



RIVERSIDE COUNTY PLANNING DEPARTMENT

John Hildebrand
Director

Agency Notice of Preparation of a Draft Environmental Impact Report

DATE: November 30, 2022

TO: Responsible/Trustee Agencies

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in the Thousand Palms community of unincorporated Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). This notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit guidance as to the scope and content of the required EIR.

PROJECT CASE NO./TITLE: Thousand Palms Warehouse – General Plan Amendment No. 220004 (GPA 220004), Change of Zone No. 2200013 (CZ 2200013), and Plot Plan No. 220022 (PPT 220022)

PROJECT LOCATION AND DESCRIPTION: The proposed Project consists of applications for GPA 220004, CZ 2200013, and PPT 220022 to allow for the development of a 1,238,992 s.f. warehouse building and an Imperial Irrigation District (IID) joint electric substation on an 83.0-acre property located at the northeast corner of Rio Del Sol and 30th Avenue in the Thousand Palms community of unincorporated Riverside County. Proposed GPA 220004 would change the General Plan land use designation on the eastern +/- half of the property from "Medium Density Residential (MDR)" to "Light Industrial (LI)." Proposed CZ 2200013 would change the zoning classification for the eastern +/- half of the property from "Residential – Agriculture (R-A)" to "Manufacturing – Service Commercial (M-SC)." PPT 220022 is proposed to allow for development of the property with a 1,238,992 s.f. warehouse building that includes 20,000 s.f. of office uses at the four corners of the proposed building and 1,218,992 s.f. of warehouse space. A total of 212 truck docking doors are proposed, with 106 dock doors facing north and 106 dock doors facing south. Access to the Project site would be accommodated by two driveways connecting with Rio Del Sol and one driveway connecting with 30th Avenue. An IID joint electric substation is proposed in the southeastern corner of the site. Off-site, improvements would occur to Rio Del Sol, 30th Avenue, and Robert Road, and utility poles with overhead lines would be installed to connect the proposed on-site IID electric substation with the electrical grid. Several potential alignments for the off-site utility poles and overhead lines are under consideration by IID, all of which will be studied in the EIR. Governmental approvals requested by the Project Applicant from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of General Plan Amendment No. 220004
2. Adoption by ordinance of Change of Zone No. 2200013
3. Adoption by resolution of Plot Plan No. 220022

LEAD AGENCY:

Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Attn: Russell Brady, Project Planner

PROJECT SPONSOR:

Applicant: Majestic Realty Co.
Attn: Phillip Brown
Address: 13191 Crossroads Pkwy., 6th Floor
City of Industry, CA 91746-3497

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit guidance from your agency as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but **not later than thirty (30) days** after receiving this notice.

Riverside Office · 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 · Fax (951) 955-1811

Desert Office · 77-588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7555

SCOPE OF ANALYSIS: It is anticipated that the proposed Project would have the potential to result in significant impacts under the following issue areas. A detailed analysis of the following issue areas will be included in the forthcoming EIR:

- Aesthetics
- Agriculture & Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Mineral Resources
- Noise
- Paleontological Resources
- Population / Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities / Service Systems
- Wildfire
- Mandatory Findings of Significance

PUBLIC SCOPING MEETING: A Scoping Session has been scheduled in order to bring together and resolve the concerns of affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The Scoping Session is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the Scoping Session, through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

TIME OF SCOPING SESSION: 1:30 p.m. or as soon as possible thereafter
DATE OF SCOPING SESSION: December 12, 2022

Information on how to participate in the hearing will be available on the Planning Department website at: <https://planning.rctlma.org/>. For further information regarding this project please contact Project Planner Russell Brady at (951) 955-3025 or email at rbrady@rivco.org, or go to the County Planning Department's Planning Commission agenda web page at <http://planning.rctlma.org/PublicHearings.aspx>.

Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Russell Brady, Project Planner
P.O. Box 1409, Riverside, CA 92502-1409

If you have any questions please contact Russell Brady, Project Planner at (951) 955-3025.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT



Russell Brady, Project Planner for John Hildebrand, Planning Director

Attachments:

- Vicinity Map
- USGS Map
- Proposed PPT 220022 Site Plan
- Project Site & Off-Site Improvement Areas, Including All Potential IID Utility Line Alignments



RIVERSIDE COUNTY PLANNING DEPARTMENT

John Hildebrand
Director

Applicant's Notice of Preparation of a Draft Environmental Impact Report

DATE: November 30, 2022

TO: Majestic Realty Co.
Attn. Phillip Brown
13191 Crossroads Pkwy., 6th Floor
City of Industry, CA 91746-3497

PROJECT CASE NO./TITLE: Thousand Palms Warehouse – General Plan Amendment No. 220004 (GPA 220004), Change of Zone No. 2200013 (CZ 2200013), and Plot Plan No. 220022 (PPT 220022)

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3. Adoption by resolution of Plot Plan No. 220022

Pursuant to the Riverside County Rules to Implement the California Environmental Quality Act of 1970, it has been determined that the above referenced project may have a significant effect on the environment and an Environmental Impact Report (EIR) is required.

OPTION TO REVISE PROJECT:

Upon receipt of this notice, the Project sponsor may revise the project to avoid or mitigate any adverse impact. If the potential adverse effects are substantially mitigated by the revised project, an EIR shall not be required and a Mitigated Negative Declaration or a Negative Declaration (statement of no significant effect) shall be prepared.

APPEAL:

The staff requirement to prepare an EIR may be appealed to the Planning Commission within ten (10) days of receipt of this notice. The appeal must be made in writing and contain brief discussion of how the project will avoid the environmental effects listed on the attachment. The appeal must be accompanied by: (1) adhesive labels containing the names and addresses of all property owners within a minimum of 600 feet of the project boundaries that total at

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Desert Office · 77588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7555

least 25 different property owners; and (2) the appropriate filing fee. (Refer to the Current Riverside County Planning Department Fee Schedule).

PREPARATION OF THE DRAFT EIR: The Draft EIR shall address the following environmental subject areas:

- Aesthetics
- Agriculture & Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Mineral Resources
- Noise
- Paleontological Resources
- Population / Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
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The Draft EIR must meet the form and content requirements of the Planning Department. The sponsor should advise the consultant to meet with the staff on a regular basis to ensure an adequate document is prepared in a timely fashion. A preliminary draft shall be submitted for review and if determined acceptable, the consultant will be notified of the appropriate number of final draft copies to be provided for distribution to State and local agencies and interested parties.

The Draft EIR must be submitted within 120 days of this Notice unless an extension of not more than thirty (30) days is received and granted by the Department.

PUBLIC SCOPING MEETING: A Scoping Session has been scheduled in order to bring together and resolve the concerns of affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The Scoping Session is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the Scoping Session, through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

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EIR FEES: The appropriate fee for an EIR (Refer to the Current Riverside County Planning Department Fee Schedule) must be submitted to the Planning Department within thirty (30) days of this Notice.

PROJECT PRESUMED ABANDONED: Unless the EIR fee and the Draft EIR are submitted within the time periods specified above, the project will be presumed abandoned, and there will be no further processing of the development application(s) by the County of Riverside, and no refund of previously paid filing fees.

Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT

Attn: Russell Brady, Project Planner
P.O. Box 1409, Riverside, CA 92502-1409

If you have any questions please contact Russell Brady, Project Planner at (951) 955-3025.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT



Russell Brady, Project Planner for John Hildebrand, Planning Director

Attachments:

Vicinity Map

USGS Map

Proposed PPT 220022 Site Plan

Project Site & Off-Site Improvement Areas, Including All Potential IID Utility Line Alignments



RIVERSIDE COUNTY PLANNING DEPARTMENT

John Hildebrand
Director

Public Notice of Preparation of a Draft Environmental Impact Report

DATE: November 30, 2022

TO: Interested Parties

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P.O. Box 1409, Riverside, CA 92502-1409

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Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT



Russell Brady, Project Planner for John Hildebrand, Planning Director

Attachments:

- Vicinity Map
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- Project Site & Off-Site Improvement Areas, Including All Potential IID Utility Line Alignments



RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Director

REVISED Agency Notice of Preparation of a Draft Environmental Impact Report

DATE: November 30, 2022

TO: Responsible/Trustee Agencies/Interested Parties

A Notice of Preparation (NOP) for the proposed Thousand Palms Warehouse project (GPA 220004, CZ 2200013, and PPT 220022) was distributed for public review on November 29, 2022. A revised NOP is being circulated with additional detail regarding the proposed Project, including exhibits depicting the proposed Project's location and design. Copies of the revised NOP and associated exhibits are attached. The public comment period for the Project's NOP will conclude on January 6, 2023.

For further information regarding this project please contact Project Planner Russell Brady at (951) 955-3025 or email at rbrady@rivco.org.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT

A handwritten signature in black ink, appearing to read "Russell Brady", is written over a horizontal line.

Russell Brady, Project Planner for John Hildebrand, Planning Director

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: _____
 Lead Agency: _____ Contact Person: _____
 Mailing Address: _____ Phone: _____
 City: _____ Zip: _____ County: _____

Project Location: County: _____ City/Nearest Community: _____
 Cross Streets: _____ Zip Code: _____
 Longitude/Latitude (degrees, minutes and seconds): _____° _____' _____" N / _____° _____' _____" W Total Acres: _____
 Assessor's Parcel No.: _____ Section: _____ Twp.: _____ Range: _____ Base: _____
 Within 2 Miles: State Hwy #: _____ Waterways: _____
 Airports: _____ Railways: _____ Schools: Rancho Mirage High School

Document Type:

CEQA: <input type="checkbox"/> NOP	<input type="checkbox"/> Draft EIR	NEPA: <input type="checkbox"/> NOI	Other: <input type="checkbox"/> Joint Document
<input type="checkbox"/> Early Cons	<input type="checkbox"/> Supplement/Subsequent EIR	<input type="checkbox"/> EA	<input type="checkbox"/> Final Document
<input type="checkbox"/> Neg Dec	(Prior SCH No.) _____	<input type="checkbox"/> Draft EIS	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Mit Neg Dec	Other: _____	<input type="checkbox"/> FONSI	_____

Local Action Type:

