

**Barker Business Park Project**  
**SPA 23-05321, DPR 23-00022, and CUP 24-05125**  
**State Clearinghouse Number 2025030929**

**Final Mitigated Negative Declaration**

*Lead Agency:*  
City of Perris  
101 North D Street  
Perris, CA 92570



*Prepared By:*  
Applied Planning, Inc.  
11762 De Palma Road, 1-C 310  
Corona, CA 92883



**May 2025**

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**Appendices**

1. Initial Study/Mitigated Negative Declaration & Appendices

The circulated Initial Study/Mitigated Negative Declaration and associated Appendices may be viewed and/or downloaded via either of the following links:

[https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review/-folder-521#docfold\\_1206\\_1313\\_479\\_521](https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review/-folder-521#docfold_1206_1313_479_521)

<https://ceqanet.opr.ca.gov/2025030929>

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# 1 Introduction

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An Initial Study/Mitigated Negative Declaration (MND) for the proposed Barker Business Park Project [Specific Plan Amendment (SPA) 23-05321, Development Plan Review (DPR) 23-00022, and Conditional Use Permit (CUP) 24-05125, herein collectively referred to as the proposed Project or Project] has been prepared in accordance with the California Environmental Quality Act (CEQA), the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines), and the City of Perris policies and practices for implementing CEQA.

On March 21, 2025, the City of Perris issued a Notice of Intent to Adopt a Mitigated Negative Declaration (SCH # 2025030929) for the proposed Project. The Notice of Intent indicated that the City, acting as the lead agency for the Project under CEQA, was notifying public agencies and interested parties that the City plans to adopt an MND for the Project.

The Notice of Intent for the proposed Project was sent to trustee and responsible agencies, members of the public, other interested parties, and the California Governor's Office of Land Use and Climate Innovation, State Clearinghouse for the 30-day public review period required under CEQA. The public review period ended on April 21, 2025.

During the review period, public agencies and members of the public had the opportunity to respond to the Notice of Intent and provide comments on the Initial Study/MND. Public comments were received by the City of Perris Planning Division and have been responded to herein by the City in accordance with CEQA requirements. The City received six (6) letters/emails from the following agencies or organizations commenting on the Initial Study/MND:

- A. Eastern Municipal Water District (EMWD), dated March 24, 2025
- B. Agua Caliente Band of Cahuilla Indians, dated April 8, 2025
- C. Riverside Transit Agency, dated April 17, 2025
- D. South Coast Air Quality Management District, dated April 18, 2025
- E. Riverside County Flood Control and Water Conservation District, dated April 18, 2025
- F. California Department of Transportation (Caltrans), dated April 21, 2025

Section 2.0, Comments and Responses, includes the comment letters/emails received by the City of Perris in response to the circulated Initial Study/MND. Copies of these comment letters and emails, as well as the City's responses to the individual comments, are included in Section 2.0. Pursuant to Article 6, Negative Declaration Process, of the State CEQA Guidelines, the City is not required to respond to comments received on an MND. However, the City has chosen to respond to the comments received on the Initial Study/MND and provide those responses to the commenters.

It should be noted that none of the comments resulted in changes to the data, analysis, conclusions, or mitigation measures in this Initial Study/MND. The comments and information provided by these agencies and organizations do not constitute significant new information that would trigger a need to recirculate the Initial Study/MND for additional public review and comments.

CEQA was amended in 1989 to add Section 21081.6, which requires a public agency to adopt a mitigation monitoring and reporting program for assessing and ensuring compliance with any required mitigation measures applied to a proposed development. A separate Mitigation Monitoring and Reporting Program has been created for the project.

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## 2 Comments and Responses

### Comment Letter A

Eastern Municipal Water District (EMWD) dated March 24, 2025



March 24, 2025

Alfredo Garcia  
Associate Planner  
City of Perris Development Services Department/Planning Division  
135 North "D" Street  
Perris, CA 92570

**Subject: The Baker Business Park Project – Notice of Intent to Adopt Mitigated Negative Declaration (MND No. 2404)**

Dear Mr. Garcia:

EMWD appreciates the opportunity to provide comments on the proposed Baker Business Park Project Mitigated Negative Declaration.

The Baker Business Park Project may require water and sewer service from EMWD, with the potential requirement for on-site and offsite facilities and associated easements to adequately serve the project demands from existing EMWD facilities. The details of said service connection points will be further detailed in a separate document, known as EMWD's Design Conditions (DC), to be developed by the project proponent.

A1

Appendix L in the MND includes a "Will-Serve" letter from EMWD dated June 15, 2023 with the expiration of the letter cited as one year from date of issue. A new letter must be requested from EMWD, as the letter included in the MND is expired. Additionally, the MND and EMWD records do not demonstrate detailed plans for the water and wastewater utilities EMWD would provide for the project.

A2

To that end, EMWD requests the Lead Agency/project proponent consult with the District via a one-hour complementary Project Intake meeting. This meeting will inform the Lead Agency/project proponent as to whether facility/pipeline improvements are required to service the project. To set up this meeting the

Board of Directors  
Stephen J. Corona, President David J. Slavson, Vice President Jeff Armstrong Joe Grundstaff Philip E. Paule

**EASTERN MUNICIPAL WATER DISTRICT**

2270 Trumble Road • Perris, CA 92572-8300  
T 951.928.3777 • F 951.928.6177 • www.emwd.org

Mr. Garcia  
March 24, 2025  
Page 2

Lead Agency/project proponent should complete a Project Questionnaire (form NBD-058) and submit to EMWD. To download this form or for additional information, please visit our web page [www.emwd.org](http://www.emwd.org), then select the "Developer" link, then select the "New Development Process Forms" link. This meeting will offer the following benefits:

1. Describe EMWD's development process
2. Identify project scope and parameters
3. Provide a preliminary review of the project within the context of existing infrastructure
4. Discuss potential candidacy for recycled water service
5. Identify project submittal requirements to start the Design Conditions review

Following the Project Intake meeting, to proceed with this project, the Design Conditions will need to be developed by the developer's engineer and reviewed/approved by EMWD prior to submitting improvement plans for Plan Check. The DC process and approval will provide the following:

1. Technical evaluation of the project's demands and existing system capacities
2. Identification of impacts to existing facilities
3. Identification of required on-site and off-site facilities, necessary to serve the project
4. Identification of easement requirements, if necessary
5. Identification of potential EMWD's cost participation in facility oversizing, if applicable

If you have questions or concerns, please do not hesitate to contact Maroun El-Hage at (951) 928-3777, extension 4468 or by e-mail at [El-hagem@emwd.org](mailto:El-hagem@emwd.org).

