DRAFT ENVIRONMENTAL IMPACT REPORT
State Clearinghouse Number 2021050021

For

Perris Valley Commerce Center Specific Plan, AmendmentNo. 13 (SPA19-05287) & Development Plan Review No. 19-00012

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LIST OF COMMONLY USED ABBREVIATIONS AND ACRONYMS

AAQS	Ambient Air Quality Standards
AASHTO	American Association of State Highway and Transportation Officials
AB	Assembly Bill
AC	Acre
ACM	Asbestos Containing Materials
ACOE	U.S. Army Corps of Engineers
ACS	US Census American Community Survey
Act	Alquist-Priolo Earthquake Fault Zoning Act
ADP	Area Drainage Plans
ADT	Average Daily Traffic
AEP	Association of Environmental Professionals
AERMAP	AERMOD Terrain Preprocessor
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
Afu	Undocumented Artificial Fill
AFY	acre-feet per year
AG	Agriculture
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AM	Morning
AMSL	Above Mean Sea Level
AOC	Area of Concern
APE	Area of Potential Effect
APN	Assessor's Parcel Number
APS	Alternative Planning Strategy
AQ/GHG	Air Quality/Green House Gas A
QIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plans
AWWA	American Water Works Association
ARB	Air Resources Board
BAAQMD	Bay Area Air Quality Management District
BACMs	Best Available Control Measures
Basin	South Coast Air Basin
BAU	Business-As-Usual
BGS	Below Ground Surface
BMPs	Best Management Practices
BNSF	Burlington Northern Santa Fe
BUOW	Burrowing Owl
CA MUTCD	California Manual on Uniform Traffic Control Devices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalARP	California Accidental Release Prevention Program
CalEEMod™	California Emissions Estimator Model™
Cal/EPA	California Environmental Protection Agency
CalFire	Riverside County Fire Department
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
Calveno	California Vehicle Noise
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board

CBC	California Building Code
CCA	Concrete Culvert Alternative
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CD	Community Development
CDF	California Department of Forestry
CDFW	California Department of Fish and Wildlife
CDOGG	California Division of Oil, Gas and Geothermal Resources
CDPH	California Department of Public Health
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System list
CESA	California Endangered Species Act
CETAP	Community Environmental Transportation Acceptability Program
CFD	Community Facilities District
CFR	Code of Federal Regulations
CH4	Methane
CHHSLs	California Human Health Screening Levels
CHP	California Highway Patrol
CIP	Capital Improvement Program
CIWMP	Countywide Integrated Waste Management Plan
CLUP	Airport Land Use Compatibility Plan
CMA	Congestion Management Agency
CML&C	Concrete-Mortar Lined and Coated
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	Carbon
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
COA	Conditions of Approval
CPTED	Crime Prevention through Environmental Design
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CRA	Cultural Resources Assessment
CRDEH	County of Riverside Department of Environmental Health
CSA	County Service Area
CUPA	Certified Unified Program Agency
CWA	Federal Clean Water Act
CY	Cubic Yards
CZ	Change of Zone
dB	Decibel
dBA	A-Weighted Decibel
DBESP	Determination of Biologically Equivalent or Superior Preservation
DEIR	Draft Environmental Impact Report
DIF	Development Impact Fee
DMA	Drainage Management Area
DNL	Day/Night Average Sound Level
DOT	Department of Transportation
Dt	Domino Fine Sandy Loam, Saline-Alkali
DTSC	Department of Toxic Substance Control
DU	Dwelling Units
DU/AC	Dwelling Units Per Acre
Dv	Domino Silt Loam, Saline-Alkali

DWR	Department of Water Resources
E+P	Existing plus Project
EA	Environmental Assessment
ECC	Emergency Command Center
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EMSA	Emergency Medical Service Authority
EMWD	Eastern Municipal Water District
EnA	Exeter Sandy Loam, 0 To 2 Percent Slopes
EoB	Exeter Sandy Loam, Slightly Saline-Alkali, 0 To 5 Percent Slopes
EPA	Environmental Protection Agency
EpA	Exeter Sandy Loam, Deep, 0 To 2 Percent Slopes
EPS	Emission Performance Standard
ERCI	Emergency Responses, Complaints and Investigation
ERNS	Emergency Response Notification System
ERRP	Enhanced Recharge and Recovery Program
ESA	Environmental Site Assessment
ETo	evapotranspiration
EwB	Exeter very fine sandy loam, 0 to 5 percent slopes
EyB	Exeter very fine sandy loam, deep, 0 to 5 percent slopes
°F	Fahrenheit
FBFMs	Flood Boundary & Floodway Maps
FDPA	Flood Disaster Protection Act
FEMA	Federal Emergency Management Act
FHBM	Flood Hazard Boundary Map
FHWA	Federal Highway Administration
FIA	Fiscal Impact Analysis
FICON	Federal Interagency Committee on Noise
FIRM	Flood Insurance Rate Map
FIS	Flood Insurance Studies
FMMP	Farmland Mapping & Monitoring Program
FPER	Fire Protection and Emergency Response Services
FPPA	Farmland Protection Policy Act
FTA	Federal Transit Administration
FY	fiscal year
GHG	Greenhouse Gas
g/m3	Micrograms Per Cubic Meter
GMZs	Groundwater Management Zones
GPA	General Plan Amendment
gpd/ac	Gallons-Per-Day Per Acre
GPEIR	General Plan Environmental Impact Report
GWP	Global Warming Potential
HCD	Housing and Community Development
HCM	Highway Capacity Manual
HCOC	Hydrologic Conditions of Concern
HCP	Habitat Conservation Plan
HECW	High-Efficiency Clothes Washers
HETs	High-Efficiency Toilets
HFCs	Hydroflourocarbons
VMT	Vehicle Miles Traveled
HPLV	High Pressure Low Volume
HOV	High-Occupancy Vehicle
HOA	Homeowners Association
HQTA	High Quality Transportation Area

HVAC	Heating, Ventilation, and Air Conditioning Units
HWCL	Hazardous Waste Control Law
Hz	Hertz
IA	Implementing Agreement
IBC	International Building Code
IC/EC	Institutional Controls / Engineering Controls registries
ICLEI	International Council for Local Environmental Initiatives I
GR	Inter-Governmental Review
IPCC	Intergovernmental Panel on Climate Change
IPR	Indirect Potable Reuse
IS	Initial Study
ITE	Institute of Transportation Engineers
JD	Jurisdictional Delineation
JPA	Joint Powers Agreement
kW	Kilowatt
KWh	Kilowatt Hours
LAFCO	Local Agency Formation Commission
LBP	Lead Based Paint
LCC	Land Capability Classification
LDN	Day-Night Average Noise Level
LE	Land Evaluation
LESA	Land Evaluation & Site Assessment
LEQ	Equivalent Sound Level
LF	Linear Feet
LID	Low Impact Development
LOS	Level of Service
LST	Localized Significance Thresholds
MAC	Municipal Advisory Council
March ALUCP	March Air Reserve Base/Inland Port Airport, Airport Land Use Compatibility Plan
MBTA	Migratory Bird Treaty Act
MELO	Model Efficient Landscape Ordinance
MCL	maximum contaminant level
MGD	Million Gallons Per Day
MGPEIR	Murrieta General Plan Environmental Impact Report
MM	Mitigation Measure
MMT	Million Metric Tons
MOU	Memorandum of Understanding
MPH	Miles Per Hour
MPOs	Metropolitan Planning Organizations
MS4	regulated small municipal separate storm sewer system
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
$MTCO_2e$	Metric Tons of Carbon Dioxide Equivalent
MUSD	Murrieta Unified School District
MUTCD	Manual on Uniform Traffic Control Devices
MWD	Metropolitan Water District
MWh	Megawatt-Hour
N2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Conservation Community Plan
NCHRP	National Cooperative Highway Research Program Report
NDIR	Non-Dispersive Infrared Photometry
NEPA	National Environmental Policy Act
NESHAP	National Emissions Standards for Hazardous Air Pollutants

NEPSSA	Narrow Endemic Plants Survey Area
NEV	Neighborhood Electric Vehicle
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NFRAP	No Further Assessment Planned site list
NHPA	National Historic Preservation Act of 1966
NIOSH	National Institute for Occupational Safety and Health
NMTP	Non-Motorized Transportation Plan
NO2	Nitrogen Dioxide
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NOX	Oxides of Nitrogen
NPA	No Project Alternative
NPDES	National Pollution Discharge Elimination System
NPDWRs	National Primary Drinking Water regulations
NPL	National Priority List
NR	noise reduction
NRCS	Natural Resources Conservation Service
NPMS	National Pipeline Mapping System
NPS	Non-Point Source
O3	Ozone
OAL	Office of Administrative Law
OCP	organochlorine pesticide
OEHHA	Office of Environmental Health Hazard Assessment
OSC-70	Open Space and Conservation Policy 70
OES	Office of Emergency Services
OFM	Office of the County Fire Marshal
OFP	Ozone Forming Potential
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OSHPD	Office of Statewide Health Planning and Development
OS-R	Open Space Recreation
OS-W	Water
Pb	Lead
pc/mi/ln	Passenger Cars Per Mile Per Lane
PDA	Protector del Agua
PEIR	Program EIR
PeMS	Performance Measurement System
PFCs	Perfluorocabons
PHF	peak hour factor
PHS	Preliminary Hydrology Study
PM	Afternoon
PM10	Respirable Particulate Matter
PM2.5	Fine Particulate Matter
POTWs	publicly owned treatment works
Ppb	Parts Per Billion
Ppm	Parts Per Million
PPV	Peak Particle Velocity
PRC	Public Resources Code
PUHSD	Perris Union High School District
PVC	Polyvinyl Chloride
PV	Photovoltaic
PVCCSP	Perris Valley Commerce Center Specific Plan
PVRWRF	Perris Valley Regional Water Reclamation Facility

Qoal	Older Alluvium
RBBD	Southwest Road and Bridge Benefit District
t RC	Rural Community
RCB	Reinforced concrete box
RCFC&WCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCHCA	Riverside County Habitat Conservation Agency
RCIP	Riverside County Integrated Project
RCLIS	Riverside County Land Information Systems
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
RCSD	Riverside County Sheriff's Department
RCTC	Riverside County Transportation Commission
RCWD	Rancho California Water District
REC	Recognized Environmental Condition
REMEL	Reference Energy Mean Emission Level
RHNA	Regional Housing Needs Assessment
RivTAM	Riverside County Transportation Analysis Model
RMS	root mean square
ROG	Reactive Organic Gases
ROW	Right(s)-of-Way
RPIA	Reduced Project Intensity Alternative
RDA	Redevelopment Agency
RTA	Riverside Transit Authority
RTP	Regional Transportation Plan
RV	Recreational Vehicle
RWQCB	Regional Water Quality Control Board
RWRF	Regional Wastewater Reclamation Facility
SA	Site Assessment
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCGC	Southern California Gas Company
SCH	State Clearinghouse
SCHWMA	Southern California Hazardous Waste Management Authority
SCS	Sustainable Communities Strategy
SDA	Subsurface Drainage Alternative
SDWA	Safe Drinking Water Act
SF6	Sulfur Hexafluoride
SFHA	Special Flood Hazard Area
SFP	School Facilities Program
SHMA	Seismic Hazard Mapping Act
SHS	State Highway System
SKR	Stephen's kangaroo rat
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigations and Cleanup
SO2	Sulfur Dioxide
SOX	Oxides of Sulfur
SMARA	The Surface Mining and Reclamation Act of 1975
SoCAB	South Coast Air Basin
SOP	Standard Operating Procedures

SP	Specific Plan
Sq. Ft.	Square Feet
SR-74	State Route 74
SRA	Source Receptor Area
STC	Sound Transmission Class
s/v	Seconds Per Vehicle
SWFP	Solid Waste Facility Permit
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminant
TCP	Traffic Control Plan
TCR	Tribal Cultural Resource
TDA	Transportation Demand Management
TDS	Total Dissolved Solids
TIA	Traffic Impact Analysis
TIS	Traffic Impact Study
TSD	Treatment, Storage and Disposal facility list
TTCP	Traditional Tribal Cultural Places
TUMF	Transportation Uniform Mitigation Fee
UBC	Uniform Building Code
ULFT	Ultra-Low-Flush Toilets
U.S.	United States
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
V/C	Volume to Capacity
VCP	Vitrified Clay Pipe
VdB	Decibel notation
VEC	Vapor Encroachment Condition
VES	Vapor Encroachment Screen
VLF	Vehicle License Fee
VOC	Volatile Organic Compound
VPD	Vehicles Per Day
VWRPD	Valley Wide Recreation and Park District
Wd	Waukena Loam, Saline-Alkali
WDL	Water Data Library
WMD	Waste Management Department
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
WRP	Waste Recycling Plan
WSA	Water Service Agreement
WSA	Water Supply Assessment
WSCP	Water Shortage Contingency Plan
WSP	Water Supply Plan

CHAPTER 1 – EXECUTIVE SUMMARY

This Executive Summary for the Perris Valley Commerce Specific Plan Amendment No. 13 (PVCC SPA 13) Project (Project) Draft Environmental Impact Report (DEIR) summarizes the environmental effects that are forecast to occur from implementation of the proposed Project. It also contains a summary of the Project background, Project objectives, and Project description. A table summarizing environmental impacts, mitigation measures, and mitigation responsibility is included at the end of this Executive Summary.

1.1 PROJECT BACKGROUND

The Project site is located in the northern portion of the City of Perris and is bounded by Ramona Expressway to the north, light industrial uses to the south, Perris Boulevard to the east, and Indian Avenue to the west.

PR Partners, LLC (Project proponent) proposes a thirteenth Amendment (SPA19-05287) to the Perris Valley Commerce Center Specific Plan (PVCCSP)(SPA13) and a Development Plan Review (DPR 19-00012) for the development of the 16.0-acre Project site with an approximate 347,918-square-foot (sq.ft.) light industrial building; the building will be divided into 339,918 sq. ft. of non-refrigerated warehousespace and 8,000 sq. ft. of office space, and herein called the Project. The Project site is located in the Cityof Perris, Riverside City, California. The applicant proposes to modify the current Specific Plan Land Use Designation of the Project site as follows:

- Current Land Use - Commercial (C): This zoning designation provides for retail, professional office, and service-oriented business activities which serve the entire City, as well as the surrounding neighborhoods. This zone combines the General Plan Land Use designation of Community Commercial and Commercial Neighborhood.
- Proposed Land Use - Light Industrial (LI): This zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. This zone correlates with the 'Light Industrial' General Plan Land Use designation.

The applicant has proposed **two options for truck access** to and from the site, the first option would have all trucks using Indian Boulevard while the second option would split the truck traffic - half onto Indian Boulevard and half onto Perris Boulevard. However, the City has recently proposed to remove Perris Boulevard from its approved list of truck routes.

The City of Perris is the Lead Agency for compliance with the California Environmental Quality Act (CEQA) based on its sole authority to approve the proposed Specific Plan Amendment and grant entitlements for the proposed Project. The decision to prepare an Environmental Impact Report (EIR) was based on the finding that the proposed Project may have one or more significant effects on the existing Project site environment and surrounding environment as is documented in the Notice of Preparation (NOP) and Initial Study. The NOP and the NOP distribution list and the surrounding property owners list are contained in Subchapter 8.1, Notice of Preparation / NOP Distribution List, of this DEIR while the Initial Study is contained in Subchapter 8.3. The Cityprepared and circulated the NOP for the Project to State and local agencies, adjacent cities, local Native American tribes, interested parties, and to surrounding property owners within a 300' radius of the Project site. The State Clearinghouse distributed the NOP (*SCH#2021050021*) to State agencies. The NOP public reviewperiod began on May 5, 2021 and ended on June 4, 2021. Respondents were asked to send their input as to the scope and content of the environmental information and issues that should be addressedin the Project DEIR no later than the end of the 30-day review period.

The City of Perris Planning Commission held a Draft EIR Scoping Meeting on Monday, May19, at 6:00 p.m. at the Perris City Hall, 101 North "D"Street, Perris, CA 92570. The NOP included the date, time, and location of the scoping meeting. Ten (10) written letters and/or emails were submitted in response to the NOP. No agency or public comments pertaining to the EIR or CEQA were received at the scoping meeting. Subchapter 8.2, NOP Comment Letters includes a copy of each NOP comment letter and email received during the comment period and comments are also summarized in Chapter 2, Introduction, with a reference to where the issue will be addressed in Chapter 4, Environmental Impact Evaluation.

The City has prepared a DEIR for the Project that evaluates the potential environmental impacts that would result from constructing and implementing the proposed Project. This EIR analyzes the proposed Project under CEQA at a project level but tiered off of the program level PVCCSP EIR.

Subsequent activities associated with implementation of the PVCCSP would be evaluated for compliance with CEQA in light of the PVCCSP EIR to determine whether additional environmental documentation must be prepared. Specifically, if Tentative Tract Maps, improvement plans, or other discretionary approvals associated with implementation of the PVCCSP are submitted and proposed, the environmental impacts of implementing those maps, plans, and approvals will be compared against the analysis set forth in the PVCCSP EIR and CEQA's mandates for subsequentand/or supplemental environmental review.

1.2 INTENDED USE OF THIS ENVIRONMENTAL IMPACT REPORT

This DEIR has been prepared in accordance with the CEQA Statutes and Guidelines, 2021, pursuant to Section 21151 of CEQA. The City of Perris is the Lead Agency for the Project and has supervised the preparation of this DEIR. This DEIR is an information document which will inform and assist public agency decision makers and the general public of the potential environmental effects, including any significant impacts that may be caused by implementing the proposed Project. Possible ways to minimize significant effects of the proposed Project and reasonable alternatives to the Projectare also identified in this DEIR.

This document assesses the impacts, including unavoidable adverse impacts and cumulative impacts, related to the construction and operation of the proposed Project. This DEIR is also intended to support the permitting process of all agencies from which discretionary approvals must be obtained for particular elements of this Project. Other agency approvals (if required) for which this environmental document may be utilized include:

- Riverside County Airport Land Use Commission
- Riverside County Flood Control and Water Conservation District
- Eastern Municipal Water District
- Regional Water Quality Control Board, Santa Ana Region

1.3 PROJECT OBJECTIVES

The Project applicant has the following objectives for the proposed Project:

- Provide additional warehouse space needed to meet regional demand.
- Provide employment opportunities for local residents.
- Meet the applicable General Plan goals regarding the proposed land use.
- Introduce uses compatible with site constraints and regulatory limitations (e.g., ALUC).
- Develop a project that integrates with and compliments the existing development pattern for this portion of the Ramona Corridor.
- Develop a project that enhances views of this City entryway.
- Provide benefits to the City with increases property tax revenue and new employment while minimizing adverse environmental impacts.

- Develop a project that will be economically feasible and operationally stable to meet the needs of businesses wishing to locate into this portion of the City of Perris.

1.4 PROJECT APPROVALS

This DEIR will be used as the information source and CEQA compliance document for the following discretionary actions or approvals by the CEQA lead agency, City of Perris: Perris Valley Commerce Specific Plan Amendment No. 13, Specific Plan Amendment Number 13 [SPA13 (City Case number SPA19-05287)], and a Development Plan Review (DPR 19-00012) for the development of the 16.0-acre Project site with an approximate 347,918-square-foot (sq. ft.) light industrial building; the building will be divided into 339,918 sq. ft. of non-refrigerated warehouse space and 8,000 sq. ft. of office space.

1.5 IMPACTS

Based on data and analysis provided in this DEIR, it is concluded the proposed Project could result in potentially significant adverse environmental impacts to the following environmental issues: Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, and Utilities and Service Systems. However, the EIR further determined these impacts could be reduced to less than significant levels by implementation of either program-level mitigation measures identified in the PVCCSP EIR or project-specific mitigation outlined in this EIR. All other potential impacts were determined to be no impact, less than significant, or less than significant without mitigation. The EIR also did not identify any significant contributions of the Project to cumulative significant impacts with implementation of the project-level mitigation recommended in the EIR. These conclusions are consistent with the thresholds identified in Section 15130 of the State CEQA Guidelines.

Table 1-2, ***Summary of Impacts with Standard Conditions and Mitigation Measures***, in Section 1.8, summarizes all the potentially environmental impacts and proposed mitigation identified in this DEIR and will be provided to the decision-makers prior to finalizing the EIR.

The following issues evaluated in the Initial Study and DEIR have been determined to experience the following impacts and mitigation as indicated based on the facts, analysis, and findings in this DEIR.