<input type="checkbox"/> General Plan Update	<input type="checkbox"/> Specific Plan	<input type="checkbox"/> Rezone	<input type="checkbox"/> Annexation
<input type="checkbox"/> General Plan Amendment	<input type="checkbox"/> Master Plan	<input type="checkbox"/> Prezone	<input type="checkbox"/> Redevelopment
<input type="checkbox"/> General Plan Element	<input type="checkbox"/> Planned Unit Development	<input type="checkbox"/> Use Permit	<input type="checkbox"/> Coastal Permit
<input type="checkbox"/> Community Plan	<input type="checkbox"/> Site Plan	<input type="checkbox"/> Land Division (Subdivision, etc.)	<input type="checkbox"/> Other: _____

Development Type:

<input type="checkbox"/> Residential: Units _____ Acres _____	<input type="checkbox"/> Transportation: Type _____
<input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Mining: Mineral _____
<input type="checkbox"/> Commercial: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Power: Type _____ MW _____
<input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Waste Treatment: Type _____ MGD _____
<input type="checkbox"/> Educational: _____	<input type="checkbox"/> Hazardous Waste: Type _____
<input type="checkbox"/> Recreational: _____	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Water Facilities: Type _____ MGD _____	

Project Issues Discussed in Document:

<input type="checkbox"/> Aesthetic/Visual	<input type="checkbox"/> Fiscal	<input type="checkbox"/> Recreation/Parks	<input type="checkbox"/> Vegetation
<input type="checkbox"/> Agricultural Land	<input type="checkbox"/> Flood Plain/Flooding	<input type="checkbox"/> Schools/Universities	<input type="checkbox"/> Water Quality
<input type="checkbox"/> Air Quality	<input type="checkbox"/> Forest Land/Fire Hazard	<input type="checkbox"/> Septic Systems	<input type="checkbox"/> Water Supply/Groundwater
<input type="checkbox"/> Archeological/Historical	<input type="checkbox"/> Geologic/Seismic	<input type="checkbox"/> Sewer Capacity	<input type="checkbox"/> Wetland/Riparian
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Minerals	<input type="checkbox"/> Soil Erosion/Compaction/Grading	<input type="checkbox"/> Growth Inducement
<input type="checkbox"/> Coastal Zone	<input type="checkbox"/> Noise	<input type="checkbox"/> Solid Waste	<input type="checkbox"/> Land Use
<input type="checkbox"/> Drainage/Absorption	<input type="checkbox"/> Population/Housing Balance	<input type="checkbox"/> Toxic/Hazardous	<input type="checkbox"/> Cumulative Effects
<input type="checkbox"/> Economic/Jobs	<input type="checkbox"/> Public Services/Facilities	<input type="checkbox"/> Traffic/Circulation	<input type="checkbox"/> Other: _____

Present Land Use/Zoning/General Plan Designation:

Project Description: (please use a separate page if necessary)

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.



Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

- | | |
|----------------------------------------------------------------------|------------------------------------------------------------------------------|
| <input type="checkbox"/> Air Resources Board | <input type="checkbox"/> Office of Historic Preservation |
| <input type="checkbox"/> Boating & Waterways, Department of | <input type="checkbox"/> Office of Public School Construction |
| <input type="checkbox"/> California Emergency Management Agency | <input type="checkbox"/> Parks & Recreation, Department of |
| <input type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input type="checkbox"/> Caltrans District # _____ | <input type="checkbox"/> Public Utilities Commission |
| <input type="checkbox"/> Caltrans Division of Aeronautics | <input type="checkbox"/> Regional WQCB # _____ |
| <input type="checkbox"/> Caltrans Planning | <input type="checkbox"/> Resources Agency |
| <input type="checkbox"/> Central Valley Flood Protection Board | <input type="checkbox"/> Resources Recycling and Recovery, Department of |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy | <input type="checkbox"/> S.F. Bay Conservation & Development Comm. |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Colorado River Board | <input type="checkbox"/> San Joaquin River Conservancy |
| <input type="checkbox"/> Conservation, Department of | <input type="checkbox"/> Santa Monica Mtns. Conservancy |
| <input type="checkbox"/> Corrections, Department of | <input type="checkbox"/> State Lands Commission |
| <input type="checkbox"/> Delta Protection Commission | <input type="checkbox"/> SWRCB: Clean Water Grants |
| <input type="checkbox"/> Education, Department of | <input type="checkbox"/> SWRCB: Water Quality |
| <input type="checkbox"/> Energy Commission | <input type="checkbox"/> SWRCB: Water Rights |
| <input type="checkbox"/> Fish & Game Region # _____ | <input type="checkbox"/> Tahoe Regional Planning Agency |
| <input type="checkbox"/> Food & Agriculture, Department of | <input type="checkbox"/> Toxic Substances Control, Department of |
| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input type="checkbox"/> Water Resources, Department of |
| <input type="checkbox"/> General Services, Department of | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Health Services, Department of | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Housing & Community Development | |
| <input type="checkbox"/> Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date _____ Ending Date _____

Lead Agency (Complete if applicable):

Consulting Firm: _____	Applicant: _____
Address: _____	Address: _____
City/State/Zip: _____	City/State/Zip: _____
Contact: _____	Phone: _____
Phone: _____	

Signature of Lead Agency Representative:  Date: _____

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Notice of Preparation

Notice of Preparation

To: _____ From: _____

(Address) (Address)

Subject: Notice of Preparation of a Draft Environmental Impact Report

_____ will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (is is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to _____ at the address shown above. We will need the name for a contact person in your agency.

Project Title: _____

Project Applicant, if any: _____

Date _____ Signature _____

Title _____

Telephone _____

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Document Root (Read-Only)

Selected Document

2022110600 - NOP - Thousand Palms Warehouse

Riverside County

Created - **12/1/2022** | Submitted - **12/1/2022** | Received - **12/1/2022** | Published - **12/1/2022**

Jerrica Harding

Document Details**Lead Agency**

Riverside County

Document Type

Notice of Preparation of a Draft EIR

Document Status

Published

Title

Thousand Palms Warehouse

Present Land Use

Land Use: Vacant/undeveloped; General Plan: Light Industrial (LI) & Medium Density Residential (MDR); Zoning: Manufacturing - Service Commercial (M-SC) and Residential Agriculture (R-A).

Document Description

The proposed Project consists of applications for GPA 220004, CZ 2200013, and PPT 220022 to allow for the development of a 1,238,992 s.f. warehouse building and an Imperial Irrigation District (IID) joint electric substation on an 83.0-acre property located at the northeast corner of Rio Del Sol and 30th Avenue in the Thousand Palms community of unincorporated Riverside County. Proposed GPA 220004 would change the General Plan land use designation on the eastern +/- half of the property from "Medium Density Residential (MDR)" to "Light Industrial (LI)." Proposed CZ 2200013 would change the zoning classification for the eastern +/- half of the property from "Residential – Agriculture (R-A)" to "Manufacturing – Service Commercial (M-SC)." PPT 220022 is proposed to allow for development of the property with a 1,238,992 s.f. warehouse building that includes 20,000 s.f. of office uses at the four corners of the proposed building and 1,218,992 s.f. of warehouse space. A total of 212 truck docking doors are proposed, with 106 dock doors facing north and 106 dock doors facing south. Access to the Project site would be accommodated by two driveways connecting with Rio Del Sol and one driveway connecting with 30th Avenue. An IID joint electric substation is proposed in the southeastern corner of the site. Off-site, improvements would occur to Rio Del Sol, 30th Avenue, and Robert Road, and utility poles with overhead lines would be installed to connect the proposed on-site IID electric substation with the electrical grid. Several potential alignments for the off-site utility poles and overhead lines are under consideration by IID, all of which will be studied in the EIR.

Attachments (Upload Project Documents)**Majestic Thousand Palms NOP (Agency).pdf****Notice of Revised NOP.pdf****Proposed PPT 220022 Site Plan (2022-11-22).pdf****SCH NOC.pdf****SCH NOP.pdf****SCH Summary Form.pdf****Study Area (2022-11-22).pdf****USGS Map (2022-11-22).pdf****Vicinity Map (2022-11-22).pdf****Contacts****Riverside County Planning Department - *Russell Brady***

P.O. Box 1409
Riverside, CA 92502-1409
Phone : (951) 955-3025
rbrady@rivco.org

T&B Planning, Inc. - *Jerrica Harding*

3200 El Camino Real Suite 100
Irvine, CA 92602
Phone : (714) 505-6360
jharding@tbplanning.com

Regions

Unincorporated

Counties

Riverside

Cities*(None)***Location Details****Cross Streets**

Northeast corner of 30th Avenue and Rio Del Sol

Coordinates

33°49'59"N 116°24'04"W

Zip Code - 92276 | **Total Acres** - 83.0 | **Jobs** - 1203 |
Parcel Number - 648-150-035 and 648-150-034 | **State Highways** - I-10 |
Railways - Union Pacific | **Airports** - None |
Schools - Della S. Lindley Elementary School and Rancho Mirage High School |
Waterways - None | **Township** - 4s | **Range** - 6e | **Section** - 7 | **Base** - San Bern

Local Action Types

General Plan Amendment | Rezone | Site Plan

Development Types

Industrial (Sq. Ft. 1238992, Acres 83.0, Employees 1203) |
Power:Electric Transmission Lines (Megawatts 50) |
Power:Other Power Type (Electric Substation)(Megawatts 50)

Project Issues

Aesthetics | Agriculture and Forestry Resources | Air Quality | Biological Resources |
Cultural Resources | Cumulative Effects | Drainage/Absorption | Energy | Flood Plain/Flooding |
Geology/Soils | Greenhouse Gas Emissions | Growth Inducement |
Hazards & Hazardous Materials | Hydrology/Water Quality | Land Use/Planning |
Mandatory Findings of Significance | Mineral Resources | Noise | Population/Housing |
Public Services | Recreation | Schools/Universities | Sewer Capacity | Solid Waste |
Transportation | Tribal Cultural Resources | Utilities/Service Systems | Vegetation |
Wetland/Riparian | Wildfire

State Review Agencies (For State Review Period Only)**Is this document subject to California Code of Regulations (CCR) Section 15205 - Revi...**

Yes

Is this document subject to California Code of Regulations (CCR) Section 15206 - Proj...