Sincerely,

**Anthony  
Budicin**

Digitally signed by Anthony  
Budicin  
Date: 2025.03.24 11:38:28  
-07'00'

Anthony Budicin  
Director of Environmental and Regulatory Compliance

Cc: Maroun El-Hage, MPA, MS, PE, EMWD Principal Civil Engineer, Dev. Services Dept.

**Response A-1:** The commenter recognizes the City of Perris' inclusion of the Eastern Municipal Water District (EMWD) in the Project CEQA review process. The City appreciates EMWD participation in the Project CEQA review process.

The commenter notes that the Project may require water and sewer service from the EMWD together with supporting connection to EMWD facilities. The commenter notes that the Project Proponent will be required to develop a Design Conditions document providing details of proposed connection to EMWD services.

As discussed in the MND, it is anticipated that the EMWD would provide water and sewer services to the Project (MND, p. 2-21 et al.). The EMWD previously issued a "Will-Serve" letter for water and sewer services for the Project (MND Appendix L). The Project Proponent will prepare all necessary documentation, including Design Conditions documentation required by the EMWD.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response A-2:** The commenter notes that the Will-Serve letter provided in MND Appendix L has expired, and that a new Will-Serve letter must be requested. The commenter states that detailed project water and wastewater service plans have not yet been provided.

The Project Proponent will request a new "Will-Serve" from the EMWD prior to application for building permits. Will-Serve documentation will be provided to the City as part of the Project building permit application package.

As noted in the MND, the Project would connect to existing sanitary sewer and water lines located within adjacent E. Frontage Road (MND, p. 2-21 et al.) Detailed plans for connection to EMWD facilities will be provided as part of the Project building permit application process. Alignments of service lines and connections to EMWD services would be required to conform to EMWD conditions and specifications.

The commenter requests the City and Project Proponent consult with the EMWD via a complementary Project intake meeting to determine specific improvements that may be necessary to serve the Project. The commenter notes that the City/Project Proponent should complete a Project Questionnaire (EMWD form NBD-058) and submit to the EMWD to further the Proponent's understanding of the EMWD's review processes, and facilitate the EMWD's understanding of the Project and formulation of Project Design Conditions. The EMWD provides additional details regarding the Design Conditions process and potential Proponent obligations. The EMWD contact information is provided.

*2 – Comments and Responses*

The Project Proponent will comply with all EMWD requirements, not limited to participation in Project intake consultation(s), development of Design Conditions, and all EMWD Conditions of Approval. The EMWD contact information is noted.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Comment Letter B**

Agua Caliente Band of Cahuilla Indians dated April 8, 2025

**AGUA CALIENTE BAND OF CAHUILLA INDIANS**

TRIBAL HISTORIC PRESERVATION



03-041-2025-001

April 08, 2025

[VIA EMAIL TO: [algarcia@cityofperris.org](mailto:algarcia@cityofperris.org)]  
City of Perris  
Mr. Alfredo Garcia  
135 N. D Street  
Perris, California 92570-2200

**Re: Notice of Intent to Adopt MND: Barker Business Park**

Dear Mr. Alfredo Garcia,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Barker Business Park project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. For this reason, the ACBCI THPO requests the following:

- \* ACBCI THPO defers this project to Luiseño tribes. This should conclude our consultation efforts.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 883-1137. You may also email me at [ACBCI-THPO@aguacaliente.net](mailto:ACBCI-THPO@aguacaliente.net).

Cordially,

Luz Salazar  
Cultural Resources Analyst  
Tribal Historic Preservation Office  
AGUA CALIENTE BAND  
OF CAHUILLA INDIANS

B1

3901 DIXON ROAD, PERRIS, CALIFORNIA 92504  
(760) 883-1137 • FAX: (760) 883-1134 • WWW.AGUACALIENTE.NET • 408-900-0000

**Response B-1:** The commenter recognizes the Lead Agency’s inclusion of the Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office in the Project CEQA review process. The City appreciates the Tribe’s participation in the Project CEQA review process.

The commenter states that the Project area is not located within the boundaries of the Tribe’s Reservation. The commenter notes that the Project is, however, located within the Tribe’s Traditional Use Area. The Tribe therefore defers comment on the Project to Luiseño tribes. The commenter restates introductory remarks and provides commenter contact information.

No comments on the MND analyses or conclusions are provided. To date, Luiseño tribes have not commented on the Project. The commenter contact information is noted.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

## **Comment Letter C**

Riverside Transit Agency (RTA) dated April 17, 2025

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**From:** Mauricio Alvarez <[malvarez@riversidetransit.com](mailto:malvarez@riversidetransit.com)>  
**Sent:** Thursday, April 17, 2025 8:57 AM  
**To:** Alfredo Garcia <[algarcia@cityofperris.org](mailto:algarcia@cityofperris.org)>  
**Subject:** The Baker Business Park

Good Morning Alfredo,

Thank you for including RTA in the development review of the Baker Business Park Project. After reviewing the plans, there are no comments to submit for this particular project.

C1

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

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**Response C-1:** The commenter recognizes the City's inclusion of the Riverside Transit Agency (RTA) in the Project CEQA review process. The City appreciates the RTA's participation in the Project CEQA review process.

The commenter states that the RTA has no comments regarding the Project. As such, no further response can be provided.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Comment Letter D**

South Coast Air Quality Management District dated April 18, 2025



SENT VIA E-MAIL:

April 18, 2025

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

Alfredo Garcia, Associate Planner  
 Development Services Department, Planning Division  
 City of Perris  
 135 North "D" Street  
 Perris, CA 92570

**Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the Barker Business Park Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Perris is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

D1

Summary of Proposed Project Information in the MND

Based on the MND, the Proposed Project involves developing a 5-acre vacant parcel into a 25,750 square-foot building, constructing a 14,139 square-foot building on a separate 10-acre vacant site, and using 9.6 acres of vacant land for sales and rental of commercial trailers – all within a 25.6 gross-acre project site consisting of two parcels bisected by E. Frontage Road.<sup>1</sup> Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located less than 25 meters east of the Proposed Project site.<sup>2</sup> Construction of the Proposed Project is anticipated to be completed in 2026.<sup>3</sup> The Proposed Project site is located northeast of Interstate 215 and Placentia Avenue interchange, between Walnut Avenue to the north and Placentia Avenue to the south.<sup>4</sup>

D2

South Coast AQMD Comments

*Mobile Source Emissions: Inconsistencies in Truck Trip Lengths and Vehicle Miles Traveled (VMT)*

D3

Appendix A, Air Quality Impact analysis (AQIA), stated that “To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length of 14.2 miles for 2-axle and 3-axle (LHDT1, LHDT2, and MHDT) trucks and 40 miles for 4+ axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages taken from the Barker Business Park (DPR23-00022, SPA23-05321, TTM23-05322)

<sup>1</sup> Appendix A, AQIA, Page 14.