Aesthetics (Initial Study Section V.1)

1.a Scenic Vistas – Less than Significant
1.b Scenic Highways – Less than Significant
1.c Visual Character – Less than Significant
1.d Light and Glare – **see Table 1.2**

Agriculture and Forest Resources (Initial Study Section V.2)

2.a Convert Designated Farmland – No Impact
2.b Ag Zoning or Preserve – No Impact
2.c Rezone Forestland – No Impact
2.d Loss of Forestland – No Impact
2.e Conversion of Ag Land or Forestland – No Impact

Air Quality (Initial Study Section V.3 and EIR Section 4.2)

4.2.a Consistency with AQMP – Less than Significant
4.2.b Increase in Criteria Pollutants – **see Table 1.2**
4.2.c Sensitive Receptors – **see Table 1.2**
4.2.d Other Emissions including Odors – Less than Significant

Biological Resources (Initial Study Section V.4 and EIR Section 4.3)

4.3.a Listed and Sensitive Species – No Impact
4.3.b Riparian Habitat or Natural Community – No Impact
4.c Impact Wetlands – No Impact
4.3.d Wildlife Species Migration – No Impact
4.e Local Ordinances – No Impact
4.3.f MSHCP Consistency – **see Table 1.2**

Cultural Resources (EIR Section 4.4)

4.4.a Historic Resources – **see Table 1.2**
4.4.b Archaeological Resources - **see Table 1.2**
4.4.c Human Remains – Less than Significant

Energy (EIR Section 4.5)

4.5.a Energy Consumption – **see Table 1.2**
4.5.b Consistency with Conservation Plans – **see Table 1.2**

Geology and Soils (Initial Study Section V.7)

7.a Faults or Seismic Impacts – Less than Significant
7.b Soil Erosion – **see Table 1.2**
7.c Unstable Geology or Soils – **see Table 1.2**
7.d Expansive Soils – **see Table 1.2**
7.e Septic Tanks – No Impact
7.f Paleontological Resources – **see Table 1.2**

Greenhouse Gas Emissions (EIR Section 4.6)

4.6.a GHG Emissions – Less than Significant
4.6.b Consistency with GHG Plans – **see Table 1.2**

Hazards and Hazardous Materials (Initial Study Section V.9)

9.a Transport, Use, or Disposal of Hazmat - Less than Significant
9.b Accidental Release – **see Table 1.2**
9.c Quarter Mile from Schools - Less than Significant
9.d Cortese List - Less than Significant
9.e Airport Land Use Plan – **see Table 1.2**
9.f Emergency Response Plans - Less than Significant
9.g Wildfires – **see Table 1.2**

Hydrology and Water Quality (EIR Section 4.7)

4.7.a Violate Water Quality Standards – Less than Significant
4.7.b Groundwater Supplies – Less than Significant
4.7.c .i Increase Erosion – Less than Significant
4.7.c.ii Increase Surface Runoff – Less than Significant
4.7.c.iii Impact Drainage System – Less than Significant
4.7.c .iv Impede Flood Flows – Less than Significant
4.7.d Flood, Tsunami, or Seiche – No Impact
4.7.e Conflict with Water Plans – Less than Significant

Land Use and Planning (Initial Study Section V.11 and EIR Section 4.8)

11.a Divide Established Community - Less than Significant
4.8.b Conflict with Adopted Plans - Less than Significant

Mineral Resources (Initial Study Section V.12)

12.a Loss of Regional Resource – No Impact
12.b Loss of Local Resource – No Impact

Noise (EIR Section 4.9)

4.9.a Generate Substantial Noise – **see Table 1.2**
4.9.b Generate Excessive Vibration – **see Table 1.2**
4.9.c Airport Noise – No Impact

Population and Housing (Initial Study Section V.14)

14.a Substantial Unplanned Growth – Less than Significant
14.b Displace People or Housing – No Impact

Public Services (Initial Study V.15)

15.a.iFire – Less than Significant
15.a.ii Police – Less than Significant
15.a.iii Schools – Less than Significant
15.a.iv Parks – Less than Significant
15.a.v Other – Less than Significant

Recreation (Initial Study V.16)

16.a Increase Use of Parks – Less than Significant
16.b Construct New Parks – Less than Significant

Transportation (Initial Study Section V.17 and EIR Section 4.10)

4.10.a Conflict with Transportation Plans – **see Table 1.2**
4.10.b Substantially Increase Vehicle Miles Traveled (VMT) – Less than Significant
17.c Increase Traffic Hazards – Less than Significant
17.d Emergency Access – **see Table 1.2**

Tribal Cultural Resources (EIR Section 4.11)

4.11.a Listed Cultural Resources – **see Table 1.2**
4.11.b Native American Consultation – **see Table 1.2**

Utilities and Service Systems (EIR Section 4.12)

4.12.a Relocate or Expand Utility Systems – Less than Significant
4.12.b Sufficient Water Supplies – Less than Significant
4.12.c Sufficient Wastewater Treatment Capacity – Less than Significant
4.12.d Generate Solid Wase – Less than Significant
4.12.e Comply with Solid Waste Plans – Less than Significant

Wildfire (Initial Study Section V.20)

20.a Impair Emergency Response Plans – **see Table 1.2**
20.b Increase Wildfire Risks – Less than Significant
20.c Install Infrastructure that Increases Risks – Less than Significant
20.d Increase Post-Fire Risks – Less than Significant

1.6 ALTERNATIVES

CEQA and the State CEQA Guidelines require an evaluation of alternatives to the proposed action. Section 15126.6 of the State CEQA Guidelines indicates that the "discussion of alternatives shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of not significant...." The State Guidelines also state that "a range of reasonable alternatives to the Project which could feasibly attain the basic objectives of the project" and "The range of alternatives required in an EIR is governed by 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The detailed analyses of the alternatives evaluated are provided in Chapter 5, Alternatives, of this DEIR. This evaluation addresses those alternatives for feasibility and range of alternatives required to permit decision- makers a reasoned choice between the alternatives.

The following evaluation also includes identification of an environmentally superior alternative as required by the State CEQA Guidelines. The three (3) alternatives were developed during review of the Project with the City of Perris and include all components of the Project. No other plausible alternatives were identified during the review process for consideration in this DEIR.

No Project Alternative (NPA). One of the alternatives that must be evaluated in an environmental impact report (EIR) is the "no project alternative," (NPA) regardless of whether it is a feasible alternative to the proposed Project, i.e., would meet the project objectives or requirements. Under this alternative, the environmental impacts that would occur if the proposed Project were not approved and implemented are identified. The NPA assumes the property remains in its current state – vacant land.

Alternative 1 - Commercial Use. This "No Project" alternative would implement the existing General Plan and PVCCSP designation on the site. This alternative includes development of a gas station with 4,500-square-foot convenience store and 16 vehicle fueling positions, 2,200-square-foot fast-food restaurant with drive-through window use in the northeast portion of the site to stay within the C1 zone. This alternative also includes the following **two options** for low intensity or low occupancy commercial uses on the rest of the site: (a) 1,374-unit Self-Storage Facility; or (b) 11.90-acre Nursery.

Alternative 2 - Lower Intensity Industrial. This alternative would have 290,000 square feet of only high cube warehousing, not general warehousing, located in the central and western portions of the site. This alternative would have 83% of the floor area compared to 347,918 square feet for the proposed Project.

This alternative would also have retail commercial (a gas station and one small restaurant pad (as described under Alternative 1) in the northeast portion of the site.

Alternative 3 – Low Intensity Business/Office Park. This alternative would have 76,920 square feet of lower intensity business park/office uses in 4 buildings in the central and western portions of the site. This alternative would also have retail commercial (a gas station and one small restaurant pad as described under Alternative 1) in the northeast portion of the site).

Table 1-1, *Impact Comparison of Project Alternatives*, lists the Project and the three (3) alternatives. Based on the analysis in Chapter 5, Alternatives, the **Lower Intensity Industrial Alternative** is the **environmentally superior alternative** because its impacts would be similar to the Project, and it also meets the Objectives but not to the same degree as the Project.

Table 1-1
Impact Comparison of Project Alternatives

Environmental Issue	Proposed Project	No Project Alternative (NPA)	Alternative 1 Commercial Use (Self-Storage or Nursery)	Alternative 2 Less Intense Industrial	Alternative 3 Less Intense Business Park/Office
Aesthetics	LTS	LTS+	LTS-	LTS	LTS-
Agriculture and Forest Resources	NI	NI	NI	NI	NI
Air Quality	LTS	NI	LTS+	LTS+	LTS+
Biological Resources	LTS	NI	LTS	LTS	LTS
Cultural Resources	LTS	NI	LTS	LTS	LTS
Energy	LTS	NI	LTS	LTS	LTS
Geology and Soils	LTS	NI	LTS	LTS	LTS
Greenhouse Gas Emissions	LTS	NI	LTS+	LTS+	LTS+
Hazards and Hazardous Materials	LTS	NI	LTS	LTS	LTS
Hydrology and Water Quality	LTS	LTS+	LTS	LTS	LTS
Land Use and Planning	LTS	NI	LTS	LTS	LTS
Mineral Resources	NI	NI	NI	NI	NI
Noise	LTS	NI	LTS	LTS	LTS
Population and Housing	LTS	NI	LTS	LTS	LTS
Public Services	LTS	NI	LTS-	LTS	LTS
Recreation	LTS	NI	LTS-	LTS	LTS
Transportation	LTS	NI	LTS+	LTS+	LTS+
Tribal Cultural Resources	LTS	NI	LTS	LTS	LTS
Utilities and Service Systems	LTS	NI	LTS	LTS	LTS
Wildfire	LTS	NI	LTS	LTS	LTS
Would Meet Project Objectives?	**YES**	**NO**	**Yes** but not nearly to the same degree	**Yes** but not to the same degree	**Yes** but not nearly to the same degree

LTS = Less Than Significant NI = No Impact - = Less than the Project += Greater than the Project SIG = Significant Impact
SSF = Self-Storage Facility NOx = oxides of nitrogen

1.7 AREAS OF CONTROVERSY

A detailed discussion of all comments received on the Project in response to the Notice of Preparation is provided in Chapter 2, Introduction. Based on this input, the only issues of controversy were: (1) the placement of all industrial uses on the site which is one entry point to the City; (2) hiring a local skilled workforce: (3) potential use of the site for housing; and (4) the potential for additional truck traffic on Perris Boulevard.

1.8 SUMMARY OF IMPACTS AND MITIGATION MEASURES DISCUSSED IN THIS DRAFT EIR

Table 1-2, *Summary of Impacts with Standard Conditions and Mitigation Measures*, provides a summary of all impacts and mitigation measures identified in the detailed environmental evaluation presented in Chapter 4, Environmental Impact Evaluation, of this DEIR. This summary is meant to provide a quick reference to proposed Project impacts; the reader is referenced to Chapter 4 to understand the assumptions, method of impact analysis, and rationale for the findings and conclusions presented in **Table 1-2**.

Table 1-2
Summary of Impacts with Standard Conditions and Mitigation Measures

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
Aesthetics	Initial /study determined impacts less than significant with mitigation measure (1.d)	**MM-AES-1:** Prior to issuance of grading permits, the Project developer shall provide evidence to the City that any temporary nighttime lighting installed for security purposes shall be downward facing and hooded or shielded to prevent security light spillage outside of the staging area or direct broadcast of security light into the sky.	Less than Significant
Agriculture and Forestry Resources	No Standard Conditions or Mitigation Measures Required		
Air Quality	Project construction and operational emissions estimated to be less than significant, but PVCCSP EIR mitigation measures required (4.2.b and 4.2.c)	**SC-AQ-1:** The Project is required to comply with Rule 402 during construction, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.	Less than Significant
		PVCCSP MM Air 2: Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.	
		PVCCSP MM Air 3: To reduce fugitive dust emissions, the development of each individual implementing development project shall comply with SCAQMD Rule 403. The developer of each implementing project shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof	

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
		of compliance with Rule 403, prior to grading permit issuance. Dust control measures shall include, but are not limited to: • Requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain); Keeping disturbed/loose soil moist at all times; • Requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered; • Installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip; • Posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved portions of the project site; • Suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour; • Appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation; • Sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials; and/or, • Replacement of ground cover in disturbed areas as quickly as possible.	
		PVCCSP MM Air 4: Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.	
		PVCCSP MM Air 5: Electricity from power poles shall be used instead of temporary diesel or gasoline-powered generators to reduce the associated emissions. Approval will be required by the city the City of Perris Building Division prior to issuance of grading permits.	
		PVCCSP MM Air 6: The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled off-road construction equipment, the use of construction equipment that demonstrates early compliance with off-road equipment with the CARB in-use off-road diesel vehicle regulation (SCAQMD Rule 2449) and/or meets or exceeds Tier 3 standards with available CARB verified or USEPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNOx unless it is unavailable in Riverside County at the time of project construction activities. Contract specifications shall be included in project construction documents, which shall be reviewed bythe City of Perris Building Division prior to issuance of a grading permit.	
		PVCCSP MM Air 7: During construction, ozone precursor emissions from mobile construction equipment shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers' specifications to the satisfaction of the City of Perris Building Division. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction. Compliance with this measure shall be subject to periodic inspections by the City of Perris Building Division.	

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
		PVCCSP MM Air 8: Each individual implementing development project shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.	
		PVCCSP MM Air 9: To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g., bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in SCAQMD's Rule 1113. Construction specifications shall be included in building specifications that assure these requirements are implemented. The specifications for each implementing development project shall be reviewed by the City of Perris Building Division for compliance with this mitigation measure prior to issuance of a building permit for that project.	
		PVCCSP MM Air 11: Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.	
		PVCCSP MM Air 13: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other state programs that restrict operations to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero- Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NOx] funding programs, as identified on SCAQMD's website (http: //www.aqmd.gov). Tenants would be required to use those funds, if awarded.	
		PVCCSP MM Air 14: Each implementing development project shall designate parking spaces for high-occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.	

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
		PVCCSP MM Air 19: In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris Building Division) prior to conveyance of applicable streets.	
		PVCCSP MM Air 20: Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All reductions will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.	
Biological Resources	Potentially Significant Consistency with MSHCP requirements (4.3.f)	**SC-BIO-1:** Prior to the issuance of grading permits, the developer shall pay the MSHCP fee.	Less than Significant
		SC-BIO-2: Prior to the issuance of grading permits, the developer shall pay the Stephen's Kangaroo Rat Fee.	
		PVCCSP MM Bio 1: In order to avoid violation of the MBTA and the California Fish and Game Code, site-preparation activities (removal of trees and vegetation) for all PVCCSP implementing development and infrastructure projects shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory birdspecies. If site-preparation activities for an implementing project are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for such project, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the implementing project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre- activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.	

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
		Project-specific habitat assessments and focused surveys for burrowing owls would be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre-construction survey for resident burrowing owls would also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity would be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP. If active nests are identified on an implementing project site during the pre- construction survey, the nests shall be avoided, or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non- breeding season.	
		PVCCSP MM Bio 2: Project-specific habitat assessments and focused surveys for burrowing owls would be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre-construction survey for resident burrowing owls would also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity would be conducted in accordance with the current Burrowing Owl Instruction forthe Western Riverside MSHCP. If active nests are identified on an implementing project site during the pre- construction survey, the nests shall be avoided, or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non- breeding season.	

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
Cultural Resources	Potentially Significant Impacts to Archaeological Resources and Human Remains(4.4.a and 4.4.b)	**MM-CR-1:** Prior to the issuance of grading permits, the Project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at both the subject site and any off-site Project-related improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur at the site or within the off-site Project improvement areas until the archaeologist has been approved by the City. The archaeologist shall be responsible for monitoring ground-disturbing activities, maintaining daily field notes and a photographic record, and for reporting all finds to the developer and the City of Perris in a timely manner. The archaeologist shall be prepared and equipped to record and salvage cultural resources that may be unearthed during ground-disturbing activities and shall be empowered to temporarily halt or divert ground-disturbing equipment to allow time for the recording and removal of the resources. In the event that archaeological resources are discovered at the Project site or within the off-site Project improvement areas, the handling of the discovered resource(s) will differ, depending on the nature of the find. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for Native American/tribal cultural/archaeological resources. However, it is understood that all artifacts, with the exception of human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner will commit to the relinquishing and curation of all artifacts identified as being of Native American origin. All artifacts, Native American or otherwise, discovered during the monitoring program shall be recorded and inventoried by the consulting archaeologist. If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop and the Project proponent and Project archaeologist shall notify the City of Perris Planning Division and the Soboba Band of Luiseño Indians and the Pechanga Band of Luiseño Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians or the Pechanga Band of Luiseño Indians shall be retained to assist the Project archaeologist in the significance determination of the Native American as deemed possible. The designated Luiseño tribal representative will be given ample time to examine the find. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribe. If the find is determined to be of sacred or religious value, the Luiseño tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaking in a manner that avoids destruction or other adverse impacts.	Less than Significant

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
		Native American artifacts that are relocated/reburied at the Project site would be subject to a fully executed relocation/reburial agreement with the assisting Luiseño tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied on-site and in an area of permanent protection, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist. Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. Subsequent to analysis and reporting, these artifacts will be subjected to curation, as deemed appropriate, or returned to the property owner. Once grading activities have ceased and/or the archaeologist, in consultation with the designated Luiseño representative, determines that monitoring is no longer warranted, monitoring activities can be discontinued following notification to the City of Perris Planning Division. A report of findings, including an itemized inventory of artifacts, shall be prepared upon completion of the tasks outlined above. The report shall include all data outlined by the Office of Historic Preservation guidelines, including a conclusion of the significance of all recovered, relocated, and reburied artifacts. A copy of the report shall also be filed with the City of Perris Planning Division, the University of California, Riverside, Eastern Information Center (EIC) and the Luiseño tribe(s) involved with the Project. **MM-CR-2:** In the event that human remains (or remains that may be human) are discovered at the Project site or within the off-site Project improvement areas during ground- disturbing activities, the construction contractors, Project archaeologist, and/or designated Luiseño tribal representative shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b). If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the “Most Likely Descendent” (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the site, the NAHC’s identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the Project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the Project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and the median with the	

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
		NAHC will make the applicable determination (see Public Resources Code Section 5097.98I and 5097.94(k)). The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the EIC.	
Energy	EIR determined impacts were less than significant but recommended mitigation from the PVCCSP EIR (4.5.a and 4.5.b)	**PVCCSP MM Air 4**, **PVCCSP MM Air 11**, **PVCCSP MM Air 14**, **PVCCSP MM Air 19**, and **PVCCSP MM Air 20** shall apply; see Air Quality Section above	Less than Significant
Geology and Soils	Recommended in Initial Study (7.a.ii)	**SC-GEO-1:** Project design shall be subject to the seismic design criteria of the 2019 edition of the California Building Code (CBC), adopted December 10, 2019, by the City of Perris as Ordinance No. 1387.	Less than Significant
		SC-GEO-2: The Project shall comply with the recommendations listed in the *Geo Investigation* as it pertains to impacts arising from unstable soils (seismic ground shaking, on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse), and/or expansive soils.	
	Recommended in Initial Study (7.b)	**PVCCSP MM Air 3** shall apply; see Air Quality Section above	Less than Significant
		SC-GEO-1 shall apply; as outlined above **SC-HYD-1** and **SC-HYD-2** shall apply; see Hydrology and water Quality Section below	
	Recommended in Initial Study (7.c and 7.d)	**SC-GEO-1** and **SC-GEO-2** shall apply; as outlined above	

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
	Recommended in Initial Study (7.f)	**MM-GEO-1:** Prior to the issuance of grading permits, the Project proponent/developer shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision for a qualified professional paleontologist (or his or her trained paleontological representative) to be on-site for any Project- related excavations that exceed three (3) feet below the pre-grade surface. Selection of the paleontologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the Project site or within the off-site Project improvement areas until the paleontologist has been approved by the City. Monitoring shall be restricted to undisturbed subsurface areas of older Quaternary alluvium. The approved paleontologist shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The paleontologist shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontologist shall have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens. Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved. Specimens shall be identified and curated and placed into an accredited repository (such as the Western Science Center or the Riverside Metropolitan Museum) with permanent curation and retrievable storage. A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.	Less than Significant
Greenhouse Gas Emissions	EIR determined impacts were less than significant but recommended mitigation from the PVCCSP EIR (4.6.b)	**PVCCSP MM Air 2**, **PVCCSP MM Air 4**, **PVCCSP MM Air 7**, **PVCCSP MM Air 11**, **PVCCSP MM Air 13**, **PVCCSP MM Air 14**, **PVCCSP MM Air 19**, and **PVCCSP MM Air 20** shall apply; see Air Quality Section above	Less than Significant

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
Hazards and Hazardous Materials	Recommended in Initial Study (9.b)	**MM-HAZ-1: Pesticide Presence.** Prior to any ground disturbance activities, the Project applicant shall coordinate the sampling and laboratory testing of onsite soils for contamination by past agricultural chemicals (e.g., pesticides, herbicides, rodenticides, heavy metals, etc.) with the County Department of Environmental Health Services (DEH). If requested, the applicant shall submit a workplan to DEH for review and approval prior to the completion of grading. If any past agricultural chemicals are found in levels that exceed applicable health standards, a qualified contractor shall be retained to remove and properly dispose of such materials. Any work conducted shall be in compliance with DEH guidelines as the appropriate oversight agency. If sampling and laboratory testing are performed, a final report shall be prepared and submitted to DEH for review and approval prior to issuance of a certificate of occupancy.	Less than Significant
		MM-HAZ-2: Buried Hazards. If any former fuel tanks or other potentially hazardous materials are found during grading or any ground disturbing activities, work in that area shall be halted within 100 feet of the find and a qualified environmental contractor shall be retained. The contractor shall assess the risk or hazard level of the material(s) and identify the most appropriate method of remediation. This work shall occur in coordination with and to the satisfaction of the County Department of Environmental Health Services (DEH).	
	Recommended in Initial Study (9.e)	**MM-HAZ-3: ALUC Consistency.** Prior to issuance of a certificate of occupancy, the applicant shall demonstrate the Project has complied with the following conditions issued by the Riverside County Airport Land Use Commission (ALUC) at its July 9, 2020, meeting relative to the March Air Reserve Base/Inland Port Airport (MARB/IPA): 1. Any outdoor lighting installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing. 2. The following uses/activities are not included in the proposed project and shall be prohibited at this site:	Less than Significant

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
		(a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. (b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landingat an airport. (c) Any use which would generate smoke or water vapor, or which would attract large concentrationsof birds, or which may otherwise affect safe air navigation within the area. Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, composting operations, trash transfer stations that are open on one or more sides, recycling enters containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.) (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. (e) Children's schools, day care centers, libraries, hospitals, skilled nursing and care facilities, congregate care facilities, hotels/motels, restaurants, places of assembly (including churches and theaters), buildings with more than 3 aboveground habitable floors, noise sensitive outdoor nonresidential uses, critical community infrastructure facilities and hazards to flight. (f) Any other uses not permitted in Accident Potential Zone II pursuant to DoDI 4165.57. 3. Prior to issuance of any building permits, the landowner shall convey and have recorded an avigation easement to the March Inland Port Airport Authority. Contact March Joint Powers Authority at (951)656-7000 for additional information. 4. The attached notice [from the July 9, 2020, ALUC Staff Report] shall be given to all prospective purchasers of the property and tenants of the buildings. 5. Any proposed detention basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm and remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for birds would be incompatible with airport operations and shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature.	

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
		Landscaping in the detention basin, if not rip-rap, should be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS, WILDLIFE AND STORMWATER MANAGEMENT" brochure available at RCALUC.ORG which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a qualified wildlife hazard biologist. A notice sign, in a form similar to that attached hereto, shall be permanently affixed to the stormwaterbasin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes". The sign will also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin. 6. March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc. 7. Noise attenuation measures shall be incorporated into the design of the office areas of the structure, to the extent such measures are necessary to ensure that interior noise levels from aircraftoperations are at or below 45 CNEL. 8. The project does not propose rooftop solar panels at this time. However, if the project were to propose solar rooftop panels in the future, the applicant/developer shall prepare a solar glare study that analyzes glare impacts, and this study shall be reviewed by the Airport Land Use Commission and March Air Reserve Base. 9. This project has been evaluated as a proposal for 260,076 square feet of e-commerce area, 79,843 square feet of warehouse area, and 8,000 square feet of office floor area. Any increase in building area or change in use will require review by the Airport Land Use Commission. In addition,this project shall not store, process or manufacture hazardous materials without review and approvalby the Airport Land Use Commission. Supporting documentation was provided to the Airport Land Use Commission and is available onlineat www.rcaluc.org, click Agendas, 07-09-20 Agenda, Bookmark Agenda Item No. 3.1. Written proof of compliance shall be provided to County Planning and ALUC prior to issuance of thecertificate of occupancy.	