Yes

Air Resources Board | Caltrans, District 8 - San Bernardino/Riverside |
Coachella Valley Mountains Conservancy | Colorado River Board |
Conservation, Department of | Emergency Services, Office of |
Fish and Wildlife, Region 6 - Inland Deserts, Ontario |
Forestry and Fire Protection, Department of | Highway Patrol, California |
Historic Preservation, Office of | Native American Heritage Commission, California |
Natural Resources Agency, California | Parks and Recreation, Department of |
Public Utilities Commission, California |
Regional Water Quality Control Board, Region 7 - Colorado River Basin, Palm Desert |
Toxic Substances Control, Department of | Water Resources, Department of

State Review Period**State Review Started**

12/1/2022

State Review Ended

1/6/2023

Local Review Period**Local Review Started**

12/1/2022

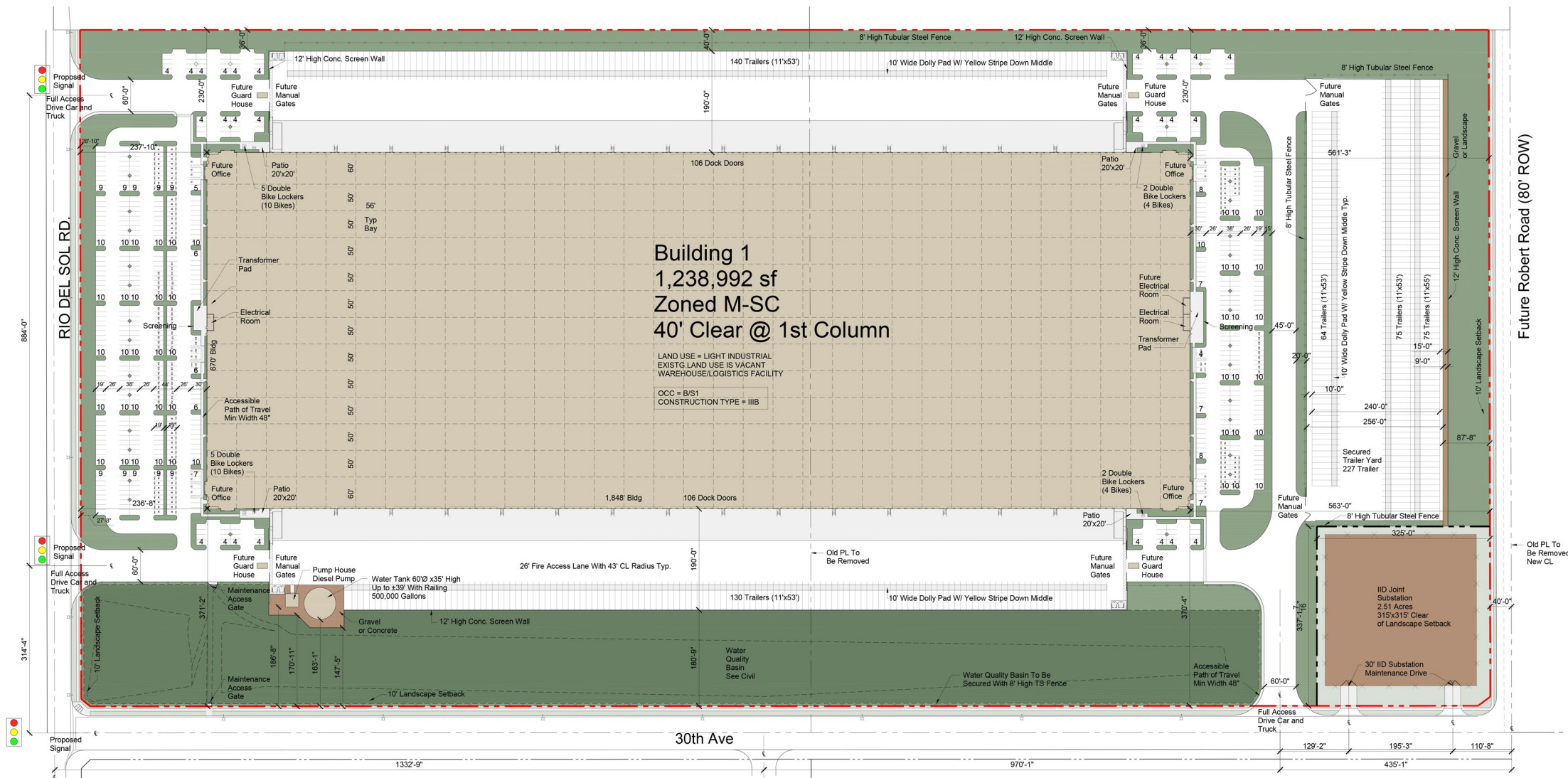
Local Review Ended

1/6/2023

Signature

Title

Date



Building 1
 1,238,992 sf
 Zoned M-SC
 40' Clear @ 1st Column

LAND USE = LIGHT INDUSTRIAL
 EXISTG. LAND USE IS VACANT
 WAREHOUSE/LOGISTICS FACILITY
 OCC = B/S1
 CONSTRUCTION TYPE = IIIB

PPT220021

Building	Site Area Gross (Acres)	Site Area Net (Acres)	Building Area (SF)	Coverage (%)	Landscape Required (SF)	Landscape Provided (%)	Landscape Provided (SF)	Landscape Provided (%)	Dock Doors Provided	Trailer Parking Provided (11x53)	Car Parking Required (See Parking Chart)	Car Parking Provided	Bike Parking Required (1.25 Car Stalls)	Bike Parking Provided
Building 1	82.9977	77.2221	1,238,992	36.83%	336,380	10.00%	759,236	22.57%	212	484	689	733	27.6	28

Building	Office	Warehouse Balance	Total	Riverside County, Ca. Parking Requirement	Per # SF	Spaces Required	Spaces Provided	EV Charging Stations Req'd (10%)	EV Charging Stations Prov'd	Clean Air Vehicle Req'd (12%)	Clean Air Vehicle Provided	Accessible Parking Required	Accessible Parking Provided	Over / Under
Building 1	20,000	1,218,992	1,238,992			250	609.50							

Parking Stalls:
 All Parking Stalls Are 9'x15' Minimum With End Stalls Being 11'x15' Minimum. Stalls Against Planters Have a 1' Wide Concrete Walkway, Integrated With Curb. All Accessible Stalls Follow ADA Guidelines.

The Project is not Located Within CSA or CFD There are No Wells on the Project Site.

Roof to be Designed to Support Future Solar Panels See Electrical Engineers Calculation For Amount of Panels Required.

The Guard Houses Shown Are Possible Future Locations. Quantity and Final Locations TBD By Landlord and Future Tenant.

See Detail 10/AD1 For Wall Detail @ Office Entry, Entry Doors Set 4" Back From Face Of Exterior Panel.

See Detail 1/AD1 For Example Trash Enclosure Detail.

Cal Green 2022 Code

EV Charging Req'd (20%)	EV stations To Be Installed With TI (25%)	Van ADA EV Charging	Standard ADA EV Charging	Ambulatory EV Charging	Standard EV Charging Stall	Bicycle parking (5%)	Clean Air Vehicle
146.6	37	2	4	4	137	36.7	Not Required. Removed From Mandatory Measures.

If Cal Green 2022 Code Goes Into Effect On This Building.

APPLICANT/OWNER:
 MAJESTIC REALTY CO.
 ATTN: TAYLOR TALT
 13191 CROSSROADS PKWY., NO., 6TH FLR.
 CITY OF INDUSTRY, CA. 91746-3497 (562) 692-9581

PREPARER:
 COMMERCE CONSTRUCTION CO.
 13191 CROSSROADS PKWY., NO. 6TH FLR.
 CITY OF INDUSTRY, CA 91746-3497 (562) 699-0453

PALM SPRINGS UNIFIED SCHOOL DISTRICT:

CABLE INTERNET:
 Spectrum
 www.spectrum.com/
 73170 Dinah Shore Dr
 Palm Desert, CA 92211 (888) 882-2253

TELEPHONE/INTERNET:
 AT&T
 (800) 222-0400
 https://www.att.com

MCI (owned by Verizon)
 (800) 950-5555
 http://www.mci.com/mcihome.jsp

Frontier Communications (formerly Verizon)
 (877) 775-6373
 http://west.frontier.com

GAS:
 So. Calif. Gas Company
 45123 Towne St
 Indio, CA 92201
 (800) 427-2200
 https://www.socalgas.com/

ELECTRIC:
 Imperial Irrigation District
 Business Office
 81600 Avenue 58
 La Grana, CA 92253
 (760) 398-5811

WATER DISTRICT:
 Coachella Valley Water District
 Corner Avenue 52 & Highway 111
 P.O. Box 1058
 Coachella, CA 92236
 (760) 398-2651
 www.covwd.org

Coachella Valley Water District
 Hovley Lane and Water Way
 Palm Desert, CA 92260
 (760) 398-2651

WASTE DISPOSAL:
 Palm Springs Disposal Services
 https://www.palmspringsdisposal.com/
 (760) 327-1351 OR (760) 329-5030
 4600 E. Mesquite Ave
 Palm Springs, CA 92264

Burttic Waste & Recycling Services
 www.burttic.com/
 41-575 Eclectic
 Palm Desert, CA 92260
 (760) 340-2113

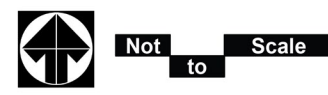
ZONING & LAND USE INFORMATION:
 COUNTY OF RIVERSIDE GENERAL PLAN:
 "LIGHT INDUSTRIAL"
 EXISTING ZONING IS "M-SC"
 EXISTING LAND USE IS LIGHT INDUSTRIAL.

