



NOTICE OF PREPARATION  
OF A DRAFT ENVIRONMENTAL IMPACT REPORT  
& PUBLIC SCOPING MEETING  
HARVEST LANDING RETAIL CENTER &  
BUSINESS PARK PROJECT

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**Date:** August 9, 2024

**To:** State Clearinghouse, Property Owners, Responsible and Trustee Agencies, and Interested Parties

**From:** City of Perris Development Services Department  
Planning Division  
135 North D Street  
Perris, CA 92570

**Subject:** Notice of Preparation for the preparation of a Draft Environmental Impact Report (EIR) for the Harvest Landing Retail Center & Business Park Project – Specific Plan Amendment (SPA) 22-05250; General Plan Amendment (GPA) 24-05175; Zone Change 24-05176; Development Plan Reviews (DPR) 22-00023, 22-00024, 22-00025, 22-05235, 22-05238, 24-00008, 24-00009; Conditional Use Permits (CUP) 22-05050, 23-05235; Tentative Tract Map (TTM) 38810 and 38811; and Development Agreement(s) (DAA) 17-05136.

**Scoping Meeting:** August 21, 2024

**NOP Comment Period:** August 9, 2024 through September 9, 2024

**Project Title:** Harvest Landing Retail Center & Business Park Project

**Project Applicant:** HIP-So Cal Properties, LLC  
2244 N. Pacific Street, Orange, CA 92865

**Notice of Preparation (NOP) of a Draft Environmental Impact Report (Draft EIR):**

The City of Perris (City) will be the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and will be responsible for the preparation of a Draft EIR for the proposed Harvest Landing Retail Center & Business Park Project (Project). The City has determined that an EIR is required for the Project based on its potential to cause significant environmental effects (State CEQA Guidelines Sections 15060 and 15081). The City is requesting input from you or your agency or organization as to the scope and content of the environmental information that is relevant to your agency or organization's statutory responsibilities or interests in connection with the proposed Project.

Due to time limits mandated by State law, your response must be received at the earliest possible date, but not later than 30 days after receipt of this NOP. The public comment period for this NOP begins on August 9, 2024, and is set to close at 5:00 p.m. on September 9, 2024.

Please send written comments to Albert Armijo, Project Planner, at the address shown above or via email to [aarmijo@cityofperris.org](mailto:aarmijo@cityofperris.org). Please include the name and contact person of the agency or organization.

**Project Information**

**I. Project Location and Setting**

The Harvest Landing Retail Center & Business Park Project site (“Project site”) includes approximately 358.28 acres and is generally bounded by I-215 to the west, Perris Boulevard to the east, Nuevo Road to the south, and Placentia Avenue to the north, in the central portion of the City of Perris. The Project site includes the current Harvest Landing Specific Plan (Specific Plan) area and parcels proposed to be annexed into the Specific Plan and is shown in Figure 1, *Project Site*. The proposed amended Specific Plan area consists of two phase areas and an overlay area, which include the Assessor’s Parcel Numbers (APNs) outlined in Table 1.

**Table 1: Specific Plan APNs**

Phase 1 APNs	Phase 2 APNs	Overlay Area APNs
305-100-028,- 008, 009	305-060-036,-037,-042	305-060-038
305-110-001 through-007,-015,-016,-021 through-027,-032 through-035	305-070-004,-088,-007,-008	
305-120-004 through-008,-020 through-026	305-090-015,-016,-017,-018,-019,-026,-028,-030,-032,-055 through-059	
305-130-001 through-006,-009		
305-140-012,-024 through-027,-031,-032,-034,-040,-041,-049,-050,-052 through-061		
305-160-001,-002,-003,-022 through-030		
305-170-018		
305-190-014,-019,-020,-028 through-031,-033		
305-220-011,-013,-018,-020,-021,-023,-028,-031,-038,-059,-060,-061,-062		

The Specific Plan Area includes three single-family residences, vacant land that has been disturbed from previous agricultural uses, and developed roadways. The Specific Plan Overlay Area is currently developed with Val Verde Elementary School.

**II. Existing Harvest Landing Specific Plan**

In 2011, the City of Perris City Council adopted the Harvest Landing Specific Plan, which is a master-planned community, including residential, recreation, and general business and commercial land uses on 341 acres in western Perris. As approved, the Specific Plan allows for the development of 169.5 acres of residential uses (1,860 units), 88.5 acres of business uses (1,306,582 square feet), 39 acres of roads and

drainage/detentions areas, and 44 acres of open space amenities, including a lake, parks, recreation center, and paseos.

### III. Project Description

The Project applicant proposes to amend the Harvest Landing Specific Plan; to develop the 358.28-acre amended Specific Plan Area to provide for land uses including Multiple Business (MBU), Commercial, and water quality management drainage and detention uses; and compliance with state housing regulations. The three separate Project components that will require permits and approvals (entitlements) are listed below:

- Harvest Landing Specific Plan Amendment (Specific Plan Amendment);
- Opening Year Development of Phase 1 of the Specific Plan (“Phase 1 Development”); and
- Compliance with the Housing Crisis Act of 2019 (Senate Bill 330).

Development of the Specific Plan Area is proposed to occur in two phases. Project-specific details of the proposed development within the 235.6-acre Phase 1 area are described below. The site-specific plans for Phase 2 area are unknown at this time and future entitlements will be needed to develop this area. Thus, the maximum development density of the 122.68-acre Phase 2 area will be analyzed programmatically in the Draft EIR.

#### 1. Specific Plan Amendment

The currently adopted Harvest Landing Specific Plan is a land-use guiding document providing for residential, business, commercial, and open space uses for an area of 341.1 gross acres. The Specific Plan Amendment is proposing to annex three parcels to the Specific Plan area and designate them with a land use of MBU (APNs 305-060-042, 305-060-036, and 305-060-037) and add an MBU overlay to APN 305-060-038, increasing the total Specific Plan area to 358.28 acres. In addition, the Specific Plan Amendment is proposing to change the existing land use plan of the Specific Plan area to replace residential uses with MBU and Commercial uses, as shown in Table 2. The Specific Plan Amendment proposes increasing the maximum allowed floor area ratio within the Commercial designation from 0.35 to 0.75, which would be consistent with the City of Perris Commercial Community General Plan land use designation. In addition, the Specific Plan Amendment would increase the maximum allowed floor area ratio within the MBU designation from 0.35 to 0.75, which would be consistent with the City of Perris Light Industrial General Plan land use designation. Based on the maximum allowed floor area ratios for each designation, the amended Harvest Landing Specific Plan would allow for a maximum development capacity of 8,604,984 square feet of MBU and 1,526,342 square feet of Commercial uses. As noted below, the maximum feasible buildout of the entire Specific Plan, based on the submitted development applications for commercial and industrial uses within the Phase I sites, would be 5,735,535 square feet of MBU uses and 428,507 square feet of Commercial uses.

**Table 2: Proposed Specific Plan Land Use Amendment**

Land Use Type	Existing Specific Plan (acres)	Specific Plan Amendment (acres)
Residential	170.1	0
Multiple Use Business	80.9	263.39
Commercial	7.6	46.72
WQMP Drainage/Detention	43.6	13.08
Other (Roads, Drainage)	38.8	35.09

## 2. Phase 1 Development

### *Business Park Site*

Within the 140.71-acre Business Park site, the existing residential structures would be demolished and seven business park buildings including one parcel hub, three high cube warehouses, and three light industrial buildings would be constructed. A vesting tentative parcel map is proposed to combine the existing parcels into seven lots; one for each proposed building. The proposed business park buildings would have a maximum height of 60 feet. In total, the Business Park site would be built out with a floor area ratio of 0.28. A total of 1,239,079 square feet or 20.2 percent of this site would be covered with drought tolerant landscaping, primarily along the boundaries of each proposed parcel. In addition, the Project would include construction of a 14-foot-high screening wall around the Building 1 parcel hub. The characteristics of each building are summarized in Table 3.

**Table 3. Business Park Site Development Summary**

<b>Building No.</b>	<b>Building Type</b>	<b>Land (acres)</b>	<b>FAR</b>	<b>Total Building SF</b>	<b>Dock Doors</b>	<b>Truck Parking</b>	<b>Auto Parking</b>
1	Parcel Hub	59.68	0.12	322,079	169	701	743
2	High-Cube Warehouse	24.16	0.37	389,000	76	93	118
3	Light Industrial	7.15	0.36	113,500	11	11	67
4	Light Industrial	3.60	0.38	60,000	6	6	43
5	Light Industrial	3.46	0.17	25,000	3	2	29
6	High-Cube Warehouse	25.95	0.45	509,000	84	102	227
7	High-Cube Warehouse	16.71	0.42	309,000	30	61	265
<b>Total</b>	-	<b>140.71</b>	<b>0.28</b>	<b>1,727,579</b>	-	<b>976</b>	<b>1,492</b>

All seven buildings would have driveways along Frontage Road which would provide access for both trucks and passenger vehicles, except Buildings 1, 2 and 6 which would only have a truck driveway along Frontage Road. Building 1 would have two additional driveways along Orange Avenue for passenger vehicles. Building 1 would provide truck access from a proposed Private Drive A. Building 2 would have three additional driveways along Orange Avenue: two for passenger vehicle access and one for emergency vehicle access. Building 3 would have an ingress passenger vehicle only driveway along Private Drive A and a passenger vehicle access only driveway at the northern corner of the site along Frontage Road. Buildings 3 and 4 would share a truck driveway along Frontage Road. Buildings 4 and 5 would share a passenger vehicle driveway along Frontage Road and Building 5 would have a truck driveway at the southwestern portion of the site. Building 6 would have one ingress/egress truck driveway along Frontage Road, and two passenger vehicle driveways along Barrett Avenue. Finally, Building 7 would have one ingress/egress truck driveway, and one passenger vehicle driveway along Frontage Road and one passenger vehicle and one emergency vehicle access driveway along Barrett Road. All truck driveways along Frontage Road would be right-out only.

### *Community Shopping Center*

Within the 22.27-acre Community Shopping Center site, a new commercial retail center with a major retail building and eight retail pads would be constructed. The proposed shopping center buildings would have a maximum height of 50.5 feet. In total, this development site would be built out to a floor-area-ratio of 0.29. A total of 117,224 square feet or 12 percent of this site is proposed for drought tolerant landscaping, primarily planted along the boundaries of the lot. In addition, three plazas are proposed at the northeast

corner of the site, featuring outdoor seating, artificial turf, a water feature, and thematic elements including a water tower, greenhouse structures, and bridge and dry creek elements. A 13.08-acre water quality basin would be constructed to the west of the development site for on-site stormwater management. The characteristics of each commercial building are summarized below in Table 4.

