

Final Environmental Impact Report

Heritage Valley Business Center Project

SCH No. 2025051051

LEAD AGENCY



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CONSULTANT



Kimley-Horn and Associates, Inc.
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May 2026

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1.0 INTRODUCTION

1.1 INTRODUCTION

The City of Menifee (City) has prepared this Final Environmental Impact Report (FEIR) in compliance with the California Environmental Quality Act (CEQA) for the Heritage Valley Business Center Project (Project). The City is required, after completion of a Draft EIR (DEIR) (State Clearinghouse No. 2025051051), to consult with and obtain comments from public agencies having jurisdiction by law with respect to the Project and provide the general public with an opportunity to comment on the DEIR. This FEIR has been prepared to respond to comments received on the DEIR, which was circulated for public review from March 18, 2026, through May 1, 2026 (45 days). The preceding Table of Contents provides a list of all persons, organizations, and public agencies who commented on the DEIR.

The City will evaluate comments on environmental issues from persons who reviewed the DEIR and will prepare a written response, pursuant to CEQA Guidelines Section 15088(a). The written response must address any significant environmental issues raised. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the Project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines Section 15204, Section 15088). Those comments are responded to in **Section 2.0: Comments on the Draft EIR and Responses to Comments**.

State CEQA Guidelines Section 15088 recommends that where a response to comment makes important changes in the information contain in the text of the DEIR, that the Lead Agency either revise the text of the DEIR or include marginal notes showing that information. Added or modified text is shown in **Section 3.0: Errata**, by underlining (example) while deleted text is shown by striking (~~example~~). The additional information, corrections, and clarifications are not considered to substantively affect the conclusions within the EIR and therefore the City has determined that recirculation of the DEIR is not required as none of the criteria for recirculation under CEQA Guidelines Section 15088.5 have been met.

CEQA Guidelines Section 15132 indicates that the contents of a FEIR shall consist of:

- a) The DEIR or a revision of the draft.
- b) Comments and recommendations received on the DEIR either verbatim or in summary.
- c) A list of persons, organizations, and public agencies commenting on the DEIR.
- d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e) Any other information added by the Lead Agency.

Pursuant to CEQA Guidelines Section 15088(b), the City will provide written responses to comments to any public agency that commented on the DEIR, at least ten (10) days prior to the Planning Commission

consideration of certifying the EIR as adequate under CEQA. Written responses to comments will also be provided to non-public agency individuals, organizations, and entities that commented on the DEIR. In addition, the FEIR will be made available to the general public at the City's Planning Division office and on the City's website a minimum of 10 days prior to the Planning Commission public hearing.

The FEIR, along with other relevant information and public testimony at the Planning Commission hearing, will be considered by the City's Planning Commission.

1.2 ORGANIZATION OF EIR

This FEIR provides the requisite information required under CEQA and is organized as follows:

- **Section 1.0: Introduction.** This section provides an introduction to the FEIR, including the requirements under CEQA, the organization of the document, as well as a brief summary of the CEQA process activities to date.
- **Section 2.0: Comments on the Draft EIR and Responses to Comments.** This section provides a list of public agencies, organizations, and individuals commenting on the DEIR, provides a copy of each written comment received, and any response required under CEQA.
- **Section 3.0: Errata to the Draft EIR.** This section presents clarifications, amplifications, and insignificant modifications to the EIR, identifying revisions to the text of the document.

1.3 CEQA PROCESS HISTORY

The City has complied with relevant Public Resources Code provisions and CEQA Guidelines regarding the preparation and processing of the Project EIR. A brief summary of the Project's CEQA process is as follows:

- A Notice of Preparation (NOP) informing interested parties and agencies of the Project was distributed on May 23, 2025, with a minimum 30-day public review period ending on June 23, 2025.
- No comments were given at the public scoping meeting held for the Project on June 3, 2025, at 5:30 pm at City Council Chambers located at 29844 Haun Road, Menifee, CA 92586. No members of the public attended the scoping meeting.
- Following a Notice of Completion (NOC), the DEIR and Notice of Availability was distributed for public review and comment for a 45-day period, beginning March 18, 2026. The public review period closed on May 1, 2026.

1.4 CHANGES TO THE DRAFT EIR

As previously stated, **Section 3.0: Errata to the Draft EIR**, details the changes to the DEIR. In response to public comments, text changes have been made to DEIR sections to clarify and amplify the analysis or mitigation measures, and to make insignificant modifications to the DEIR. This information does not rise to the level of significant new information as the resulting impact analysis and alternatives considered remain essentially unchanged, and no new or more severe impacts have been identified. These changes do not warrant DEIR recirculation pursuant to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5. As discussed herein and as elaborated upon in the respective Response to

Comments, none of the clarifications or changes made in the Errata reflect a new significant environmental impact, a “substantial increase” in the severity of an environmental impact for which mitigation is not proposed, or a new feasible alternative or mitigation measure that would clearly lessen significant environmental impacts but is not adopted, nor do the Errata reflect a “fundamentally flawed” or “conclusory” DEIR. In all cases, as discussed in individual responses to comments and DEIR Errata, these minor clarifications and modifications do not identify new or substantially more severe environmental impacts that the City has not committed to mitigate. Therefore, the public has not been deprived of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or an unadopted feasible Project alternative or mitigation measure. Instead, the information added supports the existing analysis and conclusions, and responds to inquiries made from commenters. Therefore, this FEIR is not subject to recirculation prior to certification.

CEQA Guidelines Section 15088.5 describes when an EIR requires recirculation prior to certification, stating in part:

- (a) *“A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:*
 - (1) *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
 - (3) *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to apply it.*
 - (4) *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043).*
- (b) *Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”*

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2.0 COMMENTS AND RESPONSES TO DRAFT EIR

This section includes all comments received by the City on the Draft Environmental Impact Report (DEIR), including written comments and comments submitted online via email to the City. The City circulated the DEIR for a 45-day review period as required by CEQA. The review period ran from March 18, 2026, through May 1, 2026.

2.1 Introduction to Comments and Responses

In accordance with CEQA Guidelines Section 15132, **Table 2-1: Comments from Public Agencies, Organizations, and Individuals** below provides a list of those parties that provided written comments on the DEIR during the public review period. Copies of the written comments are provided in this section and have been annotated with the assigned letter along with a number for each comment. Each comment is followed by a written response which corresponds to each commenter.

Table 2-1: Comments from Public Agencies, Organizations, and Individuals

Reference	Commenter	Date
Agency 1 (A1)	Southern California Gas Company	March 18, 2026
Agency 2 (A2)	South Coast Air Quality Management District	March 24, 2026
Agency 3 (A3)	South Coast Air Quality Management District	May 1, 2026
Agency 4 (A4)	City of Perris	May 1, 2026
Agency 5 (A5)	California Department of Transportation	May 1, 2026
Agency 6 (A6)	Riverside Transit Agency	April 30, 2026
Agency 7 (A7)	Riverside County Flood Control and Water Conservation District	April 13, 2026
Organization 1 (O1)	Advocates for the Environment	March 30, 2026
Organization 2 (O2)	Adams Broadwell Joseph and Cardozo	April 14, 2026
Individual 1 (I1)	Alex Munoz	March 23, 2026

Comment Letter A1 – Southern California Gas Company

From: SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>
Sent: Wednesday, March 18, 2026 11:13 AM
To: Charles Benjamin <cbenjamin@cityofmenifee.us>
Cc: Stephanie Roseen <sroseen@cityofmenifee.us>
Subject: 3/18/26- City of Menifee Public Notices - PLN24-0197 NOA Heritage Valley Business Center

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Regarding: PLN24-0197 NOA Heritage Valley Business Center
SoCalGas Distribution does have facilities in the area. Please include a note to have the developer contact 811 / USA at [DigAlert | Utility Locating California | Underground Wire & Cable Locator](#) prior to any excavation / demolition activities so we can Locate & Mark out our facilities. **Any excavation activity within ten (10) feet of our High-Pressure facilities will require a SoCalGas employee standby.**

If the Developer needs new gas service, please have them contact our Builder Services group to begin the application process as soon as practicable, at <https://www.socalgas.com/for-your-business/builder-services>.

If Atlas Maps or a Will Serve letter are required, a request can be submitted to:

SCGSERegionRedlandsUtilityRequest@semprautilities.com

Please attach a Google Maps satellite image of the requested area, with the exact project boundaries clearly outlined in red, provided in either PDF or JPEG format. Please note that we are unable to access external SharePoint links or zip files. It is essential that our mapping team can zoom in on the image to accurately verify cross streets. Additionally, please include the following information, if available:

- Project address
- APN for the land parcel
- Cross streets
- City
- Zip code
- Company name
- Company address
- Contact person's full name
- Phone number
- Email address

For will serve letter requests please ALSO include the following: company, entity, or person that the letter will be made out to with address, city, state, and zip code.

Please note the following:

- **Will Serve & Map requests may take up to 30 business days to receive an invoice.** The fees are \$13.50 per map and \$45 per Will Serve letter.
- Once payment is received, processed, and cleared, it may take up to 10 business days to receive the documents.
- Expedited services are not available.
- Payments must be made prior to receiving documents, with no exceptions. All payments are final and non-refundable.
- According to CPUC Tariff Rule 34 and County/Municipal Franchise Agreements, a no-cost "City Request" must be sent from the City/Agency. Third-party contractors will be charged.

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To avoid delays in processing requests and notifications, please have all Franchise correspondence sent to our Utility Request inbox.

Utility Request Contact Information by Region

Southeast Region – Redlands

For requests in the southeastern areas of Los Angeles County, Riverside County, San Bernardino County, and Imperial County, please contact:

SCGSERegionRedlandsUtilityRequest@semptrautilities.com

Southeast Region – Anaheim

For all of Orange County and the southern portions of Los Angeles County, please send Map and/or Will Serve Letter requests to:

AtlasRequests/WillServeAnaheim@semptrautilities.com

Northwest Region – Compton HQ

For West and Central Los Angeles County, please direct Map Requests and Will Serve Letters to:

SCG-ComptonUtilityRequest@semptrautilities.com

Northwest Region – Chatsworth

For requests from the northernmost parts of Los Angeles County extending up to Visalia, San Luis Obispo, Fresno, and Tulare, please contact:

NorthwestDistributionUtilityRequest@semptrautilities.com

Transmission

For Transmission-related requests, please contact:

SoCalGasTransmissionUtilityRequest@semptrautilities.com

New Business

For new gas service, please contact our Builder Services group to begin the application process:

<https://www.socalgas.com/for-your-business/builder-services>

Project Notification Requirements

Minor Street Improvement Projects

(Chip Seal, Slurry Seal, Grind & Overlay)

Please notify SoCalGas (SCG) a minimum of four (4) months prior to the start of pavement work to allow sufficient time to conduct required leak surveys and any necessary repairs.

Major Street Improvement Projects

Projects including, but not limited to:

- Excavations greater than 9 inches
- Street widening
- Installation of new curbs and gutters
- Bus pads
- Traffic signals
- Street realignments
- Grade separations

AND

Pipeline Projects

Including:

- Storm drain
- Water and sewer lines
- Electrical
- Telecommunications

Please provide signed and approved design plans showing all SCG facilities clearly identified:

- 4–6 months prior to construction for potential relocation of SCG medium-pressure facilities.

A1-1
cont.

- 9–12 months prior to construction for potential relocation of SCG high-pressure facilities.

This time is required to review plans and design any necessary modifications to conflicting SCG facilities.

Coordination & Relocation Requests

Please keep SCG informed of:

- Pre-construction meetings
- Construction schedules
- Project phasing updates

This information allows SCG to coordinate and schedule any required work.

- Potholing may be required to determine whether conflicts exist between proposed improvements and existing SCG facilities.

If SCG facilities are in conflict and relocation is required, requests must be submitted in writing and include the following:

- A signed “Notice to Owner” on official City, County, and/or company letterhead.
- Project name, number, and responsible title.
- Project address, location, anticipated start date, parameters, and full scope of work.
- A Thomas Guide page and/or Google Maps screenshot clearly highlighting the project area.
- Requestor company’s contact name, title, phone number, email address, and any additional relevant information.

A1-1
cont.

Thank you,
Josh Rubal
Lead Planning Associate
Distribution Planning & Project Management
Redlands HQ - Southeast Region
(213) 231-7978 Office
SCGSERegionRedlandsUtilityRequest@semprautilities.com

From: Charles Benjamin <cbenjamin@cityofmenifee.us>
Sent: Wednesday, March 18, 2026 8:00 AM
To: Charles Benjamin <cbenjamin@cityofmenifee.us>
Cc: Stephanie Roseen <sroseen@cityofmenifee.us>
Subject: 3/18/26- City of Menifee Public Notices - PLN24-0197 NOA Heritage Valley Business Center; 4/1/2026 TUMF Ordinance Amendment

Good morning,

Please see the attached public notice for the City of Menifee.

All public notices can be found by clicking [here \[cityofmenifee.us\]](https://cityofmenifee.us). Thank you.

Chuck Benjamin | Records Technician
Office of the City Clerk
City of Menifee | 29844 Haun Road | Menifee, CA 92586
Direct: (951) 723-1722 | City Hall: (951) 672-6777
cbenjamin@cityofmenifee.us | cityofmenifee.us [cityofmenifee.us]

Responses to Comment Letter A1 – Southern California Gas Company

A1-1 Comment noted, no further response is warranted.

