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To: [Francisco Avila](#)
Cc: [OPR State Clearinghouse](#)
Subject: Scannell Properties North Richmond Warehouse Project, SCH# 2019110186
Date: Monday, December 9, 2019 5:32:29 PM

Governor's Office of Planning & Research

DEC 10 2019

STATE CLEARINGHOUSE

Mr. Avila,

This correspondence is with respect to the Notice of Preparation for the Scannell Properties North Richmond Warehouse Project draft Environmental Impact Report (EIR).

We have received a 401 water quality certification application for a proposed project on the subject site (Parr Boulevard Development Project), and have provided comments to the applicant. Of particular note is the extent to which the federal and state waters have not been adequately characterized at the site. The noted impacts to approximately 0.145 acre of federally jurisdictional wetlands may need to be updated and revised to reflect actual site conditions. Further, there may be wetlands on site that are State, but not federally jurisdictional that need to be included in the analysis. To our knowledge, the project proponent has not yet submitted the a revised wetland delineation to the U.S. Army Corps of Engineers for evaluation. Such an evaluation should be included in further environmental review of the site so that impacts to federal and State jurisdictional wetlands and other waters can be appropriately characterized, and onsite mitigation identified as part of the environmental review process.

During further evaluation of the site for development under Section 401 of the Clean Water Act, the project proponent will be required to avoid and minimize impacts to the various wetlands that are scattered throughout the site, and provide onsite mitigation for all unavoidable impacts. The draft EIR should include mitigation measures for all proposed impacts.

The draft EIR should also include a full analysis of the potential impacts of anticipated sea level rise on the project, and the project's wetlands and wetlands mitigation work.

Please contact me with any questions or concerns.

Sincerely,

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