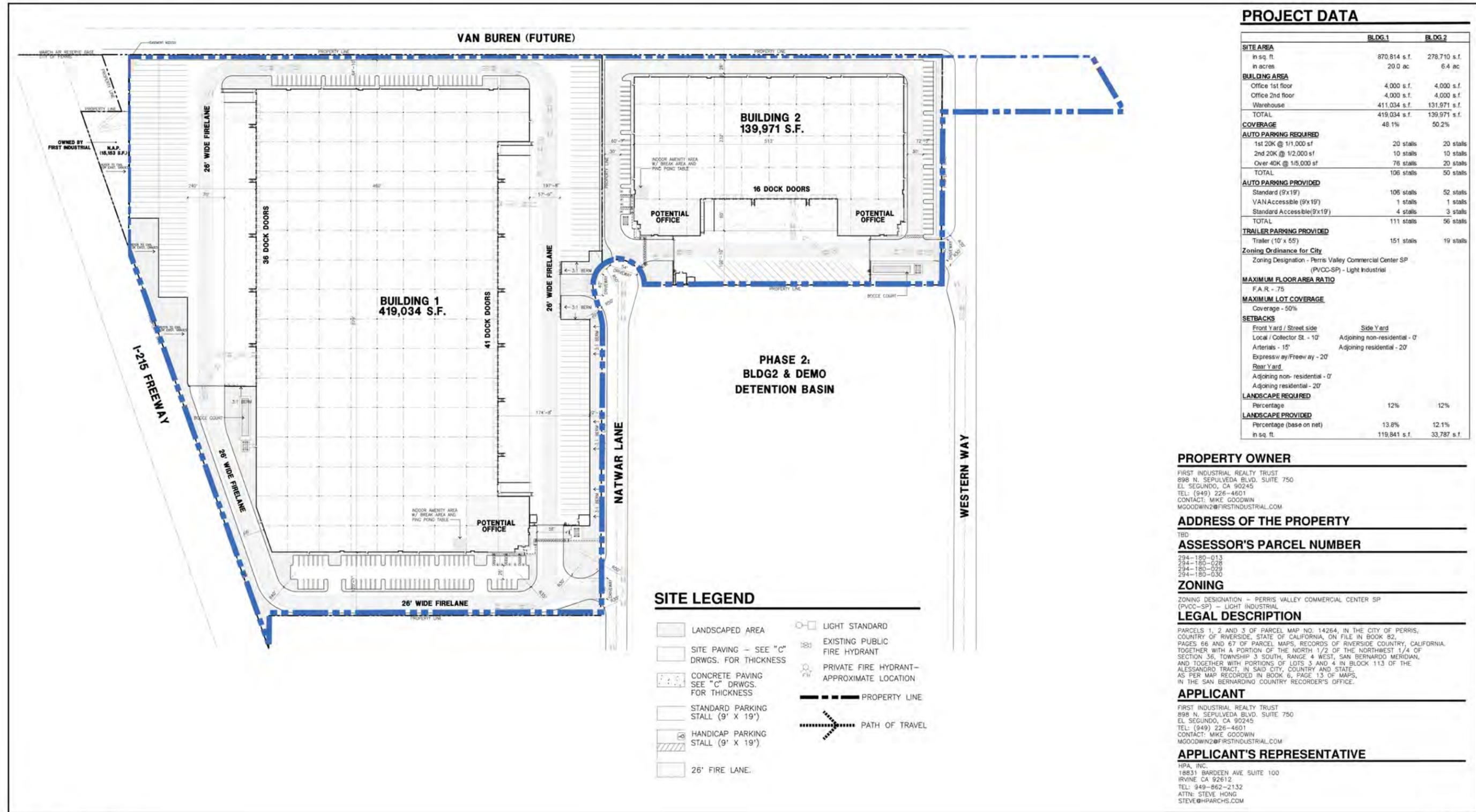


Source(s): RCTLMA (2021), Nearmap Aerial (2021)