Comment Letter A2 – South Coast Air Quality Management District

From: Jivar Afshar <jafshar@aqmd.gov>
Sent: Tuesday, March 24, 2026 2:35 PM
To: Fernando Herrera <fherrera@cityofmenifee.us>
Cc: Sam Wang <swang1@aqmd.gov>
Subject: Technical File Request for the Draft EIR for Heritage Valley Business Center Project

You don't often get email from jafshar@aqmd.gov. [Learn why this is important](#)
[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Ms. Herrera,

South Coast AQMD staff is currently in the process of reviewing the Draft EIR for Heritage Valley Business Center Project (South Coast AQMD Control Number: [RVC260318-05](#)).
The public commenting period is from March 18, 2026 to May 1, 2026. Upon review of the files provided as part of the public review period, we were able to access the PDF versions of the Draft EIR and Appendices:

<https://ceqanet.lci.ca.gov/2025051051/2>.

We respectfully request that you also provide electronic copies of the complete, **live** modeling and emissions calculation files used to quantify air quality impacts from construction and/or operation of the proposed project. Specifically, please include:

- CalEEMod input files (**.csv format**);
- Emission calculation files (**Excel format; not PDF**), including those related to truck operations or other project-related sources;
- AERMOD input and output files, including AERMOD View (**the entire package**) including (**.isc**) files;
- HARP input and output files and/or Excel files used to calculate cancer risk and chronic/acute hazards (**live files only**, no PDFs);
- Any additional files used for post-processing outside of AERMOD to calculate pollutant-specific concentrations, if applicable.

To ensure timely review, we request that these files be provided by **March 27, 2026**, via a Dropbox or other accessible download link. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Best regards,
Jivar Afshar (*she, her, hers*)

*Air Quality Specialist, CEQA
Planning, Rule Development, & Implementation
(909)396-2040*

Please note, South Coast AQMD is closed on Mondays.



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Responses to Comment Letter A2 – South Coast Air Quality Management District

- A2-1** Comment noted. South Coast Air Quality Management District was provided the requested files on March 25, 2026 and no further response is warranted.

Comment Letter A3 – SCAQMD



SENT VIA E-MAIL:

fherrera@cityofmenifee.us

Fernando Herrera, Senior Planner
City of Menifee
29844 Haun Road,
Menifee, CA 92586

May 1, 2026

**Draft Environmental Impact Report (DEIR) for the
Heritage Valley Business Center (Proposed Project)
(SCH No: 2025051051)**

The South Coast Air Quality Management District (South Coast AQMD) appreciates the opportunity to comment on the above-referenced document. The City of Menifee is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD has provided a brief summary of the Proposed Project information and prepared the following comments which are organized by topic of concern.

A3-1

Summary of Proposed Project Information in the DEIR

Based on the DEIR, the Proposed Project consists of construction of a concrete tilt-up building that would total 829,755 square feet (including 10,000 square feet of office space), approximately 503 automobile parking spaces, and approximately 258 truck trailer parking spaces.¹ Associated facilities and improvements of the Project include loading dock doors, on-site landscaping, and related on-site and off-site improvements (roadway improvements, sewer, storm drain, utilities). The Project site is predominately vacant undeveloped land that has been subject to a variety of anthropogenic disturbances associated with prior ground disturbance activities and discing.²

South Coast AQMD Comments

South Coast AQMD Air Permits and Role as a Responsible Agency

Since implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,³ Rule 203 – Permit to Operate,⁴ Rule 401 – Visible Emissions,⁵ Rule 402 – Nuisance,⁶ Rule 403 –

A3-2

¹ DEIR, p. 1-3.

² DEIR, p. 3-2.

³ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

⁴ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

⁵ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

⁶ South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

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Fugitive Dust,⁷ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,⁸ Rule 1113 – Architectural Coatings,⁹ Regulation XIII – New Source Review,¹⁰ Rule 1401 – New Source Review of Toxic Air Contaminants,¹¹ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,¹² etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and GHG impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

Mobile Source Emissions: Truck Trip Lengths and Vehicle Miles Traveled (VMT)

To determine emissions from trucks for the Proposed Project, the DEIR states that “the analysis incorporated the SCAQMD recommended truck trip length of 15.3 miles for 2-axle (LHDT1, LHDT2) trucks, 14.2 miles 3-axle (MHDT) trucks and 40 miles for 4+-axle (HHDT) trucks and weighing the average trip lengths using traffic trip percentages taken from the Heritage Valley Business Center Traffic Analysis.”¹³ This resulted in 30.41 miles for truck trips associated with the warehouse land use and 28.58 miles for truck trips associated with the high cube cold storage land use.¹⁴ The referenced 15.3 miles and 14.2 miles of truck trip lengths were originally derived

⁷ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

⁸ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

⁹ South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹⁰ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹¹ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

¹² South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

¹³ Appendix B – Air Quality Analysis, Page. 40.

¹⁴ *Ibid.*

A3-2
cont.

A3-3

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from the Southern California Association of Government's (SCAG) estimation of average truck trip length in its 2016 Regional Transportation Plan.¹⁵

However, the Proposed Project site is approximately 80 miles from the Ports of Los Angeles and Long Beach, which means the DEIR substantially underestimated the emissions from Port-related truck trips.

For this reason, South Coast AQMD staff recommends the Lead Agency revise the mobile source emission calculations in the Final EIR by taking a project-specific trip-length approach, such as 40 miles for local trips and 80 miles for Port-related trips. Using the project-specific data will more accurately reflect the real-world travel patterns and avoid underestimating the emissions and air quality impacts.

Assessment of Operational Hours for Emergency Diesel Standby Engine

The Proposed Project includes the installation of a new diesel-fired 700 horsepower emergency standby engine with. Based on Appendix B – Air Quality Analysis, the engine is assumed to operate:

- up to 1 hour per day,
- 1 day per week
- for up to 50 hours per year for maintenance and testing purposes.¹⁶

However, the engine would also operate in the event of a power outage, resulting in higher potential annual operating hours. The emissions from the engine when it is in emergency use for backup electrical power are not included in the analysis.

Additionally, in Appendix G, emissions from the engine appear to be included within the "Stationary Equipment" category, which is estimated to emit approximately 13.37 metric tons per year of carbon dioxide equivalents (CO₂e), but the emissions from the engine are not disaggregated or explained, making it impossible to determine the engine-specific GHG contribution.

To provide a more accurate assessment of the potential CO₂e emissions for the emergency standby engine, South Coast AQMD staff recommends that the Lead Agency update the analyses in the DEIR to evaluate GHG emissions assuming up to 200 operating hours per year, which represents the maximum potential emissions under a worse-case operational scenario and consistent with potential permit conditions based on potential to emit (PTE). It is important to note that South Coast AQMD permits for the emergency diesel engines may authorize operation up to 200 hours annually, while still limiting maintenance and testing to 50 hours per year.

If the Draft EIR is not updated accordingly, it is also important to note that South Coast AQMD will issue a permit condition limiting operation to the hours analyzed in the CEQA document (e.g., 50 hours/year), which could restrict project operations.

¹⁵ South Coast Air Quality Management District, Preliminary Draft Staff Report: Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce.

¹⁶ Appendix B – Air Quality Analysis, p. 42.

A3-3
cont.

A3-4

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Transport Refrigeration Units (TRUs) – Emission Rate Calculation Methodology

Based on a review of Appendix B – Air Quality Analysis and supporting emission calculation tables, the Draft EIR includes emissions from TRUs associated with project truck activity. The analysis assumes that TRUs operate for approximately 2.1 hours while trucks are parked at loading docks, and this assumption appears to have been used to estimate TRU emissions at loading dock sources.

However, while TRU emissions are also presented for on-site truck movement and off-site roadway segments (e.g., Sherman Road, Ethanac Road, and Encanto Drive), the Draft EIR does not clearly describe the methodology used to calculate TRU emission rates for these sources. Specifically, it is unclear whether the on-site TRUs are assumed to operate while trucks are in transit or how TRU activity was represented for moving sources. In addition, the Draft EIR does not provide sufficient information on the assumptions used to characterize truck movement (e.g., travel speeds, activity duration, or other operational parameters) that would support the calculation of TRU emissions associated with these sources.

Without this information, South Coast AQMD staff is unable to independently verify the TRU emission rates used in the dispersion modeling.

Therefore, South Coast AQMD staff recommends that the Lead Agency revise the Final EIR to provide additional clarification on the methodology used to estimate TRU emissions for all modeled sources, including assumptions regarding TRU operation during truck movement and the allocation of TRU-equipped trucks across on-site and off-site activities, to allow for independent verification of the analysis.

A3-5

Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

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 (NOx) 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 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 643,419 square foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply

A3-6

Fernando Herrera, Senior Planner

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May 1, 2026

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 obligation¹⁷. 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 webpage.¹⁸

A3-6
cont.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and provide a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein, including the referenced comment letters attached, at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

A3-7

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:JA

RVC260318-05
Control Number

¹⁷ 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>.

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

Responses to Comment Letter A3 – SCAQMD

A3-1 The comment summarizes the Project and acknowledges the City of Menifee as Lead Agency under CEQA. The comment's description of the Project is materially consistent with the information presented in the Draft EIR. This comment does not raise specific environmental concerns or request revisions to the analysis. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

A3-2 The DEIR acknowledges and addresses applicable SCAMD Rules and requirements. DEIR Section 5.2 Air Quality identifies and discusses applicable South Coast AQMD rules and regulations that govern Project construction and operation (DEIR pp. 5.2-19 to 5.2-23). Specifically, the DEIR analyzes compliance with Rule 402 (Nuisance), Rule 403 (Fugitive Dust), Rule 1113 (Architectural Coatings), and Rule 2305 (Warehouse Indirect Source Rule) (DEIR pp. 5.2-19 to 5.2-20). These requirements are incorporated as Laws, Ordinances, and Regulations (LOR-1 through LOR-8), which are enforceable independent of CEQA and apply to all construction and operational activities (DEIR pp. 5.2-31 to 5.2-32).

With respect to stationary and portable equipment requiring South Coast AQMD permits (including emergency generators, fire pumps, boilers, and similar equipment), the City acknowledges that such equipment would be subject to permit requirements under Rule 201 (Permit to Construct), Rule 203 (Permit to Operate), and operational rules governing emissions, toxic air contaminants, and diesel-fueled engines. The DEIR's air quality and greenhouse gas analyses employ South Coast AQMD-approved methodologies and significance thresholds to evaluate construction and operational emissions, including those from stationary sources (DEIR pp. 5.2-23 to 5.2-26). As demonstrated in the DEIR, with implementation of Mitigation Measure **MM AQ-1**, the Project would not exceed regional or localized significance thresholds for criteria pollutants, or health risks (DEIR pp. 5.2-26 to 5.2-44). DEIR **Section 5.7 Greenhouse Gases** considers and addresses all Project GHG emissions sources including stationary sources subject to SCAQMD Rules. Even with application of mitigation, Project GHG emissions impacts are disclosed as significant and unavoidable. This is due primarily to infeasibility of fully mitigating mobile source GHG emissions (DEIR pp. 5.7-23 to 5.7-29).

The City recognizes South Coast AQMD's role as a Responsible Agency under CEQA for purposes of issuing discretionary air quality permits and will consult with South Coast AQMD pursuant to CEQA Guidelines Section 15086, if the Project requires any such discretionary air quality permits. The EIR is hereby revised by reference to formally identify South Coast AQMD as a possible Responsible Agency.

This Final EIR, together with the EIR Air Quality Analysis and Health Risk Assessment (DEIR **Appendices B1 and B2**) and Greenhouse Gas Analysis (DEIR **Appendix G**) were prepared in accordance with South Coast AQMD guidance. Collectively, these documents provide sufficient Project description and environmental analysis, including evaluation of air quality and GHG impacts from stationary and portable equipment, to support South Coast AQMD's permit decisions. The City will coordinate with South Coast AQMD's Engineering and Permitting staff during the permit application process to ensure all equipment requiring air permits is properly identified and evaluated consistent with South Coast AQMD requirements. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

A3-3 The comment asserts that the analysis underestimated mobile source emissions by applying truck trip lengths derived from SCAG's 2016 Regional Transportation Plan, and recommends instead using 40 miles for local trips and 80 miles for port-related trips based on the project's approximate distance from the Ports of Los Angeles and Long Beach. The City disagrees with the comment assertions. The comment provides not substantial evidence regarding why the DEIR trip length assumptions are not valid.

This comment conflates two analytically distinct contexts and mischaracterizes the basis for the trip lengths used. The 15.3-mile, 14.2-mile, and 40-mile trip lengths referenced in the DEIR analysis originate from SCAQMD's own Rule 2305 (WAIRE Program) regulatory framework. More specifically, the vehicle class-specific trip lengths developed by SCAQMD for use in calculating regional emission burdens under that indirect source rule. These values therefore reflect SCAQMD's own determination of representative truck trip lengths applicable to warehouse land uses within the South Coast Air Basin. It would be inconsistent for SCAQMD staff to criticize the use of trip lengths that their own agency developed and codified into a regulatory program. The DEIR's air quality analysis appropriately incorporated SCAQMD-recommended truck trip lengths for emissions modeling.

Importantly, these trip lengths were not applied as flat, basin-wide averages. Rather, they were weighted against project-specific traffic percentages from the Heritage Valley Business Center Traffic Analysis (DEIR **Appendix K1**), the development-specific traffic study conducted for this Project. This weighting approach produced composite average truck trip lengths of 30.41 miles for the warehouse land use and 28.58 miles for the high cube cold storage land use. These results are notably higher than the underlying light- and medium-duty class defaults, precisely because the Project-specific fleet mix incorporates the proportional contribution of longer-haul HHDT trips already assigned a 40-mile trip length.

