

Date: December 17, 2025
Prepared by: Meaghan Truman, Senior Environmental Planner
To: Albert Armijo, City of Perris
Site: Harvest Landing Retail Center and Business Park Project
Subject: Responses to Center for Biological Diversity, Letter L2

This memo contains responses to comments related to the Environmental Impact Report (EIR) that the City of Perris received on December 16, 2025, prior to the City's Planning Commission meeting on December 17, 2025 for which the Project is on the agenda. It should be noted that similar comments have been previously submitted in a comment letter to the Draft EIR, and responded to in the Final EIR, as detailed below.

As further detailed in the individual responses to comments below, none of the comments indicate that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that there would be any of the other circumstances requiring recirculation as described in CEQA Guidelines Section 15088.5. No new significant environmental impact would result from the Project or from a new mitigation measure proposed to be implemented, there is no substantial increase in the severity of an environmental impact, no feasible project alternative or mitigation measure considerably different from others previously analyzed would lessen the environmental impacts of the proposed Project, and the EIR is not fundamentally inadequate and conclusory in nature.



December 16, 2025

Sent via email

Albert Armijo
Project Planner
City of Perris
135 N. D Street
Perris, CA 92570
aarmijo@cityofperris.org

Re: Final Environmental Impact Report for the Harvest Landing Retail Center & Business Park Project (SCH 2024080337)

Dear Mr. Armijo:

These comments are submitted on behalf of the Center for Biological Diversity (the “Center”) regarding the Harvest Landing Retail Center & Business Park Project (the “Project”). The Center has reviewed the Final Environmental Impact Report (“FEIR”) closely and is encouraged by the Project’s removal of warehouses, but is concerned about inconsistencies regarding their continued inclusion in the Project. The Center submitted extensive comments on the Draft EIR on July 21, 2025.

L2.1

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Riverside County.

The Center supports the attempted removal of warehousing from the Project.

The Center wants to express support for the City’s actions in the December 9 City Council meeting regarding warehousing in Perris. The City’s temporary moratorium on warehouse development and the proposed amendments to and codification of the Good Neighbor Guidelines are strong steps towards limiting the negative impacts of warehousing in both the City and western Riverside County. The Center encourages the Planning Commission and City Council to extend the moratorium in February.

L2.2

The Center also wants to express support for the following addition included in the Final EIR: “Warehouse uses are no longer proposed as part of the Project and would not be permitted within the Specific Plan Area without approval of a future Specific Plan Amendment.” (Final EIR at 3-23.) As described in the Planning Commission’s agenda packet, the removal of millions of square feet of industrial warehouse and distribution uses, including seven buildings from Phase 1, is a step in the right direction.

As voiced by councilmembers Corona, Nava, Rabb, and Vallejo in the December 9 meeting, the development of new warehousing is not in the best interest of the community and limits future development opportunities within the City. Removing warehousing from Harvest Landing opens up opportunities for other kinds of development that will better serve the current and future residents of Perris, as well as reduces the negative health outcomes that would result from the additional pollution caused by millions more square feet of warehouse space.

**L2.2
Cont.**

The FEIR contains inconsistencies regarding whether the Project includes warehousing.

The Center is concerned with inconsistencies in the Final EIR that make it unclear whether warehousing will remain part of the Project, or whether such changes are enforceable. While the sentence quoted above and a few other changes to the Alternatives section (Final EIR at 3-47 ["The Specific Plan Amendment would not allow warehouse uses."]), unequivocally limit warehousing in Harvest Landing, all other parts of the Final EIR indicate that Harvest Landing remains a warehousing project. For example:

- The Project Description remains unchanged, stating that a project objective is to "allow for the accommodation of...warehouse distribution, and logistics buildings." (Draft EIR at 1-2.)
- While the Final EIR made edits to a paragraph on page 3-15 of the Draft EIR, it did not strike language that in the "Phase 1 Business Park site ... three high cube warehouses ... would be constructed." (Final EIR at 3-24.)
- The Final EIR also did not strike the Draft EIR's language stating that "the Phase 2 development area...would allow up to 3,659,693 square feet of warehouse, light industrial, and/or manufacturing uses," even though other changes were made to that page. (Draft EIR at 3-23; Final EIR at 3-24-25.)
- In responding to the Center for Biological Diversity's comments, the Final EIR states that "given the type of warehouse development proposed, it is unlikely that the future tenants would own their own fleet," a statement that indicates the Project will include warehousing. (Final EIR at 2-213.)
- In responding to other comments, the Final EIR states that "[n]otably, the current approved uses for the Project site already include multiple warehouse buildings." (Final EIR at 2-339.)