Exhibit 2



**Aerial Photograph**



PROJECT DATA		
	BLDG.1	BLDG.2
<b>SITE AREA</b>		
In sq. ft.	870,814 s.f.	278,710 s.f.
In acres	20.0 ac	6.4 ac
<b>BUILDING AREA</b>		
Office 1st floor	4,000 s.f.	4,000 s.f.
Office 2nd floor	4,000 s.f.	4,000 s.f.
Warehouse	411,034 s.f.	131,971 s.f.
<b>TOTAL</b>	<b>419,034 s.f.</b>	<b>139,971 s.f.</b>
<b>COVERAGE</b>		
	48.1%	50.2%
<b>AUTO PARKING REQUIRED</b>		
1st 20K @ 1/1,000 sf	20 stalls	20 stalls
2nd 20K @ 1/2,000 sf	10 stalls	10 stalls
Over 40K @ 1/5,000 sf	76 stalls	20 stalls
<b>TOTAL</b>	<b>106 stalls</b>	<b>50 stalls</b>
<b>AUTO PARKING PROVIDED</b>		
Standard (9'x19')	106 stalls	52 stalls
VAN Accessible (9'x19')	1 stalls	1 stalls
Standard Accessible (9'x19')	4 stalls	3 stalls
<b>TOTAL</b>	<b>111 stalls</b>	<b>56 stalls</b>
<b>TRAILER PARKING PROVIDED</b>		
Trailer (10' x 55')	151 stalls	19 stalls
<b>Zoning Ordinance for City</b>		
Zoning Designation - Perris Valley Commercial Center SP (PVCC-SP) - Light Industrial		
<b>MAXIMUM FLOOR AREA RATIO</b>		
F.A.R. - 75		
<b>MAXIMUM LOT COVERAGE</b>		
Coverage - 50%		
<b>SETBACKS</b>		
Front Yard / Street side		Side Yard
Local / Collector St. - 10'		Adjoining non-residential - 0'
Arterials - 15'		Adjoining residential - 20'
Expressway/Freeway - 20'		
Rear Yard		
Adjoining non-residential - 0'		
Adjoining residential - 20'		
<b>LANDSCAPE REQUIRED</b>		
Percentage	12%	12%
<b>LANDSCAPE PROVIDED</b>		
Percentage (base on net)	13.8%	12.1%
In sq. ft.	119,841 s.f.	33,787 s.f.

**PROPERTY OWNER**  
 FIRST INDUSTRIAL REALTY TRUST  
 898 N. SEPULVEDA BLVD., SUITE 750  
 EL SEGUNDO, CA 90245  
 TEL: (949) 226-4601  
 CONTACT: MIKE GOODWIN  
 MGOODWIN2@FIRSTINDUSTRIAL.COM

**ADDRESS OF THE PROPERTY**  
 TBD

**ASSESSOR'S PARCEL NUMBER**  
 294-180-013  
 294-180-028  
 294-180-029  
 294-180-030

**ZONING**  
 ZONING DESIGNATION - PERRIS VALLEY COMMERCIAL CENTER SP (PVCC-SP) - LIGHT INDUSTRIAL

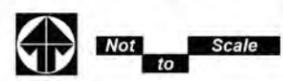
**LEGAL DESCRIPTION**  
 PARCELS 1, 2 AND 3 OF PARCEL MAP NO. 14264, IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ON FILE IN BOOK 82, PAGES 66 AND 67 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA, TOGETHER WITH A PORTION OF THE NORTH 1/2 OF THE NORTHWEST 1/4 OF SECTION 36, TOWNSHIP 3 SOUTH, RANGE 4 WEST, SAN BERNARDO MERIDIAN, AND TOGETHER WITH PORTIONS OF LOTS 3 AND 4 IN BLOCK 113 OF THE ALESSANDRO TRACT, IN SAID CITY, COUNTY AND STATE, AS PER MAP RECORDED IN BOOK 6, PAGE 13 OF MAPS, IN THE SAN BERNARDINO COUNTY RECORDER'S OFFICE.

**APPLICANT**  
 FIRST INDUSTRIAL REALTY TRUST  
 898 N. SEPULVEDA BLVD. SUITE 750  
 EL SEGUNDO, CA 90245  
 TEL: (949) 226-4601  
 CONTACT: MIKE GOODWIN  
 MGOODWIN2@FIRSTINDUSTRIAL.COM

**APPLICANT'S REPRESENTATIVE**  
 HPA, INC.  
 18831 BARDEEN AVE SUITE 100  
 IRVINE, CA 92612  
 TEL: 949-862-2132  
 ATTN: STEVE HONG  
 STEVE@HPARCHS.COM

- SITE LEGEND**
- LANDSCAPED AREA
  - SITE PAVING - SEE "C" DRWGS. FOR THICKNESS
  - CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
  - STANDARD PARKING STALL (9' X 19')
  - HANDICAP PARKING STALL (9' X 19')
  - 26' FIRE LANE.
  - LIGHT STANDARD
  - EXISTING PUBLIC FIRE HYDRANT
  - PRIVATE FIRE HYDRANT - APPROXIMATE LOCATION
  - PROPERTY LINE
  - PATH OF TRAVEL

