

APPENDIX B - NOTICE OF PREPARATION RESPONSE LETTERS



NATIVE AMERICAN HERITAGE COMMISSION

November 4, 2025

Rafael Garcia
City of Perris
135 North D Street
Perris CA 92570

Re 2025110111 City of Perris Truck Route Plan Update Project, Riverside County

Dear Mr. Garcia:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

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

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

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

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

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

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

SB 18

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

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@NAHC.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



Dennis Acuna, P. E., T. E.
Director of Transportation

COUNTY OF RIVERSIDE

TRANSPORTATION AND LAND MANAGEMENT AGENCY

Hector D. Davila, P.E.
*Deputy for Transportation/Capital
Projects*

Russell Williams
*Deputy for Transportation/Planning and
Development*

Transportation Department

December 5, 2025

Rafael Garcia, Principal Planner
City of Perris, Development Services Department
135 North "D" Street
Perris, CA 92570

RE: City of Perris Truck Route Update – Request for Interagency Collaboration

Dear Mr. Garcia,

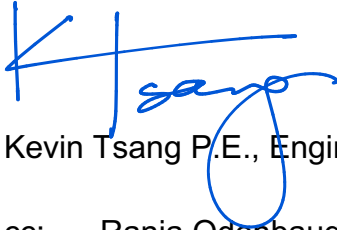
Thank you for the opportunity to review the City of Perris' Notice of Preparation of a Draft Environmental Impact Report for the City's proposed Truck Route update for compliance with Assembly Bill 98 (AB98). We appreciate the City's proactive approach to this important regional planning effort.

As you know, Riverside County is undertaking a similar process to comply with AB98 through establishing a network of designated truck routes within our General Plan Circulation Element. We are in the initial phase of truck route development and given our shared boundaries and interconnected transportation system, we see significant value in coordinating our efforts to ensure regional consistency and efficient goods movement.

We'd like to discuss one aspect of the City's proposal that has regional implications for the County. The proposed removal of San Jacinto Avenue as a truck route between I-215 and Dunlap Road would eliminate one of the few remaining major east-west connection for truck-generating uses in unincorporated County areas to access the I-215 Freeway. We understand the City may have local concerns that led to this proposal, and we are confident we can work together to explore opportunities to find solutions that support the City's local planning objectives while maintaining critical regional connections. County staff would appreciate the opportunity to meet with City staff early in your planning process to better understand your considerations and discuss potential approaches.

Please feel free to contact me at 951-955-6828 or ktsang@rivco.org to arrange a convenient time to meet. We look forward to working collaboratively with the City on this important initiative.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Tsang', with a large loop at the end of the last name.

Kevin Tsang P.E., Engineering Division Manager

cc: Rania Odenbaugh, TLMA Director
Dennis Acuna P.E., Director of Transportation
Russell Williams, Deputy Director of Transportation
John Hildebrand, Planning Director
Sarah Moore, Assistant Planning Director

December 8, 2025

Rafael Garcia, Principal Planner
City of Perris, Development Services Department
135 North "D" Street
Perris, CA 92570

RE: General Plan Amendment (GPA-25-00002) and Code Text Amendment (ZTA-25-00006)

Dear Rafael Garcia,

Thank you for the opportunity to review the proposed project for the preparation of a Draft Environmental Impact Report to amend the Circulation Element and Title 10 of the Perris Municipal Code to update the truck routes throughout Perris to in order to comply with Assembly Bill (AB) 98. The City of Meniffee has reviewed the project and offers the following comments:

- Please evaluate how the proposed truck-route changes—particularly the addition of a new truck route on Case Road—may affect roadways within the City of Meniffee. The Traffic Study should also identify any improvements needed within City of Meniffee limits. The City of Meniffee is specifically concerned about a potential increase in eastbound truck traffic on Highway 74 within Meniffee.
- Please provide all future environmental notices and documents to the City of Meniffee Community Development, Planning Division.