L2.3

The Center wants to help ensure that the City Council's goals of limiting warehousing the Perris are realized. One potential way to accomplish this is by

requiring, as a condition of approval, that no warehouses—including “parcel hubs”—can be built within Harvest Landing. Another way is to include deed restrictions prohibiting warehouses on land within the Harvest Landing project area.

**L2.3
Cont.**

The “parcel hub” is undeniably a warehouse.

The continued inclusion of a “parcel hub” in the Project contradicts the FEIR’s position that the Project “would not allow warehouse uses.” There is no identifiable difference between this “parcel hub” and a logistics warehouse.

The purpose of the hub would be as a “last-mile delivery of goods to consumers” that, “[s]imilar to operations conducted by United Parcel Service, FedEx, and the United States Postal Service, [] will sort, consolidate, and prepare shipments for onward transportation, functioning as a central node within the distribution network.” (Agenda Packet at 13–15.)

In its *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*, the Attorney General “[defines] ‘warehouse’ or ‘logistics facility’ [] as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.” The parcel hub’s intended operation to “sort, consolidate, and prepare shipments for onward transportation” is indistinguishable from a building that “stores [] goods, or products on a short-term basis for later distribution.”

The “parcel hub” would also qualify as a warehouse prohibited by the recent warehouse moratorium approved by the City Council on December 9. That moratorium defines a warehouse as “a building or premises in which goods, merchandise or equipment are stored for eventual distribution,” based on the City of Perris’s Municipal Code § 19.08.010. (December 9 City Council Agenda Packet at 238.) As a “central node within the distribution network” the “parcel hub” will do exactly what was just prohibited by City Council.

L2.4

The size of the “parcel hub” also qualifies it as a prohibited building under the new moratorium, which applies to buildings over 50,000 square feet. (December 9 City Council Agenda Packet at 242.) The hub is a single, 391,725 square foot building, which is comparable to the size of other large warehouses in Perris, and exceeds the moratorium’s size limit.

Beyond definitions, the negative impacts from the “parcel hub” are also the same as a warehouse. Nine of the ten findings regarding the justification and impetus for the warehouse moratorium regarded the impacts from heavy-duty trucks, specifically. (E.g. December 9 City Council Agenda Packet at 239–40 [describing the adverse public health and safety impacts of warehousing is caused by “the exacerbation of pollution

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levels, including emissions of diesel particulate matter and nitrogen oxides...caused by the heavy trucking that is associated with warehousing and distribution uses”].)

The “parcel hub” would include “701 truck parking spaces” and add 1814 daily vehicle trips per day, including an additional 323 trips per day compared to the number of trips analyzed in the Draft EIR. (Agenda Packet at 15; FEIR at 3-62–63.) While the FEIR does not make clear exactly how many of the daily trips would be heavy-duty trucks versus passenger automobiles, what is clear is that many, if not most, of those trips would be truck trips, given the 701 parking spaces provided for those vehicles. These additional truck trips would further diminish air quality in Perris and the surrounding areas.

That the “parcel hub” intends to serve as a “last-mile delivery of goods to customers” does not preclude it from functioning as a warehouse: the general air quality and greenhouse gas impacts from heavy-duty trucks serving the alleged “parcel hub” are no different from the impacts of heavy-duty trucks serving any other warehouse.

Finally, the Final EIR fails to demonstrate the need for yet another “parcel hub.” The FEIR states that the hub would be “[s]imilar to operations conducted by United Parcel Service, FedEx, and the United States Postal Service.” All those carriers already have massive distribution centers in or adjacent to Perris. For example, there is a USPS distribution center in south Perris, a FedEx Freight Center just to the northwest of Harvest Landing in Perris, and a “UPS Empire” distribution center between Perris and Riverside. Why Perris would need to be served by yet another “parcel hub” to deliver last-mile packages in and around the City remains unexplained, especially in light of the myriad existing facilities. Further, a quick look at these other three “parcel hubs” shows that they are, indeed, warehouses. (See Exhibit A.