Source(s): HPA (11-10-2021)





# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

[NPerez@cityofperris.org](mailto:NPerez@cityofperris.org)

Nathan Perez, Senior Planner  
City of Perris, Planning Division  
135 North D Street  
Perris, California 92570

January 11, 2022

## **Notice of Preparation of a Draft Environmental Impact Report for the First March Logistics Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

### **CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website<sup>1</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod<sup>2</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds<sup>3</sup> and localized significance thresholds (LSTs)<sup>4</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

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

---

<sup>1</sup> South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

<sup>2</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>3</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

<sup>4</sup> South Coast AQMD's 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>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), 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. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment<sup>5</sup>.

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 in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>6</sup> 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 with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory<sup>7</sup>.

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 (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions<sup>8</sup>. According to the MATES V Carcinogenic Risk interactive Map, the area surrounding the Proposed Project has an estimated cancer risk over 359 in one million<sup>9</sup>. 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.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook<sup>1</sup>, South Coast AQMD's Mitigation Monitoring and

---

<sup>5</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>6</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

<sup>7</sup> CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

<sup>8</sup> South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

<sup>9</sup> South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v).

Reporting Plan for the 2016 Air Quality Management Plan<sup>10</sup>, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy<sup>11</sup>.

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 (ZE) or near-zero emission (NZE) 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. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule<sup>12</sup> and the Heavy-Duty Low NOx Omnibus Regulation<sup>13</sup>, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentive the use of 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. At a minimum, require the use of 2010 model year<sup>14</sup> 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 trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement 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.
- 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 higher activity level.
- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

---

<sup>10</sup> South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

<sup>11</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

[https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A\\_ConnectSoCal\\_PEIR.pdf](https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf).

<sup>12</sup> CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

<sup>13</sup> CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

<sup>14</sup> 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>.

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 by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of two warehouses totaling 559,005 square feet, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation<sup>15</sup>. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or [waire-program@aqmd.gov](mailto:waire-program@aqmd.gov).

---

<sup>15</sup> South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage<sup>16</sup>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov).

Sincerely,

*Lijin Sun*

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

RVC211221-03

Control Number

---

<sup>16</sup> South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.



January 4, 2022

**Via Email and U.S. Mail**

City of Perris  
Attn: Nathan Perez  
135 N D St.  
Perris, CA 92570  
[nperez@cityofperris.org](mailto:nperez@cityofperris.org)

**RE: Public Records Act Request and Request for Mailed Notice of Public Hearings  
and Actions – First March Logistics - Nandina Ave and Natwar Ln.  
Perris, CA 92571**

Dear Mr. Perez,

CARE CA is writing to request a copy of any and all records related to the project, the First March Logistics project, located at Nandina Avenue and Natwar Lane in Perris. The project will be the construction of an industrial building with 419,000 square feet of space, including 8,000 square feet of office space, and a second industrial building with 140,000 square feet of space, including 8,000 square feet of office space. We are also writing to request copies of all communications and mailed notice of any and all hearings and/or actions related to the Project.

Our request for mailed notice of all hearings includes hearings, study sessions and community meetings related to the Project, certification of the MND (or recirculated DEIR), and approval of any Project entitlements. This request is made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108 and 21152 and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. Our request includes notice to any City actions, hearings or other proceedings regarding the Project, Project approvals and any actions taken, or additional documents released pursuant to the California Environmental Quality Act.

Our request for all records related to the Project is made pursuant to the California Public Records Act. (Government Code § 6250 et seq.) This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We will pay for any direct costs of duplication associated with filling this request up to \$200. However, please contact me at (877) 810-7473 with a cost estimate before copying/scanning the materials.

Pursuant to Government Code Section 6253.9, if the requested documents are in electronic format and are 10 MB or less (or can be easily broken into sections of 10 MB or less), please email them to me as attachments.

My contact information is:

**U.S. Mail**

Jeff Modrzejewski  
CARE CA  
501 Shatto Place, Suite 200  
Los Angeles, CA 90020

**Email**

[community@careca.org](mailto:community@careca.org)

Please call me if you have any questions. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Modrzejewski", with a long horizontal flourish extending to the right.