The regional trip lengths reflected in the DEIR analyses are consistent with standard air quality modeling practice and SCAQMD methodology, which recognizes that warehouse and distribution facilities serve diverse markets and generate trips to varied destinations throughout the region, not exclusively to the Ports of Los Angeles and Long Beach. While the Project site is located approximately 80 miles from the Ports, the comment's assumption that all or most truck trips would be Port-related is speculative and unsupported by substantial evidence regarding the Project's anticipated tenant operations or goods movement patterns. The Project is a speculative warehouse development without identified tenants, and trip origins and destinations cannot be predetermined with certainty.

The DEIR's emissions analysis using SCAQMD-recommended trip lengths provides a reasonable and conservative assessment of regional air quality impacts. Even using these trip lengths, the analysis demonstrates that with implementation of Mitigation Measure **MM AQ-1**, the Project would not exceed SCAQMD regional or localized significance thresholds for criteria pollutants or health risk (DEIR pp. 5.2-26 to 5.2-44). The Project would also be required to comply with SCAQMD Rule 2305 (Warehouse Indirect Source Rule), which independently requires warehouse operators to track and reduce emissions from mobile sources (DEIR p. 5.2-20).

For these reasons, the DEIR's use of SCAQMD-recommended regional truck trip lengths is appropriate, supported by substantial evidence, and provides a conservative basis for

evaluating air quality impacts. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

A3-4

The comment requests that the DEIR evaluate emissions impacts from the emergency standby diesel generator assuming up to 200 operating hours per year to reflect maximum potential emissions under a worst-case operational scenario. CEQA does not require an assumption of worst-case scenarios.

The DEIR's air quality and greenhouse gas analyses appropriately evaluate emissions from the Project's stationary equipment, including the emergency standby diesel generator. The air quality analysis (DEIR **Appendix B1**) includes stationary source emissions in the operational emissions calculations, which demonstrate that the Project would not exceed SCAQMD regional significance thresholds for criteria pollutants (DEIR Table 5.2-11, pp. 5.2-30–5.2-31). Similarly, the greenhouse gas analysis (DEIR **Appendix G**) includes stationary equipment emissions within the Project's total annual GHG emissions inventory.

The DEIR analysis is appropriately based on the likely maximum impact operational condition, consistent with CEQA guidance requiring evaluation of reasonably foreseeable impacts rather than speculative worst-case scenarios. The analysis assumes routine maintenance and testing operations consistent with typical industrial practice and regulatory limits for emergency standby equipment. In this regard, the DEIR assumed testing schedule is consistent with industry standard practice under National Fire Protection Association (NFPA) 110, the governing standard for emergency power supply systems, which requires diesel generator sets to be exercised at least once monthly for a minimum of 30 minutes. A weekly 15-minute test cycle is more frequent than the NFPA 110 minimum, and therefore represents a conservative assumption that, if anything, overstates testing-related emissions relative to what would be minimally required.

The comment suggests that analysis of emergency generator operations should assume the maximum permitted limit of 200 hours annually. However, this is a recommendation, not a CEQA requirement or regulatory mandate, and adopting it would produce a result inconsistent with reasonably foreseeable operations. SCAQMD permit conditions for emergency internal combustion engines cap maintenance and testing at no more than 50 hours per year, with hours beyond that threshold permitted only during actual loss-of-grid power events. Modeling generators at the full 200-hour annual limit would therefore assume sustained, large-scale grid outages. This is a speculative scenario that is neither reasonably foreseeable nor appropriate for inclusion in a CEQA analysis under CEQA Guidelines Section 15145. The analysis conservatively evaluated routine periodic testing, which is the only component of generator operation that can be considered reasonably foreseeable during normal Project operations. Emergency operation scenarios are speculative by definition and are appropriately excluded.

Further, the comment assumes extended generator operation during prolonged power outage conditions. Under such emergency conditions, it is unlikely that the Project would be fully operational as assumed in the DEIR operational analyses. During an extended power outage, warehouse operations including truck trips, transport refrigeration units, cargo handling equipment, and other mobile and stationary sources would be substantially reduced or curtailed. Any incremental increase in emergency generator emissions during such periods

would be more than offset by the overall reduction in Project emissions under emergency power outage conditions, resulting in no net increase in environmental impacts beyond those evaluated in the DEIR.

Nonetheless, the City acknowledges South Coast AQMD's recommendation regarding permit conditions and recognizes that South Coast AQMD, as the Responsible Agency for stationary source permitting, has authority to establish permit conditions based on potential to emit (PTE). While the Project's environmental analysis is based on likely maximum impacts and reasonably foreseeable operational conditions (maintenance and testing operations consistent with typical practice), any permits issued by South Coast AQMD for the emergency standby generator may include operational limits based on PTE. Such permit conditions would be enforceable independent of CEQA and would ensure that actual emissions do not exceed levels evaluated in the DEIR.

The City will coordinate with South Coast AQMD during the permit application process to ensure that all applicable permit conditions, including operational hour limits, are properly incorporated into the air quality permit for the emergency generator. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

A3-5 To clarify for the commenter, TRU emissions associated with the Heritage Valley Business Center Project were modeled for both on-site and off-site truck activity using a consistent methodology based on CARB's EMFAC2021 emissions inventory, as described at DEIR **Appendix B1** Air Quality Analysis (pp. 42–43). Detailed assumptions and methodologies are presented below.

TRU Fleet Characterization and Operating Assumptions: The Project includes up to 80,000 square feet of high-cube cold storage use within the 829,755-square-foot industrial building (**Appendix B1**, p. 4). To account for refrigerated uses, trucks associated with the cold-storage land use are assumed to be equipped with TRUs (**Appendix B1**, p. 42). For modeling purposes, 33 trucks (66 two-way truck trips per day) have the potential to include TRUs, and TRUs are accounted for during both on-site and off-site travel (**Appendix B1**, p. 42).

TRU Emission Rate Calculation Methodology: TRU emission calculations are based on CARB's EMFAC2021, which provides emission inventories in tons per day based on annual activity levels, fuel consumption, and horsepower hours (**Appendix B1**, p. 42). EMFAC2021 does not directly provide emission rates per hour or per mile as with the on-road emission model; therefore, the emission inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with project-level details (**Appendix B1**, p. 42).

This conversion was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operation (**Appendix B1**, p. 42). These project-specific hourly TRU emission rates were then applied to both on-site truck movement (including travel within the Project site to and from loading docks) and off-site roadway segments (Sherman Road, Ethanac Road, and Encanto Drive) to calculate total TRU emissions for air quality modeling purposes.

Application to On-Site and Off-Site Sources: The CalEEMod operational emissions model incorporates TRU emissions for all mobile source activity, including both on-site circulation and off-site roadway travel (**Appendix B1**, pp. 42 to 43, Table 4-10). For localized significance

threshold (LST) analysis, on-site mobile emissions were modeled using a trip length of 1 mile for both trucks and passenger cars to establish a likely maximum impact scenario (**Appendix B1**, p. 47). TRU emissions are included as a separate source category in the operational emissions summary and contribute 9.72 pounds per day of ROG, 10.19 pounds per day of NO_x, 1.17 pounds per day of CO, 0.33 pounds per day of PM₁₀, and 0.30 pounds per day of PM_{2.5} (Draft EIR, Table 5.2-11; **Appendix B1**, Table 4-10).

The methodology for calculating TRU emission rates, converting EMFAC2021 annual emission inventories to hourly rates based on equipment-specific horsepower hours and daily operating assumptions, is consistent with CARB guidance and provides a conservative estimate of TRU emissions for air quality modeling purposes. The Draft EIR's approach ensures that TRU emissions are accounted for across all truck activity (both stationary at loading docks and in transit on-site and off-site), and the resulting emissions do not exceed SCAQMD regional or localized significance thresholds. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

- A3-6** The DEIR recognizes Rule 2305's annual WAIRE Points Compliance Obligation upon occupancy (Draft EIR pp. 5.2–20). The DEIR addresses Rule 2305 compliance through LOR-7, which requires Project tenants to comply with SCAQMD Rule 2305 (Draft EIR p. 5.2–32).

Note further that the Project incorporates design features and mitigation measures that directly support future Rule 2305 compliance by aligning with WAIRE Points menu options. These include **MM GHG-4**, which requires installation of conduits for electric vehicle charging at a ratio of one charging station for every 50 dock-high doors to accommodate future EV trucks (Draft EIR p. 5.7-27); **MM GHG-7**, which requires installation of solar photovoltaic systems to offset at least 20 percent of the Project's energy demand (Draft EIR p. 5.7-27); and **MM GHG-2**, which requires all on-site outdoor cargo-handling equipment to be electric or non-diesel fueled (Draft EIR p. 5.7-27). Additional measures include LOR-6, requiring compliance with CALGreen electric vehicle charging standards (Draft EIR p. 5.2-32), and **MM GHG-3**, requiring documentation to tenants regarding clean truck funding programs such as the Carl Moyer Program (Draft EIR p. 5.7-27).

These measures facilitate warehouse operator compliance with Rule 2305 by providing infrastructure for zero-emission charging, on-site renewable energy, and zero-emission yard equipment—all of which are WAIRE Points menu options. Compliance with Rule 2305 is enforced by SCAQMD through their reporting process (Draft EIR p. 5.2-32). It is noted that future warehouse operators may contact SCAQMD staff for implementation guidance at (909) 396-3140 or waire-program@aqmd.gov. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

- A3-7** The City of Menifee acknowledges South Coast AQMD's comment letter and has herein provided written Responses to all comments as required by Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b). The Responses address each substantive environmental issue raised and are supported by factual information and analysis contained in the Draft EIR, technical appendices, and administrative record. Where the Lead Agency's position differs from SCAQMD recommendations, the Responses explain the basis for the City's conclusions with reference to substantial evidence in the record, consistent with CEQA Guidelines Section 15088(c). The City appreciates SCAQMD's technical expertise and will

contact SCAQMD at the noted point of contact should additional questions arise. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

Comment Letter A4 – City of Perris



CITY OF PERRIS

DEVELOPMENT SERVICES DEPARTMENT
PLANNING DIVISION

135 N. "D" Street, Perris, CA 92570-2200
TEL: (951) 943-5003 FAX: (951) 943-8379

May 1, 2026

Fernando Herrera, Senior Planner
City of Menifee
Community Development Department
Planning Division
29844 Haun Road
Menifee, CA 92586

SUBJECT: CITY OF PERRIS COMMENTS - NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR A PROPOSED 829,755 SQUARE FOOT HERITAGE VALLEY BUSINESS CENTER ON 41.16 ACRES - GENERAL PLAN AMENDMENT (PLN24-0197), SPECIFIC PLAN AMENDMENT (PLN24-0199), ZONE CHANGE (PLN24-0198), VESTING TENTATIVE PARCEL MAP (TPM 39292) (PLN25-0085), PLOT PLAN (PLN24-0195) - LOCATED SOUTH OF ETHANAC ROAD, BETWEEN TRUMBLE ROAD AND SHERMAN ROAD

Dear Mr. Herrera:

The City of Perris appreciates the opportunity to comment on the Notice of Availability of a Draft Environmental Impact Report for the proposed "Heritage Valley Business Center" ("Proposed Project") consisting of a tilt-up industrial building totaling 829,775 square feet on a 41.16-acre site, located generally south of Ethanac Road between Trumble Road and Sherman Road, in the City of Menifee.

Additionally, staff appreciates the developer of the project reaching out to Perris staff to resolve our concerns, including prohibiting truck traffic on Trumble Road and ensuring adequate landscape screening along Trumble Road to ensure that it provides a safe transition for the planned future commercial development on the westerly side of this roadway in the city of Perris. This will allow for vehicle traffic safety along Trumble Road.

1. **Prohibit Truck Access on Trumble.** Access on Trumble Road should be modified as appropriate to ensure truck traffic does not use this roadway, including site and driveway

A4-1

Page 2 of 2

design. A condition/mitigation should be placed on the project to make these adjustments in consultation with the City of Perris prior to issuance of a grading permit.

2. **Landscape Buffer along Trumble Road.** The 24-foot landscape along Trumble Road shall include a 6-foot-high berm in front of the proposed 14-foot-high screen wall to reduce the wall's mass, with multi-layered shrubbery and tree planting to ensure adequate screening of the truck loading area and building from the future commercial development in Perris.

A4-1
cont.

3. In regards to the VMT (Vehicle Miles Travel) Analysis, staff is requesting that the following be addressed and that the developer coordinate with the City of Perris to determine traffic signal phasing and timing, along with turn pocket lengths, as part of the project conditions of approval.

A4-2

- a. Confirm and justify that the applicable land use factor is utilized to determine the employment density and rate.
- b. Verify that the applicable mitigation measures for this project correlate with standard and feasible VMT reduction strategies.

Please provide future notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA") under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law.

A4-3

The City of Perris appreciates the opportunity to comment on this project and working with the developer to resolve our traffic, landscape screening and VMT-related concerns so that the project may move forward. Please feel free to contact me at (951) 943-5003, extension 355, if you have any questions or would like to discuss the above concern in further detail.

Sincerely,



Patricia Brenes
Planning Manager

cc: Clara Miramontes, City Manager
Wendell Bugtai, Assistant City Manager
Sunny Soltani, City Attorney
Kenneth Phung, Director of Development Services
John Pourkazemi, City Engineer

Responses to Comment Letter A4 – City of Perris

A4-1 The City of Menifee acknowledges and appreciates the City of Perris' comments on the Project and the DEIR. Responses to topical areas of concern expressed by the City of Perris are presented below.