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
	Recommended in Initial Study (9.f and 9.g)	**PVCCSP MM Air 2** shall apply; see Air Quality Section above	Less than Significant
Hydrology and Water Quality	EIR determined impacts were less than significant but standard conditions recommended in the Initial Study (7.a)	**SC-HYD-1:** SWPPP. Erosion and siltation reduction measure BMPs contained in the required SWPPP will be implemented during construction. At the completion of construction, the Project will consist of impervious surfaces, landscaped planters, and post-construction BMPs.	Less than Significant
		SC-HYD-2: WQMP. The Project proponent is required to submit a Water Quality Management Plan (WQMP) for review and approval. The WQMP identifies post-construction BMPs in addressing increases in impervious surfaces, methods to decrease incremental increases in off-site stormwater flows, and methods for decreasing pollutant loading in off-site discharges as required by the applicable NPDES requirements.	
		SC-HYD-3: Wastewater. All wastewater associated with the Project's interior plumbing systems will be discharged into the local sewer system for treatment at the regional wastewater treatment plant.	
		SC-USS-1: Sewer Connection Fees. Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable sewer connection fees to EMWD.	
	EIR determined impacts were less than significant but standard conditions recommended in the Initial Study (7.c.i)	**SC-HYD-1**, **SC-HYD-2**, and **SC-HYD-4**; as outlined above	Less than Significant
		SC-HYD-4: Site Drainage Plan. A site drainage plan is required by the City of Perris and will be reviewed by the City Engineering Department. The final grading and drainage plan will be approved by the City Engineering Department during plan check review.	
		SC-HYD-5: Storm Drainage Facilities. The Project applicant shall pay Development Impact Fees (DIF) for nonresidential development prior to the issuance of a building permit.	
	EIR determined impacts were less than significant but standard conditions recommended (4.7.c.ii)	**SC-HYD-4** and **SC-HYD-5** shall apply; as outlined above	Less than Significant
	EIR determined impacts were less than significant but standard conditions recommended in the Initial Study (7.e)	**SC-HYD-1** through **SC-HYD-5** shall apply; as outlined above	Less than Significant

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
Land Use and Planning	No Standard Conditions or Mitigation Measures Required		
Mineral Resources	No Standard Conditions or Mitigation Measures Required		
Noise	EIR determined impacts were less than significant but recommended PVCCSP EIR Mitigation Measures (4.9.a and 4.9.b)	**PVCCSP MM Noise 1:** During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.	Less than Significant
		PVCCSP MM Noise 2: During all construction, stationary construction equipment , stockpiling and vehicle staging areas will be placed a minimum of 446 feet from the closest sensitive receptor.	
		PVCCSP MM Noise 3: No combustion-powered equipment, such as pumps or generators, shall be allowed to operate within 446 feet of any occupied residence unless the equipment is surrounded by a noise protection barrier.	
		PVCCSP MM Noise 4: Construction contractors of implementing development projects shall limit haul truck deliveries to the same hours specified for construction equipment. To the extent feasible, haul routes shall not pass sensitive land uses or residential dwellings.	
Population and Housing	No Standard Conditions or Mitigation Measures Required		
Public Services	Recommended in Initial Study (15.a)	**SC-PS-1:** Development Impact Fee (DIF). The Project applicant shall pay Development Impact Fees; DIF for nonresidential development shall be paid prior to the issuance of a building permit.	Less than Significant
		SC-PS-2: Municipal Code Section 20.01.010 (Fire Code). The Project shall comply with applicable version of Section 20.01.010 of the Municipal Code at the time of permit issuance.	
	Recommended in Initial Study (15.b, 15.d, and 15.e)	**SC-PS-1** shall apply; as outlined above	Less than Significant
	Recommended in Initial Study (15.c)	**SC-PS-3:** Prior to the issuance of a building permit for nonresidential development, the Project applicant shall pay the most recent developer fee to the Val Verde Unified School District applicable at the time of building permit issuance.	Less than Significant
Recreation	Recommended in Initial Study (16.a)	**SC-REC-1:** The Project applicant shall pay Development Impact Fees (DIF) for nonresidential development prior to the issuance of a building permit.	Less than Significant

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
Transportation	EIR determined impacts were less than significant but recommended Standard Conditions and PVCCSP EIR Mitigation Measures(4.10.a)	**SC-TR-1:** Prior to any Project construction the Project Applicant shall develop and implement a City-approved Traffic Control Plan (TCP) addressing potential construction-related traffic detours and disruptions. In general, the TCP will ensure that to the extent practical, construction traffic would access the Project site during off-peak hours; and that construction traffic would be routed to avoid travel through, or proximate to, sensitive land uses.	Less than Significant
		SC-TR-2: The Board of Supervisors of the County of Riverside and the Councils of the Cities of Western Riverside County enacted the Transportation Uniform Mitigation Fee (TUMF) to fund the mitigation of cumulative regional transportation impacts resulting from future development. The mitigation fees collected through the TUMF program will be utilized to complete transportation system capital improvements necessary to meet the increased travel demand and to sustain current traffic levels of service. The fee calculations are based on the proportional allocation of the costs of proposed transportation improvements based on the cumulative transportation system impacts of different types of new development. Fees are directly related to the forecast rate of growth and trip generation characteristics of different categories of new development. Fees shall be paid at the time a certificate of occupancy is issued for the Development Project or upon final inspection, whichever comes first. Payment of the TUMF is required and is not considered unique mitigation under CEQA.	
		SC-TR-3: The Project applicant shall pay Development Impact Fees (DIF) for non-residential development prior to the issuance of a building permit.	
		SC-TR-4: The Project applicant shall pay the North Perris Road and Bridge Benefit District (NPRBBD) fee for non-residential development prior to the issuance of a building permit.	
		PVCCSP MM Trans 1: Future implementing development projects shall construct on-site roadway improvements pursuant to the general alignments and right-of-way sections set forth in the PVCC Circulation Plan, except where said improvements have previously been constructed.	
		PVCCSP MM Trans 2: Sight distance at the project entrance roadway of each implementing development project shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.	
		PVCCSP MM Trans 5: Bike racks shall be installed in all parking lots in compliance with City of Perris standards.	
	Recommended in Initial Study (17.d)	**PVCCSP MM Air 2** shall apply; see Air Quality Section above	Less than Significant

Impact Category	Impact Before Mitigation	Standard Conditions (SC) and Mitigation Measures (MM)	Impact After Mitigation
Tribal Cultural Resources	Potentially Significant Impacts to Archaeological Resources and Human Remains (4.11.a.i and 4.11.a.ii)	**MM-CR-1** and **MM-CR-2** shall apply; see Cultural ResourcesSection above	Less than Significant
Utilities and Service Systems	EIR determined impacts were less than significant but recommended Standard Conditions (4.12.a)	**SC-USS-1:** Sewer Connection Fees. Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable sewer connection fees to EMWD.	Less than Significant
		SC-USS-2: EMWD Water Efficient Guidelines. The Project will be required to comply with shall be required to comply with the EMWD Water Efficient Guidelines for New Development which are in effect at the time of building permit issuance.	
		SC-USS-3: Water Connection Fees. Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable water connection fees to EMWD.	
		SC-HYD-1 through **SC-HYD-5** shall apply; see Hydrology and Water Quality Section above	
	Recommended in Initial Study (19.e)	**SC-USS-4:** Solid Waste. The Project applicant shall comply with the requirements of AB 939 ("California Integrated Waste Management Act of 1989"), which requires waste diversion mandates. During construction and operation, the applicant shall achieve diversion of 50 percent of all solid waste through source reduction, recycling, and composting activities.	Less than Significant
Wildfire	Recommended in Initial Study (20.a)	**PVCCSP MM Air 2** shall apply; see Air Quality Section above	

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CHAPTER 2 – INTRODUCTION

2.1 PROJECT OVERVIEW

PR Partners, LLC (Project proponent) proposes to implement a thirteenth Amendment (SPA19- 05287) to the Perris Valley Commerce Center Specific Plan (PVCCSP) (SPA13) and a Development Plan Review (DPR 19-00012) for the development of the 16-acre Project site with an approximate 347,918-square-foot (sq. ft.) light industrial building; the building will be divided into 339,918 sq. ft. of non-refrigerated warehouse space and 8,000 sq. ft. of office space, and herein called the Project. The Project site is located in the City of Perris, Riverside City, California.

The applicant for SPA13 proposes to modify the current Specific Plan Land Use Designation of the Project site as follows:

- Current Land Use - Commercial (C): This zoning designation provides for retail, professional office, and service-oriented business activities which serve the entire City, as well as the surrounding neighborhoods. This zone combines the General Plan Land Use designation of Community Commercial and Commercial Neighborhood.

- Proposed Land Use - Light Industrial (LI): This zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. This zone correlates with the 'Light Industrial' General Plan Land Use designation. Reference **Table 2-1, *SPA 13 Land Use Summary***.

Table 2-1
SPA 13 Land Use Summary

General Plan Land Use	Existing Acres Prior to PVCC SP	Acres Adopted by 2018 PVCCSP	Proposed Acres (SPA1-SPA10)
Business Park/Professional Office (BPO) Professional Office (PO) Business Park (BP)	317	272	272
Commercial (C) Community Commercial (CC) Neighborhood Commercial (NC)	462	269	253
General Industrial (GI)	423	408	392
Light Industrial (LI)	1,620	1,866	2,049
Multi-Family Residential Residential (Multi-Family) (MFR-14)	22	22	22
Public (P) Public/Semi-Public/Utilities Park, Recreational and Natural Open Space (OS)	120	194	194
Residential (R) Residential (Single-Family) (R-6,000)	59	0	0
Residential (R) Residential (Single-Family) (R-20,000)	63	60	60
Specific Plan (SP)	190	0	0
Other (ROW, Basin, etc.)	307	341	341
Total Acres	**3,583**	**3,583**	**3,583**

Source: PVCC SPA13 DRAFT (**Appendix O**)

The project applicant believes that LI designation is better suited to the restrictions in place for the Project site by the March Air Reserve Base/Inland Port Airport (MARB/IPA) Influence Area.

Reference **Figure 2-1, *Existing and Proposed Zoning Classifications***.

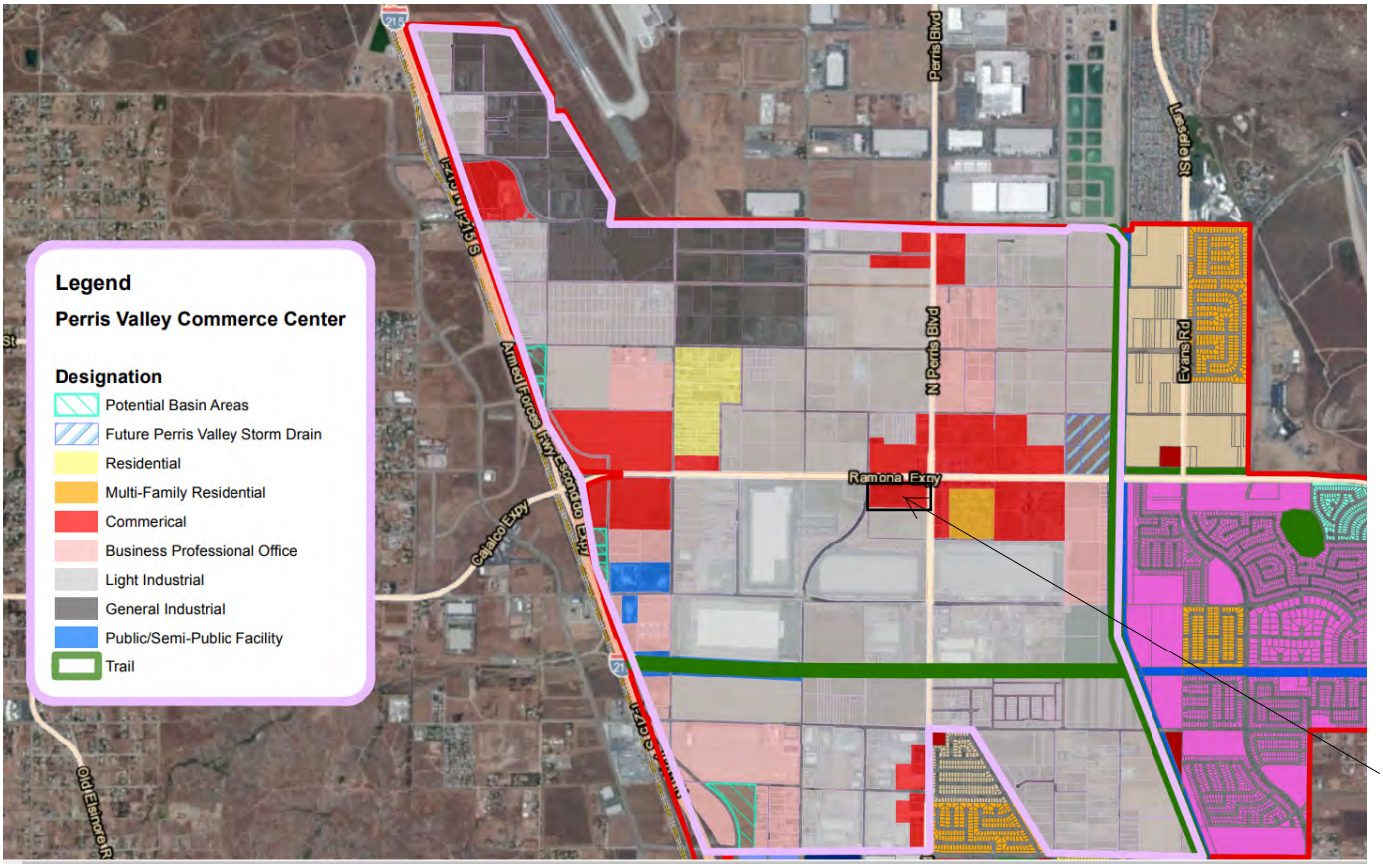
The Project site is bounded as follows: Ramona Expressway to the immediate north and commercial and light industrial uses to the north of Ramona Expressway; light industrial uses to the south; Perris Boulevard to the immediate east and commercial uses east of Perris Boulevard;and Indian Avenue to the immediate west and light industrial uses to the west of Indian Avenue. The Project site is located in the City of Perris, County of Riverside, State of California.

The Project site is currently vacant. The surrounding area is a mix of commercial and industrial land uses. Reference **Figure 2-2, *Vicinity Map*** and **Figure 2-3**, ***Aerial Photo***.

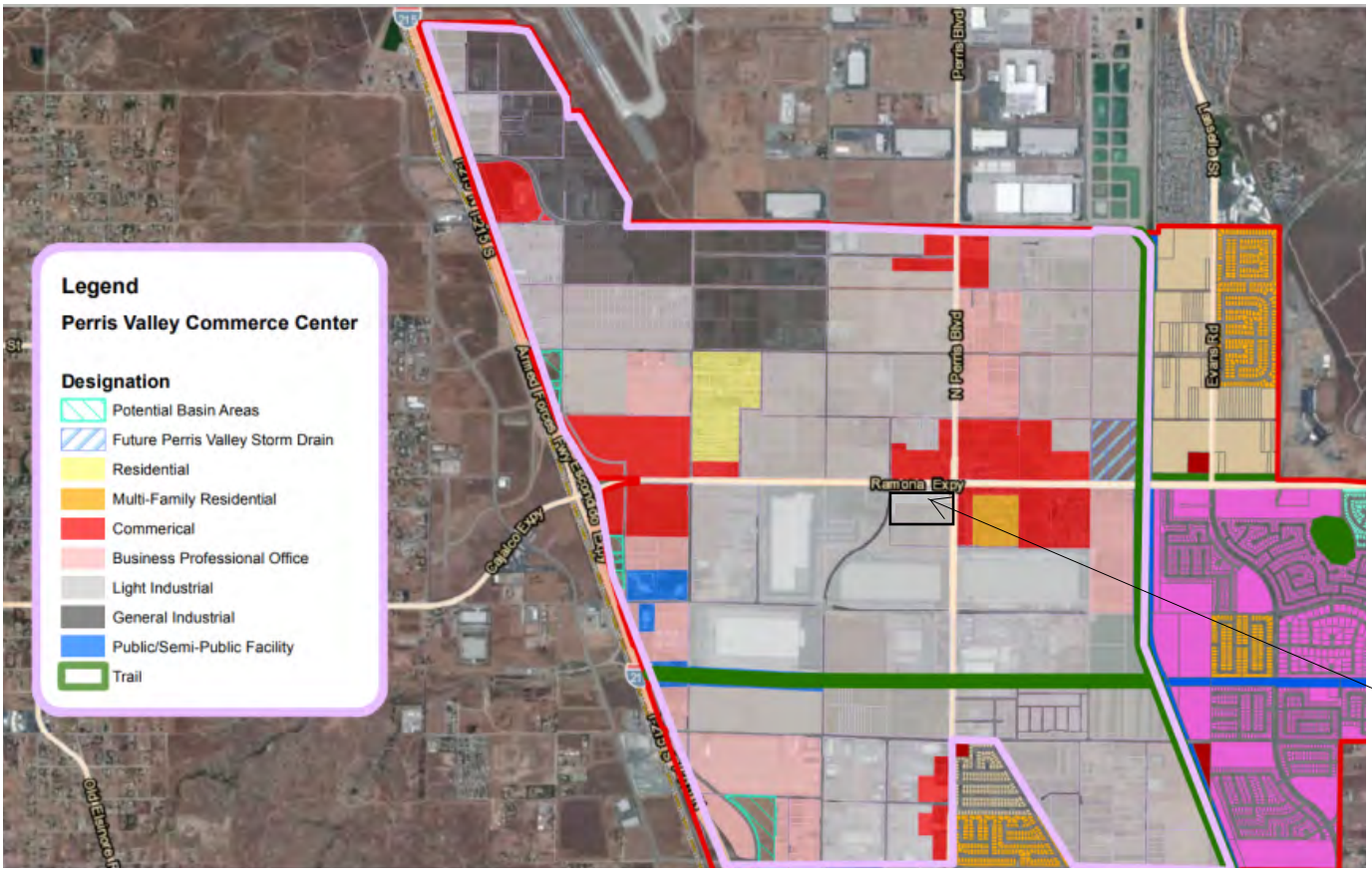
The entitlements required to permit the development of the Project are the Specific Plan Amendment Number 13 (SPA19-05287) and Development Plan Review (DPR 19-00012).

Figure 2-1
Existing and Proposed Zoning Classifications

EXISTING



PROPOSED

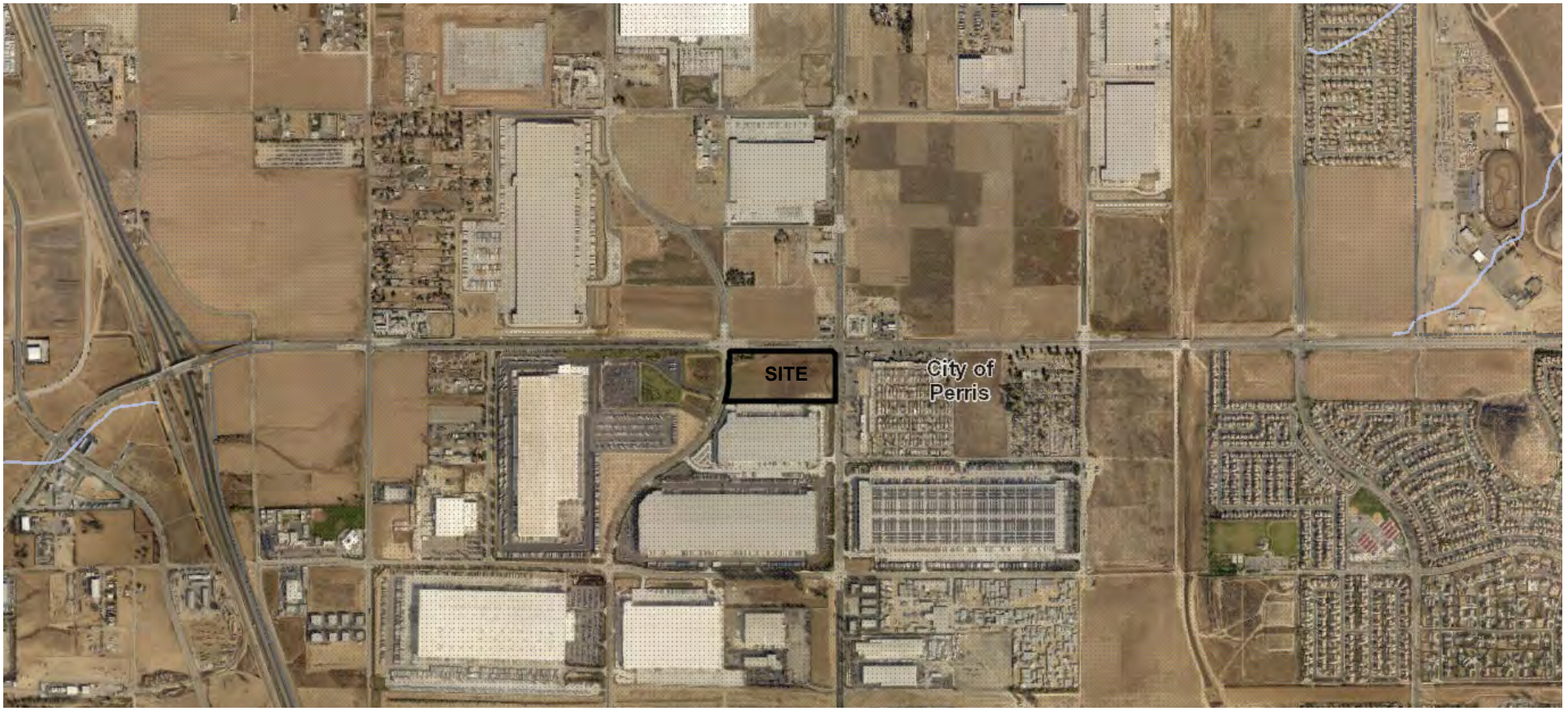


Source: City of Perris http://www.cityofperris.org/city-hall/zoning/2016-zone-map.pdf

Figure 2-2
Vicinity Map

Source: Project Plans (Appendix L)

Figure 2-3
Aerial Photo



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

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2.2 PURPOSE AND USE OF AN EIR

2.2.1 Program EIR

The Project site is within the PVCCSP planning area which covered the northwest quadrant of the City of Perris covering approximately 3,583 acres of development (including the current proposed Project site). The PVCCSP was adopted by the City of Perris City Council on January 12, 2012 (Ordinance No. 1284) and, as of the date that this DEIR was published, has been subsequently amended through October 2021. The environmental impacts resulting from implementation of allowed development under the PVCCSP have been evaluated in the Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR) (State Clearinghouse No. 2009081086), which was certified by the City of Perris City Council in January 2012. The PVCCSP EIR isa Program EIR pursuant to the Guidelines for Implementation of the California Environmental Quality Act (*CEQA Guidelines*) Section 15168, which states that:

"*A Program EIR is an EIR which may be prepared on a series of actions that can becharacterized as one large project and are related either:*

(1) Geographically,
(2) As logical parts in the chain of contemplated actions,
(3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
(4) *As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigatedin similar ways.*"

As stated in Section 15168(d)(3) of the CEQA Guidelines, the program EIR can "[f]ocus an EIR on a later activity to permit discussion solely of new effects which had not been considered before." Although the PVCCSP EIR is a Program EIR, it did not evaluate the site-specific impacts of potential individual development projects and project-specific evaluations in later-tier environmental documents for individual development projects within the PVCCSP planning area was anticipated. As such, the environmental analysis for the Project presented in this DEIR is based on, or "tiered" from, the analysis presented in the PVCCSP EIR, when applicable, and the PVCCSP EIR is incorporated by reference.