There is no reason to doubt that the “parcel hub” is a warehouse by another name. As such, it is prohibited by the moratorium and must be eliminated from the Project if the Project is to make good on its commitment to “not allow warehouse uses.”

The Center’s concerns regarding biological resources remain. As the City did not make any changes to the biological resources section of the Draft EIR, the Center’s concerns regarding biological resources remain. The Center raised detailed concerns over the surveying techniques for burrowing owls and rare plants, as well as the impacts to and mitigation for burrowing owls, white-tailed kites and prairie falcons, jurisdictional waters, and rare plants. The City failed to adopt the feasible (and necessary) mitigation measures recommended by the Center. As such, these concerns remain.

The removal of mitigation measure of AQ-14 is unsupported. The FEIR removed AQ-14, which required industrial rooftops to be designed to accommodate solar panels. The reason for this removal is unclear, and is not supported by substantial

L2.4
Cont.

L2.5

L2.6

evidence. As thoroughly described by the Center's July 21 comment and other comments on the Draft EIR, the Project must install more solar on industrial rooftops, not less.

**L2.6
Cont.**

While the Center is fully supportive of the removal of warehousing from the Project, we are concerned that the FEIR does not commit to that goal, nor does it prohibit developers from pursuing warehousing in the Specific Plan area in the future.

L2.7

Sincerely,



Evan Levy (he/him)
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Exhibit A



Figure 1: USPS Distribution center in Perris



Figure 2: UPS Empire between Riverside and Perris

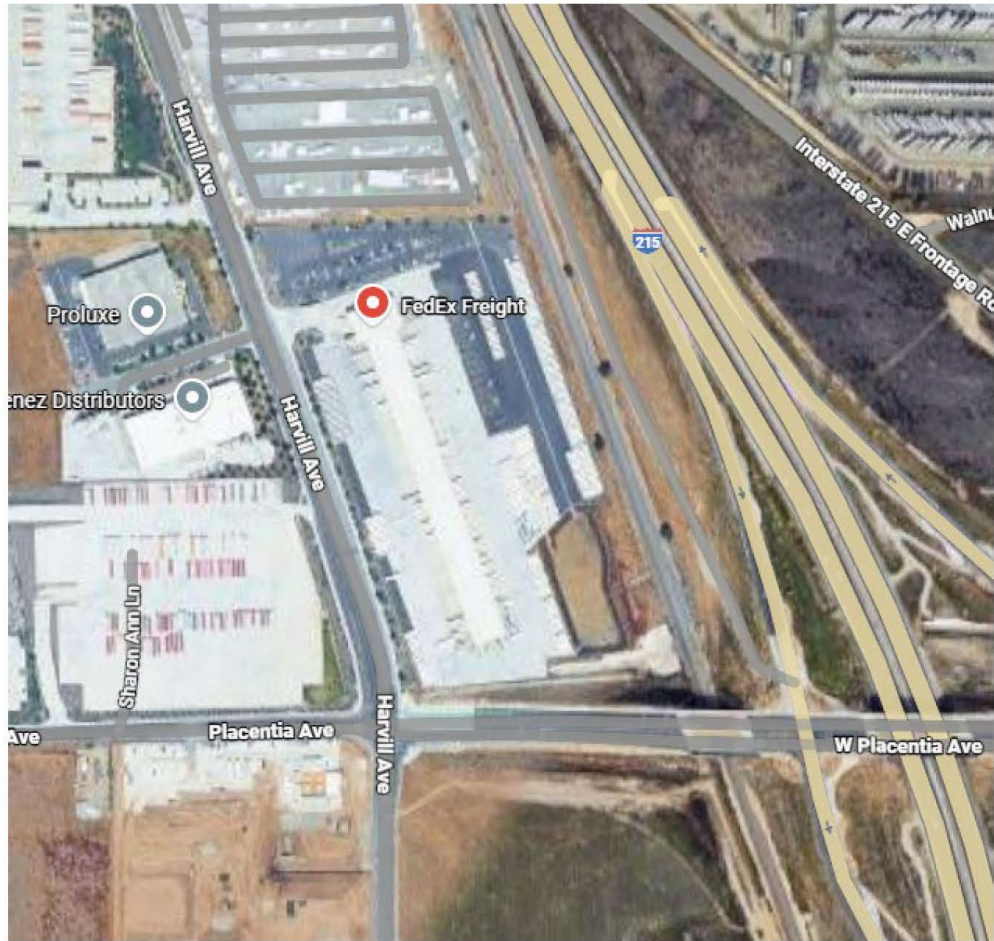


Figure 3: FedEx Freight in Perris, just northwest of Harvest Landing.