Truck Access on Trumble Road

Per the DEIR Traffic Analysis (DEIR **Appendix K1**), it is assumed that truck traffic would not access the site via Trumble Road. As shown in Exhibit 1-2 and Exhibit 4-2 of the TA, the two driveways proposed along Trumble Road (Driveway 1 and Driveway 2) are designated as passenger vehicle access only, while truck ingress/egress is assumed to occur exclusively via Sherman Road through Driveway 3 and Driveway 4. The Project's truck trip assignment and operational analyses were prepared consistent with this assumption, and the Heritage Valley Business Center Truck Routing Plan. The Truck Routing Plan would include physical signage to identify the path of travel for the trucks and note restricted movements. Furthermore, **Section 1.6** of the TA evaluated truck access and circulation specifically at the Sherman Road driveways and intersection improvements necessary to accommodate heavy truck turning movements, reflecting the Project design intent to route truck traffic to Sherman Road rather than Trumble Road. No truck turning analyses were prepared for the Trumble Road driveways because trucks are not anticipated to utilize those access points. There is no indication at this time that the Project would result in or cause potentially significant environmental impacts due to truck traffic along Trumble Road. The City may impose conditions of approval formalizing prohibition of Project truck access to Trumble Road.

Project Landscaping

Regarding landscape screening, the Project applicant proposes approximately 263,583 square feet of landscaping including landscape improvements within the Trumble Road right-of-way, consisting of approximately 528 trees including property line screen trees and evergreen screen trees (DEIR page 3-5). The Project complies with Menifee North Specific Plan landscape standards, Menifee General Plan Community Design policies requiring landscaping to reduce land use conflicts and soften wall appearance (DEIR pages 5.1-6 to 5.1-7), and the Menifee Industrial Good Neighbor Policies requiring landscape buffers and berming for tall walls (DEIR page 5.1-8). The building is setback approximately 223 feet from Trumble Road (DEIR page 5.1-10). The Draft EIR concluded that with compliance with applicable development standards and design guidelines, the Project aesthetic impacts would be less than significant (DEIR pages 5.1-9 to 5.1-14).

The City of Perris comments do not provide substantial evidence of potentially significant environmental impacts requiring additional mitigation beyond the Project's current designs and compliance with applicable City of Menifee standards. The City of Menifee would, through established design review and permitting processes, ensure that the Project final designs conform materially to the Project described and evaluated in the DEIR. The Project Applicant will continue to coordinate with City of Perris staff on design considerations along the Project's Trumble Road boundary. Findings and conclusions of the EIR are not affected. Revisions to the EIR is not required.

A4-2 Coordination with City of Perris and Project Traffic Improvements

The DEIR Traffic Analysis (TA) was prepared in coordination with both the City of Menifee and the City of Perris, with the TA Study Area (Study Area) reviewed and approved by both agencies. The Study Area includes nine intersections, of which five (Intersections 1, 2, 3, 4, and 7) are either fully or partially within City of Perris jurisdiction, including I-215 SB/NB Ramps at Ethanac Road, Encanto Drive/Ethanac Road, Trumble Road/Ethanac Road, and Sherman Road/Ethanac Road.

TA Table 1-4 identifies all recommended improvements by TA Analysis Scenario:

- Existing (2025) Conditions (TA Section 3)
- Existing plus Project (E+P) Conditions (TA Section 5)
- Existing plus Ambient Growth plus Cumulative (EAC) (2028) Conditions (TA Section 6)
- Existing plus Ambient Growth plus Project plus Cumulative (EAPC) (2028) Conditions (TA Section 6)

The Project would either construct the recommended improvements, or contribute fees toward the improvements via TUMF and DIF or fair-share contributions. Please refer to TA Section 1.5 Recommendations.

Signal phasing, timing, and turn-pocket design are addressed through the TA queuing and capacity evaluations. Please refer to the detailed analyses provided at TA **Sections 5, 6, and 7** for each of the TA Analysis Scenarios. Final design, engineering and construction would be coordinated with the City of Perris and the City of Menifee for shared-jurisdiction facilities. This would occur during the improvements permitting phase consistent with standard practices.

VMT Analysis: Employment Density and Land Use Factor

The DEIR VMT Analysis (DEIR **Appendix K2**) documents that the 829,755-square-foot warehouse was assigned an employment density factor of 1 employee per 1,030 square feet based on the Riverside County General Plan (there are no employment density factors identified in the City of Menifee General Plan), which is used by Menifee for calculating employees, resulting in 806 employees (VMT Analysis page 4). The DEIR VMT Analysis employment density factor is consistent with Riverside County General Plan factors and standard warehouse employment ratios. These results are summarized at DEIR **Table 5.13-4** Project VMT per Employee.

This socioeconomic data input was then appropriately coded into the RIVCOM transportation model to isolate Project-generated VMT under both baseline (2018) and cumulative (2045) conditions.

The comment does not provide substantial evidence demonstrating that this employment density factor is inappropriate for the Project warehouse use or that an alternative factor would materially change the DEIR VMT significance conclusion.

VMT Analysis: VMT Mitigation Measures

DEIR mitigation measures **MM TRA-1** through **MM TRA-3** represent the feasible range of VMT mitigation for this speculative warehouse project, located in a suburban (semi-rural) context

for several reasons that are grounded in Project type, locational context, and the structure of the California Air Pollution Control Officers Association (CAPCOA) Handbook.

Project Type and Applicable CAPCOA Subsectors: The CAPCOA Handbook organizes VMT reduction measures into seven transportation subsectors: Land Use, Neighborhood Design, Parking or Road Pricing/Management, Transit, Trip Reduction Programs, Clean Vehicles and Fuels, and School Programs. Of these seven subsectors, only the Trip Reduction Programs subsector is applicable to an employment-generating warehouse development such as the Project. Measures in the Land Use and Neighborhood Design subsectors apply to residential or mixed-use development projects with control over street patterns, building orientation, and neighborhood-scale amenities. These elements are not applicable to a single-use industrial warehouse. Parking pricing measures are infeasible for warehouse operations where employees require vehicle access and where shift-based operations limit transit alternatives. The Transit subsector requires proximity to high-quality transit service, which the Project lacks, as confirmed by the VMT screening analysis showing the Project does not qualify as a Transit Priority Area (VTA Analysis page 2). Clean Vehicles and Fuels measures address vehicle fleet operations controlled by the tenant/operator, not the developer of a speculative development such as the Project. School Programs are categorically inapplicable to industrial uses.

Locational Context—Suburban (Semi-Rural) Setting: The VMT Analysis confirms that the Project's locational context is suburban, defined by the CAPCOA Handbook as "an area characterized by dispersed, low-density, single-use, automobile dependent land use patterns, usually outside of the central city." The Project is not located within a Transit Priority Area (within one-half mile of an existing major transit stop or high-quality transit corridor), does not qualify as a Low VMT Area, and is situated in a location where existing transit service and alternative transportation infrastructure are limited. These locational constraints eliminate the feasibility of measures that depend on urban density, mixed-use proximity, or robust transit infrastructure. The suburban context also explains why measures such as neighborhood-scale bikeway networks, pedestrian-oriented street design, and transit pass subsidies would at best achieve minimal VMT reduction, as employees are dispersed across the region and commute patterns are automobile-dependent.

Speculative Project Nature and Tenant Control: The DEIR and VMT Analysis recognize that "the building is speculative in nature" (DEIR page 1-3) and that "generally, trip reduction programs are more appropriate for the occupant/tenant (i.e., employer) to implement and monitor rather than the building owner or developer" (VMT Analysis page 7). These constraints are critical because many potential VMT reduction strategies, such as employer-based telecommuting policies, compressed work week schedules, shift-time flexibility, or operational changes to reduce truck trips, are under the control of the future tenant, not the developer. The CAPCOA methodology requires that mitigation measures be enforceable and within the project applicant's control. **MM TRA-1** through **MM TRA-3** address this limitation by requiring the developer to provide the physical infrastructure and programmatic framework (commute marketing, TMA establishment, end-of-trip facilities) that future tenants must implement, with 90 percent employee eligibility assumed based on typical warehouse shift operations.

Maximum Subsector Reduction and Calculation Methodology: The CAPCOA Handbook states that the Trip Reduction Programs subsector has a maximum allowable reduction of 45 percent, and that measure reductions within a subsector must be multiplied (not added) unless substantial evidence shows independence. The combined reduction from **MM TRA-1** (3.6 percent), **MM TRA-2** (3.6 percent), and **MM TRA-3** (0.1 percent) totals 7.2 percent using the multiplicative formula: $1 - [(1-0.036) \times (1-0.036) \times (1-0.001)] = 7.2$ percent (VMT Analysis page 9).

Absence of Other Feasible VMT Mitigation: The Draft EIR appropriately concludes that "given the nature of operations of warehouse uses and location of the site, there are no other feasible mitigation measures that would further reduce employee-generated VMT associated with Project operations" (DEIR Page 5.13-26). This conclusion is supported by the systematic CAPCOA analysis, which demonstrates that measures outside the Trip Reduction Programs subsector are categorically inapplicable, and that additional measures within that subsector either require tenant-level control or depend on infrastructure (e.g., proximate transit, urban density, mixed-use context) that does not exist in the Project suburban location. CEQA does not require implementation of mitigation to reduce all impacts to less-than-significant levels if no feasible measures exist. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

A4-3 CEQA Noticing

Pursuant to CEQA Guidelines Section 15086(a), the City of Menifee has provided the Draft EIR to the City of Perris for review during the public review period. The City of Menifee will continue to provide CEQA notices to the City of Perris consistent with applicable requirements, including notices of public hearings and the EIR Notice of Determination.

Collaborative Resolution

The Draft EIR and these Responses address the City of Perris's comments regarding truck access, landscape/screening edge treatments, traffic signal coordination, VMT employment density assumptions, and VMT mitigation measures. The DEIR TA identifies all recommended improvements at shared-jurisdiction intersections and establishes the Project's responsibility for constructing improvements and contributing TUMF fees or fair-share funding for required improvements. The City of Menifee will continue coordinate with the City of Perris during subsequent Project review and development stages. The City of Menifee appreciates the City of Perris's constructive engagement in the Project and environmental review processes. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

Comment Letter A5 - California Department of Transportation

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 8
464 WEST 4TH STREET
SAN BERNARDINO CA, 92401
(909) 925-7520
www.dot.ca.gov



May 1, 2026

Route & Postmile: I-215 / PM 22.524
Cross Street: Sherman Rd & Ethanac Rd
GTS ID: 39604
SCH #: 2025051051

City of Menifee
Planning Division
Attn: Fernando Herrera
29844 Haun Rd,
Menifee, CA 92586

Subject: Caltrans LDR Branch Review of the Heritage Valley Business Center Project.

The California Department of Transportation (Caltrans) Local Development Review (LDR) Branch has completed its review of the Heritage Valley Business Center Draft Environmental Impact Report (EIR). The project is located on Sherman Road between Ethanac Road and McLaughlin Road in the City of Menifee.

The project proposes development of an approximately 829,755-square-foot warehouse, including 10,000 square feet of office space, on a 41.16-acre site. The application includes a Plot Plan, General Plan Amendment, Change of Zone, and Specific Plan Amendment to incorporate the site into the Menifee North Specific Plan and designate it for industrial use. The project is expected to open in 2028 and will be accessed via Trumble Road (two passenger vehicle driveways) and Sherman Road (two full-access driveways serving both cars and trucks).

Moreover, according to the Traffic Impact Analysis (TIA) the following improvements are recommended to maintain General Plan Consistency:

I-215 SB Ramps & Ethanac Road (Perris, Caltrans):

- Add a second westbound (WB) left-turn lane
- Add a southbound (SB) left-turn lane by modifying the southbound approach to include:
 - One left-turn lane
 - One shared left/through/right-turn lane
 - One right-turn lane
- Add second and third eastbound (EB) through lanes
- Modify the EB right-turn lane to a free-right turn lane
- Add a third WB through lane

I-215 NB Ramps & Ethanac Road (Perris, Caltrans):

"Improving lives and communities through transportation"

A5-1

- Restripe to add a second EB left-turn lane
- Restripe to add a second EB through lane
- Add a second WB through lane
- Add a WB right-turn lane
- Add two northbound (NB) left-turn lanes
- Add a third EB through lane
- Add a third WB through lane

Y
A5-1
cont.

Given the recommended work within Caltrans right-of-way, any impacts requiring mitigation will need to be coordinated with the Caltrans Office of Encroachment Permits. Implementation of the proposed improvements will be subject to the encroachment permit process, and a Caltrans encroachment permit must be obtained prior to construction and/or project operations begin.

Local Development Review

LDR has reviewed the currently available project documents, with input from our functional units. The comments provided in this letter are based on the information available at this time and are considered preliminary; they may be revised as the project design and site plans develop. Due to potential impacts on the State Highway System (SHS), these comments must be fully addressed and resolved before the project can advance in the review process.

A5-2

General:

1. The Applicant must ensure that all comments and recommendations enclosed in this LDR review letter are addressed accordingly and accurately by providing revised or updated documents and by providing a response letter with the Caltrans encroachment permit submittal.

Assembly Bill 98:

2. If applicable, please ensure that the project complies with the standards, designs, and other requirements outlined in [Assembly Bill 98](#).

