

**DEPARTMENT OF WATER RESOURCES**

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Governor's Office of Planning &amp; Research

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**STATE CLEARINGHOUSE**

05/23/2022

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**RE: SCH Number 2020040325: Stoneridge Commerce Center Draft EIR**

Dear Mr. Brady:

The California Department of Water Resources (DWR), Division of Operation and Maintenance, has reviewed the Draft EIR for the proposed Stoneridge Commerce Center project. DWR has the following comments.

**General Comments**

DWR operates and maintains the State Water Project (SWP), which includes an extensive system of aqueducts and pipelines that convey water through the Central Valley into the SWP's terminus at Lake Perris. Lake Perris is an artificial lake, which is contained by the Perris Dam. DWR operates and maintains the Perris Dam and adjacent DWR facilities, including an equipment storage yard. Primary access to the Perris Dam for maintenance and emergency purposes is located on the Ramona Expressway. As a result of the previous Ramona Expressway widening, DWR no longer has direct left-turn access to Perris Dam, and DWR vehicles, including heavy equipment, must utilize the Bradley Road at Ramona Expressway T-intersection for U-turns east of the primary access point. As noted in the Draft EIR, access to the proposed Stoneridge Commerce Center site will also utilize Ramona Expressway. (See, e.g., Draft EIR pp. S-2, 4.18-23; DEIR Appendix L1, p. 4.)

**Specific Comments****Transportation**

The Draft EIR notes that the county of Riverside does not provide designated truck routes. In addition, the proposed project will rely on Ramona Express way as a primary truck route. (DEIR p. 4.18-7.) Furthermore, the Draft EIR notes that truck traffic will be specifically routed to Ramona Expressway to avoid residential streets. (DEIR p. 4.18-23.) As explained above, DWR's primary access to Perris Dam is from Ramona Expressway, and all DWR emergency and maintenance vehicles must perform a U-turn at the intersection of Bradley Road and Ramona Expressway to access the DWR facility from the west. As a result, there is a potential for conflict between the proposed project truck trips and DWR's use of Ramona Expressway for access to Perris Dam, which includes trucks and other heavy equipment for critical maintenance work and emergency access. Additional truck and other vehicle trips associated with the proposed project may significantly impact DWR's emergency and maintenance access to Perris Dam as well, requiring new access routes to maintain DWR's timely emergency and maintenance access to the dam in order reduce potentially significant increase in hazards due to traffic conflicts. In fact, the Draft EIR concludes that project implementation would result in a

significant direct impact on Ramona Expressway during project construction. (DWR p. 4.18-24.)

The Draft EIR indicates that future Traffic Impact Analyses (TIAs), which will include conditions of approval, will be prepared to address transportation deficiencies. (Draft EIR pp. 4.18-29 to 4.18-30.) These future TIAs need to analyze potential impacts to and conflicts with DWR's emergency and maintenance access to Perris Dam, including appropriate conditions of approval to ensure that these potentially significant impacts are appropriately addressed. DWR also requests consultation on the temporary traffic control plan required by MM 4.18-2 to ensure this mitigation measure appropriately addresses potential impacts to DWR's Perris Dam access.

### **Hazards and Hazardous Materials**

The hazards and hazardous materials section of the Draft EIR concludes that the proposed project will not adversely affect traffic operations, including along segments of Ramona Expressway. (DEIR p. 4.9-14.) However, the transportation section of the Draft EIR concludes that service will be reduced to deficient LOS on Ramona Expressway, further exacerbated by the proposed project. (Draft EIR pp. 4.18-24; Appendix L1 pp. 19-22.) As noted above, Ramona Expressway provides access to DWR's Perris Dam facility. Thus, there is a potential for the proposed project to have a significant adverse impact on DWR's emergency response to the critical Perris Dam infrastructure. Therefore, DWR reiterates its request for consultation on the traffic control plan and future TIAs to ensure the proposed project does not have a significant adverse impact on DWR's emergency access to Perris Dam.

### **Hydrology and Water Quality**

The proposed project includes areas located in a potential dam inundation area due to the Perris Dam. (DEIR p. 4.10-19.) The Draft EIR concludes that inundation hazards associated with the failure of Perris Dam will be attenuated because of DWR's Perris Dam Modernization Project and associated improvements expected to be completed in 2023. (DEIR pp. 4.10-20, 4.10-23.) DWR is currently working with the County to complete the Perris Dam improvements. However, if these improvements are not completed as planned, additional CEQA analysis of potentially significant dam inundation impacts will be required. Therefore, this EIR needs to include a condition of approval that requires additional inundation impact analysis if the Perris Dam improvements are not completed as assumed by the Draft EIR.

For questions regarding these comments, please contact:

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DWR appreciates the County's consideration of these comments on the Stoneridge Commerce Center Draft EIR.

Sincerely,

*Nancy Finch*

Nancy Finch  
Attorney III  
DWR Office of the General Counsel

cc: John Wheat (DWR, Office of the General Counsel)  
California State Clearinghouse