<sup>2</sup> *Ibid* Page 37.

<sup>3</sup> *Ibid* Page 15.

<sup>4</sup> *Ibid* Page 14.

*Traffic Analysis Scoping Agreement.*"<sup>5</sup> The Proposed Project site, however, is located approximately 80 miles from the Ports of Long Beach and Los Angeles, which suggests that the air quality analysis may have underestimated the emissions from trucks traveling between the Ports and the Proposed Project site.

Therefore, it is recommended the Lead Agency revise the emission calculations in the Final MND by applying a project-specific approach to the vehicle trip length and trip rates. This includes using more conservative estimates such as 40 miles for local trips and 80 miles for port-related trips. Tailoring these parameters and assumptions to reflect project-specific logistics will help ensure a more accurate assessment of mobile source emissions and their associated impacts from the Proposed Project.

D3

*Additional Requirement if the Warehouses will Involve Ethylene Oxide (EtO) Chemical Used for Sterilization*

Some warehouses could potentially be receiving and storing materials sterilized with ethylene oxide (EtO), a known carcinogen identified by CARB as a Toxic Air Contaminant and by the U.S. EPA as a Hazardous Air Pollutant. EtO is a flammable, colorless gas used in many industries to make products including antifreeze, textiles, solvents, detergents, and adhesives. EtO is also used to sterilize medical devices, the primary use within South Coast AQMD. Due to concerns of EtO off-gassing from sterilized materials and the associated warehouses that receive, and store materials sterilized with EtO, there is a potential that some warehouses could emit EtO and pose a cancer risk to workers and nearby sensitive receptors. For these reasons, the Lead Agency is recommended to notify the project proponent, including the potential future tenants, if known, that if sterilization activities or related operations involving the storage or transport of materials sterilized with EtO are intended to occur at the Proposed Project site, such activities would be subject to the requirements of South Coast AQMD Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations.<sup>6</sup> Rule 1405 contains a variety of requirements applicable to both facilities and certain large warehouses that receive EtO-sterilized products. For the latter, warehouse operators are required to provide records and emissions data through fence-line monitoring or emissions studies to help assess EtO emissions from warehouses. Rule 1405 is intended to minimize EtO emissions from these sources to protect public health, particularly in nearby communities that may be vulnerable to toxic air contaminants.

D4

Thus, if the Proposed Project includes a warehouse that will store materials that have been sterilized with EtO, the Lead Agency is recommended to conduct a health risk assessment that evaluates potential health risks from EtO emissions associated with the Proposed Project and include this information in the Final MND to facilitate full disclosure of potential health risk impacts.

*Cumulative Impacts during Operation*

<sup>5</sup>*Ibid.* Page 52.

<sup>6</sup> South Coast AQMD Rule 1405:

<https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1405.pdf>

Based on the MND, the Proposed Project consists of developing a 5-acre vacant parcel into a 25,750 square-foot building, a 14,139 square-foot building on a 10-acre vacant site, and 9.6 acres of vacant land for sales and rental of commercial trailers – all on a project site totaling 25.6 gross acres and comprises two parcels bisected by E. Frontage Road. The project is within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area.<sup>7</sup> The PVCCSP was adopted by the City of Perris pursuant to a certified Environmental Impact Report (EIR) on 1/10/2012.<sup>8</sup> Prior to certification of the PVCCSP, a Draft EIR was released for public review and comment between 7/20/2011 – 9/6/2011.<sup>9</sup> During this public review period, South Coast AQMD submitted a comment recommending that the Lead Agency include a more robust analysis of cumulative impacts in the Final MND. Specifically, South Coast AQMD asked that the Lead Agency revisit the estimated number of trucks projected to serve the site, provide additional analysis demonstrating that the project will not significantly impact sensitive receptors during operation and that it will not cause a significant air quality and air toxics impact, and to evaluate additional mitigation measures to further reduce any significant air quality and air toxics impacts. The PVCCSP has been revised and amended many times since 2012, and the most recent Perris Valley Commerce Center Specific Plan Amendment No. 12 was approved on January 11, 2022.<sup>10</sup> However, the cumulative impacts from the revised projects in PVCCSP are not updated, and a robust analysis of cumulative air quality and air toxics impacts from all the projects in PVCCSP is not included in the PVCCSP or this MND.

D5

According to the City of Perris webpage under Planning – Environmental Documents for Public Review,<sup>11</sup> other development projects are located near the Proposed Project site. Such as the Notice of Preparation (NOP) Duke Warehouse at Patterson Avenue and Nance Street Project<sup>12</sup> (prepared in 2022), Ethanac Logistics Center in 101 North D Street, IS/MND for Redlands Avenue East Industrial Project<sup>13</sup> (prepared in September 2022) and IS/MND for Development Plan Review 22-00008 project. Per CEQA Guidelines Section 15065(a)(3), South Coast AQMD staff is primarily concerned with the cumulative air quality impacts from increased concentrations of air toxics in the PVCCSP region. Pursuant to CEQA, which requires an analysis of direct, indirect, and cumulative impacts, South Coast AQMD has initiated a public process to develop additional guidance for evaluating cumulative air quality impacts from increased concentrations of air toxics for projects. To date, there have been five working group meetings (WGMs) dedicated to proposed cumulative impact policy development. For more general information on the WGMs, please visit South Coast AQMD's webpage.<sup>14</sup>

D6

<sup>7</sup> Draft EIR, Page 243.

<sup>8</sup> ORDINANCE NUMBER 1284.

Accessed at: <https://www.cityofperris.org/home/showpublisheddocument/2923/637250482796800000>

<sup>9</sup> Perris Valley Commerce Center Specific Plan Final EIR, 9.0 Introduction, Public Review Summary, Page 9.0-1

Accessed at: <https://www.cityofperris.org/home/showpublisheddocument/2645/637455522835370000>

<sup>10</sup> Perris Valley Commerce Center Specific Plan Amendment No. 12, approved January 11, 2022, available at

<https://www.cityofperris.org/home/showpublisheddocument/2647/637799977032200000>

<sup>11</sup> City of Perris, Planning – Environmental Documents. Access at:

<https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review/>

<sup>12</sup> Duke Warehouse at Patterson Avenue and Nance Street Project:

<https://ceqanet.opr.ca.gov/2022010274>

<sup>13</sup> Redlands Avenue East Industrial Project. Access at: <https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review/-folder-328>

<sup>14</sup> South Coast AQMD's Cumulative Impacts from Air Toxics for CEQA Projects:

[https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-\(new\)](https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new))

Therefore, it is recommended that, at minimum, the Lead Agency perform a qualitative analysis to provide the potential cumulative impacts from air toxics in consideration by listing all surrounding past, present, and probable future projects. The Lead Agency may also perform a more detailed and robust quantitative analysis of cumulative air toxic and potential health risk implications to be included in the Final MND.