The PVCCSP EIR analyzes the direct and indirect impacts resulting from implementation of the allowed development under the PVCCSP. Measures to mitigate, to the extent feasible, the significant adverse project and cumulative impacts resulting from that development are identified in the PVCCSP EIR. In conjunction with certification of the PVCCSP EIR, the City of Perris also adopted a Mitigation Monitoring and Reporting Program (MMRP). Additionally, the PVCCSP includes Standards and Guidelines to be applied to future development projects within the Specific Plan area. The City of Perris requires that future development projects within the Specific Plan area comply with the required PVCCSP Standards and Guidelines, and applicable PVCCSP EIR mitigation measures as outlined in the MMRP, and that these requirements are to be implemented in a timely manner.

This proposed Project would include a modification of the existing Perris Valley Commerce Center to increase Light Industrial land uses and decrease Commercial Land Use designations. The Initial Study for this Project concluded that the following environmental impacts may potentially be significant for the following environmental issues: air quality, biological resources, energy, greenhouse gas emissions, hydrology and water quality, land use and planning, noise, transportation, tribal cultural resources, and utilities and service systems. Thus, it has been determined that an EIR is appropriate to evaluate the

Project. This EIR has been prepared at a **project level** (rather than a program level) since specific development information and timing is available and the development deals with one specific site. This EIR will tier off the previously certified PVCCSP EIR as appropriate per CEQA Guidelines Section 15152

2.2.2 Uses of this EIR

The City is the Lead Agency for the CEQA compliance purposes based on its sole authority to approve or disapprove the proposed Project.CEQA was adopted to assist with the goal of maintaining the quality of the environment for the people of the State. Compliance with CEQA, and with its implementing guidelines, requires the agency making a decision or taking a discretionary action on a project to consider the potential environmental effects/impacts of the project before granting any approvals or entitlements.

CEQA also requires the consideration of (i) a reasonable range of alternatives to the project or project location that could feasibly attain most of the basic project objectives and avoid or substantially lessen any of the significant environmental impacts and (ii) feasible measures that could minimize significant adverse impacts of the Project. (*CEQA Guidelines* §§ 15126.6 and 15126.4).

Thus, the Lead Agency, in this case the City of Perris, must examine feasible alternatives and identify feasible mitigation measures to reduce the potentially significant impacts of the Project as part of the environmental review process.

CEQA also states "that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof." (*Public Resources Code* §21002*).*

As applied to the Project, the City, as Lead Agency, is required to focus on and identify potential site-specific environmental impacts associated with implementing the Project. Where potential significant impacts are identified, the City must determine whether there are feasible mitigation measures or alternatives that can be implemented to avoid or substantially lessen the potential significant environmental effects.

The first step in this process is the completion of an Initial Study (IS) to determine whether an EIR is required, and if an EIR is required, to issue a Notice of Preparation (NOP).

Based on the information in the IS, the City concluded that the Project, as proposed, might cause significant impacts to portions of eleven (11) issue areas (as identified in the Project Initial Study (IS – Subchapter 8.3, *Initial Study*). Therefore, portions of the following eleven (11) issue areas will be addressed in this DEIR:

- Subchapter 4.2: Air Quality;
- Subchapter 4.3: Biological Resources;
- Subchapter 4.4: Cultural Resources;
- Subchapter 4.5: Energy;
- Subchapter 4.6: Greenhouse Gas Emissions;
- Subchapter 4.7: Hydrology and Water Quality;
- Subchapter 4.8: Land Use and Planning;
- Subchapter 4.9: Noise;

- Subchapter 4.10: Transportation;
- Subchapter 4.11: Tribal Cultural Resources; and
- Subchapter 4.12: Utilities and Service Systems.

Based on the information in the IS, the City concluded that the Project, as proposed, would have either no impact or a less than significant impact to all (or a portion) of the following issue areas, and therefore, no additional analysis would be required in the DEIR:

- Aesthetics;
- Agriculture and Forestry Resources;
- Geology and Soils;
- Hazards and Hazardous Materials;
- Mineral Resources;
- Population and Housing;
- Public Services;
- Recreation;
- Utilities and Service Systems; and
- Wildfire.

The second step is to determine whether an EIR is required. If an EIR is determined to be the most appropriate CEQA compliance document, the City must issue a Notice of Preparation (NOP) to notify the Office of Planning and Research, local agencies, and the public that an EIR will be prepared, and solicit comments regarding the project from Responsible, Trustee and federal Agencies. (*CEQA Guidelines* §15375.)

The City prepared and circulated a NOP for the Project. The NOP public review period began on May 5, 2021 and ended on June 4, 2021. Respondents were asked to send their input as to the scope and content of the environmental information and issues that should be addressed in the Project DEIR no later than 30 days after receipt of the NOP. The City's "Notice of Scoping Meeting & Preparation of a Draft Environmental Impact Report," is contained in Subchapter 8.1, *Notice of Preparation / NOP Distribution List*, of this DEIR.

The State Clearinghouse distributed the NOP (SCH # 2021050021) to State agencies, and the City distributed the NOP to additional State agencies, local agencies, adjacent cities, interested parties, and to surrounding property owners within a 300' radius. The NOP distribution list and the surrounding property owners list are contained in Subchapter 8.1, *Notice of Preparation / NOP Distribution List*, of this DEIR.

The City of Perris Planning Commission held a Scoping Meeting on Wednesday, May 19, 2021, at 6:00 p.m., at the Perris City Hall, 101 North "D" Street, Perris, CA 92570. The NOP included the date, time, and location of the scoping meeting.

2.2.3 Summary of Responses to the NOP

Ten (10) written letters and/or emails were submitted in response to the NOP. Subchapter 8.2, *NOP Comment Letters* includes a copy of each NOP comment letter received during the comment period. There were no members of the public who attended the Scoping Meeting before the Planning Commission held on May 19, 2021.

All comments (written and oral) are summarized below and include a reference to where the issuewill be addressed in Chapter 4, *Environmental Impact Evaluation*.

It should be noted that the State of California Governor's Office of Planning and Research (OPR) received the Notice of Preparation on May 5, 2021 and distributed the NOP to fourteen (14) state agencies (See the list under 2.6, Review Process). Accordingly, the NOP period ended on June 4, 2021.

Comment Letters

***Comment Letter #1*: Agua Caliente Band of Cahuilla Indians (dated 05/06/2021):**

This letter contains the following comments pertaining to tribal cultural resources:

- The Agua Caliente Band is requesting formal government to government consultation under California Senate Bill 18.
- The Agua Caliente Band is requesting formal government to government consultation under California Assembly Bill No. 52.
- A cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area.
- Copies of any cultural resource documentation (report and site records) generated in connection with this project.

These comments will be addressed in Subchapter 4.11, Tribal Cultural Resources.

Comment Letter #2: Riverside County Airport Land Use Commission (RCALUC) (dated 05/06/2021):

This email comment confirms that the project has been found consistent with the March Air Reserve Base Airport Land Use Compatibility Plan via application ZAP1390MA19.

The Letter is acknowledged, and no responses are required in this EIR.

***Comment Letter #3:* Mitchell M. Tsai (dated 05/17/2021):**

This letter contains the following requests:

- Public Records Request, pertaining to materials to this application.
- Notice List Request.

The Letter is acknowledged, and no responses are required in this EIR.

***Comment Letter #4:* South Coast Air Quality Management District (SCAQMD) (dated06/01/2021):**

This letter contains the following comments pertaining to the analysis of air quality andgreenhouse gas emissions:

- Send directly to SCAQMD for review: the DEIR, the technical appendices for Air Quality (AQ) and Greenhouse Gases (GHG), including electronic versions of all air quality modeling and health risk

assessment files, emission calculation spreadsheets and modeling input/output files.
- Use the SCAQMD CEQA Handbook and CalEEMod land use emissions software to forecastProject emissions.
- Quantify criteria pollutant emissions and compare the results to SCAQMD's regional pollutant emissions significance thresholds to determine air quality impacts.
- The Lead Agency should identify any adverse air quality impacts that could occur from all phases of the Proposed Project. This should include construction and operational activities.
- The Lead Agency should conduct a Health Risk Assessment (HRA), since the Project will probably be utilizing diesel emission vehicles.
- In the event that the implementation of the Proposed Project requires a permit from the SouthCoast AQMD, the South Coast AQMD should be identified as a Responsible Agency in the Draft EIR.
- The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* is a general reference guide for evaluating and reducing air pollution impacts.
- South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities.
- Potential mitigation measures for operational air quality impacts were brought forward by SCAQMD.
- Potential mitigation measures for operational air quality impacts from other area sources were suggested by SCAQMD.
- Potential design considerations for the Proposed Project were suggested by SCAQMD.

These comments will be addressed in Subchapter 4.2, Air Quality, and in Subchapter 4.6, Greenhouse Gas Emissions.

Comment Letter # 5: Mitchell M. Tsai (dated 06/03/21) Attorneys for Southwest Regional Council of Carpenters (dated 06/03/2021):

This letter contains comments pertaining to public records requests and community benefits:

- Request is given to be on the notification list for all notices regarding this project.
- City should require the Applicant to provide additional community benefits such as requiring local hire and use of trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California.
- The South Coast Air Quality Management District found that the "[u]se of a local state-certified apprenticeship program" can result in air pollutant reductions.
- The project would be approved in violation of the California Environmental Quality Act
- The EIR should review local hire and local skilled and trained workforce requirements as a means to mitigate the Project's significant greenhouse and transportation impacts.

These comments will be addressed in Subchapter 4.2, Air Quality, and in Subchapter 4.10, Transportation.

Comment Letter # 6: Riverside County Flood Control and Conservation District (Flood)(dated 06/03/2021):

This letter contains comments and recommended conditions pertaining to drainage facilities andProject impacts and responsibilities:

- This project involves District proposed Master Drainage Plan (MDP) facilities, namely, Perris Valley MDP Lateral E-2. The District will accept ownership of such facilities on written request of the City. 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 project is located within the limits of the District's Perris Valley Area Drainage Plan for which drainage fees have been adopted. Applicable fees should be paid prior to issuance of grading or building permits.
- An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely Perris Valley MDP Lateral E and E-1.
- The project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board.
- 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 the applicant to 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.
- If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements.

These comments will be addressed in Subchapter 4.7, Hydrology and Water Quality.

Comment Letter # 7: **Center for Community Action and Environmental Justice (CCAEJ)(dated 6/4/2021):**

The letter contains comments pertaining to air quality and land use / planning and housing:

- The census tract where this project is located has some higher factors on certain metrics which are worsened by warehouses, and there is a concern about warehouses in Perris.
- Request was given for the EIR to analyze the measures necessary to be served 100% by zero-emissions.
- Request was given to consider zoning that would replace the housing lost from the rezoning from commercial to industrial zoning.

These comments will be addressed in Subchapters 4.2, Air Quality and 4.8, Land Use and Planning.

Comment Letter # 8: **California Air Resources Board (CARB) (dated 6/4/2021):**

The letter provides comments primarily pertaining to air quality issues:

- The Project would increase exposure to air pollution in disadvantaged communities.
- The DEIR should quantify and discuss the potential cancer risks from project operation.
- The DIER should quantify and discuss the potential cancer risks from project construction.

These comments will be addressed in Subchapter 4.2, Air Quality.

Comment Letter # 9: **Rincon Band of Luiseño Indians (dated 5/14/2021):**

The letter provides comments pertaining to cultural resources issues:

- The Rincon Band of Luiseño Indians requests to be notified of the Environmental Review process.
- The Rincon Band of Luiseño Indians requests to be placed on all lists for document reviews, consultations, circulation of public documents, and notices for public hearings and scheduled approvals.
- The Band also requests copies of documents pertaining to the cultural study.

These comments will be addressed in Subchapter 4.11, Tribal Cultural Resources.

Comment Letter # 10: **Native American Heritage Commission (dated 5/5/2021):**

The letter provides comments pertaining to cultural resources issues:

- The Native American Heritage Commission (NAHC) provided background information on their responsibilities regarding historical and archaeological resources relative to the CEQA Process.
- The NAHC provided guidance on Ab 52 and SB 18 regarding Tribal Consultation.
- The NAHC provided guidance on how to evaluate Tribal Cultural Resources relative to the CEQA Process.

  These comments will be addressed in Subchapters 4.4, Cultural Resources and 4.11, Tribal Cultural Resources.

<u>Scoping Meeting Commenters</u>

There were no members of the public who attended the Scoping Meeting before the Planning Commission held on May 19, 2021. However, the Planning Commissioners raised several environmental concerns during this meeting:

- Truck routes and access
- Internal circulation within the site plan
- Parking
- Alternatives to this project
- Land Use and Planning

Truck routes and access, along with internal circulation and parking are discussed further in Subchapter 4.10, Transportation. Alternatives are discussed in Chapter 5, and Land Use and Planning concerns are discussed further in Subchapter 4.8, Land Use and Planning.
CEQA requires the City to consider the environmental information in the Project record, including this DEIR, before making a decision on the proposed Project. The City must consider and decide to approve, modify, or reject the Project, as proposed and described in Chapter 3, Project Description, of this DEIR.

This DEIR addresses all of the issue areas identified in the IS and provides information about the potential environmental impacts of implementing the Project for use by the City, interested and responsible agencies and parties, and the general public.

The City is the CEQA Lead Agency pursuant to the *CEQA Guidelines* §15051(b)(1). The DEIR for the

Project was prepared by Matthew Fagan Consulting Services, Inc. (MFCS), whowas retained to help the City conduct the environmental review of the Project required by CEQA.

The City has conducted an independent review of the contents of the Project DEIR and concurs in the conclusions and findings contained herein.

2.3 SCOPE AND CONTENT OF THIS DEIR

As discussed in Section 2.2, implementation of the proposed Project will have the potential to cause significant adverse environmental impacts to either all or portions of eleven (11) issue areas. The City considered comments on the scope of the DEIR submitted during the NOP comment period and has determined that the DEIR does not need to be expanded to address and/or clarify these issues.

In addition to evaluating the environmental issue areas listed in previously in Section 2.2, this DEIR contains all of the information mandated by the CEQA and the State CEQA Guidelines. **Table 2-2, *Required DEIR Contents***, lists the contents required in a DEIR along with a referenceto the chapter and page number where these issues can be reviewed in the document. This DEIRincludes two volumes. Volume 1 contains the CEQA mandated sections and Volume 2 containsthe Project-specific technical appendices (provided electronically).

Table 2-2
Required DEIR Contents

Required Section (CEQA)	Section in DEIR	Page Number
Table of Contents (Section 15122)		ii
Summary (Section 15123)	Chapter 1	1-1
Introduction	Chapter 2	2-1
Project Description (Section 15124)	Chapter 3	3-1
Environmental Setting (Section 15125)	Chapter 4	4-1
Significant Environmental Impacts (Section 15126.2.a)	Chapter 4	4-1
Unavoidable Significant Environmental Effects (Section 15126.2.b)	Chapter 4	4-1
Mitigation Measures Proposed to Minimize Significant Effects (Section 15126.4)	Chapter 4	4-1
Cumulative Impacts (Section 15130)	Chapter 4	4-1
Alternatives to the Proposed Project (Section 15126.6)	Chapter 5	5-1
Growth-Inducing Impacts (Section 15126.2.d)	Chapter 6	6-1
Irreversible Environmental Changes (Section 15126.2.c)	Chapter 6	6-1
Effects Found Not to be Significant (Section 15128)	Chapter 6	6-1
Organizations and Persons Consulted (Section 15129)	Chapter 7	7-1
Appendices	Chapter 8	8-1

2.4 DEIR FORMAT AND ORGANIZATION

This DEIR contains eight chapters in Volume 1, and technical appendices in Volume 2 (provided electronically), which, when considered as a whole, provides an evaluation of the potential significant adverse environmental impacts associated with the proposed Project.

The following provides a summary of the content of each Chapter in Volume 1.

- **Chapter 1** contains the Executive Summary. This includes an overview of the proposedProject and a summary of potential adverse impacts and mitigation measures.

- **Chapter 2** provides an introduction to the document, including background information about the proposed Project, the purpose of the Project, and how the Project (including the environmental review) will be implemented (including the CEQA process to date and the scope of the DEIR).

- **Chapter 3** contains the Project Description, which is used to forecast environmental impacts. This chapter describes how the proposed Project may alter the existing environment and setsthe stage for the environmental impact forecasts that follow.

- **Chapter 4** presents the environmental impact forecasts for the issues in the DEIR. For each environmental issue identified in Sections 2.1 and 2.2, the following impact evaluation is provided:

  - Potential impacts forecast to occur if the Project is implemented;
  - Any proposed design features, code requirements, applicable conditions of approval,and/or recommended mitigation measures;
  - A discussion of any Project unavoidable adverse impacts; and
  - An analysis of cumulative impacts.

- **Chapter 5** contains the evaluation of alternatives to the proposed Project. Included in this section is an analysis of the No Project Alternative and other feasible and reasonable alternatives to the proposed Project.

- **Chapter 6** presents the topical issues CEQA requires in an EIR. These include any significant irreversible environmental changes and growth-inducing impacts of the proposed Project.

- **Chapter 7** describes the resources used in preparing the DEIR. This includes persons and organizations contacted; a list of preparers; and the bibliography.

- **Chapter 8** contains those materials referenced as essential appendices to the DEIR, such as the Initial Study and the NOP. Technical Appendices are provided electronically. All Appendix materials are referenced at appropriate locations in the text of the DEIR.

2.5 AVAILABILITY OF THE DEIR

This DEIR has been distributed directly to all public agencies and interested persons on the City's NOP mailing list (see Subchapter 8.1, *Notice of Preparation / NOP Distribution List*), notified by the State Clearinghouse, as well as any other requesting agencies or individuals. All reviewers will be provided 45 days to review the DEIR and submit comments to the City for consideration and response.

The DEIR is available for public review and may be downloaded at the City's website at:

https://www.cityofperris.org/departments/development-services/planning/environmental-documents- for-public-review

The DEIR will also be available on the CEQANET website:https://ceqanet.opr.ca.gov/
The DEIR is also available for public review at the following location during the 45-day reviewperiod:

Perris City Hall
Community Development Department
101 North D Street Perris, CA 92570
951.943.5003

Copies of the Draft EIR are available for review at City Hall (address above), however, the public is encouraged to call ahead to reserve a time to review Project documents.

In accordance with the Governor's Declarations of Emergency for the State of California (Executive Orders N-25-20 and N-29-20) and the Governor's Stay at Home Order (Executive Order N-33-20), the City of Perris may be providing alternative measures for the public to attend/view Planning Commission and City Council Meetings. In-person participation may not be allowed at present due to COVID-19 – please review the City's website for current COVID-19 information and procedures.

2.6 REVIEW PROCESS

At the end of the DEIR review period, after receiving comments on the DEIR, the City will preparea Final EIR for certification prior to making a decision on the Project. The contents of the Final EIR are governed by *CEQA Guidelines* §15132.

Information about the EIR public review period and the public hearings for the proposed Project can be obtained by contacting Ms. Chantal Power, AICP Contract Planner at the City of Perris. Questions and comments submitted by mail should be addressed to:

Perris City Hall Planning Division
Chantal Power, AICP Contract Planner

101 North D Street
Perris, CA 92570
951.943.5003

Questions and comments may also be e-mailed to Chantal Power at the following address:

cpower@interwestgrp.com

Certain components of the Project may be subject to review and approval by other state agencies such as the filing of a Notice of Intent for a Construction Activity General Permit. Other public agencies whose approval of the DEIR may be required include:

- Riverside County Airport Land Use Commission
- Riverside County Flood Control and Water Conservation District
- Eastern Municipal Water District
- Regional Water Quality Control Board, Santa Ana Region

CHAPTER 3 – PROJECT DESCRIPTION

3.1 INTRODUCTION

PR Partners, LLC (Project proponent) proposes to implement a thirteenth Amendment (SPA19- 05287) to the Perris Valley Commerce Center Specific Plan (PVCCSP) (SPA13) and a Development Plan Review (DPR 19-00012) for the development of the 16-acre Project site with an approximate 347,918-square-foot (sq. ft.) light industrial building; the building will be divided into 339,918 sq. ft. of non-refrigerated warehouse space and 8,000 sq. ft. of office space, and herein called the Project.

This chapter contains a detailed description of the proposed Project with a focus on those characteristics and activities that may cause physical changes in the environment. The description contained in this Chapter provides a written summary of the proposed Project as it will be developed if the entitlements are approved by the City of Perris.

3.2 PROJECT OBJECTIVES

A project's objectives define the purpose or intent that a project proponent hopes to achieve by implementing a specific project. The following are the applicant's objectives for the proposed Project:

- Provide additional warehouse space needed to meet regional demand.
- Provide employment opportunities for local residents.
- Meet the applicable General Plan goals regarding the proposed land use.
- Introduce uses compatible with site constraints and regulatory limitations (e.g., ALUC).
- Develop a project that integrates with and compliments the existing development pattern for this portion of the Ramona Corridor.
- Develop a project that enhances views of this City entryway.
- Provide benefits to the City with increases property tax revenue and new employment while minimizing adverse environmental impacts.
- Develop a project that will be economically feasible and operationally stable to meet the needs of businesses wishing to locate into this portion of the City of Perris.

3.3 PROJECT LOCATION

The Project is located in the City of Perris, Riverside City, California.

The Project site is bounded as follows: Ramona Expressway to the immediate north and commercial and light industrial uses to the north of Ramona Expressway; light industrial uses to the south; Perris Boulevard to the immediate east and commercial uses east of Perris Boulevard; and Indian Avenue to the immediate west and light industrial uses to the west of Indian Avenue. The Project site is located in the City of Perris, County of Riverside, State of California.