**Table 4: Community Shopping Center Site Development Summary**

<b>Building No.</b>	<b>Commercial Use Type</b>	<b>Total Building Square Footage</b>
Major A	Sporting Good Superstore	50,018
Major B	Shopping Center	55,056
Major B Mezzanine	Shopping Center	2,921
Major C	Shopping Center	23,248
Major D	Retail	15,012
Major E	Supermarket	23,256
Major F	Pet Supply Store	12,500
Major G	Shopping Center	5,000
Major H	Shopping Center	5,000
Major J	Shopping Center	5,376
Major K	Medical/Dental Office	5,500
Pad 1	Fast Casual Restaurant	4,472
Pad 2	Fast Casual Restaurant	4,100
Pad 3	Fast Casual Restaurant	4,834
Pad 4A	High-Turnover Sit-Down Restaurant	4,400
Pad 4B	Shopping Center	4,542
Pad 5	High-Turnover Sit-Down Restaurant	6,462
Pad 6	Coffee with Drive-thru, indoor seating	1,800
Pad 7A	Fast Casual Restaurant	2,408
Pad 7B	Shopping Center	4,555
Pad 7C	Shopping Center	2,145
Pad 8	High-Turnover Sit-Down Restaurant	7,852
<b>Total</b>		<b>250,457</b>

The Community Shopping Center would include two driveways along Daniela Way, two driveways along N. Perris Boulevard, and two driveways along Orange Avenue. Trucks would only access the site from the western driveways along Daniela Way and Orange Avenue. A total of 1,097 parking stalls would be provided for the Community Shopping Center. Loading areas for trucks would be provided along the western side of the proposed major retail building.

*Commercial Big Box Retail*

Within the 24.45-acre Commercial Big Box Retail site, a new 167,050-square-foot free-standing discount store with a 12-pump gas station would be constructed. The proposed big box retail building would have a maximum height of 30 feet. In addition, this development site would include two outparcels that would be developed with two approximately 5,500-square-foot fast food restaurants. Overall development within the Commercial Big Box Retail site would result in an overall floor-area-ratio of 0.18. Within this development site, a total of 170,447 square feet or 19 percent of the site area is proposed for drought tolerant landscaping, planted within the parking lot and along the lot border.

A total of four driveways would provide access to the commercial retail lot, inclusive of one driveway along Barrett Avenue, two driveways along Daniela Way, and one driveway along N. Perris Boulevard. Trucks would access this development site from the driveway along Barrett Avenue. A total of 849 parking stalls would be provided for this development site.

### *Street Improvements*

As a part of the Phase 1 Development, the Project would vacate Indian Avenue from Orange Avenue to Frontage Road. The Project also includes the construction of new roadways: Daniela Way, which would provide access to the retail commercial site; and Private Drive A, which would provide access to the business park site. In addition, the following roadways would be improved as part of the Project: Perris Boulevard, Orange Avenue, Frontage Road, Indian Avenue, and Barrett Avenue.

### *Utilities*

Buildout of the Specific Plan Area would include the installation of new water, recycled water, sewer, and stormwater infrastructure along and within the adjacent streets, listed above.

### *Project Construction*

Construction of the Phase 1 Development is anticipated to begin in late 2025.

## **3. Phase 2 Development**

Within the Phase 2 Planning Area, as shown on Figure 2, the Project includes future MBU development. This area encompasses the 112.02-acre Phase 2 MBU area and the 10.66-acre MBU Overlay area. Buildout of the future development area would occur pursuant to purchase of land by future project applicants. For purposes of this analysis, development of this area is anticipated to begin in 2026 and to be completed by year 2030. The proposed amended Specific Plan buildout within the Phase 2 Development Area would allow up to 4,007,956 square feet of warehouse, light industrial, and/or manufacturing uses under the MBU designation, at a maximum floor area ratio of 0.75.

## **4. Compliance with Senate Bill 330**

The Draft EIR will include evaluation of “replacement housing” in accordance with Senate Bill (SB) 330, the Housing Crisis Act of 2019 (Government Code Section 6300). SB 330 requires, in part, that where a project results in reducing the number of housing units allowed under existing zoning, the City must concurrently rezone other parcels such that there is no “net loss” of the total allowable housing development in the City. The Project would include a Specific Plan Amendment to change residential use designations to non-residential land use designations and result in the loss of planned residential capacity of approximately 1,860 units, including 257 moderate income units and 1,030 above-moderate income units. Therefore, replacement sites for rezoning or a Density Bonus Overlay Ordinance to ensure there is no net loss in allowable housing density due to the Project would be necessary.

## **IV. Required Entitlements / Approvals**

Pursuant to the provisions of CEQA and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines), the City of Perris, as the Lead Agency, is charged with the responsibility of deciding whether to approve the Project. The following approvals and permits are required from the City of Perris to implement the Project:

- Certification of the EIR
- Specific Plan Amendment No. 22-05250 to revise land use designations, establish a plan for public facilities, design guidelines, and to annex properties to the north of the Project into the Specific Plan.
- General Plan Amendment No. 24-05175 to redesignate annexed parcels as Specific Plan (SP).
- Zone Change No. 24-05176 to rezone the properties being annexed into the Specific Plan overlay from various zonings to HL-SP (MBU).
- Development Plan Review (DPR) Nos. 22-00023, 22-00024, 22-00025, 22-05235, 22-05238, 24-00008, and 24-00009 to construct the proposed industrial buildings and No. 23-0017 to construct

the proposed commercial buildings.

- Tentative Tract Map No. 22-05250 (TTM 38810 and 38811) to revise site boundaries within the Harvest Landing Specific Plan.
- Conditional Use Permit (CUP) No. 22-05050 for drive-thru operations and No. 23-05235 for fuel stations.
- Development Agreement Amendment(s) (DAA) No. 17-05136 to update to the Harvest Landing Development Agreement per the revised Project.

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

- Santa Ana Regional Water Quality Control Board. A National Pollutant Discharge Elimination System Permit (NPDES) to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened.
- Riverside County Flood Control & Water Conservation District. Approval of storm drain plans for public storm drains.
- Eastern Municipal Water District. Approval of a Water Supply Assessment and the Project's water and sewer improvement plans.
- South Coast Air Quality Management District. Permits to construct and/or permits to operate new stationary sources of construction equipment that may emit air contaminants.
- Other Utility Agencies. Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing infrastructure to serve the proposed Project.

## V. Probable Environmental Effects of the Project

The Draft EIR for the proposed Project will contain a detailed Project Description, a description of the existing environmental setting of the Project site and surrounding area, analysis of Project-specific environmental impacts, analysis of cumulative impacts, identification of 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.

The following environmental topics will be analyzed in the Draft EIR:

- |                                      |                                 |
|--------------------------------------|---------------------------------|
| • Aesthetics                         | • Land Use and Planning         |
| • Agriculture and Forestry Resources | • Mineral Resources             |
| • Air Quality                        | • Noise                         |
| • Biological Resources               | • Population and Housing        |
| • Cultural Resources                 | • Public Services               |
| • Energy                             | • Recreation                    |
| • Geology and Soils                  | • Transportation                |
| • Greenhouse Gas Emissions           | • Tribal Cultural Resources     |
| • Hazards and Hazardous Materials    | • Utilities and Service Systems |
| • Hydrology and Water Quality        | • Wildfire                      |

## VI. Scoping Meeting

As identified previously, the City of Perris will conduct a Draft EIR scoping meeting with the City of Perris Planning Commission on August 21, 2024, at 6:00 p.m. in the Perris City Council Chambers located at 101 North D Street, Perris, CA 92570. At the meeting, the City will provide background information on environmental impact reports, provide a brief overview of the Project, and will solicit public input on environmental issues to be addressed in the Draft EIR and on items of public concern. Issues identified during the scoping meeting will be addressed in the Draft EIR (as appropriate).

## VII. Response to This Notice of Preparation

The Notice of Preparation and Project plans are available for review on the City's website at:

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

Copies of the Notice of Preparation are available for review at the Downtown Library and at the Development Services Department located at 135 North D Street, Perris, CA 92570.

Please provide written comments no later than 30 days from the 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 you or 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 submit all comments to the following address or email:

Albert Armijo, Project Planner  
City of Perris Planning Division  
135 North D Street  
Perris, CA 92570  
Email: [aarmijo@cityofperris.org](mailto:aarmijo@cityofperris.org)

Signature: *Albert Armijo*  
Albert Armijo, Project Planner

The City of Perris appreciates your conscientious attention to the Notice of Preparation

Figure 1



**Figure 2**





August 15, 2024

Albert Armijo, Project Planner  
City of Perris  
101 N. D Street  
Perris, CA 92570

RE: Harvest Landing Retail Center & Business Park Project, SCH #2024080337

Dear Mr. Armijo:

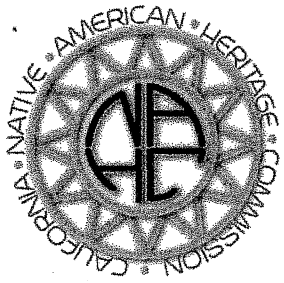
Thank you for the opportunity to provide comments on the Notice of Preparation for the Harvest Landing Retail Center & Business Park Project. While the logistics industry is an important component of our modern economy, warehouses can bring various environmental impacts to the communities where they are located. For example, diesel trucks visiting warehouses emit nitrogen oxide (NO<sub>x</sub>)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particulate matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.<sup>1</sup> Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.<sup>2</sup> The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists. Depending on the circumstances of an individual project, warehouses may also have other environmental impacts.

To help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts, the Attorney General Office's Bureau of Environmental Justice has published a document containing best practices and mitigation measures for warehouse projects. We have attached a

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<sup>1</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health> (NO<sub>x</sub>); California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf> (DPM).

<sup>2</sup> Noise Sources and Their Effects, <https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm> (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).



## NATIVE AMERICAN HERITAGE COMMISSION

August 16, 2024

Albert Armijo  
City of Perris  
135 North D Street  
Perris CA 92570

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NAHC HEADQUARTERS  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
nahc@nahc.ca.gov

**Re: 2024080337 Harvest Landing Retail Center and Business Park Project, Riverside County**

Dear Mr. Armijo:

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

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

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

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

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

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](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 ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) 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*

Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse

copy of this document to this letter, and it is also available online.<sup>3</sup> We encourage you to consider the information in this document as you prepare the draft environmental impact report for this project.

Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

The Bureau will continue to monitor proposed warehouse projects for compliance with the California Environmental Quality Act and other laws. We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at [ej@doj.ca.gov](mailto:ej@doj.ca.gov) if you have any questions.

Sincerely,



CHRISTIE VOSBURG  
Supervising Deputy Attorney General

For ROB BONTA  
Attorney General

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<sup>3</sup> <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>.



SOUTHERN CALIFORNIA  
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900 Wilshire Blvd., Ste. 1700  
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August 29, 2024

Albert Armijo, Project Planner  
City of Perris, Development Services Department  
135 North D Street  
Perris, CA 92570  
Phone: (949) 466-0038  
E-mail: aarmijo@cityofperris.org

Subject: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Harvest Landing Retail Center & Business Park [SCAG NO. IGR11106]

Dear Albert Armijo:

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Harvest Landing Retail Center & Business Park (“proposed project”) to the Southern California Association of Governments (SCAG) for review. 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 and alignment with adopted Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and policies. Finally, SCAG is the authorized regional agency for Intergovernmental 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 Harvest Landing Retail Center & Business Park in Riverside County. The proposed project consists of construction of seven business park/warehouse buildings totaling 1,727,579 square feet and 417,507 square feet of commercial uses on 358.28 acres.

**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 IGR Program, attn.: Ryan Bañuelos, Associate Regional Planner, at (213) 630-1532 or [IGR@scag.ca.gov](mailto:IGR@scag.ca.gov). Thank you.

Sincerely,

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

<sup>1</sup> Local jurisdictions and other lead agencies shall have the sole discretion to determine a local project’s or plan’s consistency and/or alignment with Connect SoCal 2024 for the purpose of determining consistency for CEQA purposes.

REGIONAL COUNCIL OFFICERS

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**Curt Hagman**  
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**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
HARVEST LANDING RETAIL CENTER & BUSINESS PARK [SCAG NO. IGR11106]**

**CONNECT SOCAL 2024**

Connect SoCal 2024 (Plan) is a long-range visioning plan for the six-county SCAG region, reflecting a continuation of the shift towards more efficient resource management including transportation infrastructure resources, land resources and environmental resources. The Plan highlights the existing land use and transportation conditions throughout the SCAG region and forecasts the region's evolving transportation needs between 2024 and 2050. The Plan identifies and prioritizes expenditures of the anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as aviation ground access.

The Plan was developed to achieve greenhouse gas (GHG) per capita emission reduction targets, consistent with Senate Bill (SB) 375 and other regional goals. In accordance with federal fiscal constraint requirements, Connect SoCal 2024 is a financially constrained Plan in terms of transportation revenues and expenditures. Connect SoCal 2024 would reduce traffic congestion, improve air quality, and improve the region's long-term economic viability through more than \$751 billion in transportation investments and a more sustainable regional development pattern. To view Connect SoCal 2024 and the accompanying technical reports, please visit the [Connect SoCal 2024](#) webpage.

**Connect SoCal 2024 Vision and Goals**

The SCAG Regional Council fully adopted the Plan on April 4, 2024. Connect SoCal 2024 represents the vision for the region and reflects the planned transportation investments, policies, and strategies that integrate with the Forecasted Regional Development Pattern to achieve the Plan's goals. The Vision and Goals for Connect SoCal 2024 are rooted in the direction set forth by Connect SoCal 2020, reflecting both SCAG's statutory requirements, the emerging trends, and persistent challenges facing the region. Reflecting input from engagement with stakeholders and members of the public, SCAG's vision for Southern California in the year 2050 is "A healthy, prosperous, accessible and connected region for a more resilient and equitable future." The following goals and subgoals help the SCAG region to achieve this vision.

***Mobility: Build and maintain an integrated multimodal transportation network***

- Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions
- Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities
- Support planning for people of all ages, abilities and backgrounds

***Communities: Develop, connect and sustain communities that are livable and thriving***

- Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances
- Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households

***Environment: Create a healthy region for the people of today and tomorrow***

- Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change
- Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water
- Conserve the region's resources

***Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents***

- Improve access to jobs and educational resources
- Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities

For ease of review, SCAG staff encourages 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 SOCAL 2024 GOALS AND SUBGOALS	
Goal/Subgoal	Analysis
Mobility Goal: <i>Build and maintain an integrated multimodal transportation network</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>
Mobility Subgoal: <i>Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions</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 2024 Key Elements**

Unique to this plan cycle, SCAG developed a set of Regional Planning Policies and Implementation Strategies to guide decision-making in the region toward integrated land use and transportation planning and other goals in Connect SoCal 2024. Eighty-eight Regional Planning Policies provide guidance for integrating land use and transportation planning to realize the vision of Connect SoCal 2024. The Implementation Strategies help the region to achieve this vision for the future and are priorities for SCAG efforts in fulfilling or going beyond the Regional Planning Policies. The Regional Planning Policies and Implementation Strategies were developed to achieve California’s greenhouse gas emission reduction goals as set forth in SB 375 and federal Clean Air Act Section 176(c) requirements for transportation conformity while meeting the broader regional objectives, such as improved equity and resilience in addition to preservation of natural lands, improvement of public health, increased roadway safety, support for the region’s vital goods movement industries and more efficient use of resources. The Plan also includes a detailed project list; strategic investments to bridge local plans with overarching regional performance targets and goals; a growth forecast and regional development pattern based on population, household and employment growth projections by 2050; and a transportation network including a list of transportation projects and investments.

Connect SoCal 2024 presents a summary of that work in five chapters of the Main Plan with additional details on Plan elements and analysis in the Plan’s accompanying 15 Technical Reports, including the [Goods Movement Technical Report](#). Connect SoCal 2024 builds upon the progress from previous RTP/SCS cycles, reflecting both SCAG’s statutory requirements, the emerging trends, and persistent challenges facing the region. These policies offer a resource by which County Transportation Commissions (CTCs) or local jurisdictions within the SCAG region, when seeking resources from state or federal programs, can refer to specific policies to demonstrate alignment with the RTP/SCS.

**Regional Growth Forecast and Forecasted Regional Development Pattern**

As part of developing a Sustainable Communities Strategy per SB 375, SCAG must include a “forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies ...” enables SCAG to reach its per capita GHG emission reduction target of 19 percent below 2005 levels by 2035. SCAG staff prepared a Forecasted Regional Development Pattern for Connect SoCal 2024 through 2050, the horizon year of the Plan. The regional growth forecast determines the projected increase in population, households, and jobs based on local general plans and known development entitlement agreements, including available data from 6th cycle housing element updates. The Connect SoCal 2024 [Demographic and Growth Forecast Technical Report](#) includes detailed discussions on socioeconomic data, including additional detail on the growth forecast, growth vision, and Sustainable Communities Strategy (SCS) consistency in Section of the Technical Report. The Connect SoCal 2024 [Land Use and Communities Technical Report](#) includes the most recent planning assumptions and estimates of population and housing.

SCAG’s work helps facilitate implementation, but SCAG does not directly implement or construct projects or have land use authority. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2035 and 2050, please refer to the [Final Connect SoCal 2024 growth forecast data](#). The growth forecasts for the region and the applicable jurisdiction is below.

	Adopted SCAG Region Growth Forecasts				Adopted City of Perris Growth Forecasts		
	Year 2019	Year 2030	Year 2035	Year 2050	Year 2019	Year 2035	Year 2050
Population	18,827,000	19,476,000	19,946,000	20,909,000	78,000	106,700	124,300
Households	6,193,000	7,006,000	7,311,000	7,814,000	18,600	28,700	34,600
Employment	8,976,000	9,609,000	9,885,000	10,276,000	18,300	29,600	33,300

**Consistency with Connect SoCal 2024**

SCAG provides informational resources to facilitate the lead agency’s consistency determination of the proposed project with Connect SoCal 2024. For the purpose of determining consistency with CEQA, local jurisdictions shall have the sole discretion to determine a local project’s or plan’s consistency and/or alignment with Connect SoCal 2024<sup>2</sup>.

**CEQA MITIGATION MEASURES**

The SCAG Regional Council certified the [Final Program Environmental Impact Report](#) for Connect SoCal 2024 (2024 PEIR) and adopted the Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact, and a Statement of Overriding Considerations on April 4, 2024. The mitigation approach used in the 2024 PEIR recognizes the limits of SCAG’s authority; distinguishes between SCAG commitments and project-level responsibilities and authorities; optimizes flexibility for project implementation; and facilitates CEQA streamlining (e.g., SB 375) and tiering where appropriate on a project-by project basis determined by each lead agency. Consistent with the approach, the 2024 PEIR identifies regional-level mitigation measures to be implemented by SCAG over the lifetime of the Plan as well as project-level mitigation measures that lead agencies can and should consider, as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes. Given that SCAG is not an implementing agency and has no decision-making authority over projects or any land use authority, it is ultimately up to each lead agency’s own discretion to determine the appropriateness of mitigation measures, including exploring opportunities of voluntary regional advance mitigation programs, based on project-specific circumstances such as individual site conditions, project specific details, and community values. Therefore, SCAG staff recommends that the proposed project’s CEQA lead agency review the 2024 PEIR for guidance, as appropriate.

<sup>2</sup> SCAG. April 2024. Connect SoCal 2024 [Demographic and Growth Forecast Technical Report](https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf). Accessible at: <https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf>

JASON E. UHLEY  
General Manager-Chief Engineer



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RIVERSIDE COUNTY FLOOD CONTROL  
AND WATER CONSERVATION DISTRICT

258122

August 30, 2024

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

Attention: Albert Armijo

Re: Harvest Landing Retail Center and Business Park, SPA 22-05250; GPA 24-05175; CZ 24-05176; DPRs 22-00023, 22-00024, 22-00025, 22-05235, 22-05238, 24-00008, 24-00009; CUP 22-05050, 23-05235; TTM 38810 and 38811; and DA 17-05136, APNs 305-100-028, 305-060-036 ETAL

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.

The District's review is based on the above-referenced project transmittal, received August 9, 2024. 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 Line H, Lateral H-2, Line K, K-15, K-16, K-17, K-19, K-20, K-21, K-22, and K-24. 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.
- If 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

Re: Harvest Landing Retail Center and Business Park, SPA 22-05250; GPA 24-05175; CZ 24-05176; DPRs 22-00023, 22-00024, 22-00025, 22-05235, 22-05238, 24-00008, 24-00009; CUP 22-05050, 23-05235; TTM 38810 and 38811; and DA 17-05136, APNs 305-100-028, 305-060-036 ETAL

258122

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.

- 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, Perris Valley Master Drainage Plan-Line J and 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.

