



November 8, 2019

**VIA EMAIL: [MBLAIS@CITYOFPERRIS.ORG](mailto:MBLAIS@CITYOFPERRIS.ORG)**

Mary Blais  
City of Perris  
135 "D" Street  
Perris, CA 92570

Governor's Office of Planning & Research

**NOV 08 2019**

**STATE CLEARINGHOUSE**

Dear Ms. Blais:

NOTICE OF PREPARATION FOR THE IDI RIDER 2 & 4 HIGH CUBE WAREHOUSES  
AND PERRIS VALLEY STORM DRAIN CHANNEL IMPROVEMENT PROJECT DRAFT  
ENVIRONMENTAL IMPACT REPORT, SCH# 2019100297

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation (NOP) for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain (PVSD) Channel Improvement Project Draft Environmental Impact Report (DEIR). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

#### Project Description

The project involves the construction and operation of two industrial buildings (Rider 2 and Rider 4) totaling 1,373,449 square feet, and the construction and subsequent operation and maintenance of improvements to the PVSD Channel along the eastern portion of the project site.

The project area is located in the southeast portion of the Perris Valley Commerce Center Specific Plan area, in the City of Perris, in Riverside County. The project area encompasses approximately 94.7 acres, and includes the Rider 2 site, the Rider 4 site, and the PVSD Channel Improvement area. The project area is generally located north of Rider Street, east of Redlands Avenue, and south of Morgan Street. Currently the project site is designated as Farmland of Statewide Importance as defined by the Department of Conservation's Farmland and Mapping Program.<sup>1</sup>

#### Department Comments

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<sup>1</sup> Department of Conservation, Farmland Mapping and Monitoring Program, California Important Farmland Finder, 2019, <https://maps.conservation.ca.gov/DLRP/CIFF/>

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.<sup>2</sup> All mitigation measures that are potentially feasible should be included in the project's environmental review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

As the courts have shown<sup>3</sup>, agricultural conservation easements on land of at least equal quality and size can mitigate the project impacts in accordance with CEQA Guideline § 15370. The Department highlights agricultural conservation easements because of their acceptance and use by lead agencies as an appropriate mitigation measure under CEQA. Agricultural conservation easements are an available mitigation tool and should always be considered; however, any other feasible mitigation measures should also be considered.

### Conclusion

The Department recommends the following discussion under the Agricultural Resources section of the DEIR:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Proposed mitigation measure for all impacted agricultural lands within the proposed project area.

Thank you for giving us the opportunity to comment on Notice of Preparation for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner at (916) 324-7347 or via email at [Farl.Grundy@conservation.ca.gov](mailto:Farl.Grundy@conservation.ca.gov).

Sincerely,



Monique Wilber  
Conservation Program Support Supervisor

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<sup>2</sup> Public Resources Code section 21002.

<sup>3</sup> *Masonite Corp. v. County of Mendocino* (2013) 218 Cal.App.4th 230, 238.