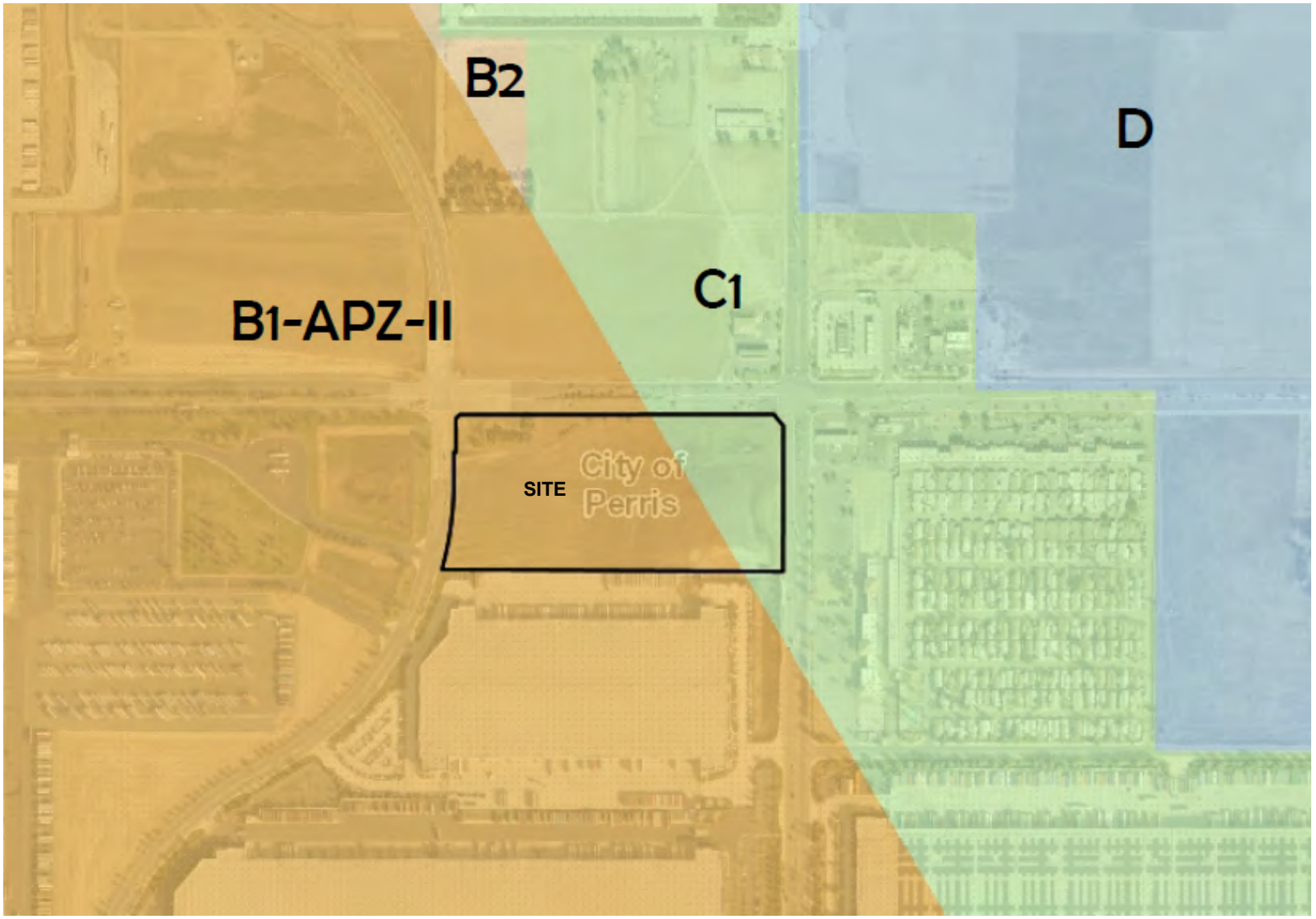
The Project site is currently vacant. The surrounding area is a mix of commercial and industrial land uses. The site and surrounding area are shown in **Figure 2-2, *Vicinity Map*** and **Figure 2-3**, ***Aerial Photo,*** provided previously in Chapter 2 of this DEIR. The Project is located in USGS 7.5-minute series Perris Quadrangle map Section 7, Township 4 south, Range 3 west, Assessor'sParcel Number 303-060-020.

3.3.1 Environmental Setting

The Project site is relatively flat with no areas of significant topographic relief. On-site elevations range from approximately 1,452 to 1,465 feet above sea level and generally slopes from southwest to northeast. The Project site primarily consists of vacant, undeveloped land that has been subject to historical disturbance related to agricultural use. The Project site no longer is used for agriculture but has been subject to on-going weed abatement activities and disturbance associated with surrounding development. These disturbances have eliminated the natural plant communities that once occurred on and the lands surrounding the Project site. As further discussed in the Biological Resources section of this IS, the onsite vegetation can be characterized as a heavily disturbed with a variety of non-native and early successional/ruderal plant species (according to the Western Riverside County Multiple Species Habitat Conservation Plan [MSHCP], developed or disturbed lands consist of areas that have been disced, cleared, orotherwise altered).

The Project site is located approximately 5.0 miles southeast of the March Air Reserve Base/Inland Port Airport (MARB/IPA), within the Airport Influence Area. Due to its location, the Project site is subject to the MARB/IPA Airport Land Use Compatibility Plan (MARB/IPA ALUCP) which divides the areas close to the airport into various safety zones based on proximity to the airport and perceived risks. An Accident Potential Zone (APZ) effectively restricts the types and intensities of land uses on some properties within the APZs to mostly nonresidential or low-occupancy industrial uses. The Project site has 11.76 acres located within Zone B1, APZ II and 3.90 acres located within Zone C1. Zone B1, APZ II allows 50 people per acre and prohibited uses include children's schools, day care centers, libraries, hospitals, congregate care facilities, hotels/ motels, restaurants, and places of assembly. Zone C1 allows 100 people per acre and prohibited uses include children's schools, day care centers, libraries, hospitals, congregate care facilities, and places of assembly. Reference **Figure 3-1, *March Air Reserve Base / Inland Port Airport Influence Area***.

Figure 3-1
March Air Reserve Base/Inland Port Airport Influence Area



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

Zone B1, APZ II allows 50 people per acre and prohibited uses include children's schools, day care centers, libraries, hospitals, congregate care facilities, hotels/ motels, restaurants, and places of assembly.

Zone C1 allows 100 people per acre and prohibited uses include children's schools, day care centers, libraries, hospitals, congregate care facilities, and places of assembly.

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3.4 PROJECT CHARACTERISTICS

3.4.1 Project Entitlements

As stated in Subchapter 3.1, the applicant for SPA13 proposes the development of a 16-acre Project site with anapproximate 347,918-square-foot (sq. ft.) light industrial building; the building will be divided into 339,918 sq. ft. of non-refrigerated warehouse space and 8,000 sq. ft. of office space.

3.4.1.1 Specific Plan Amendment (SPA13)

The applicant for SPA13 proposes to modify the current Specific Plan Land Use Designation of the Project site as follows:

- Current Land Use - Commercial (C): This zoning designation provides for retail, professional office, and service-oriented business activities which serve the entire City, as well as the surrounding neighborhoods. This zone combines the General Plan Land Use designation of Community Commercial and Commercial Neighborhood.
- Proposed Land Use - Light Industrial (LI): This zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. This zone correlates with the 'Light Industrial' General Plan Land Use designation. Reference **Table 3-1, *SPA 13 Land Use Summary***.

The Project applicant believes that the LI designation is better suited to the land use restrictions placed on the Project site by the County Airport Land Use Commission (ALUC) and the March Air Reserve Base/Inland Port (MARB/IP) Airport Influence Area (see Section 3.3.1 above).

Table 3-1
SPA 13 Land Use Summary

General Plan Land Use	Existing Acres Prior to PVCC SP	Acres Adopted by 2012 PVCCSP	Proposed Acres (SPA1-SPA10)
Business Park/Professional Office (BPO) Professional Office (PO) Business Park (BP)	317	343	263
Commercial (C) Community Commercial (CC) Neighborhood Commercial (NC)	462	349	255
General Industrial (GI)	423	408	392
Light Industrial (LI)	1,620	1,866	2,056
Multi-Family Residential Residential (Multi-Family) (MFR-14)	22	22	22
Public (P) Public/Semi-Public/Utilities Park, Recreational and Natural Open Space (OS)	120	194	194
Residential (R) Residential (Single-Family) (R-6,000)	59	0	0
Residential (R) Residential (Single-Family) (R-20,000)	63	60	60
Specific Plan (SP)	190	0	0
Other (ROW, Basin, etc.)	307	341	341
Total Acres	**3,583**	**3,583**	**3,583**

Source: PVCC SPA13 DRAFT (**Appendix O**)

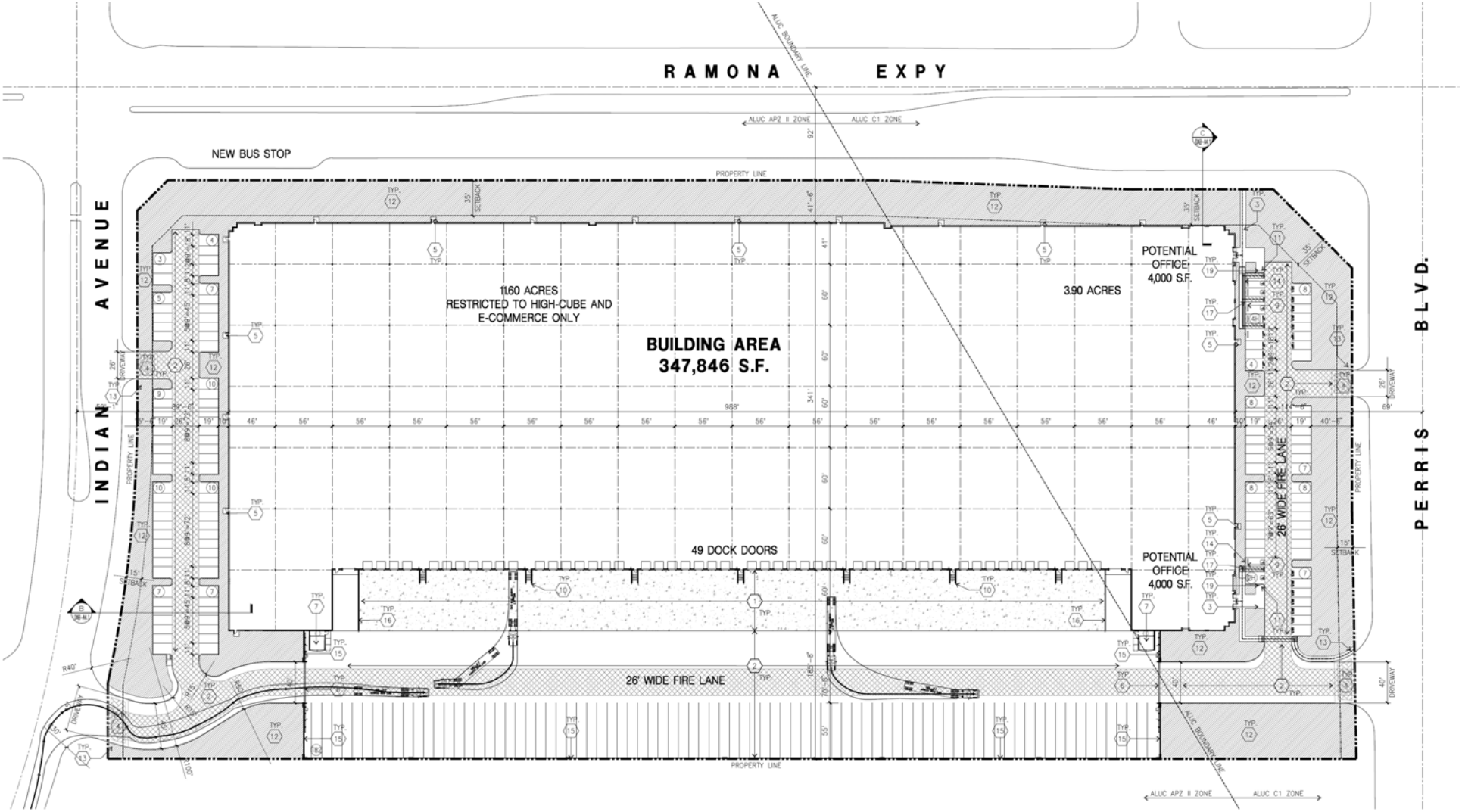
The Project would involve development of the 16-acre site with an approximate 347,918-square-foot (sq. ft.) light industrial building; the building will be divided into 339,918 sq. ft. of non-refrigerated warehouse space and 8,000 sq. ft. of office space. The Project has been designed in compliance with the industrial design standards and guidelines contained within the PVCCSP, as shown in **Figure 3-2, *Conceptual Site Plan*** and **Figure 3-3, *Conceptual Elevations***. As shown on **Figure 3-2**, the proposed building would be located in the central portion of the Project site, with parking to the east, west, and south. The plan provides designated, outdoor employee break areas on both the east and west sides of the proposed building. As shown on **Figure 3-3**, the proposed building would be a maximum of 45 feet tall. The proposed building would include aesthetic treatments such as varying building height and rust colored metal awnings and has an overall grey color scheme with white accents.

It is estimated the Project could generate from 232 to 717 new employees based on industry standards. New employment generation figures for the proposed warehouse use range from 1 employee/1,500 square feet (SF) per the PVCCSP and up to 1 employee/485 square feet per the County Airport Land Use Commission. Therefore, the Project could generate from 232 employees (347,918 total SF divided by 1500 SF/employee) up to 717 employees (347,918 total SF divided by 485 SF/employee). However, these gross numbers do not take into account ALUC land use restrictions which may restrict the total employment to the lower end of this range. As a conservative “worst case” assumption, the Project warehouse will operate 24 hours per day 7 days per week.

Required employee amenities are outlined within the PVCCSP Standards and Guidelines Section 8.2.1.4 for light industrial development relevant to recreation; these are listed below. Specific amenities to be provided shall be decided at the Tenant Improvement stage of development and approved by Planning Staff.

- An outdoor break area will be provided at each office area location (Currently shown on **Figure 3-2**)
- Require employee amenities such as, but not limited to:
- Cafeterias
- Exercise rooms
- Locker rooms and shower
- Walking trails
- Recreational facilities
- Site design will consider pedestrian access when adjacent to area wide open space, trails, parks, or other community amenities (not applicable)

Figure 3-2
Conceptual Site Plan



Source: Project Plans (Appendix H)

Figure 3-3
Conceptual Elevations

RAMONA EXPY ELEVATION – NORTH ELEVATION

INDIAN AVENUE ELEVATION – WEST ELEVATION

SOUTH ELEVATION

PERRIS BLVD. – EAST ELEVATION

Source: Project Plans (Appendix H)

3.4.2 Drainage and Water Quality

Regional System

At present, the Project site is vacant, undeveloped land with a 100 percent pervious earthen surface and no onsite drainage improvements. The Project site is relatively flat with an existing slope gradient estimated at less than 2%. According to *Map My County* (**Appendix A** of the DEIR), the Project site's average elevation is 1,460 feet above mean sea level (AMSL). In the existing undeveloped condition, on-site stormwater runoff generally sheet flows toward Ramona Expressway, Indian Street, and Perris Boulevard.

The Project applicant would construct a single 347,918-square-foot light-industrial distribution-warehouse building, access drives, walkways, parking lot, utility infrastructure, and landscaping. The site has a gentle west to east slope with a low point at the northeast corner of the site and the proposed grading will mimic this direction of flow. With a large industrial building, the pad will be relatively flat, and the grade will slope away from the building to keep the finish floor dry. Paved areas will drain to adjacent landscape areas where water quality features, primarily vegetated swales, will be placed. Storm drain will be used to route the offsite flow from the Lowe's property (located to the west across Indian Avenue) separately through the site and into the regional stormdrain. There is an existing connection to the Perris Valley Master Drainage Plan (Line E-1) at the northeast corner of the property that will be the ultimate outlet for the Project. There will be a loading bay along the south side of the building that will be set below natural grade to allow for truck loading at the finish floor elevation, and the storm drain in this area will be used to collect and store the runoff from this area in underground tanks. Runoff in those tanks will be pumped to the surface water quality facilities at the southeast corner of the site.

Water Quality

All new development in the City of Perris is required to comply with provisions of the National Pollutant Discharge Elimination System (NPDES) program, including Waste Discharge Requirements (WDR) and the 2010 Santa Ana Municipal Separate Sewer Permit (MS4) Permit as enforced by the Santa Ana Regional Water Quality Board (SARWQCB). Per City requirements, the Project will implement appropriate Best Management Practices (BMPs) to control construction-related pollution as outlined in its Stormwater Pollution Prevention Plan (SWPPP). In addition, the Project will implement appropriate post-construction operational BMPs in its Water Quality Management Plan (WQMP) including but not limited to infiltration pits, detention ponds, bioswales, berms, rain gardens, and pervious pavement. The planned drainage and water quality improvements of the Project are descried above.

3.4.3 Circulation

Vehicular Circulation

Access to the Project site would be provided via Indian Avenue with a full turning movement driveway near the southern edge of the Project site and aligning with the existing Lowe's property access point west of Indian Avenue. An additional right-in/right-out access will also be located on Indian Avenue to the north, closer to Ramona Expressway. Two right-in/right-out access points will be placed along Perris Boulevard. No access from Ramona Expressway is proposed. The roadway and site access improvements proposed as part of the Project include:

- **Ramona Expressway** – With recent City roadway expansion projects completed for Ramona

Expressway, no changes to the existing lanes or curb location are proposed. Additional right-of-way will be dedicated, and sidewalk and right-of-way landscaping will be provided.

- **Indian Avenue** – Indian Avenue will be expanded to add a dedicated right-turn lane. The existing median will be revised to allow for southbound left turning pocket to be added for traffic entering the site. Additional right-of-way will be dedicated, and sidewalk and right-of- way landscaping will be provided.

- **Perris Boulevard** – With recent City roadway expansion projects completed for Perris Boulevard, no changes to the existing lanes, or curb location are proposed. Additional right- of-way will be dedicated, and sidewalk and right-of-way landscaping will be provided connecting the existing bus bay to the existing sidewalk to the south. The City has recently proposed to remove Perris Boulevard from its approved list of truck routes. This would restrict (i.e., preclude) additional truck traffic or access onto Perris Boulevard, including the proposed Project. Therefore, the Project includes two Access Options as described below. The City can approve the proposed site plan and select either of the Access Options at their discretion.

- **Access Option 1:** Indian Avenue. This option would have Project trucks taking access from Indian Avenue with only secondary emergency access on Perris Boulevard.

- **Access Option 2:** Perris Boulevard. This option would have Project trucks taking primary access from Perris Boulevard with secondary access from Indian Avenue.

Non-Vehicular Circulation

As part of the Project, six-foot sidewalks would be constructed along the Project frontages (Ramona Expressway, Perris Boulevard, and Indian Avenue). In addition, bicycle lanes will be added on Ramona Expressway (Class IV) and Perris Boulevard (Class IID). Americans with Disabilities Act (ADA) travel is provided from the street to the site via Indian Avenue, near the southern-most driveway, and also from Ramona Expressway at the northeastern corner of the site. ADA access is also provided onsite as required. Bicycle racks are provided on both the east and west sides of the proposed warehouse building.

Parking

Automobile parking would be provided along the eastern and western boundaries of the site. A total of 145 automobile parking stalls (92 stalls are required), including three standard ADA- compliant stalls, and three van ADA-compliant stalls. Pursuant to Section 5.106.5.2 of the 2019 California Green Building Standards Code (CCR, Title 24, Part 11 – CalGreen), 17 of the parkingspaces will be designated for low-emitting, fuel efficient, and carpool/vanpool vehicles. Pursuant to Section 5.106.5.3.2 of the CalGreen Code, 7 parking spaces will provide conduits for the charging of electric vehicles. Additionally, 82 10’ x 55’ trailer parking stalls would be provided along the southern boundary of the site.

3.4.4 Grading and Construction

Grading

The site has a gentle west to east slope with a low point at the northeast corner of the site and the

proposed grading will mimic this direction of flow. With a large industrial building, the pad will be relatively flat, and the grade will slope away from the building to keep the finish floor dry. Therewill be a loading bay along the south side of the building that will be set below natural grade to allow for truck loading at the finish floor elevation while allowing for water quality improvements (see Section 3.4.2 above). Sidewalk and parking areas will be designed and graded to allow forthe required ADA access as shown on the Project design drawings.

Construction

Construction of the Project is expected to commence in December 2022 and be completed by November 2023. The construction schedule utilized in the analysis, shown in **Table 3-2**, ***Anticipated Construction Duration*** represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent (Asshown in the CalEEMod User's Guide Version 2020.4.0, Section 4.3 "OFFROAD Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to thenatural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.). The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQAGuidelines*.

Table 3-2
Anticipated Construction Duration

Phase Name	Start Date	End Date	Days
Site Preparation	12/06/2022	12/19/2022	10
Grading	12/20/2022	01/30/2023	30
Building Construction	01/31/2023	11/06/2023	200
Paving	10/10/2023	11/06/2023	20
Architectural Coating	08/15/2023	11/06/2023	60

Source: *AQ Analysis* (**Appendix I1**)

The number and types of construction equipment needed, have been assumed for the Project, and are contained in **Table 3-3, *Construction Equipment Assumptions***. Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3-3 will operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the code.

Table 3-3
Construction Equipment Assumptions

Phase Name	Equipment[1]	Amount	Hours Per Day
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	2	8
	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
Building Construction	Cranes	2	8
	Crawler Tractors	4	8
	Forklifts	4	8
	Generator Sets	2	8
	Welders	2	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Source: *AQ Analysis* (**Appendix I1**)
[1] In order to account for fugitive dust emissions, Crawler Tractors were used in lieu of Tractors/Loaders/Backhoes.

3.4.5 Utilities

All utilities and public services are currently available on, or adjacent to, the proposed Project site. Utility and Service providers are as follows:

Electricity: Southern California Edison
Water: Eastern Municipal Water District
Sewer: Eastern Municipal Water District
Cable: Frontier Communications or Time Warner
Gas: Southern California Gas
Telephone: Verizon
Schools: Val Verde Unified School District
Police: Riverside County Sheriff's Department
Fire: Riverside County Fire Department

3.4.6 Water and Sewer Facilities

Water

The Project site, along with the PVCCSP planning area and the entire City of Perris, is located within the water service boundary of the Eastern Municipal Water District (EMWD). The EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County from Moreno Valley southward along the I-215 corridor to Temecula. The EMWD has four sources of water supply including: 1) imported water purchased from the Metropolitan Water District of Southern California; 2) local groundwater; 3) desalinated groundwater; and 4) recycled water. Delivery points for each source of water are located throughout the EMWD service area.