### **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), Section 404 and 401 of the Clean Water Act, California Fish and Game Code Section 1602, and Porter Cologne Water Quality Control Act. The District's action associated with the subject project triggers evaluation by the District with respect to applicant's compliance with Federal, State and local environmental laws. For this Project, the Lead Agency is the City of Riverside, 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 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.

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.

City of Perris

- 3 -

August 30, 2024

Re: Harvest Landing Retail Center and Business  
Park, SPA 22-05250; GPA 24-05175; CZ 24-  
05176; DPRs 22-00023, 22-00024, 22-00025,  
22-05235, 22-05238, 24-00008, 24-00009;  
CUP 22-05050, 23-05235; TTM 38810 and  
38811; and DA 17-05136, APNs 305-100-028,  
305-060-036 ETAL

258122

Very truly yours,



AMY MCNEILL  
Engineering Project Manager

EM:cg



# CAL FIRE – RIVERSIDE UNIT RIVERSIDE COUNTY FIRE DEPARTMENT

**BILL WEISER - FIRE CHIEF**

Office of the County Fire Marshal  
4080 Lemon Street, 10<sup>th</sup> Floor, Riverside, CA 92501  
(951) 955-4777 [www.rvcfire.org](http://www.rvcfire.org)

PROUDLY SERVING THE  
UNINCORPORATED  
AREAS OF RIVERSIDE  
COUNTY AND THE CITIES  
OF:

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DISTRICT 5

## Planning Case Comments

**Date:** September 5, 2024

**Project Name:** Harvest Landing

**City Case Numbers:** SPA 22-05250; GPA 24-05175; Zone Change 24-05176; DPRs 22-00023, 22-00024, 22-00025, 22-05235, 22-05238, 24-00008, 24-00009; CUP 22-05050, 23-05235; TTM 38810 and 38811; and DAA 17-05136

**Planner:** Albert Armijo

**Reviewed By:** Steve Payne, Deputy Fire Marshal

**Fire Department Permit Number:** FPEIR2400018

The Fire Department has reviewed the Notice of Preparation of a Draft Environmental Impact Report for this project. Regarding your request for input as to the scope and content of the environmental information that is relevant to our organization, we provide the following comments.

The proposed project is expected to have a cumulative adverse impact on the fire department's ability to provide an acceptable level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, traffic, and population. This project will add to the workload of the closest fire stations, which are already operating at or exceeding optimal workload capacity. The Environmental Impact Report for this project will need to address these impacts and provide proportional mitigations. Development Impact Fees alone will not be adequate to mitigate these impacts.

We recommend that this issue be discussed with the Fire Department to ensure that all hazards are mitigated, and response needs are met. Further review of the project will occur upon receiving the Environmental Impact Report and additional planning applications. Additional requirements may be necessary at that time.

Please feel free to contact me with any questions.



*Belonging. Leading. Succeeding.*

**Bruce Bivins, District Superintendent**

143 E. 1st Street • Perris, California 92570  
951.657.3118 • 951.940.5115 Fax

**FRANCINE M. STORY**

CHIEF BUSINESS OFFICIAL

September 6, 2024

Albert Armijo, Project Planner  
Planning Division  
135 North D Street  
Perris, CA 92570

**Subject: Opposition to Harvest Landing Retail Center & Business Park Project**

To Whom It May Concern,

I am writing on behalf of the Perris Elementary School District to express our deep concerns and opposition to the proposed amendment to the Harvest Landing Retail Center & Business Park Project to increase the Multiple Use Business (MBU) and Commercial area from 88.5 acres to 310.11 acres. This development is in close proximity to our schools and residential areas. The residents, parents and educators within our district have raised valid concerns about the potential impacts of this development on the well being of our community, particularly in relation to the presence of diesel fuel, increased emissions, additional traffic and the dangers posed by commercial trucks near our elementary schools.

One of the primary concerns is the potential exposure of residents and students to diesel fuel emissions. The presence of diesel fuel in the vicinity raises serious health and environmental concerns. Diesel emissions contain harmful pollutants that have been linked to respiratory issues, cardiovascular problems, and other adverse health effects. Considering the sensitive nature of our school environments, where the health and safety of our students are of utmost importance, we cannot ignore the potential risks associated with exposure to such pollutants.

Furthermore, the increase in emissions from the proposed development poses a significant threat to the air quality in our community. Our schools strive to provide a healthy and conducive learning environment, and any degradation of air quality could have long-lasting implications for the well-being of our students, staff and residents.

The anticipated rise in traffic is another major concern. Our community is already grappling with traffic congestion, and an additional influx of vehicles could lead to safety hazards and further inconvenience for residents. The safety of our students, especially those who walk to school, is a paramount consideration. The potential dangers posed by commercial trucks navigating through areas near elementary schools are particularly alarming and merit careful consideration.

In light of these concerns, we urge you to reconsider the proposed amendment and explore alternative locations that prioritize the safety and well-being of our community, particularly the students attending our elementary schools. Thank you for your attention to this matter.

Sincerely,

Francine M. Story  
Chief Business Official  
Perris Elementary School District



# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

September 9, 2024

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

Albert Armijo, Project Planner  
City of Perris Planning Division  
135 North D St,  
Perris, CA 92570

**Notice of Preparation of a Draft Environmental Impact Report for the  
Harvest Landing Retail Center & Business Park Project (Proposed Project)  
(SCH No. 2024080337)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate 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 (electronic versions of all emission calculation spreadsheets, 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.**

**Responsible Agency and South Coast AQMD Permits**

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 order to issue any discretionary approvals that may be needed for air permits.

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>.

### **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 air quality 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 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 air quality significance thresholds for *operation* 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>

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

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<sup>1</sup> South Coast AQMD's CEQA Air Quality 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 air quality significance thresholds can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-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>.

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

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>.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*<sup>8</sup> includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

The Proposed Project would include, among other things, 12 pump gasoline service stations. Benzene, which is a toxic air contaminant, may be emitted from the operation. To ensure that sensitive receptors are not going to be adversely affected by the exposure to benzene, it is recommended that the Lead Agency evaluate, quantify, and perform a health risk assessment for the Proposed Project in the Draft EIR<sup>9</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>10</sup>. According to the MATES V carcinogenic risk interactive map, the area surrounding the Proposed Project has an estimated cancer risk of over 308 in one million<sup>11</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>12</sup> South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,<sup>13</sup>

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<sup>7</sup> CARB's technical advisory can be found at: [https://ww2.arb.ca.gov/sites/default/files/2017-10/rd\\_technical\\_advisory\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf).

<sup>8</sup> South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

<sup>9</sup> South Coast AQMD. Guidance for performing a gasoline dispensing station health risk assessment can be found here: <http://www.aqmd.gov/home/permits/risk-assessment>.

<sup>10</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>11</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).

<sup>12</sup> <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

<sup>13</sup> South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.<sup>14</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>15</sup> and the Heavy-Duty Low NOx Omnibus Regulation<sup>16</sup>, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentivize 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>17</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 electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

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:

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<sup>14</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

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

<sup>15</sup> CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

<sup>16</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>17</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>.

- 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 (NO<sub>x</sub>) 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 warehouses totaling 1,727,579-square-foot, 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>18</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 guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage<sup>19</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 [swang1@aqmd.gov](mailto:swang1@aqmd.gov).

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW

RVC240814-04

Control Number

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<sup>18</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>19</sup> South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

“Bringing People Together to Improve Our Social and Natural Environment”

August 13, 2024

City of Perris Development Services Department

Planning Division

135 North D Street

Perris, CA 92570

*Submitted via email to [aarmijo@cityofperris.org](mailto:aarmijo@cityofperris.org).*

**Re: Harvest Landing Retail Center & Business Park Project Notice of Preparation (SCH #2024080337)**

Dear Albert Armijo,

This letter is being submitted on behalf of the Center for Community Action and Environmental Justice (CCA EJ) in response to the Notice of Preparation which has been made available for the proposed Harvest Landing Retail Center & Business Park Project (SCH #2024080337). After reviewing the documents made available for inspection, we would like to make the following comments about issues and concerns which we want to ensure are addressed as part of the EIR process.

While it is relieving to see that all of Phase 1 appears to be siting any warehouse facilities more than a thousand feet from sensitive receptors, the concern remains for Phase 2 which based on the maps included in the NOP, would be located directly adjacent to homes. This would subject those neighborhoods to the ills which accompany these facilities including degraded air quality, noise pollution, light pollution, and more. We would like to reiterate the importance of ensuring that all of these issues are not just studied, but fully mitigated as part of the EIR process, including by ensuring that the facilities are built with the infrastructure to support zero-emissions freight equipment.

Additionally, it is important that the CEQA process identifies how the entire project will be able to meet VMT requirements and include a real effort to achieve that outcome. Relatedly, we would like to underscore the importance of multimodal methods of LOS be used for any LOS tabulations to be completed and that any LOS targets be met for bicyclists, pedestrians, and transit users. Furthermore, bicycling accommodation needs to be analyzed through the lens of the Caltrans guidelines for appropriate bikeways (Figure 1) based on horizon year traffic conditions. Both of those points are critical to ensuring that methods of reducing VMT are successful, especially to the commercial component which would be located within easy walking/biking distance of existing residential communities east of Perris Blvd.

**Mailing Address**

PO Box 33124

Jurupa Valley, CA 92519

[www.ccae.org](http://www.ccae.org)

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

“Bringing People Together to Improve Our Social and Natural Environment”

Another transportation issue which we will reiterate the importance of fully mitigating is that of the truck route to the facilities that would be built by the Project. Based on the maps included in the NOP, the Project would be situated in such a manner that trucks would be able to go basically straight from the I-215 freeway to the Project without having to go on many local roads save the Frontage Road which runs between Nuevo Road and Placentia Avenue. We would like to see this identified as the preferred truck route for the Project and truck traffic prohibited from Barrett Avenue, Perris Blvd., or any travel further east of Indian Avenue on Orange Avenue.

In summary, it is vital that the EIR process not only identify these concerns, as is customary, but that they are all fully mitigated—simply relying on identifying them as significant impacts with no mitigation fully addressing them is not enough.

Thank you for your time and consideration of these concerns. If there are any questions or concerns to be addressed, please do not hesitate to reach out for answers and clarifications.

Sincerely,



Marven E. Norman  
Policy Coordinator

*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, *CCA EJ*'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.