Jeff Modrzejewski  
Executive Director

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

"Bringing People Together to Improve Our Social and Natural Environment"

January 20, 2022

Nathan Perez, Senior Planner  
City of Perris Planning Division  
135 North "D" Street  
Perris, CA 92570

*Submitted via email to NPerez@cityofperris.org*

**Re: First March Logistics Project Notice of Preparation**

Dear Mr. Perez,

I am submitting this letter on behalf of CCAEJ to provide concerns which we would like to see addressed as part of the Environmental Impact Report which is to be prepared for the First March Logistics Project which has been proposed there in Perris.

In our conversations with community members, air quality is a top concern expressed by people and something which they want to see addressed. As part of the topics of research for the EIR, we want to ensure that the importance of ensuring that full mitigation for impacts in that area is identified to provide people with the relief that they seek from the injustice of poor air quality.

Another concern we hear from community members is regarding transportation options. We want to ensure that the EIR identifies multiple ways to mitigate transportation impacts and that all supporting documents are consulted, including the City's own Active Transportation Plan as well as guidance on bikeway selection provided by the state and federal agencies. Additionally, the City should be proactive about identifying and seeking out transit opportunities to serve these projects instead of just waiting for the transit agencies to expand service on their own.

Thank you for your time and we look forward to see these issues addressed as part of the EIR.

Sincerely,



Marven Norman  
Policy Specialist

*CCA EJ* is a long-standing community based organization with over 40 years of experience advocating for stronger regulations through strategic campaigns and building a base of community power. Most notably, CCAEJ's founder Penny Newman won a landmark federal case against Stringfellow Construction which resulted in the 'Stringfellow Acid Pits' being declared one of the first Superfund sites in the nation. *CCA EJ* prioritizes community voices as we continue our grassroots efforts to bring lasting environmental justice to the Inland Valley Region.



*Charissa Leach, P.E.  
Director of Transportation and  
Land Management*

# COUNTY OF RIVERSIDE

## TRANSPORTATION AND LAND MANAGEMENT AGENCY

### Transportation Department



*Mark Lancaster, P.E.  
Director of Transportation*

January 18, 2022

Nathan Perez  
City of Perris Planning Division  
135 North "D" Street,  
Perris, CA 92570-2200

**RE: Notice of Preparation of a Draft Environmental Impact Report for the First March Logistics Project**

Dear Mr. Perez,

Thank you for sending the Riverside County Transportation Department (County) the Notice of Preparation (NOP) of Draft Environmental Impact Report (DEIR) for the First March Logistics Project.

The project proposes two industrial warehouse buildings, totaling 559,005 square feet.

The regional access to and from the proposed project area will be provided via Harley Knox Blvd. at the I-215 Freeway. The primary access into the project area is Nalini Ln.

The County Transportation Department anticipates that the DEIR will include the preparation of a traffic study. The traffic study for the proposed development should address potential impacts and mitigation measures due to project passenger car and truck traffic that are anticipated to access Riverside County roadways in the area that are included in the Riverside County General Plan. In addition, where the proposed project would add 50 or more peak hourly trips to County intersections shall be analyzed. Necessary improvements to mitigate project impacts shall be identified, and responsibility for the needed improvements shall be designated. We request that Riverside County Transportation Analysis Guidelines be followed for the impact analysis for facilities within Riverside County. The most recent version of the guidelines can be found on the County website: <http://rctlma.org/trans/General-Information/Pamphlets-Brochures>



*Charissa Leach, P.E.  
Director of Transportation and  
Land Management*

**COUNTY OF RIVERSIDE**  
*TRANSPORTATION AND  
LAND MANAGEMENT AGENCY*

**Transportation Department**



*Mark Lancaster, P.E.  
Director of Transportation*

Thank you again for the opportunity to review and comment on the NOP. Please contact me at (951) 955-2016 with questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'RW Williams', followed by a horizontal line.

Russell Williams  
Development Review Manager

cc: Charissa Leach, Director of Transportation and Land Management  
Mark Lancaster, Director of Transportation  
Rick Lantis, Deputy Director of Transportation

**From:** [Mauricio Alvarez](#)  
**To:** [Nathan Perez](#)  
**Subject:** First March Logistics Project  
**Date:** Thursday, December 23, 2021 10:09:13 AM

---

Good Morning Nathan,

RTA has reviewed the plans you have sent and have no comments regarding this particular project.