Vehicle Miles Traveled (VMT):

While the project's VMT impacts are identified as significant and unavoidable, we support and strongly encourage the implementation of the VMT reduction strategies identified in the Draft EIR to the extent feasible. These measures are intended to reduce reliance on single-occupancy vehicle travel by promoting alternative modes, thereby lowering overall vehicle trips, VMT, and associated greenhouse gas emissions. Advancing these strategies would support long-term sustainability goals, enhance multimodal accessibility, and contribute to more environmentally responsible development. The VMT reduction strategies are listed below:

Commute Trip Reduction (CTR) Marketing (MM TRA-1)

- Provide commuter information services (on-site or online)
- Assign employee transportation coordinators
- Offer online or on-site transit pass sales
- Implement a guaranteed ride home program
- Distribute materials and resources promoting alternatives to single-occupancy vehicle travel (carpooling, transit, biking, walking)

A5-3

Ridesharing Program (MM TRA-2)

- Establish a transportation management association (TMA)
- Designate preferred parking spaces for rideshare vehicles

"Improving lives and communities through transportation"

• Provide passenger loading/unloading and waiting areas • Offer a digital platform (app or website) to coordinate carpools <u>Bicycle Facilities (MM TRA-3)</u> • Install secure bike parking and bike lockers • Provide showers and personal lockers • Maintain end-of-trip facilities to support bicycle commuting	Y A5-3 cont.
Traffic Operations General: 1. Verify sufficient right-of-way is available for the proposed improvements. See Right-of-Way section below. 2. Provide the proposed layout of the recommended improvements within State Right-of-Way.	A5-4
Traffic Analysis: 3. The queueing analysis shows that there is an excess in queue at certain locations. The proposed improvements will need to be coordinated with Caltrans and the City of Menifee/City of Perris to mitigate the unacceptable delays forecasted with this project. 4. An ISOAP analysis will need to be provided for the proposed improvements at intersection #1 (I-215 SB ramps and Ethanac Rd) and intersection #2 (I-215 NB ramps and Ethanac Rd). 5. Please include the City of Perris's bike plan to supplement the attached bike plan from the City of Menifee. 6. Please include truck turning templates for conditions with recommended improvements on State Right-of-Way. 7. Please include a copy of the Synchro files for all scenarios in State ROW.	A5-5
Safety Review: 8. The proposed project is expected to generate additional trips on the State Highway System; therefore, a Safety Analysis Report shall be prepared for the proposed development. The report shall be developed in accordance with the Local Development Review (LDR) Safety Review Practitioners Guidance (February 2024). Please follow the steps below: a. To request crash data on the State Highway System, please submit your request via our California Public Records Act (CPRA) portal following the link (Support Home Page (mycusthelp.com)) b. Please analyze the existing crash data and discuss the project's impact on safety as needed. c. Please provide appropriate countermeasures to mitigate/reduce project's safety impact if applicable.	A5-6
Truck Services 1. The City of Menifee shall evaluate whether Terminal Access approval is required if STAA trucks access the State Highway System via the on- and off-ramps from the proposed development.	A5-7
Right-of-Way 1. The proposed project will be required to dedicate additional right-of-way along Trimble Road, Sherman Road, and Ethanac Road, all of which are currently maintained by the City of Menifee. The existing and proposed right-of-way widths are summarized below: "Improving lives and communities through transportation"	A5-8 ↓

- Trimble Road: The existing right-of-way is 40 feet (20-foot half-width). The ultimate right-of-way will need to be confirmed with the City of Menifee; however, it is currently assumed to function as an industrial collector, which may require a full width of approximately 78 feet.
 - Sherman Road: The existing right-of-way is 60 feet (30-foot half-width). A full right-of-way width of 118 feet is proposed.
 - Ethanac Road: The existing right-of-way is 60 feet (30-foot half-width). A full right-of-way width of 220 feet is proposed.
2. The following items will be required as part of the Encroachment Permit application:
- A tentative map of the project site
 - A topographic survey signed and stamped by a Professional Land Surveyor (PLS)
 - A site plan clearly showing and dimensioning both the proposed and existing right-of-way
 - A legal description for the proposed dedication, signed and stamped by a PLS
 - A current preliminary title report and all supporting documents
 - The Conditions of Approval issued by the approving local agency

A5-8
cont.

Traffic Forecasting and Analysis

Traffic Volumes Forecasts

1. Some of the projects shown in EXHIBIT4-5: CUMULATIVE DEVELOPMENT MAP will not impact the study intersections in the document. For example, all trips from projects north of State Route 74 can access the SHS using the I-215 / SR-74 Interchange and will have no need to drive along Ethanac Road (see image).
 - a. Please remove these projects from the map as well as the list of cumulative projects shown in TABLE 4-2: CUMULATIVE DEVELOPMENT LAND USE SUMMARY.

EXHIBIT 4-5: CUMULATIVE DEVELOPMENT MAP



A5-9

2. Additionally, several projects identified in Exhibit 4-5: Cumulative Development Map are already existing as of 2025 (e.g., M15 – Underwood and M28 – Nova Battery Project
"Improving lives and communities through transportation")

[DEV2024-015]].

- a. Please remove these and any other projects that are already constructed or operational from Exhibit 4-5 (Cumulative Development Map) and Table 4-2 (Cumulative Development Land Use Summary).
- b. Following these revisions, update the traffic volumes presented in Exhibit 4-6 (Cumulative Only Volumes – Actual Volumes) and Exhibit 4-7 (Cumulative Only PCE Volumes) accordingly.
- c. Revise all subsequent analyses to reflect the updated cumulative scenario, including the Fair Share Contribution calculations.

A5-9
cont.

Equitable Access

If any Caltrans facilities are impacted by the project, they must comply with American Disabilities Act (ADA) Standards upon project completion. Additionally, the project must ensure the maintenance of bicycle and pedestrian access throughout the construction phase. These access considerations align with Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

A5-10

Caltrans Encroachment Permit

Be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' right-of-way requires a Caltrans-issued encroachment permit.

For information regarding the Encroachment Permit application and submittal requirements, contact:

Caltrans Office of Encroachment Permits

464 West 4th Street, Basement, MS 619
San Bernardino, CA 92401-1400
(909) 383-4526

D8.E-permits@dot.ca.gov

<https://dot.ca.gov/programs/traffic-operations/ep>

Important Note: All new permit applications must now be submitted through our new CEPS Online Portal at: <https://ceps.dot.ca.gov/>

A5-11

Please be advised that LDR's point of contact role will conclude upon the completion of the development entitlement process. Once project is entitled, the Encroachment Permit Office will serve as the primary point of contact moving forward.

Thank you again for including Caltrans in the review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D8@dot.ca.gov or call 909-925-7520.

Sincerely,



Janki Patel

Branch Chief - Local Development Review
Division of Transportation Planning
Caltrans District 8

"Improving lives and communities through transportation"

Responses to Comment Letter A5 – California Department of Transportation

- A5-1** Caltrans review of the DEIR is recognized. The Project and its discretionary actions as summarized by Caltrans are materially correct. The Applicant or successor in interest will timely coordinate with Caltrans regarding any work within Caltrans right-of-way. The Applicant or successor in interest will acquire all requisite Caltrans encroachment permits prior to construction and/or Project operations begin. Findings and conclusions of the DEIR are not affected. Revision to the DEIR is not required.
- A5-2** The comment is acknowledged. The Lead Agency and Applicant will continue to coordinate with Caltrans LDR, and will submit any revised plans and a written response to all LDR comments in conjunction with any Caltrans encroachment permit application(s).
- Based on the timing of filing the application for the proposed Project, the Project is exempt from Assembly Bill 98 requirements. Findings and conclusions of the DEIR are not affected. Revision to the DEIR is not required.
- A5-3** The comment correctly identified the DEIR conclusion that the Project's VMT impacts would be significant and unavoidable. The Lead Agency recognizes and appreciates Caltrans stated support of the DEIR proposed VMT mitigation measures. Findings and conclusions of the DEIR are not affected. Revision to the DEIR is not required.
- A5-4** In conjunction with development of final designs, the Applicant or successor in interest will provide verification of sufficient right-of-way for proposed improvements, and layout recommended improvements within State right-of-way. Findings and conclusions of the DEIR are not affected. Revision to the DEIR is not required.
- A5-5** The comment is acknowledged. The applicant will pay fair share and any required studies will take place during the planning of the offsite improvements.
- A5-6** The comment is acknowledged. Any required studies will take place during the planning of the offsite improvements.
- A5-7** The comment states that the City of Menifee (Lead Agency) shall evaluate whether Terminal Access approval is required if Surface Transportation Assistance Act¹ (STAA) trucks access the State Highway System via the on- and off-ramps from the proposed development.
- A5-8** Right-of-way requirements for Trumble Road, Sherman Road, and Ethanac Road listed by Caltrans are noted. The Applicant or its successor interest will provide all required information in conjunction with Caltrans Encroachment Permit application(s). Findings and conclusions of the DEIR are not affected. Revision to the DEIR is not required.
- A5-9** The Lead Agency has considered Caltrans' request to omit certain cumulative projects from the TA cumulative analysis. The comment is noted, but the requested change is not necessary and would not alter the conclusions of the analysis.

¹ Under federal law, STAA trucks are truck tractor/semitrailer or double trailer combinations that meet national size standards (such as 102 inch width and up to 53 foot semitrailers) established by the Surface Transportation Assistance Act of 1982. In states like California, "STAA Vehicle (Truck)" is defined as any truck that exceeds the usual state legal length limits but complies with these federal STAA dimension standards.

The list of cumulative projects and the associated Cumulative Development Map (Exhibit 4-5) were developed in coordination with, and reviewed and approved by, the City of Menifee as Lead Agency. Although certain of the listed projects may have limited potential to affect the study area intersection operations, retaining these projects in the cumulative scenario provides a conservative and robust evaluation of potential traffic conditions within the study area. Including these projects ensures that cumulative traffic impacts are not understated and that the analysis reasonably captures potential variability in driver route choice and network usage over time.

Even if the referenced projects were removed from the TA Cumulative Development Land Use Summary, the resulting reduction in cumulative traffic volumes at the study area intersections would be modest and would not meaningfully affect the TA findings or the EIR's conclusions regarding the significance of cumulative traffic impacts. For this reason, and given that the current cumulative project list reflects the Lead Agency's direction and provides a conservative basis for analysis, no revisions to the cumulative project list, map, or traffic analysis are proposed at this time.

The Project TA fair-share fee contribution(s) for area improvements are planning-level estimates only and are subject to refinement and final determination by the Lead Agency through its adopted fee programs, conditions of approval, and/or subsequent implementation agreements. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

A5-10 The Lead Agency requires that all Project improvements, including those affecting Caltrans facilities, be designed and constructed consistent with applicable ADA Standards. The Lead Agency will ensure maintenance of bicycle and pedestrian access throughout the Project construction phase. These requirements are implemented and enforced through established City development review, building permit, and site inspection processes. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

A5-11 Caltrans' encroachment permit requirements and the provided contact information are acknowledged. The City, as Lead Agency, will coordinate with Caltrans through completion of the entitlement and environmental review process; subsequent Caltrans involvement will occur through the encroachment permit process. The City appreciates Caltrans participation in the Project and environmental review processes. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

Comment Letter A6 – Riverside Transit Agency

From: Mauricio Alvarez <malvarez@riversidetransit.com>
Sent: Thursday, April 30, 2026 9:16 AM
To: Fernando Herrera <fherrera@cityofmenifee.us>
Subject: Heritage Valley Business Center

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning Fernando,

Thank you for including RTA in the development review of the Heritage Valley Business Center. After reviewing the plans, there are no comments to submit for this particular project.

Thank you,

Mauricio Alvarez, MBA

Planning Manager
Riverside Transit Agency
p: 951.565.5260 | e: malvarez@riversidetransit.com
[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)
1825 Third Street, Riverside, CA 92507

A6-1

Responses to Comment Letter A6 – Riverside Transit Agency

A6-1 Comment noted, no further response is warranted.

Comment Letter A7 – Riverside County Flood Control Water Conservation District

From: McKinney, Elsa <EMcKinne@rivco.org>
Sent: Monday, April 13, 2026 3:05 PM
To: Fernando Herrera <fherrera@cityofmenifee.us>
Cc: McNeill, Amy <ammcneil@RIVCO.ORG>; Cornelius, William <wmcornei@RIVCO.ORG>
Subject: TPM 39292, PP (PLN 24-0195), GPA PLN 24-0197, CZ PLN 24-0198; SPA PLN 24-0199; Heritage Valley Business Center-Due 5/1/2026

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Fernando,

Attached is a copy of Riverside County Flood Control's comments pertaining to the above-mentioned project.

Should you have any questions please feel free to contact us.

Kind regards,



Elsa McKinney
Engineering Tech I, Development Review
[Riverside County Flood Control & Water Conservation District](mailto:emckinne@rivco.org)
emckinne@rivco.org
1995 Market Street, Riverside, CA 92501
951.955.2878



*Off on Mondays

A7-1

Confidentiality Disclaimer

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[County of Riverside California](#)

JASON E. UHLEY
General Manager-Chief Engineer



1995 MARKET STREET
RIVERSIDE, CA 92501
951.955.1200
951.788.9965 FAX
www.rcflood.org

268675

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

April 13, 2026

City of Menifee
Planning Division
29714 Haun Road, Building A
Menifee, CA 92586

Attention: Fernando Herrera

Re: VTPM 39292 (PLN 25-0085), PLN 24-0195,
PLN 24-0197, PLN 24-0198, PLN 24-0199,
Heritage Valley Business Center,
APNs 331-110-023 through 331-110-027,
331-110-031, 331-110-035, 331-110-038,
331-110-039 and 331-110-041

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

A7-2

The District's review is based on the above-referenced project transmittal, received March 17, 2026. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- ☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- ☒ This project involves District proposed Master Drainage Plan facilities, namely, Romoland Master Drainage Plan Line A-1 to protect the sight from offsite flows. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.
- ☐ This project proposes channels, storm drains larger than 36 inches in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance.