CCA EJ

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CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

“Bringing People Together to Improve Our Social and Natural Environment”

Attachment A

Place Type and Surrounding Land-Use <sup>1</sup>		Posted Speed			
		15-20	25-30	35-45	> 45
Urban Areas & Suburban Main Streets	<2,500	Standard Shoulder or	Standard Shoulder or	Class II or Class IV	Class IV
	2,500-5,000	Shared Lane	Shared Lane		
	5,000-10,000	Class II or Class IV	Class II or Class IV	Class IV	
	>10,000	Class IV	Class IV		
Rural Areas (Developing Corridors)		15-20	25-30	35-45	> 45
	<2,500	Standard Shoulder (may be designated as a Class III facility) <sup>2</sup>			
	2,500-5,000				
	5,000-10,000				
	>10,000				
Rural Main Streets		15-20	25-30	35-45	> 45
	<2,500	Standard Shoulder or	Class II	Class II	Class I or IV
	2,500-5,000	Shared Lane		Class I, II, or IV	
	5,000-10,000	Class II			
	>10,000				

<sup>1</sup> Highway Design Manual (HDM) Index 81.3

<sup>2</sup> HDM, Tables 302.1 and 307.2

\*\* Chart is not a replacement for engineering judgement. Intended for planning purposes, to identify minimum preferred bikeway facility under different place type, volume and speed conditions.

Figure 1: Caltrans contextual guidance for preferred bicycle facilities.



**Mailing Address**  
 PO Box 33124  
 Jurupa Valley, CA 92519  
[www.ccae.org](http://www.ccae.org)

**From:** Franco <[inlandvalleyalliance@gmail.com](mailto:inlandvalleyalliance@gmail.com)>

**Sent:** Wednesday, August 21, 2024 12:40 PM

**To:** Patricia Brenes <[pbrenes@CityofPerris.org](mailto:pbrenes@CityofPerris.org)>; City Clerk <[CityClerk@cityofperris.org](mailto:CityClerk@cityofperris.org)>; Nathan Perez <[NPerez@cityofperris.org](mailto:NPerez@cityofperris.org)>

**Subject:** Public Comment Item C Harvest Landing

Hello Planning Commission,

I am very concerned about this project called Harvest Landing. It will introduce more diesel trucks and warehousing in the middle of Perris. We already know the harmful effects of high saturation of warehousing by the many studies that have been conducted (i.e. American Lung Association, Region in Crisis study, Mark Tahonos Congressional state of the air report). We need to take into account the cumulative effects that this project will produce as it relates to air quality, noise pollution, light pollution, traffic, and compliance with providing more available housing as we are lacking. As I understand, there was an original project here already that did not include warehousing. Why would we allow the developer to change the original plan that was set in motion to accommodate something like this? This developer Howard Industrial has a history of knocking down residents' homes who were not properly informed that the rental property they live in had been sold. We can point to Bloomington where 250 homes and a school were demolished for a cluster of warehouses. Does the City of Perris really want to do business with a developer like this? There is a school here that is planned to be demolished, we should not be demolishing schools for warehousing. Has the Val Verde district made a statement and informed parents of the plans of demolition? I have also taken the survey the developer put out where it asks what residents would like to see in this development. The survey is very deceiving. It forces the participants to accept the idea of a warehouse for a commercial store. In the way the questions are worded and options that are given the participant is not given a chance to in their own words to comment on the project's inclusion of warehouse. This area of Perris is already over saturated with traffic and is lacking in infrastructure. There are so many better projects that can go here. Such as the original project without the warehouses. Maybe a hospital or even a Recreational Park. I am calling on the Planning Commission to put in a motion to deny any warehouse proposals to be added to this project today. We should not even entertain the idea of adding warehousing to this project. It's a waste of the City of Perris time and resources.

Let's do Better,

Franco Pacheco

Inland Valley Alliance for Environmental Justice



September 6, 2024

*Via E-Mail*  
[aarmiljo@cityofperris.org](mailto:aarmiljo@cityofperris.org)

Albert Armijo, Project Planner  
City of Perris Planning Division  
135 North D Street  
Perris, CA 92570

RE: Notice of Preparation of a Draft Environmental Impact Report for  
Harvest Landing Retail Center & Business Park Project

Dear Mr. Armijo:

Thank you for the opportunity to provide comments on the Notice of Preparation for the Harvest Landing Retail Center & Business Park Project (the "Project").

IDS Real Estate Group ("IDS") is the owner and/or developer of various industrial properties in the vicinity of the proposed Project, including the approximately 28.5-acre site located directly north of the Project site (across Placentia Avenue) between Walnut and Barrett Avenues. IDS generally supports the Project, which we believe will have a positive impact on the community. The purpose of this letter is to request that the City consider the following comments concerning the scope and content of the Draft Environmental Impact Report ("DEIR") that will be prepared for the Project.

Permitted and Conditionally-Permitted Land Uses Under the MBU Designation

The Project proposes to change the land use designation for the portion of the Project site north of Orange Avenue and east of Indian Avenue from residential to Multiple Business Use ("MBU"). We support this proposal, as the existing residential designation would potentially expose sensitive receptors (future residents) to noise, traffic, air quality, and other potential impacts associated with proximity to existing, planned & zoned industrial and warehouse development in the area. However, based on our review of Table 3-2 (Permitted Uses) of the proposed Harvest Landing Specific Plan ("Specific Plan"), it appears that certain sensitive land uses would still be permitted or conditionally-permitted under the MBU designation, including parks and other recreation uses, child care centers, churches, and private schools. We request that the DEIR thoroughly address the potential environmental impacts of allowing such sensitive uses at this location and that the DEIR consider all feasible measures to reduce or eliminate such potential impacts, including further limits or restrictions on such uses in the Specific Plan.

## Replacement Housing

According to the Notice of Preparation of a Draft Environmental Impact Report for the Project (“NOP”), the DEIR will include an evaluation of “replacement housing” in accordance with Housing Crisis Act of 2019. More specifically, the NOP indicates that replacement sites for rezoning or a “Density Bonus Overlay Ordinance” will be necessary to ensure that there is no net loss in allowable housing density. However, the NOP does not identify any such replacement sites or describe what the contemplated overlay ordinance would do or where it would apply.

We assume that the potential replacement sites and the proposed overlay ordinance will be further described and evaluated in the DEIR, as the potential impacts of these components of the Project cannot be meaningfully evaluated in the abstract. In this regard, we request that the location of the housing replacement sites, and the areas affected by the overlay ordinance, be carefully considered and evaluated relative to their proximity to industrial, warehouse, and other existing and future land uses that could potentially expose future residents to noise, traffic, air quality, and other environmental effects.

## Mid-County Parkway

The existing Harvest Landing Specific Plan adopted in 2011 (the “Existing Specific Plan”) discusses the proposed Mid-County Parkway (“MCP”). The Existing Specific Plan states that the MCP was being studied by the Riverside County Transportation Commission (“RCTC”) and that the RCTC had identified the “Placentia alignment” as the locally preferred alignment for the proposed 32-mile transportation corridor. The Existing Specific Plan also describes a “worst case scenario” for the ultimate right-of-way alignment of the MCP within the Specific Plan area, which would apparently involve the acquisition or dedication of a portion of the Project site along Placentia Avenue.

We understand that the RCTC has since selected the Placentia alignment for the MCP and that portions of the MCP have been completed and/or will be under construction in the near future. Moreover, IDS recently obtained a copy of a draft Conceptual Master Plan for the Project dated 2022, which appears to indicate that a portion of the Project site along Placentia Avenue between Indian and Barrett Avenues would be acquired or dedicated for purposes of the MCP. However, the diagrams contained in the NOP appear to show the northern boundary of the Project site extending to the existing alignment of Placentia Avenue, which suggests that no further acquisition or dedication of land will be required for the MCP. This is consistent with information available on the RCTC webpage, which suggests that the segment of the MCP between the I-215 and Redlands Avenue has been completed and no further land or right-of-way acquisition for the project in the area west of Redlands.

We request that the DEIR discuss the current status and scope of the MCP within and near the Project area, and that the potential cumulative environmental impacts of the Project and the MCP, if any, be evaluated in the DEIR.

Thank you for your consideration.

Sincerely,



Eric Mitchell  
Senior Vice President  
DRE Lic. 01849099

Enclosure

EM

cc: **IDS REIM**

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09/09/2024

**VIA EMAIL ONLY**

Albert Armijo, Project Planner  
City of Perris Development Services Department  
135 North "D" Street  
Perris, CA 92570  
Email: [aarmijo@cityofperris.org](mailto:aarmijo@cityofperris.org)

**RE: NOP Comments for Harvest Landing Retail Center & Business Park Project**

Dear Mr. Armijo,

On behalf of Californians Allied for a Responsible Economy ("CARE CA") thank you for the opportunity to provide comments on the Notice of Preparation ("NOP") for environmental review of the Harvest Landing Retail Center & Business Park Project ("the Project"). We understand that the proposed project will be built in two phases. Phase 1 Development Area includes seven business park buildings totaling 1,727,579 sf, a commercial retail center totaling 250,457 sf, and a 167,050 sf retail building. Phase 2 Development Area would allow up to 4,007,956 square feet of warehouse, light industrial, and/or manufacturing uses.

The goal of an EIR is to provide decisionmakers and the public with detailed information about the effects of a proposed project on the environment, how significant impacts will be minimized and alternatives to the project (Pub. Res. Code § 21002.2). Ideally, the discussion should include sufficient detail to allow those who do not participate in the DEIR's preparation to understand and meaningfully deliberate the issues raised by the Project. We, therefore, respectfully request a complete analysis of all identified impacts, imposition of all feasible mitigation and study of a reasonable range of alternatives.

Since the informational sufficiency of an EIR should be at the heart of its preparation, we ask the City to consider the following requests:

**Industrial Uses:** The City, as lead agency, must make certain assumptions regarding the type and mix of light industrial uses that would likely occupy the proposed buildings. The DEIR should reflect a good faith effort at full disclosure by including as much information on the nature of operations as can be reasonably obtained, especially for Phase 2 Development. If such information is unavailable, the City should study a reasonable worst-case scenario (i.e., most impactful) so that a broad and diverse range of environmental impacts are included in the analysis.

Public Health: The DEIR should also make all efforts to minimize air quality effects and likely health consequences to the greatest extent possible. In addition, we urge the City to adopt quantitative thresholds that embody climate change's existential threat to humankind to determine the significance of the Project's GHG emissions.

Mitigation Measures: Finally, we encourage the City to incorporate modern technology in the mitigation measures and ensure that the measures are effective and enforceable. A Statement of Overriding Considerations should be considered only after ALL feasible mitigation measures are included in the MMRP.

Thank you for the opportunity to submit NOP comments. Again, CARE CA respectfully requests full analysis of the environmental impacts, feasible mitigation, and reasonable alternatives to the Project.