Thank you,

**Mauricio Alvarez, MBA**

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



January 20, 2022

Nathan Perez  
City of Perris Planning Department  
135 North D Street  
Perris, CA 92570

**SUBJECT: NOTICE OF PREPARATION FOR THE FIRST MARCH LOGISTICS CENTER**

Dear Mr. Perez:

Thank you for the opportunity to respond to the Notice of Preparation for the First March Logistics Project, generally located both east and west of Natwar Drive north of Nandina Avenue. March JPA is interested in responding to this Notice of Preparation as it is contiguous with our planning boundary and the VIP 215 industrial development currently in construction by Hillwood development. Additionally, the site is adjacent to the joint-use March Air Reserve Base/March Inland Port Airport, overseen by the March Joint Powers Commission. The March Joint Powers Authority recommends the following items be analyzed/incorporated into the environmental review for this project:

**Traffic:** Please incorporate the traffic analysis and assumptions from the VRPA Technologies traffic study prepared for the VIP 215 project, dated November 2019, including vehicle trips, truck trips, and vehicle/truck distribution.

**Traffic Scoping Agreement:** March JPA requests that a draft copy of traffic scoping agreement be made available for review to the March JPA prior to approval.

**Storm Drainage:** Drainage of storm water is planned through use of the future Perris Valley Lateral B, Stage 4. Please coordinate all proposed storm drainage with Riverside County Flood Control, TriLake Engineering and March ARB.

**Truck Routes:** Both March JPA and the City of Riverside have truck route ordinances that prohibit the use of Van Buren Boulevard as a short cut from I-215 to SR-91. These ordinances, however, do allow the use of Van Buren for local deliveries. Identification of these limitations should be identified and accounted for in the project analysis.

**FAA Review Building Height Review:** Please file and receive FAA approval of an FAA 7460-1 Notice of Construction providing Part 77 airspace review, prior to scheduling this item for public review.

Nathan Perez  
January 20, 2022

**Airport Compatibility:** March JPA recommends review of this proposal by the Riverside County Airport Land Use Commission. Should the Perris Valley Commerce Center Specific Plan not require review and a determination of consistency between the proposed project and the March Air Reserve Base/March Inland Port Airport Compatibility Plan, March JPA recommends the City of Perris incorporate the following airport compatibility provisions in the project mitigation measures and/or conditions of approval, as follows:

1. Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.
2. The following users/activities are not included in the proposed project and shall be prohibited at this site:
  - (a) Any use or activity which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than a DoD or FAA approved navigational signal or visual approach slope indicator.
  - (b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport to the extent as to result in a potential for temporary after-image greater than low (green”) level.
  - (c) Any use or activity which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marches, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.)
  - (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
  - (e) Highly noise sensitive outdoor nonresidential uses.
  - (f) Other hazard to flight.
3. The RCALUC “Notice of Airport Vicinity” shall be provided to all prospective purchasers and occupants of the property and be recorded as a deed notice.

4. Any new detention basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm, and remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for birds would be incompatible with airport operations and shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature. Landscaping in and around the detention basin(s) shall not include trees or shrubs that produce seeds, fruits, or berries.

Landscaping in the detention basin, if not rip-rap, should be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS WILDLIFE AND STORMWATER MANAGEMENT" brochure available at RCALUC.ORG which lists acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a qualified wildlife hazard biologist.

A notice sign, in the form similar to that available from RCALUC, shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes". The sign will also include the name, telephone number of other contact information of the person or entity irresponsible to monitor the stormwater basin.

5. March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with the Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in connection with remote equipment inclusive of irrigation controllers, access gates, etc.
6. The project is evaluated for warehouse distribution use. Any increase in building area, change in use to any higher intensity use, or change in building location will require an amended review to evaluate consistency with the ALUCP compatibility criteria, at the discretion of the ALUC Director.
7. Size, location and orientation of any photovoltaic solar panels, if proposed, shall be reviewed and determined through a solar glint and glare analysis performed by March Air Reserve Base. The study shall assure that the solar voltaic panels do result in any glare impacting the air traffic control tower or the creation of any "Yellow" or "red" level glare in the flight paths.
8. In the event that any glint, glare, or flash affects the airport operations, upon notification by the airport manager in writing, the project operator, within 30 days of notice, shall be required to promptly take all measures necessary to eliminate such glint, glare, or flash. An "event" includes any situation that results in an accident, incident, near-miss, or specific safety complaint regarding an in-flight experience to the airport operator or to federal, state, or county authorities responsible for safety of the air navigation. The project operator shall work with the airport operator to prevent recurrence of the incidence. Suggested measures may include, but are not limited to, changing the

Nathan Perez  
January 20, 2022

orientation and/or tilt of the source, covering the source at the time of day when events of glare occur, wholly removing the source to diminish or eliminate the source of the glint, glare, or flash. For each such event made known to the project operator, the necessary remediation shall only be considered to have been fulfilled when the airport operator states in writing that the situation has been remediated to the airport operator's satisfaction.