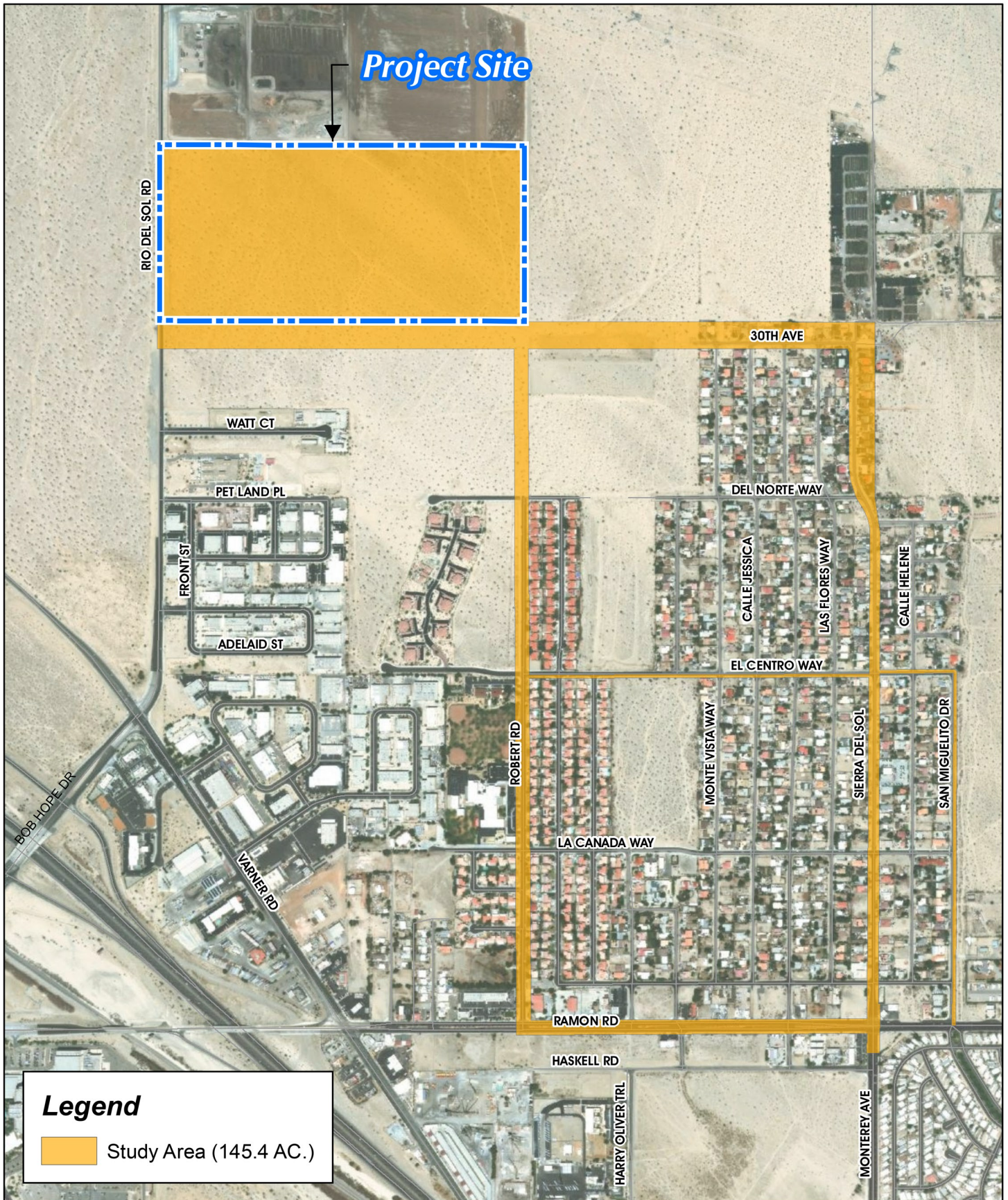
Assessor Parcel Maps:
 Parcel: 648-150-035-0, 648-150-034-0

Legal Description:
 PARCEL 1: THE SOUTH HALF OF GOVERNMENT LOT 1 IN THE SOUTHWEST QUARTER OF SECTION 7, TOWNSHIP 4 SOUTH, RANGE 6 EAST, SAN BERNARDINO BASE AND MERIDIAN, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT THEREOF.
 APN: 648-150-034
 PARCEL 2: THE SOUTH HALF OF GOVERNMENT LOT 1 IN THE SOUTHWEST QUARTER OF SECTION 7, TOWNSHIP 4 SOUTH, RANGE 6 EAST, SAN BERNARDINO BASE AND MERIDIAN, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT THEREOF.
 APN: 648-150-035

Thomas Brothers:
 Page: 758 Grid: C7, D7
Project / Case Information:
 Case Number: PPT 220022

Source(s): Commerce Construction Co. (09-29-2022)

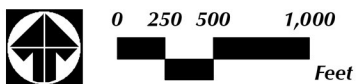




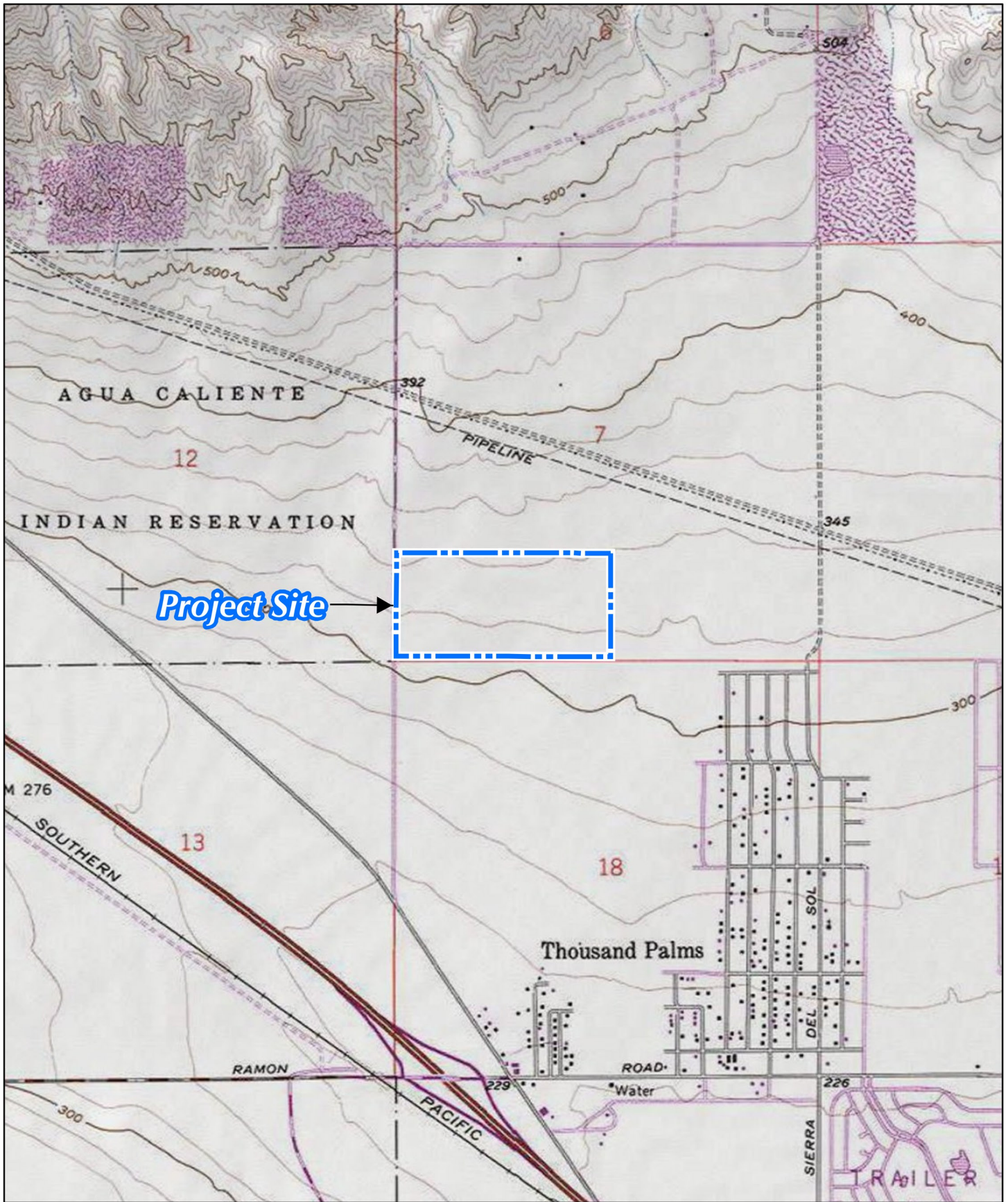
Legend

Study Area (145.4 AC.)

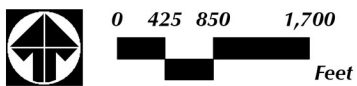
Source(s): ESRI, PBLA (2022), RCTLMA (2021)



Study Area



Source(s): ESRI, USGS (2013)



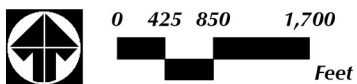
USGS Map

MAJESTIC THOUSAND PALMS

JN: 956-015
Date: 2022-11-22



Source(s): ESRI, RCTLMA (2021)



Vicinity Map

From: [Brady, Russell](#)
To: [Tracy Zinn](#); PBrown@majesticrealty.com
Subject: FW: Public records request -Thousand Palms Warehouse
Date: Wednesday, December 14, 2022 9:24:46 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

See below from CARE CA to be aware of their interest in the project.

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



How are we doing? Click the Link and tell us

From: Planning <Planning@RIVCO.ORG>
Sent: Wednesday, December 14, 2022 8:32 AM
To: Medina, Esmeralda <ESmedina@RIVCO.ORG>; Records <records@RIVCO.ORG>
Cc: Brady, Russell <rbrady@RIVCO.ORG>
Subject: FW: Public records request -Thousand Palms Warehouse

Can you assist the customer below with their records request?

Kind Regards,

TLMA-Planning Department
P.O. Box 1409/4080 Lemon Street
Riverside, CA 92501-1409
Ph: 951-955-3200 Mail Stop #1070
Website: <https://planning.rctlma.org>
Map My County: <https://enterprise.rivcoca.org/Html5Viewer/?viewer=MMC>
Zone Descriptions: <https://planning.rctlma.org/General-Plan-Zoning/Zone-Descriptions-Requirement>
Click on General Plan & Zoning link. You do not need to log into the system
Frequently Asked Questions: <https://planning.rctlma.org/General-Information/Frequently-Asked-Questions>

From: Machado, Yaoska P <ymachado@rivco.org>
Sent: Wednesday, December 14, 2022 8:31 AM
To: Planning <Planning@RIVCO.ORG>
Subject: Public records request -Thousand Palms Warehouse

Request

December 13th, 2022

Via Email and U.S. Mail

Riverside County Planning Department

Attn: Russell Brady

4080 Lemon St, 12th Floor

PO Box 1409

Riverside, CA 92502

rbrady@rivco.org

RE: Public Records Act Request and Request for Mailed Notice of Public Hearings and Actions – Thousand Palms Warehouse, Rio del Sol and 30th St Thousand Palms, CA 92276

Dear Mr. Brady,

CARE CA is writing to request a copy of any and all records related to the Thousand Palms Warehouse Project, located at Rio del Sol and 30th Street in Thousand Palms. The project will be the development of a 1,238,992 square foot warehouse building with 20,000 square feet of office space. We are also writing to request copies of mailed notice of any and all hearings and/or actions related to the Project.