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*

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## **Perris Neighbors in Action**

9th September, 2024

### **Albert Armijo**

City of Perris Planning Division  
aarmijo@cityofperris.org  
135 North "D" Street  
Perris, CA 92570

Public Comment on Record for the Harvest Landing Retail Center and Business Park Project - (SPA) 22-05250; (GPA) 24-05175; Zone Change 24-05176; (DPR) 22-00023, 22-00024, 22-00025, 22-05235, 22-05238, 24-00008, 24-00009; (CUP) 22-05050, 23-05235; (TTM) 38810 and 38811; and (DAA) 17-05136

Dear Albert Armijo,

Thank you for the opportunity to make recommendations and express concerns regarding the DEIR for the Harvest Landing Retail Center and Business Park Plan (the Project).

My intention with this letter is to raise concerns about the environmental impact of this project, as well as propose deeper context in which the DEIR may conduct its analyses and avoid many of the deficiencies found in similar project's EIRs. This letter will make many references to the project's proposed parcel hubs, high-cube warehouses, light industrial and 'business park' buildings; all of which will be referenced interchangeably as "warehouse".

### **The City Should Require This Project to be Net Zero Emissions**

The Governor's Executive Order (EO N-79-20) in September 2020 proposed a full transition to an electric fleet by 2035. It is in the best interest of both the project developers as well as the surrounding residents that this project proactively pursues that goal of zero emissions. It will be much more cost effective to build this project with these concerns in mind rather than undertaking expensive retrofitting so soon in the future. This step will also help this project and developers in demonstrating their commitment to being good neighbors.

Considerations to take regarding developing a net-zero project would be to ensure that all buildings are properly equipped with electrical hookups and capabilities to support an all-electric fleet of both passenger and commercial vehicles. The Project should also be built with the maximum allowance of solar panels and any other available alternative "renewable" energy sources. The

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EIR needs to address the impact that excluding the maximum alternative energy capabilities will have - in other words if the Project chooses to rely on anything other than the maximum percent allowed solar capabilities and renewable energies, then the impact that that omission will have in contrast to full-scale clean electric needs to be quantified.

### **Truck Emissions and Health Analyses**

#### *Accurate Truck Trip Distance Analysis*

The Project site is located approximately 80 miles away from the ports of Los Angeles. Due to this, it is important that the project EIR take into account **project specific truck trips** in the analyses concerning air quality analysis and environmental impact. Many previous EIRs conducted for similar projects within this region have chosen to rely on the South Coast Air Quality Management District's (SCAQMD) 31-mile truck trip distance — however, I must urge against the usage of this metric for this project as this distance was calculated under circumstances in which trucks were traveling within the Los Angeles region and does NOT accurately detail the type of trips which will occur on site for this project.

Should the EIR proceed with the usage of a truck trip length less than ~80 miles, then it needs to explicitly state the mitigation which will restrict truck trip distances to the proposed length and explain WHY that metric was decided on.

#### *Restriction of Transport Refrigeration Units*

This is a speculative project, meaning there is no known tenant for any of the warehouse sites thus far. It is also unclear whether this development could result in cold-storage uses. Without the knowledge of how these warehouse buildings will be utilized, there needs to be a worst-case analysis considering the impact that high-cube cold storage uses will incur. Should the Project include these uses, it will then necessitate Transport Refrigeration Unit (TRU) equipped semi trucks to carry goods to and from the site. Trucks and trailers with TRUs emit significantly higher levels of toxic pollutants including NO<sub>x</sub>, greenhouse gasses and diesel particulate matter. The very nearby residents and elementary school children will be exposed to significantly higher rates of these emissions.

The Project EIR should investigate the worst-case scenario that the maximum allowed high-cube cold storage uses are developed — given that there is no known tenant at this time, it is not possible to determine that these warehouses will NOT be used for these purposes.

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There also need to be mitigation strategies added to the EIR that require the trucks and trailers with TRUs to be plug-in capable and require the installation of electrical hookups to mitigate the idling of TRU-capable trucks and trailers in the vicinity.

### *Construction Health Impacts*

This is a very large project, and construction is slated to occur over the course of 4+ years between 2026 and 2030 (Project NOP, p6). It will be in the best interest of the surrounding residents and the students of Val Verde Elementary for the Project developers to take guidance from the Office of Environmental Health Hazard Assessments (OEHHA) and include an assessment of the cancer risk and health impact that the proposed construction will impose. The OEHHA recommends that a health assessment be included if the construction of the project is predicted to occur in a time frame in excess of 2 months, this project is sure to far exceed that timeframe, thus the EIR should investigate these impacts.

### **Cumulative Analyses**

#### *Proximity to Disadvantaged Schools and Communities*

The Project is set to surround Val Verde Elementary school on three sides, leaving only the northern portion of the school site free from contact with a warehouse. Val Verde Elementary is a K-6 elementary school with Title 1 status and 84% of the students attending the school are low income and recipients of free or reduced lunch (National Center for Educational Statistics data from 2023)<sup>1</sup>. There are no current plans of relocation nor meaningful mitigation for the school site. Assembly Bill 617 emphasizes that projects that fall within disadvantaged communities which are already burdened with excessive emissions pollution need further emissions reduction and mitigation. The EIR must explore rigorous emissions mitigation - beyond the bare minimum - in order to comply with AB 617 and to ensure that the Project does not disproportionately impact our already disadvantaged communities. The Project NOP fails to mention the estimated distance between the Project's truck loading bays and the school. Provided aerial photographs of the site do not provide optimistic expectations that the elementary school can be properly shielded from the effects of particle or noise pollution, greenhouse gas emissions nor the aesthetic effects to result from the Project. California Assembly Bill 98 (AB 98), details additional protections for sensitive receptors near incoming warehouse sites. Specific consideration must be made for this project in order to comply with the new bill. Loading truck doors need to be a MINIMUM of 500 feet away from the school site as well as any of the surrounding homes.

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The EIR MUST address the direct impact that surrounding this low income elementary school will have on the children's health and development. There also needs to be additional CUMULATIVE analysis that the warehouse portion of this project will have on the health and safety of the children, considering the presence of 68 other warehouse projects within a 5 kilometer radius of the school site (Radical Research LLC, WarehouseCITY Interactive Map)<sup>2</sup>. These projects already contribute significantly to poor air quality, noise pollution and aesthetic concerns that affect the community; meaningful consideration as to how this project will ADD to these already existing concerns needs to be quantified and heavily mitigated.

There is additional concern for the cumulative environmental impacts from this project regarding the other nearby schools, residential neighborhoods, and parks near the Project site. Clearwater Elementary, Perris HS, Orange Vista HS, Sky View Elementary School and Palms Elementary School are all within a three mile radius of the site. This region is also disproportionately surrounded by heavy emissions and poor air quality resulting from high volumes of truck and passenger traffic within the city limits and interstate 215.

The Project's proximity to the schools, homes and parks is very concerning and the **cumulative** impacts that are associated with this project needs to be assessed. The EIR needs to assess the impact that this warehouse will be **adding** to this disadvantaged community and cumulatively assess how all of the surrounding warehouses and truck traffic affect the air quality and quality of life.

#### *Runoff Into the San Jacinto Watershed*

The previous uses of the land were agricultural and the soils are sure to contain remnants of fertilizers and other agricultural chemicals. Eutrophication is the process in which excess nitrogen enters an aquatic system leading to effects such as harmful algal blooms and fish and wildlife die-offs. Agricultural fertilizers are rich in nitrogen and runoff into aquatic systems has been found to be directly associated with the precipitation of eutrophication. The EIR needs to take this into careful consideration and ensure ample assessment is done to the soil and the runoff potential. This should include but not be limited to deep-soil testing and mitigation to minimize nitrogenous runoff.

#### *Original Harvest Landing Project Plan*

The original Harvest Landing Specific Plan should also be environmentally assessed and presented as an option. There should be assessments made as to the difference in GHG emissions, diesel PM emissions, NOx emissions and the difference in impact that the original project would have on recreation and

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housing for the surrounding area compared to the new Project's impacts on the same concerns.

The spirit of the project is being significantly altered from the original intentions of the Harvest Landing specific plan. The original specific plan describes a community center which would “contain a variety of residential housing types, businesses, and amenities, all integrated by a system of open spaces and paseos. The signature feature of Harvest Landing. Is it's open space amenities; key among those are the Harvest Lake, and surrounding Harvest Lake Park.” (Harvest Landing Specific Plan, p1-1)<sup>3</sup>.

There needs to be analysis into the impact that such a radical change to the original project's vision will have on the surrounding community. Probable impacts that require special attention are: the negative effects to the aesthetic value of the neighborhood, the impact analysis should include the difference in impact that the original plan would have in contrast to the proposed project — for example, trading a scenic lake front view for that of a 60 foot high warehouse — ; the difference in GHG, NOx and particle pollution emissions as they would differ between the original and newly proposed projects; the impacts to housing development and home values for the surrounding area, again, analysis needs to be completed which will compare and contrast the difference in impacts that both the originally accepted and the newly proposed Harvest Landing plan will have on nearby homes.

### **AB 98 and SB 330**

The Project would oversee the destruction of three family homes on site - each with current dwellers. To remain in compliance with California Assembly Bill 98, the project must replace those destroyed homes with “two units of moderate - or low income - housing per one housing unit demolished” (AB 98, J. Carrillo)<sup>4</sup>. Compliance with AB 98 will require the project to replace those destroyed units with **6 units of moderate or low income housing**. This needs to be properly addressed in the EIR.

The Project NOP addresses the EIR's necessary compliance with Senate Bill 330 and makes mention of the approximately 1,860 residential units that are planned to be lost, however, the NOP also details that rezoning or a Density Bonus Overlay Ordinance as probable solutions to the issue.

Considering: Perris has been facing ongoing issues concerning the ceaseless rezoning of almost every vacant residential or commercial land to accommodate light industrial or warehousing -- a simple rezone of nearby land in the city should not suffice for compliance with SB 330, as the “replacement” land will also be highly liable to rezone to accommodate warehousing in the future. Essentially, this will simply be a measure to “kick the can down the road” and will do nothing to address the real issue of lost housing.

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The other option presented in the Notice of Preparation was to allow for a “Density Bonus Overlay Ordinance to ensure no net loss in allowable housing density due to the Project” (Harvest Landing NOP, p6). This too, is another Band-Aid fix that would have no real effect on the lost housing due to this project. The implementation of a Density Bonus Overlay Ordinance would not actually replace any housing – it would just *theoretically* make it possible for another future development to increase its housing capacity. In order to adequately ensure compliance with SB 330, any upzoning elsewhere for the residential rezone of this project needs to occur concurrently with the approval of this project. Simply increasing the housing density capacity of any residential location in Perris would not suffice as a genuine solution to the loss of housing and there needs to be real replacement housing secured, funded and built for this project and the rezone to be considered.