A7-3

A7-4

City of Menifee
Re: VTPM 39292 (PLN 25-0085), PLN 24-0195,
PLN 24-0197, PLN 24-0198, PLN 24-0199,
Heritage Valley Business Center,
APNs 331-110-023 through 331-110-027,
331-110-031, 331-110-035, 331-110-038,
331-110-039 and 331-110-041

- 2 -

April 13, 2026

268675

Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

A7-4
cont.

☒ This project is located within the limits of the District's Homeland/Romoland-Line A Area Drainage Plan for which drainage fees have been adopted; applicable fees should be paid by cashier's check or money order only to the Flood Control District or City prior to issuance of grading permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.

☒ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Romoland Master Drainage Plan Line A. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. Any proposed underground detention basin or chambers designed to attenuate the 100-year storm event shall either be maintained by a City-maintained community facilities district (CFD) or redesigned to be an open, above ground facility. For further information, contact the District's Permitting Services Section at 951.955.1266.

A7-5

☒ The District's previous comments dated June 9, 2025 are still valid.

GENERAL INFORMATION

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document, and/or Mitigation Monitoring and Reporting Program, and with all other federal, state, and local environmental rules and regulations that may apply, such as, but not limited to, the Multiple Species Habitat Conservation Plan (MSHCP), Sections 404 and 401 of the Clean Water Act, California Fish and Game Code Section 1602, and the Porter Cologne Water Quality Control Act. The District's action associated with the subject project triggers evaluation by the District with respect to the applicant's compliance with federal, state, and local environmental laws. For this project, the Lead Agency is the agency in the address above, and the District is a Responsible Agency under CEQA. The District, as a Co-permittee under the MSHCP, needs to demonstrate that all District related activities, including the actions identified above, are consistent with the MSHCP. This is typically achieved through determinations from the CEQA Lead Agency (if they are also a Co-permittee) for the project. For the MSHCP, the District's focus will be particular to Sections 6.1.2, 6.1.3, 6.1.4, 6.3.2, 7.3.7, 7.5.3, and Appendix C of the MSHCP. Please include consistency determination statements from the Lead Agency/Co-permittee for the project for each of these sections in the CEQA document, including for areas that are associated with any District action regarding the project. The District may also require that an applicant provide supporting technical documentation for environmental clearance.

A7-6

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

City of Menifee
Re: VTPM 39292 (PLN 25-0085), PLN 24-0195,
PLN 24-0197, PLN 24-0198, PLN 24-0199,
Heritage Valley Business Center,
APNs 331-110-023 through 331-110-027,
331-110-031, 331-110-035, 331-110-038,
331-110-039 and 331-110-041

- 2 -

April 13, 2026

268675

Very truly yours,

AMY MCNEILL
Engineering Project Manager

Attachment

EM:cmr

JASON E. UHLEY
General Manager-Chief Engineer



1995 MARKET STREET
RIVERSIDE, CA 92501
951.955.1200
951.788.9965 FAX
www.reflood.org

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

June 9, 2025

262307

City of Menifee
Planning Division
29714 Haun Road, Building A
Menifee, CA 92586

Attention: Fernando Herrera

Re: TPM 39292 (PLN 25-0085), PLN 24-0195,
PLN 24-0197, PLN 24-0198, PLN 24-0199,
Heritage Valley Business Center,
APNs 331-110-023 through 331-110-027,
331-110-031, 331-110-035, 331-110-038,
331-110-039 and 331-110-041

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received May 23, 2025. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- ☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- ☒ This project involves District proposed Master Drainage Plan facilities, namely, Romoland Master Drainage Plan Line A-1 to protect the site from offsite flows. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.
- ☐ This project proposes channels, storm drains larger than 36 inches in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and

A7-7

City of Menifee
Re: TPM 39292 (PLN 25-0085), PLN 24-0195,
PLN 24-0197, PLN 24-0198, PLN 24-0199,
Heritage Valley Business Center,
APNs 331-110-023 through 331-110-027,
331-110-031, 331-110-035, 331-110-038,
331-110-039 and 331-110-041

- 2 -

June 9, 2025

262307

conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

- ☒ This project is located within the limits of the District's Homeland/Romoland - Line A Area Drainage Plan for which drainage fees have been adopted; applicable fees should be paid by cashier's check or money order only to the Flood Control District or City prior to issuance of grading permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.
- ☒ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Romoland Master Drainage Plan Line A. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- ☒ The District's previous comments dated December 16, 2024 are still valid.

GENERAL INFORMATION

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document, and/or Mitigation Monitoring and Reporting Program, and with all other federal, state, and local environmental rules and regulations that may apply, such as, but not limited to, the Multiple Species Habitat Conservation Plan (MSHCP), Sections 404 and 401 of the Clean Water Act, California Fish and Game Code Section 1602, and the Porter Cologne Water Quality Control Act. The District's action associated with the subject project triggers evaluation by the District with respect to the applicant's compliance with federal, state, and local environmental laws. For this project, the Lead Agency is the agency in the address above, and the District is a Responsible Agency under CEQA. The District, as a Co-permittee under the MSHCP, needs to demonstrate that all District related activities, including the actions identified above, are consistent with the MSHCP. This is typically achieved through determinations from the CEQA Lead Agency (if they are also a Co-permittee) for the project. For the MSHCP, the District's focus will be particular to Sections 6.1.2, 6.1.3, 6.1.4, 6.3.2, 7.3.7, 7.5.3, and Appendix C of the MSHCP. Please include consistency determination statements from the Lead Agency/Co-permittee for the project for each of these sections in the CEQA document. The District may also require that an applicant provide supporting technical documentation for environmental clearance.

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

Very truly yours,



AMY MCNEILL
Engineering Project Manager

Attachment

EM:bs

A7-7
cont.

Responses to Comment Letter A7 – Riverside County Flood Control and Water Conservation District

- A7-1** The comment is introductory and no further response is warranted.
- A7-2** Comment noted. No substantial environmental impacts are mentioned. No further response is warranted.
- A7-3** Comment noted. No substantial environmental impacts are mentioned. Please refer to **Section 5.9: Hydrology and Water Quality** of the Draft EIR for information regarding compliance with applicable regulations and **Section 5.3: Biological Resources** of the Draft EIR for discussion of compliance with the MSHCP. No further response is warranted.
- A7-4** Comment noted. The City will continue to coordinate with Riverside County Flood Control and Water Conservation District on the Project. No further response is warranted.
- A7-5** Comment noted. Please refer to **Response A7-3** above regarding compliance with applicable regulations. Regarding the referenced comment letter dated June 9, 2025, please see **Response A7-7** below. No substantial environmental impacts are mentioned and no further response is warranted.
- A7-6** The comment is conclusionary and does not mention substantial environmental impacts. See **Section 5.9: Hydrology and Water Quality** of the Draft EIR for information regarding compliance with applicable regulations. No further response is warranted.
- A7-7** The letter dated June 9, 2025 is outside of the comment period, however it is included for informational purposes. The letter contains similar information to the comment received on April 13, 2026. Please refer to **Responses A7-2** through **A7-6**, above. No further response is warranted.

Comment Letter O1 – Advocates for the Environment

March 30, 2026

Fernando Herrera
Senior Planner
City of Menifee
29844 Haun Road
Menifee, CA 92586

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization



Via U.S. Mail and email to fherrera@cityofmenifee.us

Re: Comments on Draft Environmental Impact Report for Heritage Valley Business Center
Project, SCH No. 2025051051

Dear Mr. Herrera:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (DEIR) for the Heritage Valley Business Center Project (Project). The Project Site is located near Ethnac Road to the north, Sherman Road to the east, and Trumble Road to the west in the City of Menifee (City). The Project proposes to develop the 41-acre Project Site by constructing a warehouse building totaling 829,755 square feet. We have reviewed the DEIR prepared in March 2026 and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (GHG) analysis under the California Environmental Quality Act (CEQA).

O1-1

The City Should Require the Project to be Net-Zero

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions. It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net-zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero.

O1-2

Environmental groups have achieved tremendous outcomes by litigation under CEQA. Two of the largest mixed-use development projects in the history of California, Newhall Ranch (now FivePoint Valencia), and Centennial (part of Tejon Ranch) decided to move forward as net-zero communities after losing CEQA lawsuits to environmental groups. The ability for these large projects

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City of Menifee
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to become net-zero indicates that it is achievable, even for large-scale developments. The Applicant for this Project should do the same.

We urge the City to adopt net-zero as the GHG significance threshold for this project. This threshold is well-supported by plans for the reduction of GHG emissions in California, and particularly the CARB Climate Change Scoping Plans. The CARB 2017 Scoping Plan states that “achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.” (CARB 2017 Scoping Plan, p. 101.) Additionally, the CARB 2022 Scoping Plan reaffirms the necessity of a net zero target by expressing: “it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed ... in order to meet our GHG and air quality targets.” (CARB 2022 Scoping Plan, p. 184.) CARB further encourages a net-zero threshold in its strategies for local actions in Appendix D to the 2022 Scoping Plan. (CARB 2022 Scoping Plan, Appendix D p. 24-26.)

Moving this Project forward as a net-zero project would not only be the right thing for the City to do, but also would also help protect the City and the Applicant from CEQA GHG litigation.

GHG Mitigation is Insufficient under CEQA

The calculated project-related emissions amount to 6,534.64 metric tons of carbon dioxide equivalent (MTCO₂e) per year (DEIR, p. 5.7-24). The City adopted a significance threshold based on Appendix G of the CEQA Guidelines. Based on this threshold, the City concluded the Project would have significant and unavoidable GHG emissions. To reduce this identified significant GHG impact, the GHG Analysis offered greenhouse gas Mitigation Measures (MM-GHG) 1-7. (DEIR, p. 5.7-27.)

The DEIR did not include any quantitative estimate of the effectiveness of the proposed mitigation in reducing GHG emissions, nor did it provide evidence that there was no further feasible mitigation, stating there are “no feasible mitigation measures that would reduce vehicular emissions.” (DEIR, p. 5.7-25.) Despite the availability of other GHG mitigation measures not focused on vehicle emissions, the DEIR declared that the Project’s emissions would remain significant and unavoidable even after the adoption of the feasible mitigation measures. However, the DEIR’s conclusion that additional mitigation measures would be infeasible is not supported by substantial evidence; the DEIR should have included more mitigation to reduce the Project’s GHG emissions to the extent required by CEQA.

The EIR Identifies Ineffective and Insufficient Mitigation Measures

MM-GHG 3 is unlikely to be effective because the measure only mandates providing information to promote funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment. without establishing clear methods

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O1-2
cont.

O1-3

City of Menifee
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to ensure tenants receive, understand, or act upon the information. (DEIR, p. 5.7-27.) Merely providing documentation is unlikely to cause effective changes in tenant behavior without additional enforceable measures. The City should change this measure to make it more enforceable by contracting with the future tenant to require them to apply and join the programs in good faith and to use any granted funding accordingly. Ultimately, this mitigation measures should be revised to require the level of effectiveness required by CEQA, which is to the extent feasible to achieve fair share mitigation.

Infeasibility Finding Lacks Substantial Evidence

The conclusion that the Project will not be able to achieve any mitigation beyond which was identified in the proposed mitigation measures is not supported with substantial evidence. The DEIR should have proposed more mitigation measures to be applied to the maximum-feasible extent in order to justify the conclusion that the Project's GHG impact would be unavoidable due to lack of feasibility of further mitigation. While the proposed mitigation measures are a start, the City did not demonstrate that these actions would represent the maximum feasible mitigation to support a finding that the Project's impact would be significant and unavoidable.

CEQA requires that the lead agency identify specific reasons for infeasibility of further mitigation when concluding significant and unavoidable impact. The City did not attempt to specify any infeasible mitigation measures when concluding that the Project's GHG impact would be unavoidable, nor did it provide any reasoning that the identified mitigation measures represent the maximum feasible mitigation.

There are other readily available mitigation measures to help reduce the 87% of the Project's GHG mobile emissions impacts. (DEIR, p. 5.7-24.) For instance, the DEIR notes that they cannot further reduce GHG emissions because "Neither the Project Applicant nor the Lead Agency can substantively or materially affect reductions in project-related vehicular source emissions beyond regulatory requirements imposed by the federal or state governments or the SCAQMD, and mitigation measures identified herein." (DEIR, p. 5.7-24-25.) Yet the City and Applicant together can commit to design and technology specifications that reduce emissions, especially in the heavy-duty truck and transportation vehicle fleets. The City could require that the applicant's lease agreements include provisions to limit the use of heavy-duty diesel trucks or require that the tenant's vehicle fleet use non-diesel fuels such as gasoline, ethanol, or biofuels. Another feasible mitigation measure would require the applicant to enter a contract with future tenants to use zero-emission commercial vehicles upon reasonable availability and maintain a charging system for the vehicle fleet that is powered by solar panels on the Project site.

Moreover, it is feasible to create and adopt a Transportation Demand Management (TDM) program. Feasible TDM measures include, but are not limited to: rideshare incentives, transit subsidies, shuttle services, preferential carpool/vanpool parking, and flexible work schedules. This

O1-3
cont.