The EMWD currently provides service to the PVCCSP planning area through its system of existing pipelines ranging from 8" to 42" diameter within the 1627 and 1705 pressure zones. Although the EMWD has no conceptual plans for expansion of these waterlines, they have stated they will assess demand as growth occurs and upgrades are designed by the development community to meet the future demands of the Project area.

The Project site is not currently connected to the EMWD water supply system given its vacant undeveloped condition. The EMWD has provided a Will Serve letter indicating that they will provide water service for the Project. There is an EMWD 39-inch water transmission line extending along the Project site's Perris Boulevard frontage, and a distribution line (size not specified) serving the existing commercial development and mobile home park adjacent east of the Project site at the southeast quadrant of Ramona Expressway and Perris Boulevard extending south to Dawes Street. There are also additional water transmission and distribution pipelines in the general proximity of the Project. Finally, the Project's proposed specific plan land use designation change from Commercial (C) to Light Industrial (LI) for the 16-acre Project site is anticipated to have a nominal impact on the overall PVCC water supply/demand.

Sewer

The Project site, along with the PVCCSP planning area and the entire City of Perris, is located within the wastewater (sewer) service boundary of the EMWD. The Perris Valley Regional Water Reclamation Facility (PVRWRF) provides wastewater treatment for a 120-square-mile area including Perris and the Project site, Menifee, Homeland, and Winchester. Wastewater from the Project site would be delivered through existing EMWD sewer lines to the PVRWRF. The EMWD has sufficient capacity to provide wastewater services to the PVCC project area and its implementing development projects. Future development, including the Project, would be subject to conditions imposed by the City and the EMWD associated with the installation of additional pipelines within the specific plan area to serve individual implementing projects within the PVCC.

The Project site is not currently connected to the EMWD wastewater/sewer system given its vacant, undeveloped condition. However, the EMWD has provided a Will Serve letter indicating that they will provide sewer service for the Project. The PVCC area's primary trunk sewer line is located within Redlands Avenue and varies from 16- to 24-inches in diameter, with secondary trunk lines varying from 15- to 24-inches in diameter located within Harley Knox Boulevard and Morgan Street. Collection lines varying from 8- to 10-inches are in Dawes Street and Ramona Expressway serving the existing commercial development and mobile home park adjacent east of the Project site at the southeast quadrant of the Ramona Expressway and Perris Boulevard.

Similar to the previous discussion of water supply/demand, the Project's proposed specific plan land use designation change from Commercial (C) to Light Industrial (LI) for the 16-acre Project site is anticipated to have a nominal impact on the larger PVCC wastewater supply/demand.

3.5 USES OF THIS ENVIRONMENTAL IMPACT REPORT

As previously stated, before the proposed Project can be developed, the City must approve the necessary land use entitlements. Approval of the land use entitlements will allow the proposed development to proceed together with the corresponding changes to the physical environment. This DEIR will be used as the information source and CEQA compliance document for the following, future discretionary actions or approvals by the City shall include, but not be limited to:

- Specific Plan Amendment
- Entitlements
- Statewide General Construction Permit
- Grading Permit
- Encroachment Permit
- Building Permits

Other public agencies whose regulatory approval may be required include:

- Riverside County Airport Land Use Commission
- Riverside County Flood Control and Water Conservation District
- Eastern Municipal Water District
- Regional Water Quality Control Board, Santa Ana Region

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CHAPTER 4 – ENVIRONMENTAL IMPACT EVALUATION

4.1 INTRODUCTION

4.1.1 Background

The City of Perris has prepared this project level EIR to evaluatethe potential significant environmental impacts that may result from the proposed Project.

The City concluded that an EIR must be prepared to address the potential impacts associated with the proposed Project. The decision to prepare an EIR is documented in the Notice of Preparation (NOP), which is provided in this document in Subchapter 8.1, and was based on thefinding that the proposed Project may have one or more potentially significant effects on the environment. This EIR will tier off the previously certified PVCCSP EIR as appropriate per CEQAGuidelines Section 15152.

This Chapter of the DEIR provides the detailed information used to forecast the type and significance of potential environmental impacts that implementation of the proposed Project and related actions could cause if the Project is implemented as described in Chapter 3, *Project Description*.

The analysis in the Initial Study (IS), as part of the NOP, was supported by a number of Technical Studies that were included as IS Appendices A through H. These are also included in the DEIR Appendices and used as sources to support the conclusions of the DEIR. The only IS/NOP Technical Study that was not cited in the DEIR is on Paleontological Resources (IS/NOP **Appendix D**). This report is included as DEIR **Appendix D**, for reference.

Based on the information in the NOP, the City concluded that the proposed Project might cause significant impacts to portions of ten (10) issue areas as identified in the Project Initial Study (IS – Subchapter 8.3, *Initial Study*). Therefore, portions of the following eleven (11) issue areas will be addressed in this DEIR:

- Subchapter 4.2: Air Quality;
- Subchapter 4.3: Biological Resources;
- Subchapter 4.4: Cultural Resources;
- Subchapter 4.5: Energy;
- Subchapter 4.6: Greenhouse Gas Emissions;
- Subchapter 4.7: Hydrology and Water Quality;
- Subchapter 4.8: Land Use and Planning;
- Subchapter 4.9: Noise;
- Subchapter 4.10: Transportation;
- Subchapter 4.11: Tribal Cultural Resources; and
- Subchapter 4.12: Utilities and Service Systems.

The environmental impact analysis section for each environmental topic listed above is arrangedin the following manner:

Introduction

An introduction that summarizes the specific issues of concern for each subchapter, as identifiedin the IS and the NOP scoping process, where applicable.

Environmental Setting

A summary of the current or existing environmental setting for each physical resource or human infrastructure system is presented as the baseline from which impacts will be forecast. The baseline for the analysis in this DEIR is discussed in greater detail, below.

Thresholds of Significance

Based on stated assumptions and identified criteria or thresholds of significance. These are typically contained in the Project IS (Subchapter 8.3), and/or part of Appendix G, Environmental Checklist Form, of the CEQA Guidelines.

To provide the reviewer with a criterion, or set of criteria, with which to evaluate the significance of potential environmental impacts, this document provides issue specific criteria, i.e., thresholds of significance, for each topic considered in this DEIR. These criteria are either standard thresholds, established by law or policy (such as ambient air quality standards or thresholds of significance established by the South Coast Air Quality Management District) or Project-specific evaluation thresholds that are developed with City Staff and used specifically for this Project.

Potential Impacts

After comparing the forecasted physical changes in the environment that may be caused by implementing the proposed Project with existing baseline conditions and the issue-specific significance threshold criterion or criteria, a conclusion is reached on whether the proposed Project has the potential to cause a significant environmental impact for the issue being evaluated. Potential direct and indirect impacts of the proposed Project are forecast, and the significance of impacts is assessed without applying any mitigation.

Standard Conditions and Mitigation Measures

Where appropriate and feasible, measures to reduce potential significant environmental impacts are identified and described in this section of the DEIR. Over the past several years, mitigation has evolved in scope and complexity. As environmental issues are addressed in a progressive and adaptive manner, previous measures developed to mitigate project specific impacts are eventually integrated into local, regional, state and federal statutes, rules and regulations, such as the Uniform Building Code or Water Quality Management Plans. Compliance with these laws or regulatory requirements are referred to in this DEIR as standard conditions. Mitigation measures that are incorporated into statutes or rules and regulations become mandatory requirements (not discretionary) and they no longer need to be identified as discretionary mitigation measures applicable to the Project, although they are often referenced to demonstratethat identified environmental impacts can and will be mitigated.

Recommended measures that can be implemented to mitigate or substantially lessen potential environmental impacts are also identified described in this section, as well as their effectiveness in reducing impacts to less than significant levels.

Cumulative Impacts

Potential cumulative environmental impacts are assessed under each environmental topic, where applicable. Cumulative impacts describe potential environmental changes to the existing physical conditions that may occur as a result of project implementation together with other reasonably foreseeable, planned, and approved future projects producing related impacts. The CEQA Guidelines

(Section 15355) defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts may result from individually minor but collectively significant projects taking place over a period of time. Projects that have progressed to the state that CEQA review has been initiated are treated as foreseeable probable future projects.

Unavoidable Adverse Impacts

Significant and unavoidable environmental impacts and any significant impacts that may be caused by implementing mitigation measures are addressed.

After determining the degree of mitigation that can be achieved by the proposed measures and after identifying any potential adverse impacts that the mitigation measures may cause, a conclusion is provided regarding the remaining significant and/or unavoidable adverse impact for each environmental topic, if any.

4.1.2 Baseline Conditions and Analysis

The "baseline" of an EIR is typically those environmental conditions that exist at the time the NOP is issued, unless there are extenuating circumstances that require selection of a different baseline or multiple baselines. This EIR uses the standard baseline of environmental conditions at the time the NOP was issued (i.e., May 5, 2021).

This document utilizes conservative (worst-case) assumptions in making impact forecasts based on the assumption that, if impacts cannot be absolutely quantified, the impact forecasts should over-predict consequences rather than under-predict them. The many technical studies that were prepared for this document are incorporated into this Chapter by summarizing the technical information to ensure technical accuracy. The NOP was distributed to the public, specific agencies, and through the State Clearinghouse on May 5, 2021. The NOP comment period closed on June 4, 2021. A Scoping Meeting was held on May 19, 2021.

The Project-specific technical studies prepared in support of this DEIR were all compiled and completed prior to, concurrent with, or after the NOP date of May 5, 2021, and all analysis in the DEIR was compiled subsequent to this date and take into account comments made on the NOP and during the scoping process.

The Project-specific technical studies themselves are included as Appendices to the DEIR, which will be distributed in electronic form and made available to all parties upon request. The information used, and analyses performed, to make impact forecasts are provided in depth in this document to allow reviewers to follow a chain of logic for each impact conclusion and to allow the reader to reach independent conclusions regarding the significance of the potential impacts described in the following subchapters.

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4.2 AIR QUALITY

4.2.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of air quality from implementation of the Project. The Air Quality Section of the Initial Study (IS, Subchapter 8.3, *Initial Study*) evaluated the following four issues:

a. Would the Project conflict with or obstruct implementation of the applicable air quality plan?
b. Would the Project result in a cumulatively considerable net increase of any criteriapollutant for which the Project region is non-attainment under an applicable federalor state ambient air quality standard?
c. Would the Project expose sensitive receptors to substantial pollutant concentrations?
d. Would the Project result in other emissions (such as those leading to odors) affecting a substantial number of people?

Based on the analysis in the IS it was determined that the impact of other emissions and odors (issue d.) would be less than significant, and no mitigation was required. Therefore, that issue **would not** require any further analysis in the Draft Environmental Impact Report (DEIR). Basedon the analysis in the IS, the remaining three (3) issue areas, a. through c., **would** be further analyzed in the DEIR.

It should be noted that **Standard Condition SC-AQ-1** is carried over from the IS to this DEIR, aswell as mitigation measures from the PVCCSP EIR which were presented in the IS (**PVCCSP MMAir 1** through **MM Air 11**, **MM Air 13** through **MM Air 15**, and **MM Air 18** through **MM Air 20**). **MM Air 1**, **MM Air 10**, and **MM Air 15** required subsequent studies which have since been completed and, therefore, these mitigation measures are no longer applicable.

In addition to the IS, the following sources were used in the evaluation presented in this Subchapter:

- *Perris And Ramona Warehouse (DPR19-00012) Air Quality Impact Analysis City of Perris,* prepared by Urban Crossroads, 9-21-2021 (*AQ Analysis*, **Appendix I1**)
- *Perris And Ramona Warehouse (DPR19-00012) Mobile Source Health Risk Assessment City of Perris,* prepared by Urban Crossroads, 3-15-2021 (*HRA*, **Appendix I3**)
- *Final Environmental Impact Report Perris Valley Commerce Center Specific Plan* https://www.cityofperris.org/home/showpublisheddocument/13874/637455522381730000

Notice of Preparation (NOP)/Scoping Comments

During the NOP period, a letter was received from the South Coast Air Quality ManagementDistrict (SCAQMD) dated 06/01/2021 that made the following comments regarding air quality:

- Send directly to SCAQMD for review: the DEIR, the technical appendices for Air Quality (AQ)and Greenhouse Gases (GHG), including electronic versions of all air quality modeling and health risk assessment files, emission calculation spreadsheets and modeling input/output files. Use the SCAQMD CEQA Handbook and latest version of CalEEMod land use emissions software to forecast Project emissions.
- Quantify criteria pollutant emissions and compare the results to SCAQMD's regional pollutant emissions significance thresholds to determine air quality impacts.
- SCAQMD staff recommends that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.
- The Lead Agency should identify any potential adverse health risk impacts using its best efforts to

find out and a good-faith effort at full disclosure in the CEQA document. SCAQMDstaff recommends that the Lead Agency conduct a health risk assessment (HRA) to disclose the potential health risks to the residents in the Draft EIR. The HRA should follow current regulatory guidance for such studies including MATES IV data and SCAQMD and OEHHA guidance on HRA methodology.

- The SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.
- In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project.
- Identifying potential mitigation measures for the Proposed Project using the following references: South Coast AQMD's CEQA Air Quality Handbook; South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan; and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.
- Mitigation Measures may include but are not limited to: Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks; Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level; Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment; Maximize use of solar energy by installing solar energy arrays; Use light colored paving and roofing materials; Utilize only Energy Star heating, cooling, and lighting devices, and appliances; and Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.
- Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following: Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.); Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site; Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside; Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors; and Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.
- In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts.
- If the Project generates significant adverse air quality impacts, discuss a reasonable range of potentially feasible alternatives in sufficient detail to allow a meaningful evaluation, analysis and comparison with the Project. Include a “no project” alternative, and alternatives to the Project or its location that will avoid or substantially lessen any significant effects.
- If the Project requires a permit from the SCAQMD, identify SCAQMD as a Responsible Agency under CEQA.

Response: *Technical studies for Air Quality (AQ) and Greenhouse Gases (GHG) are included in the Technical Appendices of this EIR (provided electronically). The SCAQMD CEQA Handbook and CalEEMod land use emissions software were used to forecast Project emissions. Criteria pollutant emissions were used to compare the results to SCAQMD’s regional pollutant emissions significance*

thresholds to determine air quality impacts. Impacts of air pollutants on people who will live in a new project and mitigation (where necessary) have been provided. A Health Risk Assessment (HRA) has been prepared to disclose the potential health risks to the residents in the DEIR. The analysis, conclusions and design features/mitigation are discussed in Subsections through 4.2.6 of this DEIR.

In addition, the actual input files for the air quality (CalEEMod) and Health Risk Assessment (AERMOD) will be provided directly to the SCAQMD per their request when the DEIR is provided for public review.

No comments regarding air quality were received in response to the NOP at the scoping meetingheld for the proposed Project.

Note: Any tables or figures in this Section are from the *AQ Analysis* or the *HRA*, unless otherwise noted.

4.2.2 Environmental Setting

4.2.2.1 Regional Setting and Climate

The Project site is located within the South Coast Air Basin (SCAB). To the west of the SCAB is the Pacific Ocean. To the north and east are the San Gabriel, San Bernardino, and San Jacinto mountains, while the southern limit of the SCAB is the San Diego County line. The SCAB consistsof Orange County, all of Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County.

The local dominant wind blows predominantly from the south-southwest with relatively low velocities. The annual average annual wind speed is about 10 miles per hour (mph). Summer wind speeds average slightly higher than winter wind speeds. Low average wind speeds, together with a persistent temperature inversion limit the vertical dispersion of air pollutants throughout theSCAB. The region also experiences periods of hot, dry winds from the desert, known as Santa Ana winds. If the Santa Ana winds are strong, they can surpass the sea breeze, which blows from the ocean to the land, and carry the suspended dust and pollutants out to the ocean. If thewinds are weak, they are opposed by the sea breeze and cause stagnation, resulting in high pollution events.

The annual average temperature varies little throughout much of the SCAB, ranging from the low to middle 60s (°Fahrenheit). With more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The mountains surrounding the region form natural horizontal barriers to the dispersion of air contaminants. Airpollution created in the coastal regions and Los Angeles metropolitan area are transported inlanduntil reaching the mountains, where the combination of mountains and temperature inversion layers generally prevent further dispersion. This poor ventilation results in a gradual degradation of air quality from the coastal areas to inland areas of the SCAB. Air stagnation may occur during theearly evening and early morning periods of transition between day and nighttime flows.

Temperature inversions are an important feature that limits the vertical depth through which pollution can be mixed. During the summer, coastal areas are characterized by a sharp discontinuity between the cool marine air at the surface and the warm, sinking air aloft within the high-pressurecell over the ocean to the west. This marine/subsidence inversion allows for good local mixing but acts like a giant lid over the SCAB. The air remains stagnant, as the average wind speed in downtown Los Angeles becomes less than 5 mph.

A second type of inversion forms on clear winter nights when cold air off the mountains sinks to thevalley

floor while the air aloft over the valley remains warm which forms radiation inversions. These inversions, in conjunction with calm winds, trap pollutants such as those from automobile exhaust near their source. They lead to air pollution "hotspots" in heavily developed coastal areas of the SCAB, although onshore breezes often push the pollutants along canyons into the inland valleys. Summers are often periods of hazy visibility and occasionally unhealthful air, while winter air quality impacts tend to be highly localized and can consist of elevated levels of nitrogen dioxide and fine particulate matter.

4.2.2.2 Description of Criteria Air Pollutants

The following describes the air pollutants of concern related to the Project. Criteria air pollutants are defined as those pollutants for which the federal and state governments have established air quality standards for outdoor or ambient concentrations to protect public health. The following descriptions of criteria air pollutants have been provided by the South Coast Air Quality Management District (SCAQMD).

Carbon Monoxide (CO) is a colorless, odorless, toxic gas produced by incomplete combustion of carbon-containing fuels (e.g., gasoline, diesel fuel, and biomass). Sources include motor vehicle exhaust, industrial processes (metals processing and chemical manufacturing), residential wood burning, and natural sources. CO is somewhat soluble in water; therefore, rainfall and fog can suppress CO conditions. CO enters the body through the lungs, dissolves in the blood, and competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs in the body. The ambient air quality standard for carbon monoxide is intended to protect persons whose medical condition already compromises their circulatory system's ability to deliver oxygen. These medical conditions include certain heart ailments, chronic lung diseases, and anemia. Persons with these conditions have reduced exercise capacity even when exposed to relatively low levels of CO. Fetuses are at risk because their blood has an even greater affinity to bind with CO. Smokers are also at risk from ambient CO levels because smoking increases the background level of CO in their blood. The South Coast basin is has recently achieved attainment status for carbon monoxide by both United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB).

Nitrogen Dioxide (NO_2) is a byproduct of fuel combustion. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_x. NO_2 acts as an acute irritant and, in equal concentrations, is more injurious than NO. At atmospheric concentrations, however, NO_2 is only potentially irritating. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase in bronchitis in young children has also been observed at concentrations below 0.3 parts per million (ppm). NO_2 absorbs blue light which results in a brownish red cast to the atmosphere and reduced visibility. Although NO_2 concentrations have not exceeded national standards since 1991 and the state hourly standard since 1993, NO_x emissions remain of concern because of their contribution to the formation of O_3 and particulate matter.

Ozone (O_3) is one of a number of substances called photochemical oxidants that are formed when VOC's and NO_x react in the presence of ultraviolet sunlight. O_3 concentrations in the South Coast basin are typically among the highest in the nation, and the damaging effects of photochemical smog, which is a popular name for a number of oxidants in combination, are generally related to the concentrations of O_3. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the subgroups most susceptible to O_3 effects. Short-term exposures (lasting for a few hours) to O_3 at levels typically observed in southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. In recent

years, a correlation between elevated ambient O_3 levels and increases in daily hospital admission rates, as well as mortality, has also been reported. The SCAB is designated by the USEPA as an extreme non- attainment area for ozone. Although O_3 concentrations have declined substantially since the early 1990s, the SCAB continues to have peak O_3 levels that exceed both state and federal standards.

Fine Particulate Matter (PM_{10}) consists of extremely small, suspended particles or droplets 10 microns or smaller in diameter that can lodge in the lungs, contributing to respiratory problems. PM_{10} arises from such sources as re-entrained road dust, diesel soot, combustion products, tire and brake abrasion, construction operations, and fires. It is also formed in the atmosphere from NO_x and SO_2 reactions with ammonia. PM_{10} scatters light and significantly reduces visibility. Inhalable particulates pose a serious health hazard, alone or in combination with other pollutants. More than half of the smallest particles inhaled will be deposited in the lungs and can cause permanent lung damage. Inhalable particulates can also have a damaging effect on health by interfering with the body's mechanism for clearing the respiratory tract or by acting as a carrier of an absorbed toxic substance. The SCAB has recently achieved federal attainment status for PM_{10}, but is non-attainment based on state requirements.

Ultra-Fine Particulate Matter ($PM_{2.5}$) is defined as particulate matter with a diameter less than 2.5 microns and is a subset of PM_{10}. $PM_{2.5}$consists mostly of products from the reaction of NO_x and SO_2 with ammonia, secondary organics, finer dust particles, and the combustion of fuels, including diesel soot. $PM_{2.5}$ can cause exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease, declines in pulmonary function growth in children, and increased risk of premature death from heart or lung diseases in the elderly. Daily fluctuations in $PM_{2.5}$ levels have been related to hospital admissions for acute respiratory conditions, school absences, and increased medication use in children and adults with asthma. The SCAB is designated as non-attainment for $PM_{2.5}$ by both federal and state standards.

Sulfur dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur- containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children. Individuals with asthma may experience constriction of airways with exposure to SO_2. Though SO_2 concentrations have been reduced to levels well below state andfederal standards, further reductions in SO_2 emissions are needed because SO_2 is a precursor tosulfate and PM_{10}. The SCAB is considered a SO_2 attainment area by USEPA and CARB.

Lead (Pb) concentrations once exceeded the state and federal air quality standards by a wide margin but have not exceeded state or federal air quality standards at any regular monitoring station since 1982. Though special monitoring sites immediately downwind of lead sources recorded localized violations of the state standard in 1994, no violations have been recorded since. Consequently, the SCAB is designated as an attainment area for lead by both the USEPAand CARB. The *AQ Analysis* did not analyze lead emissions from the Project, as it is not expectedto emit lead in any significant measurable quantity.

Volatile Organic Compounds (VOC), although not actually a criteria air pollutant, VOCs are regulated by the SCAQMD because they cause chemical reactions which contribute to the formation of ozone. VOCs are also transformed into organic aerosols in the atmosphere, contributing to higher PM_{10} and lower visibility levels. Sources of VOCs include combustion engines, and evaporative emissions associated with fuel, paints and solvents, asphalt paving, and the use of household consumer products such as aerosols. Although health-based standards have not been established for VOCs, health effects can occur from exposures to high concentrations of VOC. Some hydrocarbon components classified as VOC emissions are hazardous air pollutants. Benzene, for example, is a hydrocarbon component of VOC emissions that is known to be a human carcinogen. The term reactive organic gases (ROG) are

often usedinterchangeably with VOC.