9. In the event that any electrical interference affecting the safety of the air navigation occurs as a result of project operation, upon notification from the airport operator of an event in writing, within 30 days of written notice, the project operator shall be required to promptly take all measures necessary to eliminate such interference. An "event" includes any situation that results in an accident, incident, or near-miss report by airport personnel, or specific safety complaint to the airport operator or to federal, state, or county authorities responsible for the safety of air navigation. The project operator shall work with the airport operator to prevent recurrence of the event. For each such event made known to the project operator, the necessary remediation shall only be considered to have been fulfilled when the airport operator states in writing that the situation has been remediated to the airport operator's satisfaction.
10. Upon approval of the building height through the 7460-1 Part 77 analysis, the maximum height of the building shall not be amended without further review by the Airport Land Use Commission and the Federal Aviation Administration; provided that however, that reduction in structure height or elevation shall not require further review by the Airport Land Use Commission. The Specific coordinates, frequencies, and power shall not be amended without further review by the Federal Aviation Administration.
11. Within five (5) days after construction of the structure reaches its greatest height, FAA Form 7460-2 (Part II), Notice of Actual Construction or Alteration, shall be completed by the project proponent or his/her designee and e-filed with the Federal Aviation Administration. (Go to <https://oeaaa.faa.gov> for instructions.) This requirement is also applicable in the event the project is abandoned or a decision is made not to construct the applicable structure.

Should you require further information, I may be reached at (951) 656-7000 or [fairbanks@marchjpa.com](mailto:fairbanks@marchjpa.com).

Sincerely,



Dan Fairbanks  
Planning Director



## NATIVE AMERICAN HERITAGE COMMISSION

December 23, 2021

Nathan Perez  
City of Perris  
135 North "D" Street  
Perris, CA 92570

**Re: 2021120497, First March Logistics Project, Riverside County**

Dear Mr. Perez:

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.**

CHAIRPERSON  
**Laura Miranda**  
Luiseño

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

PARLIAMENTARIAN  
**Russell Atebery**  
Karuk

COMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
Apache

COMMISSIONER  
**Isaac Bojorquez**  
Ohlone-Costanoan

COMMISSIONER  
**Sara Dutschke**  
Miwok

COMMISSIONER  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

COMMISSIONER  
**Wayne Nelson**  
Luiseño

COMMISSIONER  
**Stanley Rodriguez**  
Kumeyaay

EXECUTIVE SECRETARY  
**Christina Snider**  
Pomo

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

## 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)).

## 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](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](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](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse



**From:** [Lestina, Deanna](#)  
**To:** [Nathan Perez](#)  
**Cc:** [Cunningham, Kevin](#)  
**Subject:** NOP of Draft Environmental Impact Report for First March Logistics  
**Date:** Friday, January 21, 2022 3:47:40 PM  
**Attachments:** [image001.png](#)

---

Dear Mr. Perez,

This email is written in response to the Notice of Preparation (NOP) of Draft Environmental Impact Report (EIR) for the First March Logistics Project. The proposed development would be bounded by the 215 freeway on the west, the March Air Force Base on the east, and Nandina Avenue on the south in the city of Perris, County of Riverside. The Riverside County Flood Control and Water Conservation District's (District) has reviewed the NOP and has the following comments:

1. The proposed project is located within the District's Perris Valley Master Drainage Plan (MDP) boundaries. When fully implemented, these MDP facilities will provide flood protection to relieve those areas within the MDP boundary of the most serious flooding problems and will provide adequate drainage outlets. The DEIR should address impacts to MDP facilities within the proposed project area. The MDP maps can be viewed online at [www.rcflood.org](http://www.rcflood.org). To obtain further information on the MDP and the proposed facilities, please contact Kyle Gallup of the District's Planning Section at 951.955.1345.
2. Please be advised that any work that involves District rights-of-way, easement, or facilities will require an encroachment permit from the District. Therefore, the District will likely be a CEQA responsible agency and should be named as such in the DEIR to facilitate the encroachment permit process. To obtain further information on encroachment permits or existing facilities, contact Devraj Oza of the Encroachment Permit Section at 951.955.1266.
3. Please be advised the Perris Valley Channel Lateral B, Stage 4 storm drain improvement project is currently under way and is planned to be under construction by 2023. The storm drain improvements will be along the March Air Force Base from Harley Knox Boulevard to the northern border of the proposed project. The storm drain improvements will collect the 100-year runoff and convey the water to the existing Perris Lateral B Channel at Heacock Street. To obtain more information about the Perris Valley Channel, Lateral B, stage 4 project, please contact Jerry Aguirre of the Environmental and Regulatory Services 2 Section.
4. Please note that if the project proposes storm drains 36 inches or larger in diameter the District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. To obtain further information regarding the design requirements for the District to accept developer-built facilities, please contact Albert Martinez of the District's Plan Check Section at 951.955.8885.