Our request for mailed notice of all hearings includes hearings, study sessions and community meetings related to the Project, certification of the MND (or recirculated DEIR), and approval of any Project entitlements. This request is made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108 and 21152 and Government Code Section 65092, which require local agencies to mail

such notices to any person who has filed a written request for them with the clerk of the agency's governing body. Our request includes notice to any City actions, hearings or other proceedings regarding the Project, Project approvals and any actions taken, or additional documents released pursuant to the California Environmental Quality Act.

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

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

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

My contact information is:

U.S. Mail

Jeff Modrzejewski

CARE CA

501 Shatto Place, Suite 200

Los Angeles, CA. 90020

Email

community@careca.org

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

Sincerely,

Jeff Modrzejewski

Executive Director

Yaoska Machado
County of Riverside Executive Office

Senior Public Information Specialist

ymachado@rivco.org

Office: (951)955-1140

Cell: (951)809-6200



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[County of Riverside California](#)



December 14, 2022

Sent via email

Russell Brady
Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92502-1409
Phone: (951) 955-3025
rbrady@rivco.org

RE: Comments on Notice of Preparation of an Environment Impact Report for the Thousand Palms Warehouse, SCH # 2022110600

Mr. Brady,

These comments are submitted on behalf of the Center for Biological Diversity (“the Center”) regarding the Notice of Preparation of an Environmental Impact Report (“EIR”) for the Thousand Palms Warehouse (“the Project”). The Center urges Riverside County (“County”) to undertake a thorough and comprehensive environmental review of the Project as required under the California Environmental Quality Act (“CEQA”), prior to considering approval. Riverside County is heavily burdened by existing warehouse development and the EIR must account for the compounding cumulative harms the area suffers from intensive industrial development. Because the Project will develop vacant land, it is also more likely to have serious impacts to habitat. Therefore, it is particularly important the EIR fully analyze and mitigate impacts to species and biological resources. Additionally, because the Project would rezone land from Medium Density Residential and Residential-Agricultural to Light Industrial and Manufacturing-Service Commercial in the midst of a housing crisis, the EIR must contain evidence showing that a plan has been developed to replace that housing with the capacity for least an equivalent amount of housing elsewhere. The EIR must also fully disclose and analyze the Project’s potential impacts to air quality and greenhouse gas emissions and adopt best practice measures to mitigate them.

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. 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.

Under CEQA, an EIR must provide decision-making bodies and the public with detailed information about the effect a proposed project is likely to have on the environment, list ways in which the significant effects of a project might be minimized and indicate alternatives to the project. (Pub. Res. Code § 21002.2.) The proposed Project is a 1,238,992 square foot industrial warehouse building on 83 acres at the northeast corner of Rio Del Sol and 30th Avenue in the Thousand Palms community of unincorporated Riverside County. (NOP at 1.) The EIR must fully disclose the impacts of this land use change so that the public can fully understand the publicly borne costs associated with the Project.

I. The EIR Must Carefully Assess and Mitigate the Project’s Cumulative Impacts on its Heavily Burdened Surroundings.

With the rapid increase in global trade, the Ports of LA and Long Beach have become a primary entryway for goods, processing over 40 percent of all imports into the United States, and accounting for 20 percent of diesel particulate pollutants in southern California—more than from any other source. (Minkler, et al. 2012.) These goods are often ‘transloaded’ before leaving Southern California, meaning that they spend some time in warehouse storage facilities before they reach their final destination. (Betancourt 2012, p. 2.) This has resulted in a massive expansion of warehouse development in Southern California.

The number of warehouses in San Bernardino and Riverside counties has grown from 162 in 1975 to 4,299 in 2021, according to a recent mapping project from the Robert Redford Conservancy for Southern California Sustainability at Pitzer College. (Rode 2022.) The approximately 840 million square feet of new warehouse facilities—and the roads and railyards that serve them – has permanently altered the landscape of the Inland Valley area, creating a logistics hub so massive that it is now visible from space. (Pitzer 2022.)

Therefore, the people living in the area would face environmental impacts not just from this project, but from this project’s cumulative effects with the surrounding warehouse development. The EIR must analyze and mitigate this cumulative impact. CEQA requires a lead agency consider whether the combined effects from both the proposed project and other projects would be “cumulatively considerable.” (CEQA Guidelines, § 15130, subd. (a).) The incremental effects of an individual project are cumulatively considerable if the effects are significant when “viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” (*Id.*, §§ 15065, subd. (a)(3), 15355, subd. (b).) To perform this analysis, a lead agency must “use its best efforts to find out and disclose all that it reasonably can.” (*Id.*, § 15144; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 96.) Where, as here, a community already bears a high pollution burden, the relevant question is “whether any additional amount” of pollution caused by the project “should be considered significant in light of the serious nature” of the existing problem. (*Kings County Farm Bureau, supra*, 221 Cal.App.3d at 718.) Absent this analysis, piecemeal approval of multiple projects with related impacts could lead to severe environmental harm. (*San Joaquin Raptor/Wildlife Rescue Ctr. v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 720.)

Pursuant to a recent settlement with the Attorney General’s Office, the South Coast Air Quality Management District (SCAQMD) has committed to revise its CEQA guidance for analyzing cumulative air quality impacts. (AGO 2022; SCAQMD 2022.) SCAQMD staff have

proposed an approach for new guidance that would consider existing burdens associated with nearby pollution sources and quantify cumulative air quality impacts and the effects on human health. The purpose of this new approach is to consider the impacts of concentrating polluting land uses, like warehouse projects, in disadvantaged areas, thereby encouraging local governments to site future projects in areas where they will have the least impact on human health. (AGO 2022.) Accordingly, the County may soon be required to conduct additional analysis for cumulative air quality impacts. Should SCAQMD release its updated rules, the County must update its cumulative air quality analysis.

II. The EIR Must Fully Analyze and Mitigate Impacts to Species that Might Use the Site.

The EIR must adequately assess and mitigate impacts to special-status species that are known to occur, have the potential to occur, or historically occurred in and near the Project area. For example, the Project Site is directly adjacent to Critical Habitat for the Coachella Valley fringe-toed lizard and the Coachella Valley milk-vetch. Further, the Project is located within the range of the western Joshua tree South population (“YUBR South”). (CDFW 2018.) Increasing development, climate change, persistent drought, more frequent and intense wildfires, invasive species, and other threats have led to ongoing reductions in western Joshua trees and western Joshua tree habitat throughout their historic range. Protecting western Joshua trees and their habitat from continued destruction and habitat loss is therefore vitally important to the persistence of the species in California. Joshua tree woodland is a community recognized by the California Department of Fish and Wildlife (“CDFW”) as a Natural Community of Concern. Sensitive natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. (CDFW 2018.)

The EIR should include analyses of the Project’s potential impacts to these species and all other species that the Project might impact through extensive literature reviews and targeted species and habitat surveys conducted at appropriate times of year using CDFW and/or US Fish and Wildlife Service (USFWS) guidelines and protocols. Movement studies should also be conducted to understand the site’s role in wildlife connectivity.

III. The EIR Must Replace Housing Capacity Lost to Downzoning with Safe, Healthy Housing.

Southern California is suffering from an affordable housing crisis. (Pimentel 2022; Newton 2022.) Counties already struggle to identify suitable infill parcels for housing development. When counties do not prioritize quality, infill affordable housing, developers turn to sprawl development, which results in multi-hour commutes, damaged ecosystems, and dirty air.

California’s No Net Loss Law requires that a jurisdiction not reduce a parcel’s residential density through downzoning unless it either shows that the remaining sites in the Housing Element can accommodate the jurisdiction’s unmet Regional Housing Need Allocation at each

income level or identifies additional sites for housing sufficient to achieve no net loss of residential unit capacity. (Gov. Code, § 65863, subd. (b)-(c).)

Because the project area is currently zoned for housing, the EIR must include plans to replace this housing capacity or demonstrate that the need is met elsewhere. If replacement housing is necessary, the replacement housing must be in an area where the residents will be protected from environmental health risks as much as possible. Therefore, the EIR should include a plan for housing capacity in residential neighborhoods that are far from warehouses and other industrial uses.

IV. The EIR Must Fully Analyze and Mitigate Greenhouse Gas Emissions.

The EIR must carefully consider the project's effects on statewide goals for reducing greenhouse gas emissions. Where a project will generate greenhouse gas emissions either directly or indirectly, the EIR should describe the expected increase in emissions and discuss mitigation measures. (*Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 17 Cal.App.5th 413, 430-34; Pub. Res. Code §§ 21002; 21083.5.) Major warehouse projects have the documented effect of substantially increasing construction, operation, and vehicle-related emissions, all of which produce climate change-causing greenhouse gases. (Betancourt et al. at 4-5; USEPA 2018.) The EIR must carefully and completely address both the impacts on emissions from construction and operation of the plant, and those from vehicle miles traveled by trucks transporting goods to and from the warehouse and commuting employees.

To mitigate the known environmental harms of warehouse projects, the EIR should identify specific measures that the developers will take to minimize any increase in greenhouse gas emissions caused by the Project. These measures should include sustainability measures, like ensuring roofs are white to minimize the need for air conditioning and including rooftop solar for energy production. (AGO 2021; Betancourt et al. at 6.) Moreover, the Project should incorporate features to minimize greenhouse gas emissions, like zero-emissions off-road vehicles and construction equipment, electric vehicle charging stations, and a plan to adopt zero-emissions heavy trucks. (AGO 2021; *id.*) Mitigation measures must be “fully enforceable through permit conditions, agreements, or other measures” so “that feasible mitigation measures will actually be implemented as a condition of development.” (*Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261.) Mitigation measures should be designed so benefits are realized by the local community and could include funding zero emission public transit, solar installations on residential homes, or providing publicly accessible electric vehicle charging infrastructure.

Finally, the EIR must fully describe the greenhouse gases the warehouse's construction will produce and outline all feasible mitigation measures that will be taken to address them. Construction of such a large warehouse will require substantial quantities of construction materials, such as concrete. Cement and concrete manufacture is extremely energy intensive and produces a large amount of greenhouse gas emissions. (Masanet et al. at 89.) Concrete manufacturing accounts for roughly 3 percent of California's greenhouse gas emissions. (*Id.*) This and other sources of greenhouse gas and particulate emissions—such as dust and emissions

from heavy machinery used during construction—should be thoroughly examined and mitigated in the EIR.