D6

*Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program*

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 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 a 643,419 square foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, the Lead Agency is recommended to 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). For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.<sup>16</sup>

D7

*South Coast AQMD Air Permits and Role as a Responsible Agency*

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air

D8

<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>

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

permits from South Coast AQMD will be required. The final CEQA document, whether a MND or EIR, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>17</sup> Rule 203 – Permit to Operate,<sup>18</sup> Rule 401 – Visible Emissions,<sup>19</sup> Rule 402 – Nuisance,<sup>20</sup> Rule 403 – Fugitive Dust,<sup>21</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>22</sup> Rule 1113 – Architectural Coating,<sup>23</sup> Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,<sup>24</sup> Rule 1179 – Publicly Owned Treatment Works Operations,<sup>25</sup> Regulation XIII – New Source Review,<sup>26</sup> Rule 1401 – New Source Review of Toxic Air Contaminants,<sup>27</sup> Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>28</sup> Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,<sup>29</sup> etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD changes from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

D8

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in

D9

<sup>17</sup> South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>18</sup> South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>19</sup> South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

<sup>20</sup> South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

<sup>21</sup> South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

<sup>22</sup> South Coast AQMD. Rule 1110.2 available at: [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>23</sup> South Coast AQMD. Rule 1113 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

<sup>24</sup> South Coast AQMD. Rule 1166 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

<sup>25</sup> South Coast AQMD. Rule 1179 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

<sup>26</sup> South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scagmd-rule-book/regulation-xiii>

<sup>27</sup> South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

<sup>28</sup> South Coast AQMD. Rule 1466 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

<sup>29</sup> South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

Alfredo Garcia, Associate Planner

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April 18, 2025

order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

D9

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record explaining why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

D10

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) should you have any questions.

D11

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:SG

RVC250319-01

Control Number

**Response D-1:** The South Coast Air Quality Management District (South Coast AQMD) acknowledges its receipt and review of the MND. The commenter recognizes the City of Perris as the CEQA Lead Agency for the Project.

The City of Perris as the Lead Agency appreciates the South Coast AQMD's participation in the Project CEQA review process.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response D-2:** This comment provides a summary description of the Project. The commenter's summary description of the Project is materially correct. The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response D-3:** This comment states that the truck trip lengths employed in the MND and supporting Air Quality Impact Analysis are not appropriate given the Project's distance from the Ports of Long Beach and Los Angeles. The City disagrees with the commenter's statements. Commenter remarks regarding Project trip characteristics lack evidentiary support.

First, the commenter here and elsewhere in remarks provided, appears to misclassify the Project as a warehouse development. The Project does not include or require warehouse uses. As noted in the MND Project Description, the Project consists of the development and operation of local-serving businesses that would provide for rental, lease, sale, and maintenance of trailers and heavy equipment (MND Section 2.0, Project Description). No warehouse buildings or uses are proposed. The trip generation and trip lengths for the Project are based on and reflect the specific Project and Project context described in the MND. Project Trip generation characteristics are discussed in detail in the Traffic and VMT Analysis (MND Appendix J) Section 4, Projected Future Traffic. Project trip length characteristics are discussed in the Traffic and VMT Analysis, Section 8.2.3 Local Serving Land Use. Representative discussion includes:

[Project] Tenant 1's primary business is renting and leasing semi-trailers to a diverse clientele. Importantly, Tenant 1 does not participate in trucking operations, general vehicle storage, or industrial activities such as freight storage, hauling, or breaking. Heavy duty trucks are not housed on-site; only those needing a trailer will visit the location. This usage is anticipated to reduce VMT, as customers would otherwise drive longer distances to rent a commercial trailer. (Traffic and VMT Analysis, p. 70)

[Project] Tenant 2 is a construction equipment leasing company operates as a local-serving entity due to the specific logistical demands of the construction industry. Proximity to clients allows for timely delivery of heavy machinery, which is often required on short notice to meet project deadlines and ensure work can continue without interruption. By being located near construction sites, the company minimizes downtime and provides quick access to essential equipment. The transportation of large construction machinery is logistically complex and costly, so operating locally reduces transportation expenses and streamlines the leasing process. (Traffic and VMT Analysis, p. 70)

The Project would not generate truck trips ending or beginning at the Ports of Long Beach and Los Angeles.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response D-4:**

The commenter notes that use and storage of ethylene oxide (EtO)-containing materials at the site would be subject to the requirements of South Coast AQMD Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations. The commenter here again appears to misclassify the Project as a warehouse or manufacturing use that could potentially store or accept EtO-containing products. The Project does not include warehouse or manufacturing uses. Rather, the Project uses would provide for local-serving rental, lease, sale, and maintenance of trailers and heavy equipment. At this time, the Project does not include any proposed use of the site for medical device sterilization or other industrial operations known to utilize or emit EtO. Furthermore, the current development concept does not contemplate warehouse uses that would involve the long-term storage of sterilized medical equipment or other EtO-treated materials. Given the nature of the Project uses, additional analysis is not required.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response D-5:**

This comment states that a robust analysis of cumulative air quality and air toxics impacts from all projects in the Perris Valley Commerce Center Specific Plan (PVCCSP) is not included in the PVCCSP and this MND. As discussed in the City's response to the South Coast AQMD's comments on the PVCCSP EIR, (Response to Comment L-4), the PVCCSP was analyzed with a "programmatically" approach (PVCCSP EIR, page 3.0-7) and the PVCCSP EIR is considered to be a programmatic document, as defined in Section 15168 of the State CEQA Guidelines.

When a programmatic EIR is prepared, later activities, which for the PVCCSP consists of implementing development and infrastructure projects, must be examined to determine whether an additional environmental document is required (State CEQA Guidelines Section 15168(c)). This evaluation takes place as part of the City's normal development review process.

Air pollutant emissions for build out of the Perris Valley Commerce Center (PVCC) area of the City of Perris were quantified and evaluated in the PVCCSP EIR and determined to be significant and unavoidable. All mitigation measures in the PVCCSP EIR that apply to air quality are implemented by individual projects to reduce air emissions.