We appreciate your consideration of these comments and thank you again for the opportunity to provide input. If you have questions, please contact me at 951-723-3769 or by e-mail at kluna@cityofmeniffee.us

Sincerely,



Kimberly Luna, AICP
Associate Planner
Community Development Department

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

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

December 8, 2025

City of Perris, Development Services Department
Attn: Rafael Garcia, Principal Planner
135 North D Street
Perris, CA 92570
Submitted via email to RGarcia@cityofperris.org.

Re: Truck Route Plan Update Notice of Preparation (SCH #2025110111)

Dear Rafael Garcia,

I am writing this letter on behalf of the Center for Community Action and Environmental Justice (CCA EJ) and Perris community members to respond to the Notice of Preparation (NOP) for the Truck Route Plan Update (SCH #2025110111) which has been proposed to be carried out in Perris, in compliance with AB98 (Carillo, 2024). After reviewing the documents included with the NOP, there are a few comments which are being offered to ensure that the EIR process is able to adequately and appropriately address everything which needs to be covered by the study, especially the cumulative impacts of concentrating trucks on a few corridors.

Overall, the updated Truck Route Plan represents an improvement to the communities which live along the several routes which are being removed. At the same time, we would like to ensure that there are adequate mitigation measures along those which remain and look to the EIR process to prioritize those. We would like to ensure that would include measures such as improved tree canopy along the truck routes, but to include additional passive measures to ensure that trucks can remain on truck routes.

We would also like to ensure that the EIR process is able to cover the requirements of SB932 (Portantino, 2022) to further identify safety improvements that need to be made along truck routes, particularly for active transportation and other vulnerable road users, but further identify other truck-focused measures that comply with SB932 requirements so that as the Truck Route Plan is implemented, that those safety measures can be implemented at the same time to save lives and money from combining the work together.

Thank you for the ability to provide these comments.

Sincerely,



Marven E. Norman
Environmental Policy Analyst

CCA EJ is a long-standing community based organization with over 40 years of experience advocating for stronger regulations through strategic campaigns and building a base of community power. Most notably, CCA EJ's founder Penny Newman won a landmark federal case against Stringfellow Construction which resulted in the 'Stringfellow Acid Pits' being declared one of the first Superfund sites in the nation. **CCA EJ** prioritizes community voices as we continue our grassroots efforts to bring lasting environmental justice to the Inland Valley Region.

Mailing Address
PO Box 33124
Jurupa Valley, CA 92519
www.ccae.org

December 9, 2025

VIA E-MAIL AND
FIRST CLASS MAIL

Rafael Garcia, Principal Planner
City of Perris, Development Services Department
135 North "D" Street
Perris, CA 92570
Email: RGarcia@cityofperris.org
Phone: (951) 943-5003 Ext. 413

Re: Notice of Preparation (NOP) and Public Scoping Meeting for the preparation of a Draft Environmental Impact Report related to General Plan Amendment (GPA-25-00002) and Code Text Amendment (ZTA-25-00006) to amend the Circulation Element and Title 10 of Perris Municipal Code to update the City's Truck Routes for compliance with Assembly Bill (AB) 98

Dear Mr. Garcia:

On behalf of Golden Hill Country, LLC and Ranch Haven, LLC (collectively, "Owner"), the owner of the property that is being developed to the east of the City of Perris ("Perris") into an industrial/warehouse complex known as the Stoneridge Commerce Center (the "Project"). This letter is being sent to object to the City of Perris' proposed modification to its Circulation Element and truck routes ("Truck Route Modifications") via the General Plan Amendment and Code Text Amendment identified above, and to provide brief comments on the Notice of Preparation.

As the City is aware, the Project currently will utilize San Jacinto Avenue to access the I-215 to limit the Project's impacts to the surrounding community. This truck route was settled upon as a result of intense analysis of various alternatives that were triggered due to the City's comments during the Project's environmental review phase before the County of Riverside ("County"). For the City to unilaterally attempt to prohibit this truck route after the County's extensive review and approval is likely unlawful, and if actually adopted could result in significant environmental impacts to the surrounding communities.