V. The EIR Must Fully Analyze and Mitigate Air Quality Impacts.

Warehouse projects are well-documented sources of air quality degradation that can create serious, negative health outcomes for surrounding communities. (Betancourt 2012, pp. 4-5.) Particulate emissions from diesel vehicles that carry freight to and from warehouses contribute to “cardiovascular problems, cancer, asthma, decreased lung function and capacity, reproductive health problems, and premature death.” (*Id.* at 5.)

Air pollution and its impacts are felt most heavily by young children, the elderly, pregnant women and people with existing heart and lung disease. People living in poverty are also more susceptible to air pollution as they are less able to relocate to less polluted areas, and their homes and places of work are more likely to be located near sources of pollution, such as freeways or ports, as these areas are more affordable. (ALA 2022.) Some of the nation’s most polluted counties are in Southern California, and Riverside County continually tops the list. (ALA 2022.) According to the American Lung Association’s 2022 “State of the Air” report, Riverside County is the second-worst ranked county in the state for ozone pollution, with a “Fail” grade and an average number of 84 days per year with ozone levels in the unhealthy range. (*Id.*) Even more disturbing, the same report found that Riverside County is one of only fourteen counties in the country that received a “Fail” grade in all air quality metrics. (*Id.*)

The EIR must include best practice measures to mitigate impacts to air quality. The California Office of the Attorney General has published a document entitled “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act” to help lead agencies design warehouse projects to minimize and mitigate environmental harms. (AGO 2021.) It contains the following best practices for siting and designing warehouse facilities, along with recommended mitigation measures (not repeated here) that should be incorporated into the Project:

- Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.

- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

IV. Conclusion

Thank you for the opportunity to submit comments on the Notice of Preparation of an Environmental Impact Report for the Thousand Palms Warehouse. The environmental effects of the Project will include direct and indirect impacts on biological resources, housing, greenhouse gases, and air quality and will also add to cumulative environmental impacts. Evaluation of each of these impacts, as well as analysis of a reasonable range of alternatives and mitigation measures, must be included in the EIR.

Given the possibility that the Center will be required to pursue legal remedies to ensure that the County complies with its legal obligations including those arising under CEQA, we would like to remind the County of its statutory duty to maintain and preserve all documents and communications that may constitute part of the “administrative record” of this proceeding. (§ 21167.6(e); *Golden Door Properties, LLC v. Superior Court* (2020) 53 Cal.App.5th 733, 762-65.) The administrative record encompasses any and all documents and communications that relate to any and all actions taken by the County with respect to the Project, and includes “pretty much everything that ever came near a proposed [project] or [] the agency’s compliance with CEQA” (*County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.) The administrative record further includes all correspondence, emails, and text messages sent to or received by the County’s representatives or employees, that relate to the Project, including any correspondence, emails, and text messages sent between the County’s representatives or employees and the Applicant’s representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the County (1) suspend all data destruction policies; and (2) preserve all relevant hardware unless an exact replica of each file is made.

Please add Center attorney Hallie Kutak (hkutak@biologicaldiversity.org) and me to your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the number or email listed below.

Sincerely,



Frances Tinney, Legal Fellow
Center for Biological Diversity
1212 Broadway, Suite #800
Oakland, CA 94612
ftinney@biologicaldiversity.org
Tel: (510) 844-7117

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CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

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

January 6, 2023

Riverside County Planning Department
Attn: Russell Brady, Project Planner
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409

Submitted via email to rbrady@rivco.org.

Re: Thousand Palms Warehouse Notice of Preparation (SCH #2022110600)

Dear Mr. Brady,

After reviewing the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the proposed Thousand Palms Warehouse (“Project”), we have the following concerns to bring forth for inclusion as part of the study done for the Project. Although the census tract where the Project is located does not meet the threshold to be classified as a disadvantaged community per CalEnviroScreen 4.0 (Figure 1), it nevertheless is the most impacted tract of all of those in the vicinity. Additionally, truck traffic from the Project would by necessity pass along Interstate 10 as well as State Route 60 through the San Gorgonio Pass to destinations to the west such as warehouses in the Riverside or San Bernardino areas or the ports and in doing so, would be traveling through some of the most impacted communities in the state (Figure 2).

Therefore, it is imperative that the DEIR identify how the impact from truck traffic serving the Project is able to be mitigated such that other communities would not be forced to bear the brunt of this development. This includes identifying strategies to ensure that truck traffic remains on designated routes as well as ensuring that polluting trucks are removed from service as soon as possible.

Thank you for your time and attention to this matter. If there are any questions or further clarification that is needed, please do not hesitate to reach out to have them answered.

Sincerely,



Ana Gonzalez
Executive Director

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.

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE
“Bringing People Together to Improve Our Social and Natural Environment”

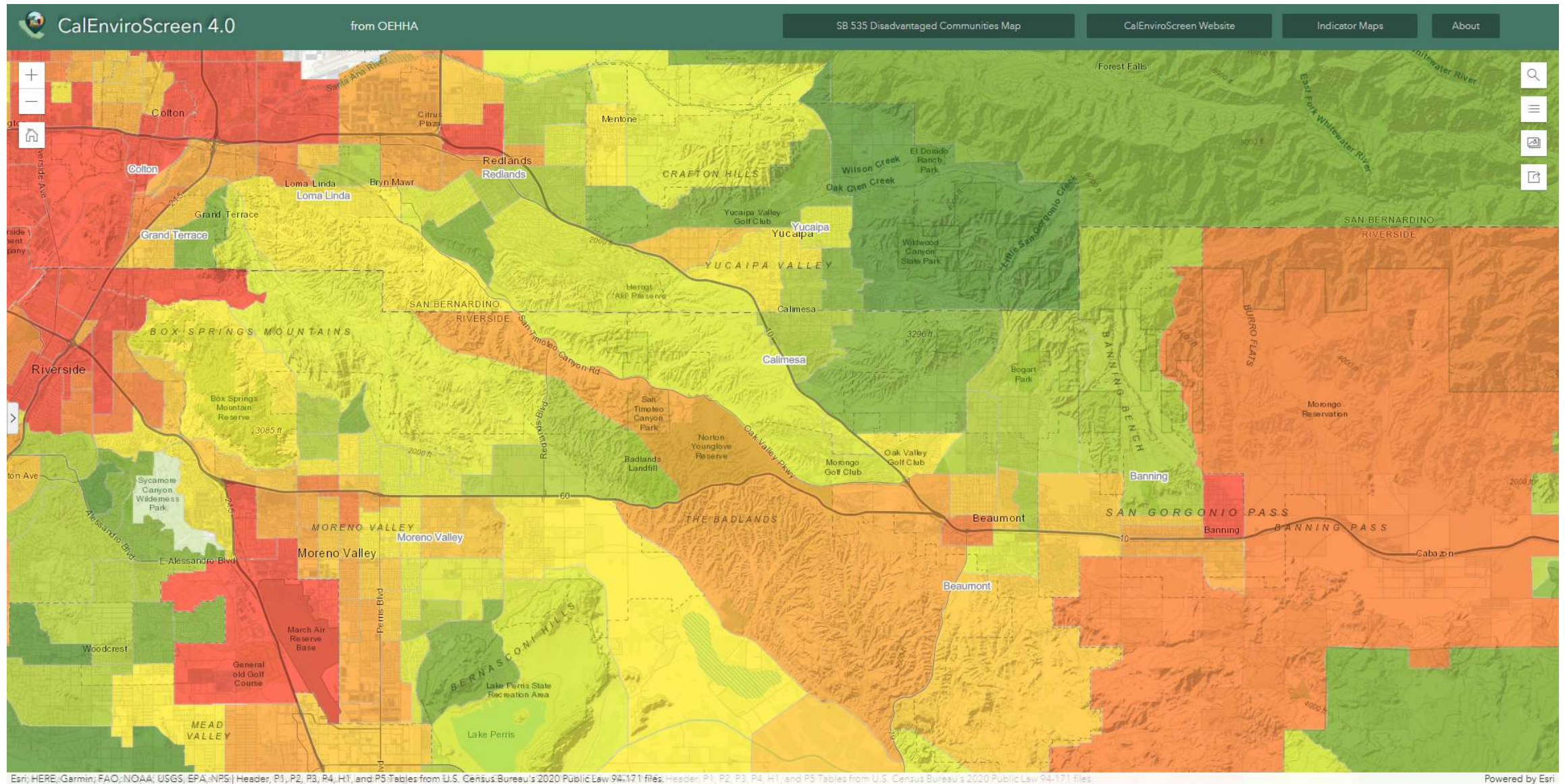


Figure 2: Census tracts along the I-10, I-215, SR-60, and SR-91 corridors in the San Geronimo Pass, Riverside, and San Bernardino areas.

Mailing Address
P.O. Box 33124
Jurupa Valley CA 92519

Physical Address
3840 Sunnyhill Drive, Suite A
Jurupa Valley CA 92509

Tel: **951-360-8451**
Fax: 951-360-5950
www.ccaej.org



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



January 5, 2023
Sent via email

Mr. Russell Brady
Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92502

Subject: Notice of Preparation of a Draft Environmental Impact Report
Thousand Palms Warehouse Project
State Clearinghouse No. 2022110600

Dear Mr. Brady:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the Riverside County Planning Department (County) for the Thousand Palms Warehouse Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The proposed Project includes a general plan amendment, zone change, and plot plan resolution for the development of a 1,238,992 sq. ft. warehouse building and Imperial Irrigation District (IID) joint electric substation in the Thousand Palms community of unincorporated Riverside County. The site is located east of Rio Del Sol, north of 30th Avenue, south of 28th Avenue, and west of Robert Road. Geographic coordinates of the Project are 33.832523, -116.401221. Assessor's Parcel Numbers are 648-150-035 and 648-150-034. Specific details of the proposed Project include:

1. General Plan Amendment to change the General Plan land use designation on the eastern +/- half of the property from "Medium Density Residential" to "Light Industrial".
2. Zone Change to change the zoning classification for the eastern +/- half of the property from "Residential – Agriculture" to "Manufacturing – Service Commercial".
3. Plot Plan Resolution to allow for the development of the property with a 1,238,992 sq. ft. warehouse building that includes 20,000 sq. ft. of office uses at the four corners of the proposed building and 1,218,992 sq. ft. of warehouse space. A total of 212 truck docking doors are proposed, with 106 dock doors facing north and 106 dock doors facing south. Access to the Project site would be accommodated by two driveways connecting with Rio Del Sol and one driveway connecting with 30th Avenue. An IID joint electric substation is proposed in the southeastern corner of the site. Off-site, improvements would occur to Rio Del Sol, 30th Avenue, and Robert Road, and utility poles with overhead lines would be installed to connect the proposed on-site IID electric substation with the electrical grid.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

CDFW recommends that the forthcoming DEIR address the following:

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

The CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDDB@wildlife.ca.gov to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

Please note that CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511). Species to be

addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants>).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).
6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project (including the plan's land use designations, policies, and programs). To ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g. National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).
3. An evaluation of impacts to adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs.
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DEIR should analyze the cumulative effects of the plan's land use designations, policies and programs on the environment. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Alternatives Analysis

CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would "feasibly attain most of the basic objectives of the Project," and would avoid or substantially lessen any of the Project's significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a "no project" alternative (CEQA Guidelines § 15126.6[e]).