Because, at the programmatic level, there were no specific implementing development projects proposed or truck trip data available, a meaningful analysis of health risk impacts could not be performed at the PVCCSP stage of master planning. Therefore, the PVCCSP EIR concluded that any such analysis would be, at best, speculative (PVCCSP EIR, page 4.2-49) and did not discuss the issue further as allowed per Section 15145 of the State CEQA Guidelines. Thus, the PVCCSP EIR's conclusions related to the individual PVCCSP implementing development and infrastructure projects exposing sensitive receptors to substantial pollutant concentrations were based on the health risks from previously evaluated industrial projects within the PVCC vicinity (PVCCSP EIR Table 4.2-M) and the determination from the General Plan EIR. However, PVCCSP EIR mitigation measure MM Air 15 specifically requires a health risk assessment to identify project-specific impacts resulting from the use of diesel trucks from potential implementing development projects based on the number of dock doors and truck trips.

Additionally, there is no methodology to quantify the cumulative areawide or localized health risks from multiple facilities within a community-wide area. This is because the South Coast AQMD's recommended thresholds of significance (utilized by the City of Perris to evaluate air quality impacts of proposed projects) apply to individual development projects and are meant to evaluate the incremental increase in emissions from a proposed source. These thresholds do not apply to the emissions generated by a group of related or cumulative projects. Therefore, a community wide health risk assessment was not required for the PVCCSP. Furthermore, the City uses the South Coast AQMD's recommended methodology to evaluate cumulative impacts, as detailed in South Coast AQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Per South Coast AQMD White Paper guidance, projects that exceed the project-specific significance thresholds are considered to be cumulatively considerable. Conversely, projects that do not exceed project-specific thresholds are not considered to be cumulatively significant. Individual HRAs have been prepared for nearly every individual light industrial project proposed within the PVCC area.

In the absence of any formal guidance, the Project Health Risk Assessment (*Barker Business Park Mobile Source Health Risk Assessment (HRA)*, MND Appendix A) employed current South Coast AQMD guidance. Based on the HRA analysis, Project toxic air contaminant emissions would not cause or result in exceedance of South Coast AQMD cancer and non-cancer significance thresholds (HRA pp. 1, 2, et al.). Project toxic air contaminant emissions impacts would, therefore, not be considered individually or cumulatively significant.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response D-6:** This comment states that the Air Quality Impact Analysis does not consider cumulative impacts resulting from increased concentrations of air toxics in the region associated with cumulative projects. Specifically, the comment mentions four vicinity warehouse developments. These developments include the following:

- Duke Warehouse at Patterson Avenue and Nance Street project
- Ethanac Logistics Center project
- Redlands Avenue East Industrial project
- Development Plan Review 22-00008 project

The commenter notes that South Coast AQMD has held five public working group meetings aimed at developing methodology for the evaluation of cumulative health risks, there is currently no recommended methodology, policy, or guidance for evaluating these cumulative impacts.

The City of Perris is aware that the South Coast AQMD has initiated a public process to develop additional guidance for evaluating cumulative air quality impacts from increased concentrations of air toxics for projects and that five meetings of the working group have occurred to date. The City is also aware that the South Coast AQMD has not adopted any new guidance for the evaluation of cumulative air quality impacts from increased concentrations of air toxics. The City understands that the next steps in the South Coast AQMD's process include the development/compilation of additional mitigation measures and alternatives, the preparation of a preliminary draft proposal of guidance, and continuing to hold additional working group meetings and to work with affected stakeholders.

It is not the responsibility of one individual development project to evaluate the potential health risks associated with the existing and future development of all properties within a community planning area. Instead, as per the State CEQA Guidelines, the Draft EIR provides an analysis to determine whether the Proposed Project would expose sensitive receptor to substantial diesel particulate matter pollutant concentrations utilizing the current methodologies and thresholds of significance recommended for individual development projects by the South Coast AQMD.

Additionally, according to California Air Resources Board (CARB) guidance, emissions from warehouse and distribution center operations dissipate significantly with distance from the source.<sup>1</sup> The health risk from these emissions drops sharply as distance increases, with multiple sources indicating that impacts are substantially reduced (reduced by approximately 80 percent) at distances greater than 1,000 feet. To be considered a potential source of emissions that could contribute considerably to effects of the Project, developments listed by the commenter should be within 1,000 feet of the Project. Such is not the case, as summarized below:

- The Duke Warehouse at Patterson Avenue and Nance Street development is located approximately 11,649 feet (2.21 miles) northeast of the Project site, and approximately 9,970 feet from a Project truck route on Frontage Road.
- The Ethanac Logistics Center development is located approximately 35,077 feet (6.64 miles) southwest of the Project site, and approximately 34,282 feet from a Project truck route on Placentia Avenue.
- The Redlands Avenue East Industrial development is located approximately 4,702 feet (0.89 miles) northeast of the Project site, and approximately 1,922 feet from a Project truck route on Placentia Avenue.
- The Development Plan Review 22-00008 development is located approximately 5,965 feet (1.13 miles) northeast of the Project site, and north of the Project truck route on Placentia Avenue.

As indicated above, commenter-listed developments are located at distances from the Project that are substantially greater than 1,000 feet.<sup>2</sup> Further, as discussed in the Air Quality Impact Analysis, toxic air contaminants trends in the region generally have declined despite increased development (Air Quality Impact Analysis pp. 40, 41).

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

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<sup>1</sup> <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>

<sup>2</sup> While the Development Plan Review 22-00008 development is situated directly north of the Project's Placentia Avenue truck route, it remains well over 1,000 feet from both the Project site and the maximally exposed individual receptor (MEIR).

**Response D-7:**

The commenter summarizes South Coast AQMD Rule 2305 requirements and related South Coast AQMD Rule 316 requirements for warehouse projects. The commenter states “since the Proposed Project consists of the development of a 643,419-square-foot warehouse, the Proposed Project’s warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied.”

Rule 2305 applies to warehouse uses of 100,000 square feet or more. The commenter’s statements appear to be a carryover for some other South Coast AQMD comment letter. Contrary to the commenter’s statements, the Project *does not* include development of a 643,419-square-foot warehouse. As noted previously, the Project consists of the development and operation of local-serving uses providing for lease, sale, and maintenance of heavy equipment and trailers. Total area of the Project buildings would be less than 40,000 square feet. South Coast AQMD Rule 2305 would not be applicable to the Project.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response D-8:**

The commenter notes various South Coast AQMD permitting requirements for stationary and portable emissions sources such as: generators, fire water pumps, boilers, etc. The South Coast AQMD states that the MND/Air Quality Impact Analysis should include a discussion of South Coast AQMD Rules potentially applicable to the Project. The commenter notes the South Coast AQMD’s dual roles as both a Commenting Agency and a Responsible Agency.