Evan Levy

Response to Letter L2: Center for Biological Diversity, dated December 16, 2025

This comment letter was received after the Draft EIR public review and comment period ended on July 14, 2025. As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised and to enhance the administrative record for consideration of the Project by the City of Perris.

Comment L2.1: This comment states that the Center for Biological Diversity (“Center”) has reviewed the Final EIR and states that while the Center is encouraged by the Project’s removal of warehouses, concerns remain regarding their continued inclusion in the Final EIR. The comment also provides a brief overview of the Center and describes that its organization is dedicated to the protection of native species and their habitats.

Response L2.1: This comment is introductory in nature. See Responses O6.1 through O6.45 within the Final EIR for responses to the Center’s previous comment letter on the Draft EIR. None of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Therefore, no further response is warranted.

Comment L2.2: This comment expresses the commenter’s support of the changes within the Final EIR including the exclusion of warehouse uses within the Final EIR.

Response L2.2: The comment does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is required or provided.

Comment L2.3: This comment states that the Final EIR includes inconsistencies on whether warehousing would remain a part of the proposed Project.

Response L2.3: As mentioned by the commenter and on Final EIR page 3-47, the proposed Specific Plan Amendment would not allow warehouse uses. The Draft EIR still analyzes the impacts of potential warehouses being developed onsite in order to provide the most conservative analysis of the development of the Project site. No warehouses would be permitted without a future Specific Plan Amendment, which would trigger further CEQA analysis on any future proposed warehouse projects within the Specific Plan Area.

Comment L2.4: This comment states that the proposed inclusion of a parcel hub within the Specific Plan while not allowing warehouse uses is a contradiction, and parcel hubs should not be allowed within the Specific Plan Area.

Response L2.4: Parcel Hubs are operationally different from traditional warehouses and are better aligned with the intent of the Specific Plan Mixed Business Use (MBU) designation. Parcel Hubs function as last-mile facilities with smaller service areas, higher percentage of passenger vehicles, shorter truck trips, and fewer heavy-duty truck movements, whereas large warehouse or logistics have a higher percentage of truck trips and longer haul trips. Allowing Parcel Hubs supports local and regional delivery needs, compared to conventional warehouse uses which are more focused on larger regional, national, and even international delivery needs. Therefore, the local and smaller regional focus of Parcel Hubs makes them more appropriate within the MBU area was compared to general warehouse use and in conformance with the City’s moratorium. In addition, the proposed plans have been reviewed by the City Planning Department for consistency with the City’s memorandum. Thus, no further response is warranted.

Comment L2.5: This comment states that commenter’s previous comments regarding biological resources remain as no changes were made within the Final EIR.

Response L2.5: This comment does not raise a specific new issue with the adequacy of the Draft EIR and the biological issues raised in the previous comment letter were responded to in Responses O6.1 through O6.45 within the Final EIR; including burrowing owls, rare plants, avian species, and jurisdictional waters. None of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Therefore, no further response is warranted.

Comment L2.6: This comment states the removal of mitigation measure AQ-14 is unsupported and the Project must include additional solar rooftops.

Response L2.6: Mitigation Measure AQ-14 was removed in the Final EIR to reduce redundancy within the document, as Mitigation Measures GHG-5 requires solar installation as described in Chapter 4 of the Final EIR, *Mitigation Monitoring and Reporting Program*.

Mitigation Measure GHG-5: The Project Applicant/Developer shall install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the project site to be installed in the future, with a specified electrical generation capacity in order to meet California Green Building Code Standards. The entire roof of the office section of each industrial building shall be designed to support solar installations; and, once the building tenant has been identified, solar panels shall be installed in order to generate enough energy to meet 100% of the building office's energy needs.

Comment L2.7: This comment concludes the letter by stating the commenter has concerns about the Project's commitment to removing warehouses.

Response L2.7: The comment is conclusory in nature and does not raise a specific issue with the adequacy of the Draft EIR. As substantiated by the previous responses, none of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Therefore, no further response is warranted.