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The County should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW

recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.

2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.
3. *California Species of Special Concern (CSSC)*: CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC that have the potential or have been documented to occur within or adjacent to the Project area, including, but not limited to: burrowing owl (*Athene cunicularia*) and loggerhead shrike (*Lanius ludovicianus*).
4. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645

struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. City of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, in order for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

6. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

7. *Moving Out of Harm's Way*: To avoid direct mortality to any non-listed terrestrial wildlife, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to inspect the Project area prior to any Project activities. Any individuals found shall not be harassed and shall be allowed to leave the Project area unharmed. If needed, a qualified biologist may guide, handle, or capture an individual non-listed wildlife species to move it to a nearby safe location within nearby refugium, or it shall be allowed to leave the Project site of its own volition. Capture methods may include hand, dip net, lizard lasso, snake tongs and snake hook. If the wildlife species is discovered or is caught in any pits, ditches, or other types of excavations, the qualified biologist shall release it into the most suitable habitat nearby the site of capture. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Only biologists with appropriate authorization by CDFW shall move CESA-listed or other special-status

species. Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss.

8. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in “take” (California Fish and Game Code Section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the Project; unless this Project is proposed to be a covered activity under the MSHCP. It is the policy of CESA to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. CDFW must comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specify a mitigation monitoring and reporting program that will meet the requirements of CESA.

Coachella Valley Multiple Species Habitat Conservation Plan

Within the Inland Deserts Region, CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the CVMSHCP per Section 2800, *et seq.*, of the California Fish and Game Code on September 9, 2008. The CVMSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the CVMSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the CVMSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the CVMSHCP please go to: <http://www.cvmshcp.org/>.

The proposed Project occurs within the CVMSHCP area and is subject to the provisions and policies of the CVMSHCP. In order to be considered a covered activity, Permittees should demonstrate that proposed actions are consistent with the CVMSHCP and its associated Implementing Agreement.

Regardless of whether take of threatened and/or endangered species is obtained through the CVMSHCP or through a CESA ITP, the DEIR needs to address how the proposed Project will affect the conservation objectives of the CVMSHCP. Therefore, all surveys required by the CVMSHCP to determine consistency should be conducted and results included in the DEIR so that CDFW can adequately assess whether the Project will impact the CVMSHCP.

Lake and Streambed Alteration Program

Based on review of material submitted with the NOP and review of aerial photography, the Project site contains at least one ephemeral stream that traverses the site. Depending on how the Project is designed and constructed, it is likely that the Project applicant will need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To submit a Lake or Streambed Alteration notification package, please go to <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>.

ADDITIONAL COMMENTS AND RECOMMENDATIONS

To ameliorate the water demands of this Project, CDFW recommends incorporation of water-wise concepts in Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California species, and installing water-efficient and targeted irrigation systems (such as drip irrigation). Local water agencies/districts, and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species. Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: <http://saveourwater.com>. In addition, Section 4.0 of the CVMSHCP includes "Table 4-112: Coachella Valley Native Plants Recommended for Landscaping" (pp. 4-180 to 4-182; https://cvmshcp.org/Plan_Documents.htm).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Information can be submitted online or via completion of the CNDDDB field survey form at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

FILING FEES


The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Thousand Palms Warehouse Project (SCH No. 2022110600) and recommends that the County address CDFW's comments and concerns in the forthcoming DEIR. If you should have any questions pertaining to the comments provided in this letter, please contact Jacob Skaggs, Environmental Scientist, at jacob.skaggs@wildlife.ca.gov.

Russell Brady, Project Planner
County of Riverside
January 5, 2023
Page 12

Sincerely,

DocuSigned by:

84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

ec: Heather Brashear, Senior Environmental Scientist, Supervisor
Inland Deserts Region
heather.brashear@wildlife.ca.gov

Vincent James, U.S. Fish and Wildlife Service
Vincent_james@fws.gov

Rollie White, U.S. Fish and Wildlife Service
Rollie_white@fws.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov

REFERENCES

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California.
<http://vegetation.cnps.org/>



COACHELLA VALLEY WATER DISTRICT

Established in 1918 as a public agency

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Dan Charlton

December 14, 2022

Russell Brady, Project Planner
Riverside County Planning Department
P.O. Box 1409
Riverside, CA 92502-1409

Dear Mr. Brady:

Subject: Notice of Preparation of a Draft EIR for the Thousand Palms Warehouse Project

The proposed Thousand Palms Warehouse Project (Project) includes development of a 1,238,992 square foot warehouse building in the Thousand Palms community of unincorporated Riverside County. The Project meets one or more of the following definitions provided in California Water Code Section 10912 of a “project” requiring preparation of a Water Supply Assessment (WSA).

1. A proposed residential development of more than 500 dwelling units.
2. A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
3. A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
4. A proposed hotel or motel, or both, having more than 500 rooms.
5. A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
6. A mixed-use project that includes one or more of the projects specified in this subdivision.
7. A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

The purpose of a WSA is to satisfy the requirements under Senate Bill 610 (Water Code Section 10910 et seq.) to assess that adequate water supplies are or will be available to meet the water demand associated with the proposed development.

Russell Brady, Project Planner
Riverside County Planning Department
December 14, 2022
Page 2

The Project is located within the Coachella Valley Water District's (CVWD) municipal water service area. If the Project plans to request municipal water service, an approved WSA will be required from CVWD ("Water Supplier"). Please contact either party below for assistance with submitting a WSA request to CVWD.

Melanie Garcia	(760) 398-2661 x3599	melanie.garcia@cvwd.org
Zoe Rodriguez del Rey	(760) 398-2661 x2389	zrodriguezdelrey@cvwd.org

Thank you for the opportunity to review the proposed Project and provide comments for the Project's Notice of Preparation (NOP) of A Draft Environmental Impact Report (EIR).

Sincerely,



Zoe Rodriguez del Rey
Water Resources Manager

MG: a\Env Svcs\WR\2022\Dec\TP Warehouse Comment Ltr.doc
File: 0054.7, 0163.11





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January 5, 2023

Mr. Russell Brady
Project Planner
Riverside County Planning Department
P.O. Box 1409
Riverside, CA 92502-1409

SUBJECT: NOP of an EIR for the Thousand Palms Warehouse Project; GPA220004, CZ2200013 and PPT220022

Dear Mr. Brady:

On December 2, 2022 the Imperial Irrigation District received from the City of Coachella Development Services Department, the Notice of Preparation of an Environmental Impact Report for the Thousand Palms Warehouse Project; General Plan Amendment No. 220004, Change of Zone No. 2200013, Plot Plan No. 220022. The applicant, Majestic Realty Co., proposes the construction and operation of a total of 1,238,992 sq. ft. warehouse/distribution/manufacturing building on a 83-acre site located east of Rio Del Sol, north of 30th Avenue, south of 28th Avenue and west of Robert Road in Riverside County, CA. The project also includes the construction of an IID "joint" electric substation on the project site. Off-site improvements would include improvements to Rio Del Sol, 30th Avenue, and Robert Road including utility poles and overhead lines connection to the proposed substation.

IID has reviewed the project information has the following comments:

1. IID will not begin any studies, engineering or estimate costs to provide electrical service to the project until the applicant submits a customer project application (available at <http://www.iid.com/home/showdocument?id=12923> and detailed loading information, panel sizes, project schedule and estimated in-service date. Applicant shall bear all costs associated with providing electrical service to the project, including but not limited to the construction of new substation facilities, transmission line extensions, distribution getaways, distribution feeder breakers, feeder backbones and distribution line extensions, underground conduit systems and upgrades or reconfigurations of existing facilities as well as applicable permits, zoning changes, landscaping (if required by the County) and rights-of-way and easements.
2. However, based on the preliminary information provided to IID, the district can accommodate the project's power requirements per the Permanent Plan of Service

below. The district's ability to provide service from existing infrastructure is based upon current available capacity, which may be impacted by future development in the area. It is important to note that a detailed and final study will be developed once a customer project application and loading calculations are received. This detailed information will allow IID to perform an accurate assessment and provide a full report of any potential impacts and mitigation measures. The conditions of service could change as a result of the additional studies.

Plan of Service for Majestics Development (16 MVA)

- a. The additional power load requirements for the project will require the acquisition, design and construction of a new substation with 2-25 MVA transformer banks 92/13.2 kV, transmission and distribution backbone line(s) extensions, distribution getaways and distribution feeders. A standard 315" by 315" site will also be required at a strategic location approved by IID. Final site dimensions will be determined once evaluation is completed. Additional requirements to be determined, include but are not limited to grading, fencing and zoning change.
- b. The extension of 2-92 kV transmission lines with two distribution underbuilds with an "in" and "out" configuration is also required to serve the new substation from IID's existing 92 kV transmission "CE" line running on the south side of Ramon Road, going north along San Miguelito Dr, west on El Centro Way and North along Robert Rd. IID will require that additional rights-of-way be provided for this transmission line corridor.
- c. A transmission-level power flow analysis was performed for this preliminary assessment with information provided by the Applicant. If the project does move forward based on schedule provided, a more detailed transmission study is required to properly assess the impacts caused by this project. The cost of any additional technical assessment shall be borne by the applicant.
- d. Applicant will be required to install the conduit/vault system for new feeders and getaways from the substation to the project and in the frontage of the project following the Permanent Plan of Service.