South Coast AQMD Rules considered applicable to the Project are summarized in the Air Quality Impact Analysis on pages 8 through 10. The Project Applicant will be required to comply with all applicable South Coast AQMD Rules and permitting requirements. At present, the Air Quality Impact Analysis assumes that each building would include installation of a stationary diesel-powered emergency fire water pump. It is anticipated that each emergency fire water pump would require a South Coast AQMD air permit. Should any additional equipment be required, the Project Applicant will consult with the South Coast AQMD to comply with any additional or modified South Coast AQMD permit requirements.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response D-9:**

The commenter speculates that the Project would require new or additional stationary and portable equipment that would somehow render the MND analyses “inadequate.” The City disagrees with this statement based on the preceding responses and the following discussion.

First, the commenter remarks are, as noted, speculative. The commenter does not provide any evidentiary support for statements that the Project would include substantial additional stationary or portable equipment; or that such equipment would generate emissions that would result in impacts not already considered and addressed in the MND and Air Quality Impact Analysis. The Air Quality Impact Analysis assumes installation of diesel-powered emergency fire water pumps. Even with this assumption, Project-source emissions would not approach, much less exceed, applicable South Coast AQMD criteria pollutant thresholds of significance – emissions generated by fire water pump operations would comprise a nominal portion of the Project total emissions. For ease of reference, a summary of the Project Peak Operational-Source Emissions is presented below in Table 1. The City considers it highly unlikely that emissions generated by additional stationary sources would substantially affect the MND analyses or conclusions.

**Table 1  
Maximum Daily Operational-Source Emissions**

Source	Emissions (lbs./day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summer</b>						
Mobile Source	2.13	12.80	24.20	0.15	8.59	2.38
Area Source	5.34	0.19	22.80	0.00	0.04	0.03
Emergency Fire Pumps	1.97	5.50	5.02	0.01	0.29	0.29
Cargo Handling Equipment	0.12	0.38	16.44	0.00	0.03	0.03
<b>Total Maximum Daily Emissions</b>	<b>9.56</b>	<b>18.87</b>	<b>68.46</b>	<b>0.16</b>	<b>8.95</b>	<b>2.73</b>
South Coast AQMD Regional Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
<b>Winter</b>						
Mobile Source	2.05	13.50	20.80	0.15	8.59	2.38
Area Source	1.61	0.00	0.00	0.00	0.00	0.00
Emergency Fire Pumps	1.97	5.50	5.02	0.01	0.29	0.29
Cargo Handling Equipment	0.12	0.38	16.44	0.00	0.03	0.03
<b>Total Maximum Daily Emissions</b>	<b>5.75</b>	<b>19.38</b>	<b>42.26</b>	<b>0.16</b>	<b>8.91</b>	<b>2.70</b>
South Coast AQMD Significance Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Source: Barker Business Park Air Quality Impact Analysis (Urban Crossroads, Inc.) September 3, 2024.

Further, should additional stationary and portable equipment be proposed, such equipment would be subject to South Coast AQMD permitting requirements, to include Applicant-provided emissions impacts analysis of such equipment.

Lastly, the Project in total is subject to City development review processes. Should the final Project designs differ substantially from the Project described and analyzed in the MND (including provision of substantial additional quantities of stationary/portable equipment), the City would evaluate those changes consistent with CEQA requirements. This would ensure that any potentially new or different impacts would be appropriately addressed.

The commenter provides South Coast AQMD permitting contact information. The South Coast AQMD permit contact information is noted.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response D-10:**

The commenter recommends that the Project CEQA analysis be revised per South Coast AQMD comments and suggestions. For the reasons stated herein, the City disagrees with the commenter's statements, suggestions, and recommendations. In summary, the City considers the MND and supporting air quality impact analyses to adequately and accurately present the Project's potential criteria pollutant and toxic air contaminant health risk impacts. Here the MND and supporting technical analyses comprise a good faith effort at full disclosure of the Project's potential impacts.

The commenter requests written responses to comments and notification regarding public hearings for the Project. The City will provide information and notification regarding the Project and related hearings and decisions consistent with CEQA requirements.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response D-11:**

The commenter states that South Coast AQMD staff is available to work with the City to address the commenter's statements. South Coast AQMD contact information is provided.

The City appreciates South Coast AQMD's participation in the Project CEQA review process. The South Coast AQMD contact information is noted.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Comment Letter E**

Riverside County Flood Control and Water Conservation District dated April 18, 2025

JASON E. UHLEY  
General Manager-Chief Engineer



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261682

RIVERSIDE COUNTY FLOOD CONTROL  
AND WATER CONSERVATION DISTRICT

April 18, 2025

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

Attention: Alfredo Garcia

Re: DPR 23-00022, CUP 24-05125, SPA 23-05321  
APNs 305-050-051 and 305-050-055

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

E1

The District's review is based on the above-referenced project transmittal, received March 20, 2025. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- This project involves District proposed Master Drainage Plan facilities, namely, Perris Valley Master Drainage Plan Lateral H-12 to collect and convey the offsite flows from the north, northwest of the project site. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. 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. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.
- This project proposes channels, storm drains larger than 36 inches in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. 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. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

E2

City of Perris - 2 -  
Re: DPR 23-00022, CUP 24-05125, SPA 23-05321,  
APNs 305-050-051 and 305-050-055

April 18, 2025

261682

- This project is located within the limits of the District's Perris Valley San Jacinto River Homeland/Romoland Line A Homeland/Romoland Line B Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.
- An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Interim Placentia Avenue Basins and Storm Drains. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- The District's previous comments are still valid.

E2

**GENERAL INFORMATION**

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document, and/or Mitigation Monitoring and Reporting Program, and with all other federal, state, and local environmental rules and regulations that may apply, such as, but not limited to, the Multiple Species Habitat Conservation Plan (MSHCP), Sections 404 and 401 of the Clean Water Act, California Fish and Game Code Section 1602, and the Porter Cologne Water Quality Control Act. The District's action associated with the subject project triggers evaluation by the District with respect to the applicant's compliance with federal, state, and local environmental laws. For this project, the Lead Agency is the agency in the address above, and the District is a Responsible Agency under CEQA. The District, as a Co-permittee under the MSHCP, needs to demonstrate that all District related activities, including the actions identified above, are consistent with the MSHCP. This is typically achieved through determinations from the CEQA Lead Agency (if they are also a Co-permittee) for the project. For the MSHCP, the District's focus will be particular to Sections 6.1.2, 6.1.3, 6.1.4, 6.3.2, 7.3.7, 7.5.3, and Appendix C of the MSHCP. Please include consistency determination statements from the Lead Agency/Co-permittee for the project for each of these sections in the CEQA document. The District may also require that an applicant provide supporting technical documentation for environmental clearance.