First, the City's attempt to de-designate San Jacinto Avenue is inconsistent with the requirements of AB 98. Specifically, AB 98 requires that local agencies establish "***travel routes for the transport of goods, materials, or freight for storage, transfer, or redistribution to safely accommodate additional truck traffic*** and avoid residential areas and sensitive receptors, as defined by Section 65098." (Gov't Code 65302.02(a)(emphasis added).) Notably, AB 98 requires a local agency to designate routes that "accommodate" truck traffic, meaning that AB 98 does not

Rafael Garcia, Principal Planner
December 9, 2025
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authorize the outright prohibition of truck traffic. In this case, the City's attempt to eliminate all of the roadways that feed to the I-215 from the east of the City does not "accommodate" the additional truck traffic generated to the east of the I-215, but categorically prohibits such access, and fails to strike the balance required by AB 98.

Furthermore, AB 98 requires the county and/or city to update its circulation element to also "maximize the use of interstate or state divided highways as preferred routes for truck routes," and to "maximize use of arterial roads, major thoroughfares, and predominantly commercially oriented local streets when state or interstate highways are not utilized." (Gov't Code § 65302.02(b).) Similarly, AB 98 states that truck routes shall be routed via transportation arteries that minimize exposure to sensitive receptors. (Gov't Code § 65302.02(b)(2).) In this case, the City's attempt to de-designate San Jacinto Avenue as a truck route will necessarily impact numerous existing sensitive receptors to the east of the Project if San Jacinto Avenue was prohibited as a truck route. As such, the City's removal of San Jacinto Avenue as a designated truck route does not comply with the requirements of AB 98.

Second, even if the City were to de-designate San Jacinto Avenue pursuant to its authority found in Vehicle Code § 35701, such a restriction would not be applicable to the trucks travelling to and from the Project and taking access to the I-215 (a non-restricted street) pursuant to Vehicle Code § 35703. Vehicle Code § 35703 provides as follows:

No ordinance adopted pursuant to Section 35701 shall prohibit any commercial vehicles coming from an unrestricted street having ingress and egress by direct route to and from a restricted street when necessary for the purpose of making pickups or deliveries of goods, wares, and merchandise from or to any building or structure located on the restricted street or for the purpose of delivering materials to be used in the actual and bona fide repair, alteration, remodeling, or construction of any building or structure upon the restricted street for which a building permit has previously been obtained.

In this case, the City's Truck Route Modifications essentially force the Project to be on a de facto "restricted street" within the meaning of Vehicle Code § 35703 because the City is prohibiting all truck traffic from moving in and out of the east of the City. Accordingly, per Section 35703, trucks going to and from the Project would still be able to utilize San Jacinto Avenue because it is the most direct route to and from I-215. Thus, at a minimum, while the proposed de-designation of San Jacinto Avenue is likely inconsistent with AB 98, and thus should not be adopted, even if the City moves forward with the action, the City's environmental document must recognize that truck traffic from the Project will continue to use San Jacinto Avenue pursuant to the Project's existing entitlements.

Lastly, while Owner will reserve the right to comment on any potential environmental document until the document is circulated, any environmental document proposed by the City for

Rafael Garcia, Principal Planner
December 9, 2025
Page 3

its proposed Truck Route Modifications must take into account the resulting impacts that would effect the surrounding jurisdictions from pushing truck traffic to other areas. The City cannot restrict its analysis to impacts within the City of Perris. This would mean that City would have to analyze the Truck Route Modifications' VMT, air quality, and greenhouse gas impacts at a minimum, and how the modifications would interact with the other projects in the area, including the Project. Likewise, any environmental document would have to acknowledge that truck traffic would still take access to the I-215 from the Project, and analyze the Truck Route Modifications' environmental impacts with that assumption.

We appreciate the opportunity to provide this comment letter, and look forward to working with the City in an attempt to reach a mutually beneficial result.

Sincerely,

RUTAN & TUCKER, LLP

A handwritten signature in black ink, reading "Travis Van Ligten". The signature is fluid and cursive, with a long horizontal flourish at the bottom.

Travis Van Ligten