Toxic Air Contaminants (TACs) are defined as air pollutants which may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health, and for which there is no concentration that does not present some risk. This contrasts with the criteria pollutants, in that there is no threshold level for TAC exposure below which adverse health impacts are not expected to occur. The majority of the estimated health risk from TACs can be attributed to a relatively few compounds, the most common being diesel particulate matter (DPM). In addition to DPM, benzene and 1,3-butadiene are also significant contributors to overall ambientpublic health risk in California.

4.2.2.3 Local Air Quality

The air quality at any site is dependent on the regional air quality and local pollutant sources. Regional air quality is determined by the release of pollutants throughout the air basin. Estimates of the existing emissions in the SCAB provided in the Final 2016 Air Quality Management Plan, prepared by SCAQMD, March 2017, indicate that collectively, mobile sources account for 60 percent of the Volatile Organic Compounds (VOC), 90 percent of the mixture of NO (Nitrogen Oxide) and NO_2 (Nitrogen Dioxide, commonly called NO_x) emissions, 95 percent of the Carbon Monoxide (CO) emissions and 34 percent of directly emitted Ultra-Fine Particulate Matter ($PM_{2.5}$), with another 13 percent of $PM_{2.5}$ from road dust.

The SCAQMD has divided the SCAB into fourteen general forecasting areas and thirty-six Source Receptor Areas (SRAs) for monitoring and reporting local air quality. The SCAQMD provides daily reports of the current air quality conditions in each general forecast area and SRA. The monitoring areas provide a general representation of the local meteorological, terrain, and air quality conditions within the SCAB.

The Project site is located within the Perris Valley area (SRA 24). The Perris Valley monitoring station is located approximately 3.6 miles south of the Project site and reports air quality statistics for O_3 and PM_{10}. For purposes of analysis, the Elsinore Valley monitoring station located approximately 12.3 miles southwest of the Project sites within SRA 25, is the nearest station that monitors CO and NO_2. Relative to the Project sites, the Metropolitan Riverside County monitoring station is located approximately 15.1 miles northwest within SRA 23 and is the nearest monitoring station for $PM_{2.5}$. It should be noted that the Elsinore Valley and Metropolitan Riverside County monitoring stations were utilized in lieu of the Perris Valley monitoring station only in instances where data was not available.

The most recent three years of data available is shown on **Table 4.2-1, *Local Air Quality***, and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Development Site. Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ for 2017 through 2019 was obtained from the SCAQMD Air Quality Data Tables. Additionally, data for SO_2 has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations.

Table 4.2-1
Local Air Quality (2017-2019)

Pollutant	Standard	Year		
		2017	2018	2019
Ozone (O_3)				
Maximum Federal 1-Hour Concentration (ppm)		0.120	0.117	0.118
Maximum Federal 8-Hour Concentration (ppm)		0.105	0.103	0.095
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	33	31	26
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	80	67	64
Carbon Monoxide (CO)				
Maximum Federal 1-Hour Concentration	> 35 ppm	1.2	1.1	1.6
Maximum Federal 8-Hour Concentration	> 20 ppm	0.8	0.8	0.7
Nitrogen Dioxide (NO_2)				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.049	0.041	0.038
Annual Federal Standard Design Value		0.008	0.009	0.007
Fine Particulate Matter (PM_{10})				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 150 µg/m^3	75	64	97
Annual Federal Arithmetic Mean (µg/m^3)		32.2	29.7	25.3
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m^3	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m^3	11	3	4
Ultra-Fine Particulate Matter ($PM_{2.5}$)				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 35 µg/m^3	50.30	50.70	46.70
Annual Federal Arithmetic Mean (µg/m^3)	> 12 µg/m^3	12.18	12.41	11.13
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m^3	6	2	4

ppm = Parts Per Million
µg/m^3 = Microgram per Cubic Meter
Source: Data for O3, CO, NO2, PM10, and PM2.5 was obtained from SCAQMD Air Quality Data Tables.

4.2.2.4 Regulatory Setting

The Federal Clean Air Act (§ 7602) defines an air pollution as any agent or combination of such agents, including any physical, chemical, biological, or radioactive substance which is emitted into or otherwise enters the ambient air. Household combustion devices, motor vehicles, industrial facilities and forest fires are common sources of air pollution. Air pollution can cause disease, allergies and death. It affects soil, water, crops, vegetation, manmade materials, animals, wildlife, weather, visibility, and climate. It can also cause damage to and deterioration of property, present hazards to transportation, and negatively impact the economy. This section provides background information on criteria air pollutants, the applicable federal, state and local regulations concerningair pollution, and the existing physical setting of the Project within the context of local air quality.

4.2.2.4.a Federal

Federal and State Ambient Air Quality Standards

The Federal Clean Air Act, which was last amended in 1990, requires the EPA to set National Ambient Air Quality Standards (NAAQS) for criteria pollutants considered harmful to public health and the environment. The State of California has also established additional and more stringent California Ambient Air Quality Standards (CAAQS) in addition to the seven criteria pollutants designated by the federal government.

Ambient Air Quality Standards (AAQS) are designed to protect the health and welfare of the populace with a reasonable margin of safety. The standards are divided into two categories, primary standards and secondary standards. Primary standards are implemented to provide protection for the "sensitive" populations such as those with asthma, or the children and elderly. Secondary standards are to provide protection against visible pollution as well as damage to the surrounding environment, including animals, crops, and buildings.

Reference **Table 4.2-2, *Federal and State Ambient Air Quality Standards***.

Several pollutants listed in **Table 4.2-2** are not addressed in this analysis. Lead is not included because the Project is not anticipated to emit lead. Visibility-reducing particles are not explicitly addressed in this analysis because particulate matter is addressed. The Project is not expected to generate or be exposed to vinyl chloride because proposed Project uses do not utilize the chemical processes that create this pollutant and there are no such uses in the Project vicinity. The Project is not expected to cause exposure to hydrogen sulfide because it would not generate hydrogen sulfide in any substantial quantity.

In addition to setting out primary and secondary AAQS, the State has established a set of episode criteria for O_3, CO, NO_2, SO_2, and PM_{10}. These criteria refer to episode levels representing periods of short-term exposure to air pollutants that actually threaten public health, as required in the California Air Pollution Emergency Plan and Title 40 of the U.S. Code of Federal Regulations. Health effects are progressively more severe as pollutant levels increases from Stage One to Stage Three.

Table 4.2-2
Federal and State Ambient Air Quality Standards[1]

Air Pollutant	Averaging Time	Federal Standard (NAAQS)[2]	California Standard (CAAQS)[2]
Ozone	1 Hour	--	0.09 ppm
	8 Hour	0.070 ppm[4]	0.070 ppm
Carbon Monoxide (CO)	1 Hour	35 ppm	20 ppm
	8 Hour	9 ppm	9 ppm
Nitrogen Dioxide (NO_2)	1 Hour	0.100 ppm	0.18 ppm
	Annual	0.053 ppm	0.030 ppm
Sulfur Dioxide (SO_2)	1 Hour	0.075 ppm	0.25 ppm
	3 Hour	0.5 ppm[3]	--
	24 Hour	--	0.04 ppm
Particulate Matter (PM_{10})	24 Hour	150 µg/m³	50 µg/m³
	Mean	--	20 µg/m³
Particulate Matter ($PM_{2.5}$)	24 Hour	35 µg/m³	--
	Annual	12 µg/m³	12 µg/m³
Lead[4]	30-day	--	1.5 µg/m
	Quarter	1.5 µg/m	--
	3-month average	0.15 µg/m	--
Visibility reducing particles	8 Hour	--	0.23/km extinction coefficient (10-mile visibility standard)
Sulfates	24 Hour	--	25 µg/m
Vinyl chloride[4]	24 Hour	--	0.01 ppm
Hydrogen sulfide	24 Hour	--	0.03 ppm

[1] Source: USEPA and CARB.
[2] ppm = parts per million of air, by volume; µg/m3 = micrograms per cubic meter; Annual = Annual Arithmetic Mean; 30-day = 30-day average; Quarter = Calendar quarter.
[3] Secondary standard.
[4] The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Attainment Status

The Clean Air Act requires states to prepare a State Implementation Plan (SIP) to ensure air quality meets the NAAQS. The CARB provides designations of attainment for air basins where AAQS are either met or exceeded. If the AAQS are met, the area is designated as being in "attainment", if the air pollutant concentrations exceed the AAQS, then the area is designated as being "nonattainment". If there is inadequate or inconclusive data to make a definitive attainment designation, the area is considered "unclassified."

National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Each standard has a different definition, or 'form' of what constitutes attainment, based on specific air quality statistics. For example, the Federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring values exceeds the threshold per year. In contrast, the federal annual $PM_{2.5}$ standard is met if the three-year average of the annual average $PM_{2.5}$ concentration is less than or equal to the standard. When a state submits a request to the EPA to re-designate a nonattainment area to attainment, the Clean Air Act (CAA) section 175A(a) requires that the

state (or states, if the area is a multi-state area) submit a maintenance plan ensuring the area can maintain the air quality standard for which the area is to be re-designated for at least 10 years following the effective date of re-designation. **Table 4.2-3, *South Coast Air Basin Attainment Status*** lists the attainment status for the criteria pollutants in the SCAB.

Table 4.2-3
South Coast Air Basin Attainment Status

Pollutant	State Status	National Status
Ozone	Nonattainment	Nonattainment (Extreme)
Carbon monoxide	Attainment	Attainment (Maintenance)
Nitrogen dioxide (annual)	Attainment	Attainment (Maintenance)
Nitrogen dioxide (1-hour)	Attainment	Attainment
Total	Attainment	Attainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
Lead	Attainment	Nonattainment (Partial)[1]

[1] Partial Nonattainment designation – Los Angeles County portion of Basin only.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6, referred to as Title 24 or the California Energy Code, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction waste and demolition ordinances and defers to them as the ruling guidance, provided they establish a minimum 65% diversion requirement. The code also provides exemptions for areas not served by construction waste and demolition recycling infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official.

Energy efficient buildings require less consumption of electricity so increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas (GHG) emissions. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. The 2019 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption in the SCAB and across the State of California. For example, the 2019 Title 24 standards require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting requirements for nonresidential buildings.

The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after

implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Non-residential buildings (such as the Project) will use approximately 30% less energy due to lighting upgrade requirements.

Because the Project will be constructed after January 1, 2019, the 2019 CALGreen standards are applicable to the Project and require, among other items:

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack.
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility.
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles.
- Electric vehicle (EV) charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity forthe future load.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings.
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste or meet a local construction and demolition waste management ordinance, whichever is more stringent.
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed.
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if morerestrictive.
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) are required to comply with various conservation standards.
- Outdoor portable water use in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELO), whichever is more stringent.
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenantwithin a new building or within an addition that is project to consume more than 1,000 gallons per day.
- Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greaterthan 2,500 sf requiring a building or landscape permit.
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify thatthe building systems and components meet the owner's or owner representative's project requirements.

South Coast Air Quality Management District (SCAQMD)

The agency responsible for air pollution control for the SCAB is the SCAQMD which is responsible for controlling emissions primarily from stationary sources. The SCAQMD maintains air quality monitoring stations throughout the SCAB. The SCAQMD, in coordination with the Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the SCAB. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as nonattainment of the federal and/or California ambient air quality standards. The term nonattainment area is used to refer to an air SCAB where one or more ambient air quality standards are exceeded.

Every three years the SCAQMD prepares a new AQMP by updating the previous plan and having a 20-year horizon. The latest version is the 2016 AQMP which is a regional blueprint for achieving the federal air quality standards and healthful air. While air quality has dramatically improved over the years, the SCAB still exceeds federal public health standards for both ozone and particulate matter (PM) and experiences some of the worst air pollution in the nation. The 2016 AQMP includes both stationary and mobile source strategies to ensure that rapidly approaching attainment deadlines are met, that public health is protected to the maximum extent feasible, and that the region is not faced with burdensome sanctions if the Plan is not approved or if the NAAQS are not met on time.

The most significant air quality challenge in the SCAB is to reduce NO_x emissions sufficiently to meet the upcoming ozone standard deadlines. Based on the inventory and modeling results, 522 tons per day (tpd) of total SCAB NO_x 2012 emissions are projected to drop to 255 tpd and 214 tpd in the 8-hour ozone attainment years of 2023 and 2031 respectively, due to continued implementation of already adopted regulatory actions ("baseline emissions"). The analysis suggests that total SCAB emissions of NO_x must be reduced to approximately 141 tpd in 2023 and 96 tpd in 2031 to attain the 8-hour ozone standards. This represents an additional 45 percent reduction in NO_x in 2023, and an additional 55 percent NO_x reduction beyond 2031 levels.

The SCAQMD establishes a program of rules and regulations to obtain attainment of the state and federal standards in conjunction with the AQMP. Several of the rules and regulations that may be applicable to this Project include, but are not limited to, the following:

- **SCAQMD Rule 402** prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **SCAQMD Rule 403** governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.
- **SCAQMD Rule 445** restricts wood burning devices from being installed into any new development and is intended to reduce the emissions of particulate matter for wood burning devices.
- **SCAQMD Rule 1113** governs the sale, use, and manufacturing of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. Therefore, all paints and solvents used during construction and operation of project must comply with Rule 1113.
- **SCAQMD Rule 1143** governs the manufacture, sale, and use of paint thinners and solvents used in

thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

- **SCAQMD Rule 1186** limits the presence of fugitive dust on paved and unpaved roads and sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency or special district such as water, air, sanitation, transit, or school district.
- **SCAQMD Rule 1303** governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM_{10} among other pollutants.
- **SCAQMD Rule 2202** On-Road Motor Vehicle Mitigation Options, is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. It applies to any employer who employs 250 or more employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average.
- **SCAQMD Rule 2305**, the Warehouse Indirect Source Rule requires warehouse buildings greater than 100,000 square feet to directly reduce NOx and PM emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. The SCAQMD estimates that Rule 2305 will reduce warehouse-related emissions by 10 to 15 percent.

Regulatory Setting for Health Risks

The Project is addressed through the efforts of various international, federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality are discussed below.

Federal - United States Environmental Protection Agency

The USEPA is responsible for setting and enforcing the NAAQS for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. NAAQS pollutants were identified using medical evidence.
As part of its enforcement responsibilities, the EPA requires each state with federal nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the national standards. The SIP must integrate federal, state, and local components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP.

4.2.2.4.b State

State – California Air Resources Board

The CARB is a part of the California Environmental Protection Agency and is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, the CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. In addition, the CARB establishes emission standards for motor vehicles sold in California, consumer products (e.g., hairspray, aerosol paints, and barbeque lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

CARB Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

adopts new section 2485 within Chapter 10, Article 1, Division 3, title 13 in the California Code of Regulations. The measure limits the idling of diesel vehicles (i.e., commercial trucks over10,000 pounds) to reduce emissions of toxics and criteria pollutants. The driver of any vehicle subject to this section: (1) shall not idle the vehicle's primary diesel engine for greater than five minutes at any location; and (2) shall not idle a diesel-fueled auxiliary power system for more than five minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle if it has a sleeper berth and the truck is located within 100 feet of a restricted area (homes and schools).

CARB Requirements to Reduce Idling Emissions from New and In-Use Trucks. Amendments were made to Title 13 in California Code of Regulations in Sections 1956.8, 2404, 2424, 2425, and 2485. The amendment states: "all new 2008 and subsequent model-year heavy- duty diesel engines shall be equipped with an engine shutdown system that automatically shuts down the engine after 300 seconds of continuous idling operation once the vehicle is stopped, the transmission is set to 'neutral' or 'park,' and the parking brake is engaged. If the parking brakeis not engaged, then the engine shutdown system shall shut down the engine after 900 secondsof continuous idling operation once the vehicle is stopped and the transmission is set to 'neutral'or 'park.' There are a few conditions where the engine shutdown system can be overridden to prevent engine damage. Any project trucks manufactured after 2008 would be consistent with this rule, which would ultimately reduce air emissions.

Statewide Truck and Bus Regulation (Regulation to Reduce Emissions of DPM, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles, Title 13,California Code of Regulations, Section 2025). On December 12, 2008, the ARB approved this regulation to reduce emissions from existing on-road diesel trucks and buses operating in California. This regulation applies to all on-road heavy-duty diesel-fueled vehicles with a gross vehicle weight rating greater than 14,000 pounds, agricultural yard trucks with off-road certified engines, and certain diesel fueled shuttle vehicles of any gross vehicle weight rating. Out-of-state trucks and buses that operate in California are also subject. Under the regulation, older, heaviertrucks (i.e., those with pre-2000 year engines and a gross vehicle weight rating greater than 26,000 pounds), are required to have installed a particulate matter filter and must be replacedwith a 2010 engine between 2015 and 2020, depending on the model year. By 2015, all heavierpre-1994 trucks must be upgraded to 2010 engines and newer trucks are thereafter required to be replaced over the next eight years. Older, more polluting trucks are required to be replaced first, while trucks that already have relatively clean 2007-2009 engines are not required to be replaced until 2023. Lighter trucks (14,001-26,000 pounds) must adhere to a similar schedule. Furthermore, nearly all trucks that were not required under the Truck and Bus Regulation to be replaced by 2015 were required to be upgraded with a particulate matter filter by that date.

The CARB is also responsible for regulations pertaining to toxic air contaminants. The Air Toxics"Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly) was enacted in 1987 asa means to establish a formal air toxics emission inventory risk quantification program. AB 2588, as amended, establishes a process that requires stationary sources to report the type and quantities of certain substances their facilities routinely release into the South Coast Air Basin. The data is ranked by high, intermediate, and low categories, which are determined by: the potency, toxicity, quantity, volume, and proximity of the facility to nearby receptors.

The Children's Environmental Health Protection Act of 1999 (Health and Safety Code Section 39606) requires explicit consideration of infants and children in assessing risks from air toxics. This necessitated that the Office of Environmental Health Hazard Assessment (OEHHA) revise the methods for both noncancer and cancer risk assessment, and of the exposure variates. The2015 draft version of the OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines wasupdated from the previous 2003 version. The revised guidance manual reflects advances in thefield of risk assessment along with explicit consideration of infants and children.

4.2.2.4.c Local

Applicable City of Perris General Plan Goals and Policies

The following are the applicable General Plan Air Quality Goals and Policies:

Healthy Community Element

Goal HC-6: Healthy Environment – Support efforts of local businesses and regional agencies to improve the health of our region's environment.

HC 6.1: Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning.

HC 6.2: Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management.

HC 6.3: Promote measures that will be effective in reducing emissions during construction activities.

- Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations
- All construction equipment for public and private projects will also comply with California Air Resources Board's vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD
- Project proponents will be required to prepare and implement a Construction ManagementPlan which will include Best Available Control Measures among others. Appropriate control measures will be determined on a project by project basis, and should be specificto the pollutant for which the daily threshold is exceeded

4.2.3 Thresholds of Significance

The criteria used to determine the significance of potential Project-related air quality impacts aretaken from the *CEQA Guidelines* (14 CCR §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a cumulatively considerable net increase of any criteria pollutant for which theproject region is in non-attainment under an applicable federal or state ambient air qualitystandard.
- Expose sensitive receptors to substantial pollutant concentrations.
- Result in other emissions (such as those leading to odors) adversely affecting asubstantial number of people.

As discussed in Subsection 4.2.1, the Project impacts to three (3) criteria pertaining to air qualitywill be analyzed. According to the IS, the Project would have a significant impact if it would:

a. Conflict with or obstruct implementation of the applicable air quality plan.
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard.
c. Expose sensitive receptors to substantial pollutant concentrations.

The questions posed in the IS are included for each topical section to guide the impact analysis and the above significance criteria represent a summary of the thresholds raised in the City's IS.The potential air quality changes in the environment are addressed in response to the above thresholds in the following analysis in Subsection 4.2.4.

Regional Significance Thresholds

The SCAQMD has established air quality emissions thresholds for criteria air pollutants for the purposes of determining whether a project may have a significant effect on the environment per Section 15002(g) of the Guidelines for implementing CEQA. By complying with the thresholds ofsignificance, the project would be in compliance with the SCAQMD AQMP and the federal and state air quality standards. SCAQMD's significance thresholds for impacts to regional air quality are shown in **Table 4.2-4, *SCAQMD Air Quality Significance Thresholds***. Lead is not includedas part of this analysis as it is not available for purchase at gas stations and it is no longer legal to put leaded fuel in vehicles operating on public roadways.

Table 4.2-4
SCAQMD Air Quality Significance Thresholds

Pollutant	Mass Daily Emissions (pounds)	
	Construction	Operation
Oxides of Nitrogen (NO_X)	100	55
Volatile Organic Compounds (VOC)	75	55
Coarse Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55
Oxides of Sulfur (SO_X)	150	150
Carbon Monoxide (CO)	550	550

Local Significance Thresholds

The SCAQMD has published the "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" and air quality emissions were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold (LST) Look-up Tables. **Table 4.2-5, *SCAQMD Localized Significance Thresholds (LST)***, lists the Localized Significance Thresholds (LST) used to determine whether a project may generate significant adverse localized air quality impacts. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard.

LSTs are developed based on the ambient concentrations of four applicable air pollutants for source receptor area (SRA) 24 – Perris Valley. The nearest existing sensitive receptors are located adjacent to the eastern property line. Potential future residential sensitive receptors maybe located adjacent to the northern property line. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. Therefore, the sensitive receptor distance from the site boundary is assumed to be 25 meters and the daily disturbance area is calculated to be 5 acres.

Table 4.2-5
SCAQMD Localized Significance Thresholds (LST)

Pollutant	Construction (lbs./day)	Operational (lbs./day)
NO_X	270	270
CO	1,577	1,577
PM_{10}	13	4
$PM_{2.5}$	8	2

Source: SCAQMD Mass Rate Localized Significance Thresholds for 5-acre site in SRA-24 at 25 meters

Health Risk Significance Thresholds

In addition to the thresholds established above for pollutants, the SCAQMD has also defined health risk thresholds. These thresholds are represented as a cancer risk and a non- cancer hazard to the public from exposures to TACs. Cancer risk represents the probability (in terms ofrisk per million individuals) that an individual would contract cancer resulting from exposure to TACs continuously over a lifetime exposure period of 30 years for sensitive receptors. Thus, an individual located in an area with a cancer risk of one would experience a one chance out of a population of one million of contracting cancer over a 30-year time period, assuming that individual lives in that exact location continuously for the entire 30-year time period.