### **Noise Impacts**

As previously stated, the project is set to surround Val Verde Elementary school on three sides. It is also within a 3 mile radius of many other elementary and high schools, various community parks and neighborhoods.

There needs to be investigation into the impact that the excess noise pollution will have on the nearby residents, park-goers and most importantly - the elementary and high school students. There needs to be mitigation to prevent this noise pollution from critically affecting the lives of the surrounding residents. Off-hours need to be set for the site and the truck traffic, with specific attention to the hours of operation for the schools surrounding the project, and the school the project engulfs.

### **Project Zoning Concerns**

The Project as originally planned made use of a “new” planning zone specific to the Harvest Landing Specific Plan. The Multiple Business Uses (MBU) zone was included in the original project plan to permit and invite *a variety* of different business types into the region. Since MBU defines a commercial and professional sector with a mix of uses, the EIR must address the impact of this purely industrial plan versus the one originally intended which would have included include a mix of necessary uses for Perris residents; those permitted uses include but are not limited to: open spaces and parks, paseos, trails, administrative and professional offices, automotive and marine services, beauty and barber supply stores and more. Those residents nearby the project moved to this region with an expectation that this region would be developed with a mix of industries — the impact to their property values, their health related to the excess pollution expected from the semi truck traffic and the loss of high paying career jobs needs to be quantified.

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The NOP also inaccurately and disingenuously classifies the various warehouses (parcel hub, high-cube warehouse and light industrial buildings) as a “Business Park”. This needs to be rectified in the EIR. Currently, it appears that the designation of “Business Park” was self described in an effort to thwart necessary restrictions on warehousing and distribution projects — as explored in the next section.

#### *Conditional Use Permit Necessity*

While as defined in the Harvest Landing Specific Plan, warehousing and distribution are permitted, this permissance is allowed for facilities under 100,000 square feet. For facilities greater than this threshold, a conditional use permit will be required for each building. Five out of seven of the proposed warehouse buildings fall above this 100,000 square foot threshold and therefore will require conditional use permits. The issuance of conditional use permits is at the discretion of the planning commission and the city council and it must be determined that the project will be compatible with it’s surroundings and not pose a negative impact to public welfare. Given the direct proximity of much of the warehousing sites bordering the elementary school as well as the immense environmental and health impact that this project will have on nearby residents and school children — there is a strong possibility that the necessary permits will be denied.

For these reasons and many of those previously explored, the EIR must consider the possibility that the warehousing aspects of this project will be denied, and needs to analyze the environmental impacts that would have occurred under the original Harvest Landing Specific Plan as adopted in 2005.

#### **Jobs Analyses**

##### *Importance of Using Accurate Jobs Approximations*

Another critical deficiency found in many nearby project EIRs is the inaccuracy in the methodology used to determine approximate jobs to be created with the site plan. The most commonly used estimate for determining the jobs per acre comes from old data from the 1990s. This figure is typically assumed to be 21 jobs per acre, however, recent data from the CA EDD Labor Market dataset shows that a much smaller figure one nearer to 8 jobs per acre is more accurate. The EIR must accurately determine an estimate for the number of jobs to be created for the warehouse projects and needs to **CITE** where they receive this figure from — for transparency purposes.

##### *Job Quality and Salary*

Warehouse jobs are not known to be high-paying or sought-after jobs in our region. This is due to many factors including issues in worker welfare,

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low-rates of pay and instability in the warehouse economy and increasing automation.

The vacancy rate for warehouses in our region is on the rise and employment rates are decreasing. There is also a concerning stagnation in wages associated with warehouse jobs and a genuine concern that our region is not being fortified with enough robust-paying jobs to afford housing or necessities within the city of Perris or elsewhere.

In the existing Harvest Landing Specific Plan, this region would also be developed with a blend of various professional offices, research and development and other higher paying careers than a warehouse worker position would offer. Should the “updated” Harvest Landing Plan be adopted, then almost the entire area will instead be replaced with light industrial and warehouse uses. The EIR must address the impact of the loss of these promised higher-paid office jobs associated with the original intentions of the Multiple Business Uses zoning. What effect will this have on the median income of the surrounding community and/or of those projected to be employed at the site? The effect of losing these job opportunities **MUST** be taken into account and analyzed.

Further, this project will be built on a “speculative basis”, and there is no tenant in agreement at this time. Given the state of the warehouse worker’s rights and their current fight for basic dignities such as protections from the heat and health care — it should be addressed in the EIR the effect that having proper heat protections will have on the community. Particularly, there needs to be an assessment done on the impact that **NOT** having air conditioning has for the warehouse workers on the floor (not the managers and higher staff).

Thank you again for the opportunity to raise my concerns to be addressed in the EIR for the Harvest Landing Specific Plan. It should be abundantly clear that this warehouse proposal is exceedingly flawed and is **NOT** what the residents of Perris want nor need. Please add Perris Neighbors in Action to the list of interested parties and keep us informed of any and all updates to this project.

<sup>1</sup>National Center for Educational Statistics,  
[https://nces.ed.gov/ccd/schoolsearch/school\\_detail.asp?Search=1&SchoolID=069113510286&ID=069113510286](https://nces.ed.gov/ccd/schoolsearch/school_detail.asp?Search=1&SchoolID=069113510286&ID=069113510286)

<sup>2</sup>Radical Research LLC, WarehouseCITY Interactive Map,  
<https://radicalresearch.shinyapps.io/WarehouseCITY/>

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<sup>3</sup> Harvest Landing Original Specific Plan,  
<https://www.cityofperris.org/home/showpublisheddocument/2631>

<sup>4</sup> AB 98 (J. Carrillo),  
<https://slcl.senate.ca.gov/system/files/2024-08/ab-98-j-carrillo.pdf>

Sincerely,

**Jillian Menez**

**Perris Neighbors in Action**

<https://www.cityofperris.org/home/showpublisheddocument/13652/637775940661530000>

Link for City GIS / Zoning Information: <https://www.cityofperris.org/our-city/about-perris/maps>

Link for City Municipal Code: [https://library.municode.com/ca/perris/codes/code\\_of\\_ordinances](https://library.municode.com/ca/perris/codes/code_of_ordinances)

Link for City Specific Plans: <https://www.cityofperris.org/departments/development-services/specific-plans>

Link for City General Plan, Special Studies, and Policy Documents:

<https://www.cityofperris.org/departments/development-services/general-plan>

Link for CEQA Documents in Public Review:

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

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**From:** Deitra Carter <dcarter@msn.com>

**Sent:** Thursday, August 15, 2024 2:31 PM

**To:** Patricia Brenes <pbrenes@CityofPerris.org>

**Subject:** Warehouse

I oppose of any more warehouses of any kind in the city of Perris. I believe we need new members in our City beginning with the Mayor. It is unfair to continue to build warehouses here because of the "status quo's ". We have numerous empty warehouses that we're purposely built without any real value to the community. Warehouses are being built among communities!! Tell me how does this affect your family? Not at all if you don't live here. Perris has been considered depressed and looked down upon. I have watched it many years, actually since 1957. Sure, growth is good but how is it good when you put warehouse's with hundreds of pollutants among communities. Our roads are terrible, and patching it isn't a fix!! I truly hate I must miss this meeting because I certainly have a lot to say. I live behind Perris Lake in the Villages of Avalon. Where are the accommodations for this area ?The warehouses certainly are accommodating my asthma!!

Deitra Carter Clayton

Get [Outlook for iOS](#)

Below are helpful links:

Link for City applications: <https://www.cityofperris.org/our-city/city-hall/city-forms/-folder-155>

Link for City cannabis applications: <https://www.cityofperris.org/our-city/city-hall/city-forms/-folder-147>

Link for City fee schedule:

<https://www.cityofperris.org/home/showpublisheddocument/2537/637217201195900000>

Link for City Development Impact Fees:

<https://www.cityofperris.org/home/showpublisheddocument/13652/637775940661530000>

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<https://www.cityofperris.org/departments/development-services/general-plan>

Link for CEQA Documents in Public Review:

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

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**From:** Gray <[graythecolor@proton.me](mailto:graythecolor@proton.me)>

**Sent:** Sunday, August 18, 2024 8:33 PM

**To:** Patricia Brenes <[pbrenes@CityofPerris.org](mailto:pbrenes@CityofPerris.org)>

**Subject:** Comments on the Perris Planning Commission

This comment is in reference to Howard Industrial Partner's warehouse project.

Nothing good comes from this project at all. Bulldozing 170 acres of high density housing and an elementary school is a disgusting thing to do. This will harm the roads, cause more air pollution, harm the people living around that area, not to mention schools around the area will have to accommodate the newly unenrolled children. This project is the result of corporate greed. Keep this out of Perris!

**From:** [Charlie Cisakowski](#)  
**To:** [Brady Connolly](#); [Emilio Lozano](#); [Meaghan Truman](#)  
**Subject:** Fwd: Urgent Concerns Regarding Proposed Warehouse Developments and Rezoning  
**Date:** Wednesday, August 21, 2024 3:35:33 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Charlie Cisakowski  
EPD SOLUTIONS  
(253)753-4928

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**From:** Patricia Brenes <[pbrenes@CityofPerris.org](mailto:pbrenes@CityofPerris.org)>  
**Sent:** Wednesday, August 21, 2024 3:12:04 PM  
**To:** Meaghan Truman <[Mtruman@epdsolutions.com](mailto:Mtruman@epdsolutions.com)>; Charlie Cisakowski <[Charlie@epdsolutions.com](mailto:Charlie@epdsolutions.com)>; albertgeorgearmijo@gmail.com <[albertgeorgearmijo@gmail.com](mailto:albertgeorgearmijo@gmail.com)>  
**Subject:** RE: Urgent Concerns Regarding Proposed Warehouse Developments and Rezoning

[NON-EPD]

Below is another letter regarding this project.