E3

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

Very truly yours,



AMY MCNEILL  
Engineering Project Manager

EM:rlp

**Response E-1:** The commenter notes that the Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for projects located within incorporated cities. Comments are, however, provided in instances where items of specific interest to the District may be affected. The District also provides drainage/stormwater management information of general interest.

Commenter remarks regarding the nature and scope of comments provided by the District are acknowledged.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response E-2:** The commenter identifies District requirements for modification of and connection to District facilities. Fee and encroachment permit requirements are also identified.

The City and Project Applicant will comply with District requirements for modification of and connection to District facilities. The City and Project Applicant will ensure that all required fees are paid, and that encroachment permits are obtained. The encroachment permit information provided by the commenter is noted.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response E-3:** The commenter summarizes CEQA mitigation requirements, and specifically mitigation required for potentially significant impacts affecting stormwater management, water quality, and biological resources. The MND substantiates that all potential Project impacts to biological resources would be less-than-significant as mitigated, and potential impacts to stormwater management and water quality would be less-than-significant (MND Section 3.0 Environmental Evaluation, 3.2 Initial Study Checklist and Substantiation, IV. Biological Resources, X. Hydrology and Water Quality). Required mitigation (MM BIO-1 and MM BIO-2) is incorporated into the MND Mitigation Monitoring and Reporting Program.

The commenter notes that NPDES permitting may be required for the Project. The City and Project Applicant will comply with NPDES permitting requirements.

The commenter cites requirements for projects located in a Federal Emergency Management Agency (FEMA) - mapped floodplain. These requirements are noted. However, the Project site is not located in a FEMA-mapped floodplain. The Project site is not otherwise subject to flood hazards (MND Section 3.0 Environmental Evaluation, 3.2 Initial Study Checklist and Substantiation, X. Hydrology and Water Quality).

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Comment Letter F**

California Department of Transportation (Caltrans) dated April 21, 2025

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

**California Department of Transportation**

DISTRICT 8  
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April 21, 2025

Route & Postmile #: I-215 / 29.479  
Cross Street: I-215 & W Placentia Ave  
GTS ID: 35919  
SCH #: 2025030929

City of Perris  
Planning Division  
Attn: Alfredo Garcia  
135 North "D" Street  
Perris, CA 92570

**Subject: Barker Business Park Project MND – Northeast of I-215 & Placentia Avenue, Perris, CA.**

The California Department of Transportation (Caltrans) Local Development Review (LDR) Branch has completed its review of the Mitigated Negative Declaration (MND) and related documents for the Barker Business Park Project. The Project site is located in the City of Perris, northeast of the Interstate 215 (I-215)/Placentia Avenue interchange, and is bounded by Walnut Avenue to the north and Placentia Avenue to the south. It consists of two parcels (APNs 305-050-051 and 305-050-055), bisected by the I-215 East Frontage Road.

The Barker Business Park Project will develop two vacant parcels with complementary uses focused on the rental, lease, sale, and maintenance of heavy equipment and commercial trailers. The site will be divided into three lots:

- **Lot 1** (5.0 acres, northwest of the western site): Will feature a 25,750 sq. ft. building for equipment maintenance and office use, 80 employee parking stalls, and 32,660 sq. ft. of landscaping (15%). Access via three driveways from E. Frontage Road.
- **Lot 2** (10.3 acres, southeast of the western site): Will include a 14,139 sq. ft. building for maintenance and administration, a holding/display lot, 15 parking stalls, and 67,947 sq. ft. of landscaping (15.1%). Access via one driveway from E. Frontage Road.
- **Lot 3** (9.6 acres, eastern site): Will serve as a display lot supporting Lot 2 operations, with 65,182 sq. ft. of landscaping (15.6%) and one driveway from E. Frontage Road.

F1

Given the proximity of the proposed development to Caltrans' right-of-way (R/W), potential impacts requiring mitigation are anticipated, and the issuance of a Caltrans Encroachment Permit is considered likely. Based on the information provided in the most recent submittal, these remarks are considered preliminary and may be subject to revision as site development progresses.

F2

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Based on the information provided in the MND and related documents, we are submitting the following comments and recommendations for your consideration:

**Local Development Review**

General

1. Any Traffic Operations comments provided in this letter must be addressed before the project proceeds to the Caltrans Encroachment Permit phase.
2. Applicant must include this letter and comment responses with their future Caltrans Encroachment Permit application submittal.
3. A detailed review on Site Plan will be performed during the Encroachment Permit process.
4. During the Encroachment Permit phase, coordination with Caltrans Hydraulics and Stormwater units to obtain their input on the project is recommended.
5. We recommend that the City of Perris review and confirm the forecasted traffic volumes utilized in the analysis to ensure their accuracy and alignment with current and projected conditions.

**Traffic Operations**

TIA and VMT Analysis

1. Section 1.4 Study Area – The project must include the intersections of I-215 SB Ramps/Ramona Expressway, and I-215 NB Ramps/Ramona Expressway.
2. Include ramp merge/diverge analysis at the I-215 NB/Ramona Expressway, and I-215 SB/Ramona Expressway.
3. Use the Caltrans Transportation Impact Study Guide (May 20, 2020) for VMT Screening Analysis.

**Equitable Access**

If any Caltrans facilities are impacted by the project, they must comply with American Disabilities Act (ADA) Standards upon project completion. Additionally, the project must ensure the maintenance of bicycle and pedestrian access throughout the construction phase. These access considerations align with Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

**Caltrans Encroachment Permit**

Any permanent work or temporary traffic control that encroaches onto Caltrans' Right-of-Way (R/W) requires a Caltrans-issued encroachment permit.

For information regarding the Encroachment Permit application and submittal requirements, contact:

Caltrans Office of Encroachment Permits  
464 West 4th Street, Basement, MS 619  
San Bernardino, CA 92401-1400  
(909) 383-4526

[D8.E-permits@dot.ca.gov](mailto:D8.E-permits@dot.ca.gov)

<https://dot.ca.gov/programs/traffic-operations/ep>

**Important Note:** All new permit applications must now be submitted through our new CEPS Online Portal at: <https://ceps.dot.ca.gov/>

At this time, no further review from the Local Development Review (LDR) Branch is required. Please be advised that LDR's point of contact role will conclude upon the completion of the development entitlement process. Once project is entitled, the Encroachment Permit Office will

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F4

serve as the primary point of contact moving forward.