Thank you for the opportunity to review the NOP. For our record keeping purposes, we request that you acknowledge receipt of this email. If you have any questions concerning this email, I may be contacted at 951.955.3134 or Kevin Cunningham at 951.955.1526.



Deanna Lestina | ERS II  
Assistant Flood Control Planner  
D: (951)955-3134  
Riverside County Flood Control &  
Water Conservation District  
Office Hours: Tu-Fr, 6:00A-4:30P

### **Confidentiality Disclaimer**

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure. If you are not the author's intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error please delete all copies, both electronic and printed, and contact the author immediately.

[County of Riverside California](#)

**From:** [Vega, Jaqueline](#)  
**To:** [Nathan Perez](#)  
**Cc:** [Rull, Paul](#)  
**Subject:** Notice of environmental impact report  
**Date:** Tuesday, December 21, 2021 1:48:03 PM  
**Attachments:** [image001.png](#)

---

Good Afternoon,

Thank you for transmitting the above reference project for review. Please note that proposed project site is located within Zone B2 of March Air Base AIA and review by ALUC is not required at this time, because the City of Perris is consistent with the March ALUCP and the proposed project does not propose any legislative actions.(GPA,CZ)

Should you have any questions, please contact me.

*Jackie Vega*  
Student Intern



### Confidentiality Disclaimer

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure. If you are not the author's intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error please delete all copies, both electronic and printed, and contact the author immediately.

[County of Riverside California](#)

## NATIVE AMERICAN HERITAGE COMMISSION

Governor's Office of Planning &amp; Research

December 23, 2021

**Dec 24 2021**

Nathan Perez  
City of Perris  
135 North "D" Street  
Perris, CA 92570

**STATE CLEARINGHOUSE**

Re: 2021120497, First March Logistics Project, Riverside County

Dear Mr. Perez:

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.



CHAIRPERSON  
Laura Miranda  
*Luiseño*

VICE CHAIRPERSON  
Reginald Pagaling  
*Chumash*

PARLIAMENTARIAN  
Russell Attebery  
*Karuk*

COMMISSIONER  
William Mungary  
*Paiute/White Mountain Apache*

COMMISSIONER  
Isaac Bojorquez  
*Ohlone-Costanoano*

COMMISSIONER  
Sara Dutschke  
*Miwok*

COMMISSIONER  
Buffy McQuillen  
*Yokayo Pomo, Yuki, Nomlaki*

COMMISSIONER  
Wayne Nelson  
*Luiseño*

COMMISSIONER  
Stanley Rodriguez  
*Kumeyaay*

EXECUTIVE SECRETARY  
Christina Snider  
*Pomo*

NAHC HEADQUARTERS  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

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, subs. (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](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

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](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](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](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse



January 18, 2022

Mr. Nathan Perez, Senior Planner  
City of Perris, Planning Division  
135 North "D" Street  
Perris, California 92570  
Phone: (951) 943-5003  
E-mail: [NPerez@cityofperris.org](mailto:NPerez@cityofperris.org)

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the First March Logistics Project [SCAG NO. IGR10550]**

Dear Mr. Perez,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the First March Logistics Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.<sup>1</sup>

Pursuant to Senate Bill (SB) 375, SCAG is 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). 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 Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is also 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.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the First March Logistics Project in Riverside County. The proposed project consists of two industrial buildings with a total of 543,005 SF of warehouse and 16,000 SF of office, plus 167 automobile parking stalls, 170 trailer parking stalls, and 93 loading docks on a 27.56-acre site.

**When available, please email environmental documentation to [IGR@scag.ca.gov](mailto:IGR@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 Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or [IGR@scag.ca.gov](mailto:IGR@scag.ca.gov). Thank you.