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kind of mitigation is both feasible and necessary to offset the Project's fair share of emissions. Consequently, substantial evidence did not support the conclusion that further mitigation is infeasible.

O1-3
cont.

The Project's GHG Impacts Must be Fully Mitigated

CEQA requires that the Project include fair-share mitigation for all significant cumulative impacts. (*Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Here, this means mitigation of the full extent of the Project's GHG impacts. The DEIR claims that no other mitigation measures are feasible, beyond the identified mitigation measures. But that conclusion is incorrect, and not supported by substantial evidence.

The amount of GHG emissions that comprises the Project's fair share is clear. The reasonable lifespan this Project is approximately 30 years, as indicated by the amortization of construction emissions. (DEIR, p. 5.7-23.) Therefore, the Project would likely contribute around 195,000 MTCO₂e during its entire lifespan.¹ This would be a good starting point from which to subtract the effect of additional non-offset mitigation measures, before implementing offset purchases.

CEQA does not distinguish between mobile and non-mobile sources of GHG emissions; the lead agency can mitigate cumulative GHG impacts through any measure. More mitigation options for reducing the GHG impact of project operations include automatic light switches, requiring all generators to be powered by non-diesel fuel, and solar-powered water heaters, among many other mitigation strategies that can be incorporated in the project as design features or as mitigation measures. Such features could be adopted individually or as part of a comprehensive goal of sustainable building certification, such as Leadership and Energy and Environmental Design (LEED), that extends further beyond CALGreen requirements.

O1-4

The DEIR does not consider the use of electric or hybrid construction equipment as a feasible mitigation measure. This Project will rely on diesel-powered construction equipment, which contributes substantially to GHG emissions. (DEIR, p. 5.2-39.) Incorporating electric vehicle (EV) or hybrid construction equipment would reduce both short-term construction emissions and long-term operational emissions.

The project also accounts for the possibility of refrigerated uses and trucks with cold storage. (DEIR, p. 5.7-23.) However, there is no proposed mitigation for warehouse refrigeration storage. The City should commit to low-warming HFCs or other alternatives to traditional coolants, as well as energy-efficient refrigeration systems.

Beyond addressing these gaps, the Project could expand on existing mitigation measures. The DEIR indicates that the Project will commit to on-site solar generation by installing solar panels sufficient to offset at least 20% of the Project's total energy demand. (DEIR, p. 5.7-27.) The Project could feasibly install solar panels across a larger portion of available roof space to increase renewable

¹ 6,491.99 MTCO₂e per year × 30 years = 194,759.7 MTCO₂e

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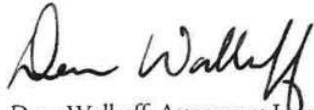
energy generation and further reduce greenhouse gas emissions. This measure could be extended to require solar panels capable of offsetting 100% of the buildings' energy demands.

Even after implementing on-site emissions reductions to the maximum feasible extent, the City could also require the Applicant to purchase offsets to the extent necessary to mitigate the Project's emissions to the fair share extent. Overall, there are more options available to mitigate emissions to the full extent of project emissions.

Conclusion

The DEIR fails to require all feasible mitigation, despite concluding that the significant GHG impact will be unavoidable. The lead agency has not met its burden of showing that such measures are infeasible, and therefore, the DEIR should be amended to reflect all feasible mitigation to the fair-share extent. Please put me on the interest list to receive updates about the progress of this Project. We make this request under Public Resources Code, section 21092.2.

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

O1-4
cont.

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Responses to Comment Letter O1 – Advocates for the Environment

O1-1 The City acknowledges Advocates for the Environment's (AFE) comment letter. The comment description of the Project conforms materially to the Project as presented in the Draft EIR. AFE comments regarding greenhouse gas emissions are addressed in the responses that follow. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

O1-2 The City disagrees with the comment assertions. The City acknowledges the comment's advocacy for a net zero greenhouse gas (GHG) significance threshold and the references to global building sector emissions, state climate policy, and CARB's Climate Change Scoping Plans. However, CEQA does not require a lead agency to adopt a net zero numerical threshold for project level GHG analysis, nor does any state agency mandate that individual discretionary projects be evaluated against a net zero standard at this time. Instead, CEQA Guidelines direct lead agencies to exercise careful judgment, based on scientific and factual data, in selecting thresholds and methodologies appropriate to the agency's jurisdiction and the type of project under review (Draft EIR, **Section 5.7.4**).

As described at DEIR **Section 5.7**, the City relied on the South Coast Air Quality Management District's (SCAQMD's) recommended Tier 3 screening concepts and substantial evidence in the SCAQMD Interim GHG Significance Threshold guidance to select a numeric threshold of 3,000 MTCO₂e per year for industrial/warehouse projects. Notably, this is more conservative than the 10,000 MTCO₂e per year industrial threshold adopted by the SCAQMD Governing Board for projects where SCAQMD is the lead agency (Draft EIR, pp. 5.7-18 to 5.7-22). The City has not adopted a net zero GHG significance threshold, and there is no requirement under CEQA or any applicable state regulation that the City do so for this Project. The comment's preference for a more stringent, net zero threshold represents a policy view rather than a CEQA obligation.

The comment cites CARB's 2017 and 2022 Scoping Plans and Appendix D to the 2022 Scoping Plan as support for a net zero threshold. As the Draft EIR explains, Appendix D to the 2022 Scoping Plan focuses primarily on climate action plans and local authority over new residential and mixed use residential development projects; CARB expressly states that the recommendations in this section "apply only to residential and mixed use development project types" and that it "plans to continue to explore new approaches for other land use types in the future" (Draft EIR, p. 5.7-12). Industrial warehouse uses, such as the Project, are not within the land use categories covered by Appendix D's recommended local "net zero" strategies. Accordingly, it would be inappropriate and unsupported by CARB's own language to treat Appendix D as requiring or even directly endorsing a net zero project level threshold for this industrial/warehouse use.

The Draft EIR further documents that the Project has been evaluated against the existing regulatory framework designed to achieve statewide climate targets, including AB 32, SB 32, AB 1279 (carbon neutrality by 2045), SB 100, and CARB's Cap and Trade Program and transportation-sector rules, among others (Draft EIR, pp. 5.7-13 to 5.7-21, 5.7-28, 5.7-29). The GHG analysis uses CalEEMod (2022.1) to quantify construction and operational emissions, incorporates applicable laws, ordinances, and regulations (LOR 1 through LOR 8), and imposes Project specific mitigation measures (**MMs GHG-1** through **GHG-7**) such as electrification of on site cargo handling equipment, EV ready infrastructure, and installation of a photovoltaic

system sized to offset at least 20 percent of the Project's projected energy demand (Draft EIR, pp. 5.7-25 to 5.7-27). With these measures, the Project would be consistent with applicable elements of the 2022 Scoping Plan and the City's General Plan policies OSC 9.5, OSC 10.1 through OSC 10.4, and C 1.5 (Draft EIR, pp. 5.7-20, 5.7-28, 5.7-29).

Despite implementation of all feasible measures, the Project's net annual GHG emissions (approximately 6,492 MTCO₂e per year) would exceed the City's adopted 3,000 MTCO₂e per year threshold, and the Draft EIR transparently discloses this as a significant and unavoidable impact (Draft EIR, pp. 5.7-23 to 5.7-29). The analysis also explains that approximately 87 percent of the Project's GHG emissions are from mobile sources, which the City cannot directly regulate beyond enforcing applicable state and regional requirements; even if all other source categories were reduced to zero, mobile emissions alone would exceed the numeric threshold (Draft EIR, p. 5.7-24). Under CEQA, the appropriate course where all feasible mitigation has been imposed and a significant impact remains is to disclose the impact and, if the project is approved, adopt a Statement of Overriding Considerations, not to impose an infeasible requirement that the project achieve net zero emissions.

The comment references large mixed use developments (Newhall Ranch/FivePoint Valencia and Centennial) that ultimately advanced as net zero communities after CEQA litigation. Those projects involved different lead agencies, land use types, sizes, and regulatory/policy contexts, and their negotiated settlement outcomes do not establish a statewide CEQA requirement that all new projects, particularly industrial warehouse projects such as this one, must be net zero to avoid significant GHG impacts. CEQA allows, but does not mandate, lead agencies to adopt different thresholds and mitigation approaches based on substantial evidence and local circumstances. The City's selection of a conservative 3,000 MTCO₂e per year threshold, coupled with robust regulatory compliance and mitigation, is supported by substantial evidence in the record (Draft EIR **Section 5.7 Greenhouse Gas Emissions**, DEIR **Appendix G Greenhouse Gas Analysis**).

Finally, as discussed at DEIR **Section 5.7.6**, GHG impacts are inherently cumulative, and an individual project of this size is of insufficient magnitude by itself to substantially influence global climate conditions; instead, the Project's contribution is considered in the context of the State's comprehensive programmatic framework for achieving long term climate targets. The City has analyzed the Project's consistency with that framework, disclosed that the Project would exceed the numeric threshold and could impede achievement of interim statewide GHG reduction goals. The City has identified mitigation that would reduce these impacts to the extent feasible. CEQA does not require the City to deny the Project or to require net zero emissions when doing so has not been shown in the record to be feasible for this particular industrial warehouse use. For these reasons, the City declines to revise its GHG significance threshold to a net zero standard for this Project, and the Draft EIR's GHG analysis and conclusions remain unchanged. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

- O1-3** The City disagrees with the comment assertions. As described in the Draft EIR and within these Responses, the Project's net annual GHG emissions, including amortized construction emissions, are estimated at approximately 6,492 MTCO₂e per year. Project GHG emissions would therefore exceed the City's adopted 3,000 MTCO₂e per year significance threshold derived from SCAQMD's recommended Tier 3 screening levels. In response, the Draft EIR

identifies a combination of existing laws, ordinances, and regulations (LOR 1 through LOR 8) and project level **Mitigation Measures MM GHG-1** through **MM GHG-7** to reduce GHG emissions, while transparently disclosing that a significant and unavoidable impact would remain (Draft EIR, pp. 5.7-23 to 5.7-29).

Contrary to the comment's assertion, CEQA does not require that each mitigation measure's quantitative GHG reduction be individually modeled, so long as the lead agency uses a reasonable methodology and explains, based on substantial evidence, why impacts remain significant even with feasible mitigation. Aggregate GHG emissions reductions from the EIR GHG mitigation measures are modeled per accepted CalEEMod protocols and are reflected in the total Project GHG emissions. However, precise reductions for these measures are limited and would not meaningfully reduce emissions as discussed in the greenhouse gas report (see Pg 49-50). The Draft EIR uses the most current version of CalEEMod available at the time (2022.1) to quantify construction and operational GHG emissions and recognizes that some regulatory and technological measures (e.g., future EV usage and Rule 2305 implementation) are not easily or reliably quantified at the project level (DEIR p. 5.7-25, DEIR **Appendix G**). The analysis explains that even if emissions from all non mobile source categories were reduced to zero, mobile source emissions alone would still exceed the 3,000 MTCO₂e per year threshold, and therefore, even aggressive mitigation would not avoid a significant impact (Draft EIR, pp. 5.7-22 to 5.7-29).

The comment characterizes **MM GHG-3** as "unlikely to be effective" because it requires only that the Applicant provide information on funding opportunities, such as the Carl Moyer Program, to tenants. However, this measure is merely part of a broader package of GHG mitigation that includes mandatory operational controls and infrastructure commitments directly imposed on the Applicant, such as anti idling signage and enforcement (**MM GHG-1**), full electrification or non diesel fueling of on site cargo handling equipment (**MM GHG-2**), installation of EV truck conduit and hookups (**MM GHG-4**), EV ready passenger car parking (**MM GHG-5**), exclusive use of electric landscaping equipment (**MM GHG-6**), and a photovoltaic system sized to offset at least 20 percent of the Project's projected energy demand (**MM GHG-7**) (Draft EIR, p. 5.7-27). **MM GHG-3** is intended as a supplemental mechanism to encourage voluntary accelerated turnover to cleaner than required equipment by tenants, over and above regulatory baselines and the other, more directly enforceable mitigation measures already committed to by the Applicant.

With respect to the comment's suggested revisions to **MM GHG-3** and additional lease based requirements (e.g., contractual mandates to apply for incentive programs, categorical limits on diesel truck use, wholesale replacement of diesel with alternative fuels, or binding commitments to future zero emission commercial vehicle fleets and on site charging powered exclusively by solar), the Draft EIR explains why further mobile source reductions beyond those embedded in statewide and regional programs and that would result from the EIR mitigation measures are not feasible at this time. As discussed in the DEIR, approximately 87 percent of the Project's GHG emissions are from vehicle usage that is controlled principally through state and regional mobile source standards and CARB programs; the City does not regulate truck fleet procurement or engine technology and cannot ensure that future tenants' regionally distributed truck fleets will be subject to project specific conditions (Draft EIR, pp. 5.7-24 to 5.7-25, 6-8 to 6-9). The EIR explicitly states that "Neither the Project Applicant nor

the Lead Agency can substantively or materially affect reductions in project related vehicular source emissions beyond regulatory requirements imposed by the federal or state governments or the SCAQMD, and mitigation measures identified herein” and concludes that “there are no feasible mitigation measures that would reduce vehicular emissions” beyond those already incorporated (Draft EIR, pp. 5.7-24 to 5.7-25, 6-8 to 6-9).