Thanks,



**PATRICIA BRENES**  
PLANNING MANAGER

**Desk:** 951.943.5003 EXT 355  
**Email:** [pbrenes@cityofperris.org](mailto:pbrenes@cityofperris.org)  
**Web:** [www.cityofperris.org](http://www.cityofperris.org)



Below are helpful links:

Link for City applications: <https://www.cityofperris.org/our-city/city-hall/city-forms/-folder-155>

Link for City cannabis applications: <https://www.cityofperris.org/our-city/city-hall/city-forms/-folder-147>

Link for City fee schedule:

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<https://www.cityofperris.org/home/showpublisheddocument/13652/637775940661530000>

Link for City GIS / Zoning Information: <https://www.cityofperris.org/our-city/about-perris/maps>

Link for City Municipal Code: [https://library.municode.com/ca/perris/codes/code\\_of\\_ordinances](https://library.municode.com/ca/perris/codes/code_of_ordinances)

Link for City Specific Plans: <https://www.cityofperris.org/departments/development-services/specific-plans>

Link for City General Plan, Special Studies, and Policy Documents:

<https://www.cityofperris.org/departments/development-services/general-plan>

Link for CEQA Documents in Public Review:

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

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**From:** Ramon Espinoza <raymonecorporate2@gmail.com>

**Sent:** Monday, August 19, 2024 12:37 PM

**To:** Nathan Perez <NPerez@cityofperris.org>; Patricia Brenes <pbrenes@CityofPerris.org>; Kenneth Phung <Kphung@cityofperris.org>

**Subject:** Urgent Concerns Regarding Proposed Warehouse Developments and Rezoning

Dear City Council Members and Developers,

I hope this message finds you well. I am writing to express my deep concerns regarding the proposed construction of large warehouses and the associated rezoning of land in our city. While economic growth is vital, I believe we must carefully evaluate the repercussions these mega structures may have on our community, especially on senior citizens, schools, military veterans, native wildlife, and the overall quality of life for residents.

### Negative Impacts of Large Warehouses:

1. **Environmental Degradation**: Large warehouses require significant land clearing, which leads to habitat destruction, loss of biodiversity, and increased pollution. This is particularly problematic for native species that rely on these ecosystems for survival.
2. **Increased Traffic and Congestion**: The influx of heavy trucks and commercial vehicles will result in traffic congestion, posing safety risks to pedestrians, particularly seniors and children. This increased traffic can also lead to longer commute times for residents.
3. **Strain on Local Infrastructure**: The construction and operation of mega warehouses can overwhelm our existing infrastructure, leading to potholes, increased maintenance costs, and a strain on public services. This could divert funds from

essential services such as education and public safety.

4. **Impact on Property Values**: The presence of large warehouses can significantly reduce property values in surrounding neighborhoods. Homeowners, including many senior citizens, may find it challenging to sell their homes, resulting in financial hardship.

5. **Limited Job Quality**: While warehouses may create jobs, many of these positions are low-paying and lack benefits. This does not meet the needs of our community members, including military veterans who seek sustainable, well-paying employment opportunities.

6. **Neglect of Education and Community Services**: The focus on warehouse development can detract from necessary investments in our schools and community services. Our educational institutions are already underfunded, and further neglect will harm future generations.

7. **Quality of Life Deterioration**: The construction and operation of large warehouses can lead to increased noise, light pollution, and visual blight, detracting from the community's charm and livability, which is vital for families and retirees.

8. **Displacement of Local Businesses**: As large warehouses are built, local businesses may struggle to survive, leading to closures and job losses. This loss of local character and economic diversity can harm our community's fabric.

### ### Reasons Against Rezoning:

1. **Community Opposition**: There is significant concern among residents regarding the proposed rezoning for warehouse development. Ignoring community voices undermines trust in local governance.

2. **Zoning Integrity**: Rezoning an area primarily intended for residential or community use sets a concerning precedent for future developments, potentially opening the door to more disruptive projects that do not align with community needs.

3. **Long-Term Planning**: Our city's long-term planning should prioritize sustainable development that respects the environment and enhances the quality of life for all residents, rather than short-term economic gains.

4. **Potential Legal Challenges**: Rezoning may lead to legal challenges from

community members who feel their voices are not being heard. This could result in costly litigation and further delays.

5. **Alternative Developments**: There are numerous opportunities for developing community-centered projects that would benefit local residents, such as parks, recreational facilities, and affordable housing, rather than large warehouses that do not meet our community's needs.

I urge the city council and developers to carefully consider these concerns and prioritize thoughtful, sustainable development that benefits all residents. It is crucial that we protect our community's character, environment, and the well-being of our most vulnerable members.

Thank you for your attention to this important matter. I look forward to your response and hope to see a commitment to preserving the integrity of our community.

Sincerely,

Ramon Espinoza  
562-326-7852  
21690 Prospect St.  
Perris CA 92570

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**From:** ERICK FELIX <[erick\\_felix5@hotmail.com](mailto:erick_felix5@hotmail.com)>

**Sent:** Tuesday, August 20, 2024 8:49 AM

**To:** Patricia Brenes <[pbrenes@CityofPerris.org](mailto:pbrenes@CityofPerris.org)>

**Subject:** Most recent Howard Industrial Partners proposal

Hi, I've been living in this city since 1997. Essentially majority of my life I have been living here. I don't appreciate all these excessive warehouses that's being made recently. I am once again choosing to be active in the interest of future generations for the citizens of Perris. I don't know why folks in charge of Perris always seem to be entertaining the idea of making warehouses and it always feels like an uphill battle despite the folks in charge of Perris KNOWS how it's citizens feel about all these warehouses trying to be made, we voted em' in to represent us and this building of warehouse frenzy does not reflect the majority of the citizens of Perris. The idea of bulldozing Val Verde Elementary sounds insane and will mostly upset it's citizens as it can potentially complicate the citizens respective lives in a city that's ever growing. I would encourage y'all to keep and respect it's original plans for that area as I believe it will be more beneficial over the years to come. Let's work on becoming a city guests would love to spend time as well as money and not see Perris as the ghetto of Southern California that some folks already have such an option of Perris. Thank you.

Sent from Android device

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**From:** elissacuriel <[elissacuriel@gmail.com](mailto:elissacuriel@gmail.com)>  
**Sent:** Wednesday, August 21, 2024 7:38 PM  
**To:** Patricia Brenes <[pbrenes@CityofPerris.org](mailto:pbrenes@CityofPerris.org)>  
**Subject:** Concerned residents

My names Elissa Curiel. I've been a resident for 33 years and I'm opposed to the warehouse they want to build by the 215 and Nuevo. I ask the counsel members to think of the communities health and also the traffic, it'll bring to the area. Also land could be used for better things like drs office. Me being a caregiver would love to not have to drive 25 to 30 miles away to see a specialist for my parents. I know that'll take work for the city representative to try and bring that here but isn't that their job to bring better to our community and not make it a slab city. I could go on but considering I'm watching the live right now, I thought I'd leave it short so I can continue. Thank you.

Sent from my Galaxy

**From:** [Charlie Cisakowski](#)  
**To:** [Emilio Lozano](#); [Brady Connolly](#); [Meaghan Truman](#)  
**Subject:** FW: Opposition to the attached.  
**Date:** Thursday, August 22, 2024 8:58:58 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)

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**Charlie Cisakowski**

**\*please note I will be out of the office September 9<sup>th</sup> and will return September 17<sup>th</sup>**

[Charlie@epdsolutions.com](mailto:Charlie@epdsolutions.com)

253.753.4928 | cell

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[www.epdsolutions.com](http://www.epdsolutions.com)

**E | P | D** SOLUTIONS, INC

[www.epdsolutions.com](http://www.epdsolutions.com)

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**From:** Patricia Brenes <[pbrenes@CityofPerris.org](mailto:pbrenes@CityofPerris.org)>  
**Sent:** Thursday, August 22, 2024 8:16 AM  
**To:** Meaghan Truman <[Mtruman@epdsolutions.com](mailto:Mtruman@epdsolutions.com)>; Charlie Cisakowski <[Charlie@epdsolutions.com](mailto:Charlie@epdsolutions.com)>  
**Cc:** [albertgeorgearmijo@gmail.com](mailto:albertgeorgearmijo@gmail.com)  
**Subject:** FW: Opposition to the attached.

[NON-EPD]

Please add the email below to the list of comments received regarding this project.

Thank you,



**PATRICIA BRENES**  
PLANNING MANAGER

Desk: 951.943.5003 EXT 355  
Email: [pbrenes@cityofperris.org](mailto:pbrenes@cityofperris.org)  
Web: [www.cityofperris.org](http://www.cityofperris.org)



Below are helpful links:

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**From:** Jose Quintero JR <[quintero.jr@hotmail.com](mailto:quintero.jr@hotmail.com)>  
**Sent:** Wednesday, August 21, 2024 6:16 PM  
**To:** Patricia Brenes <[pbrenes@CityofPerris.org](mailto:pbrenes@CityofPerris.org)>  
**Subject:** Opposition to the attached.

Hello I am emailing to provide my opposition to this project and any other project or rezoning and amendments to any specific plan that includes retail and commercial land. The city has an abundance of empty warehouses. The city should also limit its business developers with shady and unethical behaviors.



# 8.6 MILLION SF OF WAREHOUSE PROPOSALS

August 21, 2024

Applicant: *Howard Industrials Partners*

**From:** [Susana Sanchez-Valenzuela](#)  
**To:** [Patricia Brenes](#)  
**Cc:** [Nathan Perez](#); [Kenneth Phung](#); [twheeler@rivco.org](mailto:twheeler@rivco.org)  
**Subject:** Howard Industrial Partners Proposal

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To whom it may concern on the Planning Commission of the City of Perris,

8.6 million Sq ft of proposed warehouses  
Increased respiratory illnesses in our children  
Increased traffic  
A bulldozed elementary school  
Labor law violations  
Resource extraction  
Displacement and evictions (Bloomington)  
Decreased standard of living for our residents

Who is Tim Howard and these other developers that are allowed to take our land and convert it into a dystopian nightmare? Why Perris? These projects, far from necessary are SHORT SIGHTED in the face of the catastrophic changes our planet is experiencing.

The residents of Perris have so much history to be proud of, so many beautiful stories of deep community over the decades, we are proud of who we are and proud to say we are from Perris. We deserve better. We deserve a vision of the future that centers CREATIVITY, REGENERATION, HOPE and yes... LOVE!!  
Love and hope for our children and our collective health, love for the land and all it gives us, love for our Town.

These projects have begun to run away from the Planning Commission and the city council. The people do not want them. They benefit very few in exchange for low-skill, high stress jobs with little room for upward mobility and personal growth. They are a blight on the land and are actively creating a DISTOPIAN landscape. These warehouses do more than the enumerated above.

They eat away at the human spirit. It is unhealthy for our soul to look out and see these boxes where a hill, a valley or a sunset should be.

Please. Reject this and all other warehouse projects in the future.

Build Libraries, build gardens, build art houses, restore the theaters, build community. Make Perris known for something other than this.