Sincerely,

Frank Wen, Ph.D.  
Manager, Planning Strategy Department

<sup>1</sup> Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

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

REGIONAL COUNCIL OFFICERS

President  
Clint Lorimore, Eastvale

First Vice President  
Jan C. Harnik, Riverside County  
Transportation Commission

Second Vice President  
Carmen Ramirez, County of Ventura

Immediate Past President  
Rex Richardson, Long Beach

COMMITTEE CHAIRS

Executive/Administration  
Clint Lorimore, Eastvale

Community, Economic &  
Human Development  
Jorge Marquez, Covina

Energy & Environment  
David Pollock, Moorpark

Transportation  
Sean Ashton, Downey

**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
FIRST MARCH LOGISTICS PROJECT [SCAG NO. IGR10550]**

**CONSISTENCY WITH CONNECT SOCIAL**

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). 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 Connect SoCal.

**CONNECT SOCIAL GOALS**

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. 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. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

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 CONNECT SOCIAL GOALS	
Goal	Analysis
Goal #1: <i>Encourage regional economic prosperity and global 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>
Goal #2: <i>Improve mobility, accessibility, reliability and travel safety for people and goods</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.

**Connect SoCal Strategies**

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. 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 2020 Connect SoCal 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 [2020 Connect SoCal Goods Movement Technical Report](#).

For further information on industrial development and warehousing in Southern California, please see [Industrial Warehousing in the SCAG Region](#).

**DEMOGRAPHICS AND GROWTH FORECASTS**

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG’s 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development

agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California’s GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal’s Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted City of Perris Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	83,088	101,117	108,931	121,038
Households	6,333,458	6,902,821	7,170,110	7,633,451	21,431	27,458	30,007	33,798
Employment	8,695,427	9,303,627	9,566,384	10,048,822	19,013	23,267	24,797	26,411

**MITIGATION MEASURES**

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG’s Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The 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.

## Nicole Morse

---

**From:** Nathan Perez <NPerez@cityofperris.org>  
**Sent:** Tuesday, January 4, 2022 1:58 PM  
**To:** Nicole Morse; Michael Goodwin  
**Cc:** Sarah Bova  
**Subject:** FW: Public Records Request - First March Logistics  
**Attachments:** Public Records Request Form .docx

Hello Everyone,  
We had a public request for your First March Logistics project at Natwar in the City of Perris.  
I wanted to FYI you

**Nathan Perez**  
**Senior Planner**  
City of Perris  
Department of Development Services - Planning Division  
135 N. "D" Street  
Perris, CA 92570  
Tel: (951) 943-5003  
<http://www.cityofperris.org/>  
[Available Monday to Thursday](#)

---

**From:** Sean Silva <sean@careca.org>  
**Sent:** Tuesday, January 4, 2022 12:35 PM  
**To:** Nathan Perez <NPerez@cityofperris.org>  
**Subject:** Public Records Request - First March Logistics

January 4, 2022

### Via Email and U.S. Mail

City of Perris  
Attn: Nathan Perez  
135 N D St.  
Perris, CA 92570  
[nperez@cityofperris.org](mailto:nperez@cityofperris.org)

**RE: Public Records Act Request and Request for Mailed Notice of Public Hearings and Actions –  
First March Logistics - Nandina Ave and Natwar Ln.  
Perris, CA 92571**

Dear Mr. Perez,

CARE CA is writing to request a copy of any and all records related to the project, the First March Logistics project, located at Nandina Avenue and Natwar Lane in Perris. The project will be the construction of an industrial building with 419,000 square feet of space, including 8,000 square feet of office space, and a second industrial building with 140,000 square feet of space, including 8,000 square feet of office space. We are also

writing to request copies of all communications and mailed notice of any and all hearings and/or actions related to the Project.

Our request for mailed notice of all hearings includes hearings, study sessions and community meetings related to the Project, certification of the MND (or recirculated DEIR), and approval of any Project entitlements. This request is made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108 and 21152 and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. Our request includes notice to any City actions, hearings or other proceedings regarding the Project, Project approvals and any actions taken, or additional documents released pursuant to the California Environmental Quality Act.

Our request for all records related to the Project is made pursuant to the California Public Records Act. (Government Code § 6250 et seq.) This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We will pay for any direct costs of duplication associated with filling this request up to \$200. However, please contact me at (951) 540-1290 with a cost estimate before copying/scanning the materials.

Pursuant to Government Code Section 6253.9, if the requested documents are in electronic format and are 10 MB or less (or can be easily broken into sections of 10 MB or less), please email them to me as attachments.

My contact information is:

**U.S. Mail**

Jeff Modrzejewski

CARE CA

501 Shatto Place, Suite 200

Los Angeles, CA 90020

**#Email**

[community@careca.org](mailto:community@careca.org)

Please call me if you have any questions. Thank you for your assistance with this matter.

Sincerely,

Jeff Modrzejewski

Executive Director