The comment’s suggested measures would also conflict with or duplicate comprehensive statewide programs that already govern the transition of medium and heavy duty fleets to zero emission technologies, such as CARB’s Advanced Clean Trucks, Advanced Clean Fleets, Low Carbon Fuel Standard, and other off road and on road rules identified in the Draft EIR’s discussion of 2022 Scoping Plan consistency (Draft EIR, pp. 5.7-11 to 5.7-12, 5.7-28). CEQA does not require a local land use agency to impose project specific fleet procurement mandates on private tenants where such requirements would be speculative with respect to future operators, could conflict with ongoing regulatory programs, and would be impracticable to monitor and enforce over the multi decade life of a warehouse facility. The City reasonably relies instead on the combination of statewide mobile source regulations, SCAQMD Rule 2305 (Warehouse ISR), and the Project’s infrastructure and operational commitments to support future emission reductions (Draft EIR, pp. 5.7-20 to 5.7-25, 5.7-27 to 5.7-29).

Regarding the comment’s suggestion that the City adopt additional transportation demand management (TDM) measures as GHG mitigation, the Draft EIR already requires TDM type trip reduction measures through **MM TRA-1**, **MM TRA-2**, and **MM TRA-3**, which together implement commute trip reduction marketing, a ridesharing program with a permanent transportation management association, and end of trip bicycle facilities (Draft EIR, pp. 5.13-25 to 5.13-27). These measures are anticipated to reduce the Project’s total vehicle miles traveled (VMT) by approximately 7.2 percent, but, even with implementation of all feasible transportation mitigation, the Project cannot achieve the 30.6 percent VMT reduction needed to meet the City’s VMT significance threshold and therefore results in a significant and unavoidable VMT impact (Draft EIR, pp. 5.13-25 to 5.13-27, pp. 6-8, 6-9). Because GHG emissions are strongly correlated with VMT, the same practical and enforceability constraints that limit further VMT reduction also constrain the extent to which additional TDM measures could feasibly and demonstrably reduce project level GHG emissions. Please refer also to FEIR **Comment A4-2 Response**.

CEQA requires a lead agency that identifies a significant and unavoidable impact to adopt all feasible mitigation and then, if it approves the project, to adopt a Statement of Overriding Considerations explaining why the project’s benefits outweigh the residual impacts; it does not require the City to prove that every conceivable mitigation concept is infeasible. The Draft EIR identifies specific GHG mitigation measures, explains why mobile source dominated emissions remain above the 3,000 MTCO₂e per year threshold even with these measures and regulatory compliance, and expressly concludes that Project GHG emissions impacts would be significant and unavoidable (Draft EIR, pp. 5.7-23 to 5.7-29, 6-8 to 6-9). Given the dominance of mobile sources, the jurisdictional and practical limits on regulating off site truck fleets, and the existence of comprehensive state programs governing vehicle technology, the City’s determination that no additional feasible GHG mitigation is available is supported by substantial evidence in the record. For these reasons, the City declines to revise or add to the

EIR GHG mitigation measures. The EIR's GHG mitigation and significance conclusions remain unchanged. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

- O1-4** The City disagrees with the comment's assertions. The City acknowledges the comment reference to Napa Citizens for Honest Gov't v. Napa County Board of Supervisors and the suggestion that CEQA requires "fair share" mitigation for cumulative GHG impacts. However, Napa Citizens is mischaracterized by the comment. Contrary to comment assertions, the Napa Citizens decision holds that a lead agency must adopt all feasible, evidence supported mitigation for cumulative impacts and explain its reasoning. The decision does not require that an agency must mathematically eliminate a project's entire cumulative contribution.

As explained at DEIR **Section 5.7**, the Draft EIR quantifies the Project's annual GHG emissions using CalEEMod 2022.1, amortizes construction emissions over a 30 year project life consistent with SCAQMD practice, and compares the resulting net annual emissions (approximately 6,492 MTCO₂e per year) to the City's 3,000 MTCO₂e per year significance threshold derived from SCAQMD's Tier 3 screening approach (DEIR, pp. 5.7-22 to 5.7-24). Because those annual emissions exceed this conservative threshold even with compliance with applicable laws, ordinances, and regulations (LOR 1 through LOR 8) and implementation of **MM GHG-1** through **MM GHG-7**, the Draft EIR properly discloses a significant and unavoidable GHG impact (DEIR, pp. 5.7-23 to 5.7-25, 5.7-29). CEQA requires the adoption of all feasible mitigation and good faith disclosure of any remaining significant impact; it does not require a single project to offset 100 percent of its modeled lifetime emissions.

The comment's "fair share" estimate of roughly 195,000 MTCO₂e assumes that CEQA significance must be judged on a 30 year cumulative total, but CEQA Guidelines section 15064.4 instead directs lead agencies to use a reasonable quantitative analysis, such as annual emissions compared to a scientifically and policy supported threshold, together with consideration of statewide climate programs. The City follows that approach here by evaluating amortized construction and operational emissions on an annual basis against the 3,000 MTCO₂e threshold, which itself is designed to capture approximately 90 percent of emissions from future development (DEIR, pp. 5.7-21 to 5.7-24). The fact that the Project still exceeds this benchmark, even with robust mitigation, is the reason the impact is determined to be significant and unavoidable, not, as the comment suggests, because the City views the remaining emissions as "acceptable" or unworthy of consideration.

The comment also makes several conclusory statements that "more" mitigation is available without showing, with facts or analysis, that the suggested concepts are both technically and economically feasible for this specific warehouse project or that they would materially change the Project's GHG emissions profile. In contrast, the Draft EIR identifies specific, enforceable measures (including Title 24 and CALGreen requirements, SCAQMD Rule 2305 compliance, and **MM GHG-1** through **MM GHG-7**) and explains why, given that approximately 87 percent of GHG emissions are from vehicle usage outside the City's and the Project applicant's direct control, no additional feasible measures have been identified that would reduce annual emissions below the adopted threshold (DEIR, pp. 5.7-20 to 5.7-25). Accordingly, the City concludes that the Draft EIR provides the kind of reasoned, evidence based analysis CEQA requires. Please refer also to previous **Comment O1-3 Response**.

The comment does not demonstrate that the City has failed to adopt feasible mitigation or has misapplied Napa Citizens. Further, the City disagrees with the comment assertion that the Draft EIR fails to require all feasible GHG mitigation or that additional measures such as mandatory LEED certification, wholesale electrification of construction equipment, 100 percent rooftop solar, or project specific offset purchases are required or feasible for this Project. The GHG analysis and mitigation program presented in **Section 5.7** of the Draft EIR remain adequate and supported by substantial evidence, and no revisions are warranted in response to this comment. The comment's request to be added to the Project interest list pursuant to Public Resources Code section 21092.2 has been noted and will be honored by the City. Findings and conclusions of the EIR are not affected. Revision to the EIR is not required.

Comment Letter O2 – Adams Broadwell Joseph and Cardozo

From: Lorrie J. LeLe <ljlele@adamsbroadwell.com>
Sent: Tuesday, April 14, 2026 3:18 PM
To: Orlando Hernandez <ohernandez@cityofmenifee.us>; Stephanie Roseen <sroseen@cityofmenifee.us>; Fernando Herrera <fherrera@cityofmenifee.us>
Cc: Sheila Sannadan <ssannadan@adamsbroadwell.com>
Subject: Request for Mailed Notice of Actions and Hearings – Heritage Valley Business Center Project (8234)

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please find attached our request for mailed notice of actions and hearings regarding the Heritage Valley Business Center project.

Please add only Sheila Sannadan – ssannadan@adamsbroadwell.com

Thank you,

Lorrie LeLe
Legal Assistant
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814
ljlele@adamsbroadwell.com | Phone: 916.444.6201 Ext. 10 | Fax: 916.444.6209 |

O2-1

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April 14, 2026

Via U.S. Mail and Email

Orlando Hernandez
Community Development Director
City of Menifee
Community Development Department
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Menifee, CA 92586
Email: ohernandez@cityofmenifee.us

Stephanie Roseen, City Clerk
Office of the City Clerk
City of Menifee
29844 Haun Road
Menifee, CA 92586
Email: sroseen@cityofmenifee.us

Via Email Only

Fernando Herrera, Senior Planner
Email: fherrera@cityofmenifee.us

Re: Request for Mailed Notice of Actions and Hearings – Heritage Valley Business Center Project (Vesting Tentative Parcel Map (TPM) No. 39292 (PLN25-0085); Plot Plan No. (PLN24-0195); General Plan Amendment No. PLN24-0197; Change of Zone No. PLN24-0198; Specific Plan Amendment No. PLN24-0199; SCH No. 2025051051)

Dear Mr. Hernandez, Ms. Roseen, and Mr. Herrera:

We are writing on behalf of Californians Allied for a Responsible Economy (“CARE CA”) to request mailed notice of the availability of any environmental review document, prepared pursuant to the California Environmental Quality Act, related to the Heritage Valley Business Center Project (Vesting Tentative Parcel Map (TPM) No. 39292 (PLN25-0085); Plot Plan No. (PLN24-0195); General Plan Amendment No. PLN24-0197; Change of Zone No. PLN24-0198; Specific Plan Amendment No. PLN24-0199; SCH No. 2025051051) (“Project”), proposed by Core5 Industrial Partners LLC (“Applicant”), as well as a copy of the environmental review document when it is made available for public review.

The Project proposes the construction of a concrete tilt-up building that would total 829,755 square feet (including 10,000 square feet of office space), approximately 503 automobile parking spaces, and approximately 258 truck trailer parking spaces. Associated facilities and improvements of the Project include

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O2-2

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loading dock doors, on-site landscaping, and related on-site and off-site improvements (roadway improvements, sewer, storm drain, utilities). The approximately 41-acre Project site is generally located southeast of the Interstate 215/Ethanac Road interchange in the northeastern part of the City of Menifee, County of Riverside, State of California. The Project site is generally bounded by a Riverside County Flood Control channel, Southern California Edison utility lines and future McLaughlin Road to the south, Ethanac Road to the north, Sherman Road to the east, and Trumble Road to the west, and consists of ten parcels total (Assessor Parcel Numbers: 331-110-031, 331-110-024, 331-110-025, 331-110-026, 331-110-035, 331-110-027, 331-110-041, 331-110-038, 331-110-039, and 331-110-023).

O2-2
cont.

CARE CA is a non-profit organization which advocates for a sustainable construction industry and protecting the environment and health of its communities' workforces. The organization includes City of Menifee residents, the District Council of Ironworkers and Southern California Pipe Trades DC 16, along with their members, their families, and other individuals who live and work in the City of Menifee and in Riverside County.

We also request mailed notice of any and all hearings and/or actions related to the Project. These requests are made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108, 21152, and 21167(f) 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.

O2-3

Please send the above requested items by email and U.S. Mail to our South San Francisco Office as follows:

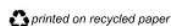
U.S. Mail

Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email

ssannadan@adamsbroadwell.com

8234-002j

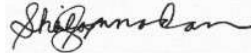


April 14, 2026
Page 3

If you have any questions, please call me at (650) 589-1660 or email me at ssannadan@adamsbroadwell.com. Thank you for your assistance.

Y
O2-3
cont.
I

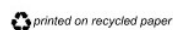
Sincerely,



Sheila M. Sannadan
Legal Assistant

SMS:lj1

8234-002j



Responses to Comment Letter O2 – Adams Broadwell Joseph and Cardozo

- O2-1** Comment noted. The commenter is added to the interest list for the Project. No further response is warranted.
- O2-2** The comment includes introductory information about the Project and topics unrelated to CEQA or substantial environmental impacts. No further response is warranted.
- O2-3** Comment noted. The commenter is added to the interest list for the Project. No further response is warranted.

Comment Letter I1 – Alex Munoz

From: Alex Munoz <alexandria.munoz13@gmail.com>
Sent: Monday, March 23, 2026 3:51 PM
To: Fernando Herrera <fherrera@cityofmenifee.us>
Subject: The Heritage Valley Business Center comments

You don't often get email from alexandria.munoz13@gmail.com. [Learn why this is important](#)

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I'm opposed to this Project. Traffic is getting worse in the city. There's tons of empty warehouses in Moreno Valley and it's create the same problem here! Please don't build!

I1-1

Responses to Comment Letter 11 – Alex Munoz

- I1-1** The comment is noted. **Section 5.13: Transportation** provides information on potential Project traffic impacts. No further response is warranted.

3.0 ERRATA TO THE DRAFT EIR

3.1 INTRODUCTION TO THE ERRATA

In accordance with Section 15132 of the CEQA Guidelines, the FEIR for the Heritage Valley Business Center Project includes the DEIR, dated March 2026, as well as any proposed revisions or changes to the DEIR.

The changes to the DEIR do not affect the overall conclusions of the environmental document, and instead represent changes to the DEIR to provide clarification, amplification and/or insignificant modifications, as needed as a result of public comments on the DEIR, or due to additional information received during the public review period. These clarifications and corrections do not warrant recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5.

None of the changes or information provided in the comments identify a new significant environmental impact, a substantial increase in the severity of an environmental impact for which mitigation is not proposed, or a new feasible alternative or mitigation measure that would clearly lessen significant environmental impacts but is not adopted. In addition, the changes do not reflect a fundamentally flawed or conclusory DEIR.

Changes to the DEIR are listed by Section, page, paragraph, etc. to best guide the reader to the revision. Changes are identified as follows:

- Deletions are indicated by ~~strikeout text~~.
- Additions are indicated by underlined text.

3.2 CHANGES TO THE DRAFT EIR

No changes to the Draft EIR have been identified.