3. The applicant shall bear the cost of the substation infrastructure but may be eligible for reimbursement from a third party user or third party users for a portion of the costs pursuant to existing IID regulations and/or approval by the IID Board of Directors.
4. Please be advised that pursuant to IID process, the standard time frame for the implementation of a new substation transformer (engineering, equipment procurement and construction) requires a minimum of 18 months. As a result, applicant should adjust its project in-service dates accordingly. The procurement of the new substation banks will commence upon receipt of the customer project application for the substation bank acquisition including payment for the full cost of the required equipment.
5. Line extensions to serve the project will be made in accordance with IID Regulations:

No. 2 (<http://www.iid.com/home/showdocument?id=2540>)
No. 13 (<http://www.iid.com/home/showdocument?id=2553>),
No. 15 (<http://www.iid.com/home/showdocument?id=2555>),
No. 20 (<http://www.iid.com/home/showdocument?id=2560>) and
No. 23 (<https://www.iid.com/home/showdocument?id=17897>).
6. Underground infrastructure that includes trenching, conduits, pull boxes, switch boxes and pads should be installed at the applicant's expense following IID approved plans and within the public utility easement (PUE) or a dedicated easement, if applicable. Physical field installation of underground infrastructures should be verified and approved by an IID inspector prior to cable installation as per IID Developer's Guide (available for download at the district website <https://www.iid.com/home/showdocument?id=14229>).
7. For additional information regarding electrical service for the project, the applicant should be advised to contact the IID Energy - La Quinta Division Customer Operations, 81-600 Avenue 58 La Quinta, CA 92253, at (760) 398-5841 and speak with the project development planner assigned to the area.
8. It is important to note that IID's policy is to extend its electrical facilities only to those project that have obtained the approval of a city or county planning commission and such other governmental authority or decision-making body having jurisdiction over said developments.
9. The applicant will be required to provide rights-of-way and easements for the substation, power line extensions and/or any other infrastructure needed to serve the project.

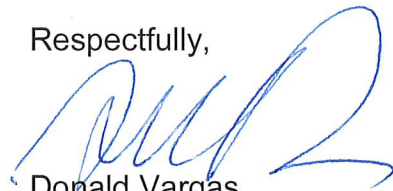
10. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at <https://www.iid.com/about-iid/department-directory/real-estate>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
11. Public utility easements over all private public roads and additional ten (10) feet in width on both side of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure.
12. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and/or distribution lines, ancillary facilities associated with the conveyance of energy service; the acquisition and dedication of real property, rights of way and/or easements for the siting and construction of electrical utility substations, electrical transmission and/or distribution lines and ancillary facilities associated with the conveyance of energy service, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA) documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**
13. Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. The State CEQA Guidelines define

a project under CEQA as “the whole of the action” that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. CEQA case law has established general principles on project segmentation for different project types. For a project requiring construction of offsite infrastructure, the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713.

14. Applicant should be advised that landscaping can be dangerous if items are planted too close to IID’s electrical equipment. In the event of an outage, or equipment failure, it is vital that IID personnel have immediate and safe access to its equipment to make the needed repairs. For public safety, and that of the electrical workers, it is important to adhere to standards that limit landscaping around electrical facilities. IID landscaping guidelines are available at <https://www.iid.com/energy/vegetation-management>.

Should you have any questions, please do not hesitate to contact me at (760) 482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas
Compliance Administrator II

Enrique B. Martinez – General Manager
Mike Pacheco – Manager, Water Dept.
Jamie Asbury – Manager, Energy Dept.
Matthew H Smelser – Deputy Mgr. Energy Dept.
Constance Bergmark – Deputy Mgr. Energy Dept.
Daryl Buckley – Mgr. of Distribution Svcs. & Maint. Oprtns., Energy Dept.
Geoff Holbrook - General Counsel
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance
Laura Cervantes. – Supervisor, Real Estate

NATIVE AMERICAN HERITAGE COMMISSION

December 1, 2022

Russell Brady, Project Planner
Riverside County
P.O. Box 1409
Riverside, CA 92502

Re: 2022110600, Thousand Palms Warehouse - General Plan Amendment No. 220004, Change of Zone No. 2200013, and Plot Plan No. 220022 Project, Riverside County

Dear Mr. Brady:

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.



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Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

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Sara Dutschke
Miwok

COMMISSIONER
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COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok/Nisenan

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



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

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a.** A brief description of the project.
 - b.** The lead agency contact information.
 - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).
 - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a.** Alternatives to the project.
 - b.** Recommended mitigation measures.
 - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a.** Type of environmental review necessary.
 - b.** Significance of the tribal cultural resources.
 - c.** Significance of the project's impacts on tribal cultural resources.
 - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

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

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

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) 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.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



South Coast Air Quality Management District

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

SENT VIA E-MAIL:

January 6, 2023

rbrady@rivco.org

Russell Brady, Project Planner
Riverside County
Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92502-1409

Notice of Preparation of a Draft Environmental Impact Report for the Thousand Palms Warehouse Project

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

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ 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.

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

² CalEEMod is available free of charge at: www.caleemod.com.

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

⁴ 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>.

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 regional air quality CEQA *operational* thresholds to determine the level of significance.

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 assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

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) emissions⁶. According to the MATES V Carcinogenic Risk interactive Map, the area surrounding the Proposed Project has an estimated cancer risk over 260 in one million⁷. 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,⁸ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,⁹ and Southern California Association of

⁵ 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>.

⁶ 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>.

⁷ 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).

⁸ <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

⁹ 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).

Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.¹⁰

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 Rule¹¹ and the Heavy-Duty Low NOx Omnibus Regulation¹², ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year¹³ that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.

¹⁰ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

¹¹ CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹² 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>.

¹³ 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>.

- 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_x) 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 a 1,238,992 square foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, 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 obligation¹⁴. 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. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage¹⁵.

¹⁴ 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>.

¹⁵ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

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.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW
RVC221220-01
Control Number



TEAMSTERS LOCAL UNION NO. 1932

Affiliated with the **INTERNATIONAL BROTHERHOOD OF TEAMSTERS**

December 5, 2022

RE: Thousand Palms Warehouse Project, Notice of Preparation and Scope of Environmental Impact Report (EIR)

Hello:

This letter is being submitted on behalf of Teamsters Local 1932 and the many Teamsters in the area that Local 1932 represents.

We have reviewed the Notice of Preparation (NOP) published by the County for this proposed project. The NOP states in general terms the issue areas that will be covered by a proposed EIR. We are encouraged to see that Air Quality, Transportation, Greenhouse Gas Emissions, Energy, Land Use, and Hydrology will be among the areas that will be addressed in the environmental impact report (EIR).

We would in particular ask the County to pay particular attention to the cumulative impact analysis for those issue areas in particular.

Cumulative impacts under CEQA are two or more individual environmental effects “which, when considered together, are considerable or which compound or increase other environmental impacts.” (CEQA Guidelines, § 15355.) “The individual effects may be changes resulting from a single project or a number of separate projects.” (Id., subd. (a).) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. (Guidelines, § 15355, subd. (b).) It is an impact “which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.” (Guidelines, § 15130, subd. (a)(1).) “Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.” (Guidelines, § 15355, subd. (b).)

CEQA requires an EIR to discuss cumulative impacts when two conditions are present: (1) the combined impact of the project and other projects is significant, and (2) the project's incremental contribution to the combined impact is “cumulatively considerable.” (Guidelines, § 15130, subds. (a), (a)(2); *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 120 [126 Cal. Rptr. 2d 441], disapproved of on another ground in *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1109, fn. 3 [184 Cal. Rptr. 3d 643, 343 P.3d 834]).

The Guidelines provide two alternative methods for discussing significant cumulative impacts in an EIR, at least one of which must be used. Under the first method, the EIR may evaluate cumulative impacts using a “list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.” (Guidelines, § 15130, subd. (b)(1)(A).) If this method is used, “factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type.” (Guidelines, § 15130, subd. (b)(2).)

In the second method, an agency may utilize a “summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.” The applicable plans include a general plan, regional transportation plan, or regional plans for the reduction of greenhouse gas emissions. (Guidelines, § 15130, subd. (b)(1)(B).) When this method is used, it is critical that the projections or planning document used is not “outdated or inaccurate.” It will be considered inadequate if so.

Under either method, the EIR should establish the geographic scope of the area affected by the cumulative impacts. The geographic scope to be analyzed must be reasonably defined. It “cannot be so narrowly defined that it necessarily eliminates a portion of the affected environmental setting.” (Bakersfield Citizens for Local Control v. City of Bakersfield (2004) 124 Cal.App.4th 1184, 1216 [22 Cal. Rptr. 3d 203].) Nor may it be defined so broadly as to dilute the significance of a project’s cumulative impact. (See Ebbetts Pass Forest Watch v. Department of Forestry & Fire Protection (2004) 123 Cal.App.4th 1331, 1352–1353 [20 Cal. Rptr. 3d 808].)

The analysis should include “all sources of related impacts, not simply similar sources or projects” (City of Long Beach v. Los Angeles Unified School Dist., supra, 176 Cal.App.4th at p. 907, citing (Kostka & Zischke supra, § 13.44, p. 653.)) It must also examine reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative impact. (Guidelines, § 15130, subd. (b) (5).)

It is critical that the County consider this project in context of the many warehouse and logistical projects recently built, recently approved, planned and reasonably projected or anticipated. An editorial in the Los Angeles Times described the County and the broader Inland Empire as at “a breaking point,” with more and more projects being approved in what are known as “diesel death zones,” with disparate impacts being faced by working class communities, in particular working class communities of color.

The Inland Empire, as of 2021, already contained a billion square feet of warehouse space. Riverside County alone contains more than a thousand warehouses, and there have been significant projects approved in the last year. Since 2020, there have been at least a half dozen projects where Riverside County was the lead agency for CEQA purposes. The cumulative impact, particularly on energy demands and greenhouse gas emissions and the resultant air quality and health impacts, need to be considered all together. This includes impacts from vehicles traveling to and from the warehouses and completing deliveries throughout the region.

With the principles above in mind, we strongly urge the County to consider the cumulative impacts of yet another approval for a major warehouse project. These projects cannot continue to be considered in isolation, or simply adopted with “overriding considerations.” The very real health impacts for residents of Riverside County are becoming dire, and need to be evaluated and considered with specificity.

Please keep us apprised as to the progress and status of this project.

Sincerely,

A handwritten signature in black ink that reads "Randy Korgan". The signature is written in a cursive, flowing style.

Randy Korgan
Secretary-Treasurer
Teamsters Local 1932