Thank you again for including Caltrans in the review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email [LDR-D8@dot.ca.gov](mailto:LDR-D8@dot.ca.gov) or call 909-925-7520.

F4

Sincerely,



**Janki Patel**  
Branch Chief - Local Development Review  
Division of Transportation Planning  
Caltrans District 8

"Improving lives and communities through transportation"

**Response F-1:** The commenter states that Caltrans has completed review of the MND. The commenter provides a summary description of the Project.

Caltrans review of the MND is acknowledged. The commenter summary description of the Project is materially correct. Please refer also to detailed Project information presented in the MND Section 2.0 Project Description.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response F-2:** The commenter notes that comments provided are preliminary and that encroachment permits from Caltrans may be required.

The preliminary aspects of the commenter remarks are noted. The City and Project Applicant will comply with any applicable Caltrans encroachment permitting requirements.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response F-3: *Local Development Review***

The commenter lists items/actions required prior to, or in conjunction with, Caltrans issuance of encroachment permit(s). The City and Project Applicant will comply with any applicable Caltrans encroachment permit requirements.

***Traffic Operations***

The commenter requests additional/modified traffic operations analyses listed below. Responses regarding each commenter request are provided. As a general note, the Traffic and VMT Analysis appended to the MND (MND Appendix J) describes trip generation and trip distribution characteristics of the Project. This information is employed in developing related MND CEQA analyses (e.g., air quality impacts, greenhouse gas emissions impacts, noise impacts) that are dependent, at least in part, on Project trip generation characteristics. The Traffic and VMT Analysis also provides the City with information necessary to plan and program potential transportation system improvements necessary to maintain target Level of Service (LOS) conditions. As Caltrans is aware, and as discussed in the Caltrans Vehicle Miles Traveled-Focused Transportation Impact Study Guide, the State has transitioned away from LOS to VMT for CEQA Analyses. Note further, per the CEQA Guidelines, lead agencies are not required to perform every test, analysis, or research study requested or demanded by commenters (CEQA Guidelines Section 15204(a)).

**Request:** Modification of the Traffic and VMT Analysis to include the intersections of I-215 SB Ramps/Ramona Expressway, and I-215 NB Ramps/Ramona Expressway.

**Response:** The Traffic and VMT Analysis and list of study area intersections to be analyzed was developed in coordination with the City of Perris Engineering Department, and reflects the City's Traffic Analysis guidelines. More specifically, as discussed in the Traffic and VMT Analysis:

The 9 [Traffic and VMT Analysis] study area intersections shown in [Traffic and VMT Analysis] Exhibit 1-3 and listed in [Traffic and VMT Analysis] Table 1-1 were selected for evaluation in this Traffic and VMT Analysis based on consultation with City of Perris staff. At a minimum, the study area includes intersections where the Project is anticipated to contribute 50 or more peak hour trips per the City Guidelines. The "50 peak hour trip" criterion represents a minimum number of trips at which a typical intersection would have the potential to be affected by a given development proposal. The 50 peak hour trip criterion is a traffic engineering rule of thumb that is accepted and widely used within Riverside County (including the City of Perris) for estimating a potential area of influence (i.e., study area). (Traffic and VMT Analysis, p. 6).

The Project is not forecasted to contribute 50 or more peak hour trips at the intersections of I-215 SB Ramps/Ramona Expressway and I-215 NB Ramps/Ramona Expressway. The commenter does not provide any evidentiary support indicating that the Project would substantially contribute to or otherwise adversely affect operations at the intersections of I-215 SB Ramps/Ramona Expressway and I-215 NB Ramps/Ramona Expressway. Therefore, these locations are not included in the Traffic and VMT Analysis.

**Request:** Modification of the Traffic and VMT Analysis to include ramp merge/diverge analysis at the I-215 NB/Ramona Expressway, and I-215 SB/Ramona Expressway intersections.

**Response:** Based on the City's traffic analysis criteria, the Project is not projected to contribute sufficient trips that would result in potentially adverse merge/diverge operations at the I-215 NB/Ramona Expressway and I-215 SB/Ramona Expressway intersections. The commenter does not provide any evidentiary support indicating that the Project would substantially contribute to or otherwise adversely affect operations at the I-215 NB/Ramona Expressway and I-215 SB/Ramona Expressway intersections. These locations were therefore not analyzed in the Traffic and VMT Analysis. Please refer also to preceding remarks regarding development and scope of the Traffic and VMT Analysis Study Area.

**Request:** Use of the Caltrans Transportation Impact Study Guide (Guide) for VMT screening.

**Response:** The VMT analysis presented in the Traffic and VMT Analysis was prepared consistent with CEQA and the City of Perris' adopted Transportation Impact Analysis Guidelines. The supporting discussion is presented in the Traffic and VMT Analysis:

CEQA requires all lead agencies to adopt VMT as the measure for identifying transportation impacts for land use projects. To comply with CEQA, the City adopted analytical procedures, screening tools, and impact thresholds for VMT, which are documented in the City's Transportation Impact Analysis Guidelines for CEQA (May 12, 2020) (City Guidelines). This VMT screening evaluation has been developed based on the adopted City Guidelines. (Traffic and VMT Analysis, p. 69)

The VMT analysis substantiates that VMT impacts of the Project would be less-than-significant. The commenter does not provide any evidentiary support indicating that the Project would substantially contribute to or otherwise result in potentially significant VMT Impacts.

Based on the preceding, the findings and conclusions of the MND and appended Traffic and VMT Analysis are not affected by this comment. Revisions to the MND, or the Traffic and VMT Analysis are not required.

***Equitable Access***

The commenter notes American Disabilities Act (ADA) Standards applicable to any Project improvements affecting Caltrans facilities. The commenter notes that maintenance of bicycle and pedestrian access is required throughout Project construction activities. The City requires compliance with ADA standards generally. The Project Construction Traffic Management Plan provides generally for efficient and safe access throughout Project construction activities. The City ensures compliance with Caltrans equitable access requirements noted above through the Project Conditions of Approval and established development review processes.

The findings and conclusions of the MND are not affected by this comment. Revisions to the MND are not required.

**Response F-4:**

***Caltrans Encroachment Permit***

The commenter notes that "any permanent work or temporary traffic control that encroaches onto Caltrans' Right-of-Way requires a Caltrans-issued encroachment permit." The City and Project Applicant will comply with any applicable Caltrans encroachment permit requirements.

The commenter provides encroachment permit and commenter contact information. The contact information provided by the commenter is noted. The City appreciates Caltrans participation in the Project CEQA review process.

The findings and conclusion of the MND are not affected by this comment. Revisions to the MND are not required.

