

Response to Comments

Comment Deadline: December 1, 2022 by 5:00 p.m.

Draft Waste Discharge Requirements (WDRs) and Clean Water Act Section 401 for Dredged or Fill Discharges to Waters of the State
for

IDI Logistics, LLC – PLC North On and Off Site Commercial Development Project, City of Perris, Riverside County
Order R8-2022-0069

The responses to comments received during the public comment period are set forth below. Please contact Hossein Shahrokhnia at (951) 782-4998 or Hossein.Shahrokhnia@waterboards.ca.gov with any questions.

Comment Letter #	Date	Commenter	
1	November 2, 2022	Martin Rasnick, Glenn Lukos Associates, Inc. mrasnick@wetlandpermitting.com	
Comment #	Location in the WDRs	Comment	Staff Response
1	Requirements C. Mitigations Requirements	We would like two conditions added to the Waste Discharge Order in case mitigation credits have not been released at Riverpark. These conditions would allow the use of a letter of credit acceptable to the Regional Board if credits are not available. The conditions are contained in Tentative Order Number R8-2022-0067 at Section C-2 and C-3 of that order. A copy of that tentative order is attached for reference. Please make this addition.	<p>Section C. has been modified to acknowledge that if mitigation credits do not become available at Riverpark Mitigation Bank, the Discharger may choose another mitigation bank per written approval of Santa Ana Water Board’s Executive Officer or the Discharger shall provide a Letter of Credit (LOC).</p> <p>Section C.2. of the Order has been updated as shown below:</p> <p><u>If mitigation credits do not become available in a timely manner at Riverpark Mitigation Bank, the Discharger may obtain Santa Ana Water Board Executive Officer’s</u></p>

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1	November 2, 2022	Martin Rasnick, Glenn Lukos Associates, Inc. mrasnick@wetlandpermitting.com	
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			<p>written approval for the choice of another mitigation bank, and if needed, adjust the mitigation ratio and credit type consistent with the bank conditions to adequately offset the Project impacts. In no case shall the mitigation to impacts ratio be less than 2:1.</p> <p>Also, a new requirement has been added to Section C. of the Order to reflect the requirement of providing a Letter of Credit (LOC) by the Discharger. Section C.4. has been added as below:</p> <p><u>Until mitigation credits become available at Riverpark Mitigation Bank or use of another mitigation bank is approved by the Executive Officer, the Discharger shall provide a financial security for compensatory mitigation in the form of an irrevocable Letter of Credit (LOC) acceptable to Santa Ana Water Board as described below:</u></p> <p>a. <u>An irrevocable LOC shall be obtained for the amount to perform all compensatory</u></p>

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			<p><u>mitigation pursuant to this Order.</u></p> <p>b. <u>The amount of the LOC shall be based on a cost estimate that shall be submitted to Santa Ana Water Board for approval 30 days prior to commencing Project activities.</u></p> <p>c. <u>The Discharger shall provide a draft copy of the LOC to Santa Ana Water Board for review and approval 30 days prior to execution. The LOC shall not be executed without Santa Ana Water Board's prior approval.</u></p> <p>d. <u>The final executed LOC shall be submitted to Santa Ana Water Board 15 days prior to commencing Project activities.</u></p> <p>e. <u>Upon execution of the LOC, the Discharger shall provide the original and one copy of the executed document to Santa Ana Water Board.</u></p> <p>f. <u>In the event that the LOC will expire and not be renewed before the compensatory</u></p>

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			<p><u>mitigation obligations have been met, the Discharger shall be responsible for providing Santa Ana Water Board a new LOC to replace the existing LOC at least 60 days prior to the expiration date.</u></p>
2	Applicant information	<p>Steve Hollis is no longer with IDI Logistics. Can we make a global change for applicant name to:</p> <p>Brian Caris Vice President of Construction IDI Logistics 840 Apollo Street, Suite 343, El Segundo, CA 90245 Telephone: 760.567.0266 Email: brian.caris@idilogistics.com</p>	The applicant contact name has been updated for our records.