TACs can also cause chronic (long-term) and acute (short-term) related non-cancer illnesses such as reproductive effects, respiratory effects, eye sensitivity, immune effects, kidney effects, blood effects, central nervous system effects, birth defects, or other adverse environmental effects. Risk characterization for non-cancer health hazards from TACs is expressed as a hazardindex (HI). The HI is a ratio of the predicted concentration of the Project's emissions to a concentration considered acceptable to public health professionals, termed the Reference Exposure Level (REL). The SCAQMD has established the following health risk thresholds:

- Maximum Incremental Cancer Risk: 10 in 1 million at the nearest sensitive receptor oroff-site worker; and
- Hazard Index (project increment) 1.0 or greater.

In 2005, the Western Riverside Council of Governments published a guidance document referredto as the "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities." This document recommends guidelines that provide local governments and developers with a menu of options or strategies that can reduce exposure to diesel particulate from new and/or modified warehouse or distribution centers, or other sources of diesel pollution, such as freeways, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. The Guidelines include seven goals, and a variety of strategies for each goal that can be implemented in whole or part. There are a variety of benefits associated with adopting the guidelines, such as reducing the exposure of residents and sensitive receptors to diesel emissions.

4.2.4 Potential Impacts

THRESHOLD a: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact

The Project site is located within the SCAB which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the SCAG, county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. These state and federal air quality standards are currently exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

In March 2017, the SCAQMD released the *Final 2016 AQMP* (*2016 AQMP*) which continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the *2016 AQMP* incorporates scientific and technological information and planning assumptions, including the *2016-2040 RTP/SCS*, a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements. The Project's consistency with the AQMP will be determined using the *2016 AQMP* as discussed below.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the *1993 CEQA Handbook*. These indicators are discussed below:

- **Consistency Criterion No. 1.** The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded.

    - **Construction Impacts - Consistency Criteria 1.** The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS that would occur if localized or regional significance thresholds were exceeded. The Project would not exceed the applicable regional significance thresholds for construction activity. Therefore, the Project would not conflict with the AQMP according to this criterion.

    - **Operation Impacts – Consistency Criteria 1.** The Project would not exceed the applicable regional significance thresholds for operational activity. Therefore, the Project would not conflict with the AQMP according to this criterion.

    - **Criterion 1 Summary.** On the basis of the preceding discussion, the Project is determined to be consistent with the first criterion.

- **Consistency Criterion No. 2.** The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase. The *2016 AQMP* demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in City of Perris General Plan is considered to be consistent with the AQMP.

- **Construction Impacts – Consistency Criterion 2.** Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds will be exceeded, a less than significant impact would result.

- **Operation Impacts – Consistency Criterion 2.** As previously stated, the Project is located with the PVCC SP area. The PVCC SP designates the Project site for Commercial uses. The Commercial designation provides for retail, professional office, and service- oriented business activities which serve the entire City, as well as the surrounding neighborhoods. This designation combines the General Plan Land Use designation of Community Commercial and Commercial Neighborhood.

  The Project is proposed to consist of 347,918 square feet of high-cube cold-storage warehouse space. The Project's proposed uses are not consistent with the site's current land use designations. As the Project's proposed land use and development is not consistent with the land use designation, the Project would require a General Plan Amendment. However, since the Project construction and operational regional and localized emissions do not exceed the thresholds of significance, the Project would not cause an exceedance of an air quality violation. It should also be noted that the industrial use proposed by the Project will generate less traffic and consequently fewer emissions than if the Project site were developed consistent with the Commercial land use designation, which would generate more trips and consequently more emissions than the proposed Project.

  Criterion 2 Summary. On the basis of the preceding discussion, the Project is determined to be consistent with the second criterion.

AQMP Consistency Conclusion. The Project would not have the potential to result in or cause NAAQS or CAAQS violations. Additionally, Project construction and operational-source emissions would not exceed the regional or localized significance thresholds with mitigation. The Project is therefore considered to be consistent with the AQMP. Impacts will be less than significant, and no mitigation is required.

THRESHOLD b: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact

PVCCSP EIR mitigation measures MM Air 1 and MM Air 10 require that proposed development projects that are subject to CEQA shall have construction-related and operational air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined in conjunction with the SCAQMD. The results of the construction-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate the SCAQMD's LST analysis or other appropriate analyses as determined in conjunction with the SCAQMD.

Since the time that the PVCCSP EIR was certified by the City of Perris, the URBEMIS model has been replaced by the California Emissions Estimator Model (CalEEMod). CalEEMod Version 2020.4.0 was

used to calculate criteria air pollutants and GHG emissions from the construction and operation of the Project. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify criteria air pollutant and GHG emissions. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from off-site energy generation, solid waste disposal, vegetation planting and/or removal, and water use. The model also identifies mitigation measures to reduce criteria pollutant and GHG emissions. The model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air districts and is now recommended by the SCAQMD for all general development projects within the SCAB.

The Project will result in short-term air pollutant emissions during construction and long-term emissions during operation which are analyzed below. By preparing the following analysis, the Project has complied with PVCCSP EIR mitigation measures MM Air 1 and MM Air 10.

Construction

Construction activities associated with the Project will result in emissions of VOCs, NOX, SOX, CO, PM10, and PM2.5. Construction-related emissions are expected from the following construction activities: Site Preparation; Grading; Building Construction; Paving; and Architectural Coatings. For purposes of analysis, construction of the Project is expected to commence in December 2022 and end in November 2023. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines.* CalEEMod calculates maximum daily emissions for summer and winter periods. The estimated maximum daily construction emissions without mitigation are summarized on **Table 4.2-6, Estimated *Construction Emissions***.

Table 4.2-6 Estimated Construction Emissions

Year	Unmitigated Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2022	4.55	50.60	30.19	0.08	16.06	6.64
2023	55.41	56.01	59.23	0.15	10.95	3.63
Winter						
2022	4.55	50.62	30.04	0.08	16.06	6.64
2023	55.32	56.23	56.81	0.14	10.95	3.63
Maximum Daily Emissions	**55.41**	**56.23**	**59.23**	**0.15**	**16.06**	**6.64**
SCAQMD Regional Threshold	75.0	100.0	550.0	150.0	150.0	55.0
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

The *AQ Analysis* concluded that emissions resulting from Project construction will not exceed thresholds established by the SCAQMD for emissions of any criteria pollutant, as shown in **Table 4.2-6**. Therefore, proposed Project construction-source emissions would be considered less than significant on a project-specific and cumulative basis.

The Project is required to comply with SCAQMD Rule 402 (Rule 402) during construction, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of

persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause,injury or damage to business or property. Rule 402 shall be implemented as **Standard Condition SC-AQ-1**. Compliance with Rule 402 is a standard condition and is not considered unique mitigation under CEQA. Although the construction-related emissions of the Project would be less than significant, the Project is located within the PVCCSP planning area and will be required to implement PVCCSP EIR mitigation measures **MM Air 2** through **MM Air 9** (see "Mitigation Measures" at the end of this section).

Operation

Operational activities associated with the Project will result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions are expected from the following primary sources: Area Sources; Energy Sources; Mobile Sources; and On-Site Cargo Handling Equipment. As previously stated, CalEEMod utilizes summer and winter EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. The estimated operational-source emissions are summarized in **Table 4.2-7, *Operational Emissions***. **Table 4.2-7** indicates that the Project's daily regional emissions from on-going operations will not exceed the thresholds of significance.

Although the operational emissions of the Project would be less than significant, the Project is located within the PVCCSP planning area and will be required to implement PVCCSP EIR mitigation measures **MM Air 11**, **MM Air 13**, **MM Air 14**, **MM Air 18**, **MM Air 19**, and **MM Air 20** for the reduction of operational (see "Mitigation Measures" at the end of this section). The Project is not a refrigerated facility, so PVCCSP EIR mitigation measure **MM Air 12** is not applicable to the Project.

Table 4.2-7 Operational Emissions

Source	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
Area Source	7.88	<0.01	0.11	<0.01	<0.01	<0.01
Energy Source	0.02	0.19	0.16	<0.01	0.01	0.01
Mobile Source	1.76	12.93	19.44	0.11	6.75	1.95
On-Site Equipment Source	0.22	2.07	1.50	<0.01	0.08	0.07
Total Maximum Daily Emissions	**9.89**	**15.19**	**21.20**	**0.12**	**6.84**	**2.03**
SCAQMD Regional Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Winter						
Area Source	7.88	<0.01	0.11	<0.01	<0.01	<0.01
Energy Source	0.20	0.19	0.16	<0.01	0.01	0.01
Mobile Source	1.55	13.65	17.28	0.11	6.75	1.95
On-Site Equipment Source	0.22	2.07	1.50	<0.01	0.08	0.07
Total Maximum Daily Emissions	**9.67**	**15.91**	**19.05**	**0.11**	**6.84**	**2.03**
SCAQMD Regional Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Cumulative Impacts

The *AQ Analysis* assumes that individual projects that do not generate operational or construction

emissions that exceed the SCAQMD's recommended daily thresholds for project- specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Conversely, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable (see also Subsection 4.2.5 for more discussion of cumulative impacts).

Summary

Based on recommended SCAQMD analysis methodologies, both short-term construction air pollutant emissions and long-term operational pollutant emissions of the proposed Project would be less than significant on a project-specific and a cumulative basis.

THRESHOLD c: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact

Localized Significance Thresholds

The first part of this analysis is to use the methodology included in the SCAQMD *Final Localized Significance Threshold Methodology*. The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as Localized Significance Thresholds (LSTs). LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. For this Project, the appropriate SRA for the LST analysis is the SCAQMD Perris Valley (SRA 24). LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size.

The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual a cumulatively significant impact. The nearest receptor for localized impacts of PM_{10} and $PM_{2.5}$ is the existing residence at 80 East Dawes Street approximately 499 feet east of the Project site. The nearest receptor for localized impacts of NO_X and CO is the Fallas Distribution Center at 3900 Indian Avenue approximately 140 feet south of the Project site.

Construction. Although the total acreage disturbed is more than 5 acres per day for construction activities, the *LST Methodology* provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, the 5-acre LST look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This approach is conservative as it assumes that all on-site emissions associated with the Project would occur within a concentrated 5-acre area. As such, LSTs for a 5-acre site during construction are used as a screening tool to determine if further detailed analysis is required. **Table 4.2-8, *LST Impacts – Construction***, identifies the localized impacts at the nearest receptor location in the vicinity of the Project.

Table 4.2-8
LST Impacts – Construction

Onsite Emissions	Unmitigated Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation				
Maximum Daily Emissions	**50.35**	**19.98**	**15.82**	**6.57**
SCAQMD Localized Threshold	293	2,010	78	24
Threshold Exceeded?	**No**	**No**	**No**	**No**
Grading				
Maximum Daily Emissions	**41.66**	**28.06**	**10.64**	**3.54**
SCAQMD Localized Threshold	293	2,010	78	24
Threshold Exceeded?	**No**	**No**	**No**	**No**
Building Construction				
Maximum Daily Emissions	**40.24**	**27.92**	**1.72**	**1.61**
SCAQMD Localized Threshold	293	2,010	78	24
Threshold Exceeded?	**No**	**No**	**No**	**No**
Paving				
Maximum Daily Emissions	**10.19**	**14.58**	**0.51**	**0.47**
SCAQMD Localized Threshold	293	2,010	78	24
Threshold Exceeded?	**No**	**No**	**No**	**No**
Architectural Coatings				
Maximum Daily Emissions	**1.74**	**2.41**	**0.09**	**0.09**
SCAQMD Localized Threshold	293	2,010	78	24
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: CalEEMod unmitigated localized construction-source emissions

As shown in **Table 4.2-8**, even without mitigation localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant. Therefore, the Project would have a less than significant localized impact during construction. The required implementation of PVCCSP EIR mitigation measures **MM Air 2** through **MM Air 9** would further reduce the construction-related emissions of the Project.

Operation. The Project is located on an approximately 15.52-acre parcel. As noted previously, the *LST Methodology* provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, the 5-acre LST look-up tables can be used as a screening tool to determine whether pollutants require additional detailed analysis. This approach is conservative as it assumes that all on-site emissions associated with the project would occur within a concentrated 5-acre area. As such, LSTs for a 5-acre site during operations are used as a screening tool to determine if further detailed analysis is required.

The LST analysis generally includes on-site sources (area, energy, mobile, and on-site cargo handling equipment). However, the CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. To establish a maximum potential impact scenario for analytic purposes, the emissions shown on **Table 4.2-9, *LST Impacts – Operations***, represent all onsite Project-related stationary (area) sources and 5% of the Project-related mobile sources. As shownon **Table 4.2-9**, operational emissions would not exceed the LST thresholds for the nearest sensitive receptor. Therefore, the Project would have a less than significant localized impact during operational activities and no mitigation is required.

Table 4.2-9
LST Impacts – Operations

Onsite Emissions	Unmitigated Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**2.94**	**2.74**	**0.43**	**0.18**
SCAQMD Localized Threshold	293	2,010	19	6
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: CalEEMod localized operational-source emissions are presented in Appendices 3.3 and 3.5.

Microscale CO Concentration Standards

As discussed below, the Project would not result in potentially adverse CO concentrations or "hot spots." Further, detailed modeling of Project-specific CO "hot spots" is not needed to reach this conclusion. An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment.

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards. Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, 8.4 ppm 8-hr CO concentration measured at the Long Beach Blvd. and Imperial Hwy. intersection (highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, an adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The ambient 1-hr and 8-hr CO concentration within the Project study area is estimated to be 2.6 ppm and 1.6 ppm, respectively (data from I-5 Near Road station for 2019).

Therefore, even if the traffic volumes for the proposed Project were double or even triple of the traffic volumes generated at the Long Beach Blvd. and Imperial Hwy. intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO "hot spot" at any study area intersections.

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph)—or 24,000 vph where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vph and AM/PM traffic volumes of 8,062 vph and 7,719 vph

respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm).

Naturally Occurring Asbestos

The proposed Project is located in Riverside County which is not among the California counties that are found to have serpentine and ultramafic rock in their soils. Therefore, the potential risk for uncovering naturally occurring asbestos during Project construction is small. However, in the event asbestos is found on the site, the Project will be required to comply with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) Asbestos Program. An Asbestos NESHAP Notification Form shall be completed and submitted to the CARB immediately upon discovery of the contaminant. The Project will be required to follow NESHAP standards for emissions control during site renovation, waste transport and waste disposal. A person certified in asbestos removal procedures will be required to supervise on-site activities. By following the required asbestos abatement protocols (i.e., regulatory compliance), the Project impact is less than significant, and no mitigation is required.

Health Risk Assessment

A Mobile Source Health Risk Assessment (*HRA*) was prepared for the Project in compliance with PVCCSP EIR mitigation measure MM Air 15. The *HRA* evaluated the potential health risk impacts to sensitive receptors (which are residents) and adjacent workers associated with the development of the proposed Project. More specifically, health risk impacts were evaluated for exposure to TACs including diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site. The *HRA* followed the methodologies required by the SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA) for such studies, and examined three exposure scenarios; individual, worker, and school children.

Universal Transverse Mercator (UTM) coordinates for World Geodetic System (WGS) 84 were used to locate the Project site boundaries, each volume source location, and receptor locations in the Project site's vicinity. Modeled sensitive receptors were placed at residential and non-residential locations.

Receptors may be placed at applicable structure locations for residential and worker property and not necessarily the boundaries of the properties containing these uses because the human receptors (residents and workers) spend a majority of their time at the residence or in the workplace's building, and not on the property line. It should be noted that the primary purpose of receptor placement is focused on long-term exposure. For example, the HRA evaluates the potential health risks to residents and workers over a period of 30 or 25 years of exposure, respectively. Notwithstanding, as a conservative measure, receptors were placed at either the outdoor living area or the building façade, whichever is closer to the Project site.

For purposes of this HRA, receptors include both residential and non-residential (worker) land uses in the vicinity of the Project. These receptors are included in the HRA since residents and workers may be exposed at these locations over a long-term duration of 30 and 25 years, respectively. This methodology is consistent with SCAQMD and OEHHA recommended guidance. The nearest modeled receptors are illustrated in **Figure 4.2-1, *Modeled Receptors from the HRA***.

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Figure 4.2-1
Modeled Receptors from the HRA

Source: *HRA Analysis* (**Appendix I3**)

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Individual Exposure Scenario. The residential land use with the greatest potential exposure to Project TAC source emissions is Location R3, which represents the existing residence at 80 East Dawes Street, approximately 499 feet east of the Project site. Receptor R2 is placed at the private outdoor living areas (backyards) facing the Project site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer[1] risk attributable to Project TAC source emissions is estimated at 0.95 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project site and primary truck route than the MEIR analyzed herein, and TACs generally dissipates with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project will not cause a significant human health or cancer risk to nearby residences.

Worker Exposure Scenario. The worker receptor land use with the greatest potential exposure to Project TAC source emissions is the Fallas Distribution Center at 3900 Indian Avenue, approximately 140 feet south of the Project site. The measurement was to the building façade where a worker could remain for a typical workday. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact is 0.53 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyze herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent workers.

School Child Exposure Scenario. There are no schools located within a quarter-mile of the Project site. As such, there would be no significant impacts that would occur to any schools in the vicinity of the Project. Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70- percent drop-off in particulate pollution levels at 500 feet. Based on CARB and SCAQMD emissions and modeling analyses, an 80-percent drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center. The 1,000-foot evaluation distance is also supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources. For purposes of this assessment, a one-quarter mile radius or 1,320 feet geographic scope is utilized for determining potential impacts to nearby schools. This radius provides a more health protective scenario for evaluation than the 1,000-foot impact radius.

Summary. The *HRA* determined lifetime cancer risk from project-generated TAC emissions are provided in **Table 4.2-10, *Summary of Cancer and Non-Cancer Risks***. **Table 4.2-10** demonstrates that the Project will not result in significant cancer or non-cancer risks due to TAC and DPM emissions from Project operation and no mitigation is required.

[1] Cancer risk is expressed as a probability of an individual out of a population of one million contracting cancer via a continuous exposure to TACs over a 70-year lifetime. Recent changes to health risk methodology have reduced the exposure time to 30 years; however, the risk calculations now include risks due to pre-natal, infant and child exposure as well as to adults (16+ years) and older.

Table 4.2-10
Summary of Cancer and Non-Cancer Risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold?
30-Year Exposure	Maximum Exposed Individual Receptor	0.95	10	**No**
25-Year Exposure	Maximum Exposed Worker Receptor	0.53	10	**No**
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold?**
Annual Average	Maximum Exposed Sensitive Receptor	<0.01	1.0	**No**
Annual Average	Maximum Exposed Worker Receptor	<0.01	1.0	**No**

Health Consequences

In December 2018, in the case of Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, the California Supreme Court held that an EIR air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As discussed in briefs filed in the Friant Ranch case, correlating a project's criteria air pollutant emissions to specific health impacts is challenging. The SCAQMD, which has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes noted that it may be "difficult to quantify health impacts for criteria pollutants." SCAQMD used O_3 as an example of why it is impracticable to determine specific health outcomes from criteria pollutants for all but very large, regional-scale projects. First, forming O_3 "takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources." (SCAQMD, 2015a, p. 11) Second, "it takes a large amount of additional precursor emissions (NO_X and VOCs) to cause a modeled increase in ambient ozone levels over an entire region," with a 2012 study showing that "reducing NO_X by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion." (SCAQMD, 2015a, pp. 12-14) SCAQMD concluded that it "does not currently know of a way to accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from relatively small projects." (SCAQMD, 2015a, pp. 12-14) The San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) ties the difficulty of correlating the emission of criteria pollutants to health impacts to how ozone and particulate matter are formed, stating that "[b]ecause of the complexity of ozone formation, a specific tonnage amount of NOx or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area." (SJVUAPCD, 2015, p. 4) Similarly, the tonnage of PM "emitted does not always equate to the local PM concentration because it can be transported long distances by wind," and "[s]econdary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as sulfur dioxides (SOx) and NOx," meaning that "the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area." (SJVUAPCD, 2015, p. 5) The disconnect between the

amount of precursor pollutants and the concentration of ozone or PM formed makes it difficult to determine potential health impacts, which are related to the concentration of ozone and PM experienced by the receptor rather than levels of NOx, SOx, and VOCs produced by a source. Most local agencies lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in cause asthma), existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Instead, readers are directed to the Project's air quality impact analysis above, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation. The LST analysis above determined that the Project would not result in emissions exceeding SCAQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_x, PM_{10}, and $PM_{2.5}$. As the Project's emissions will comply with federal, state, and local air quality standards, the proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and would not provide a reliable indicator of health effects if modeled.

Mitigation Required by the Perris Valley Commerce Center Specific Plan (PVCCSP)

The IS incorporated 18 PVCCSP EIR recommended mitigation measures (**MM Air 1** through **MMAir 15** and **MM Air 18** through **MM Air 20**) for warehouse-related projects within the specific plan area. (Although **MM Air 12** was included in the IS, it will not be carried over to the EIR as the Project applicant is not proposing any refrigerated warehouse space.) These measures were intended to control vehicle-related air pollutant emissions including TACs and DPM from diesel trucks from warehouses within the PVCCSP. Three of these mitigation measures (**MM Air 1**, **MM Air 1**0, and **MM Air 15**) have been implemented by the analysis provided in this Initial Study. Therefore, 14 mitigation measures from the PVCCSP EIR will be applied to the proposed Project.

4.2.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

SC-AQ-1 The Project is required to comply with Rule 402 during construction, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to businessor property.

Mitigation Measure(s)

The analysis in Subsection 4.2.4 determined that all Project-specific air quality and health risk impacts of the proposed Project are less than significant. However, the proposed Project is required to comply with the following PVCCSP EIR mitigation measures since it is a warehouse project located within the PVCCSP planning area.

PVCCSP MM Air 2 Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

PVCCSP MM Air 3 To reduce fugitive dust emissions, the development of each individual implementing development project shall comply with SCAQMD Rule 403. The developer of each implementing project shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance. Dust control measures shall include, but are not limited to:

- Requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for +20 days, assuming no rain);
- Keeping disturbed/loose soil moist at all times;
- Requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered;
- Installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip;
- Posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved portions of the project site;
- Suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour;
- Appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation;
- Sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials; and/or,
- Replacement of ground cover in disturbed areas as quickly as possible.

PVCCSP MM Air 4 Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.

PVCCSP MM Air 5 Electricity from power poles shall be used instead of temporary diesel or gasoline-powered generators to reduce the associated emissions. Approval will be required by the city the City of Perris Building Division prior to issuance of grading permits.

PVCCSP MM Air 6 The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled off-road construction equipment, the use of construction equipment that demonstrates early

compliance with off-road equipment with the CARB in-use off-road diesel vehicle regulation (SCAQMD Rule 2449) and/or meets or exceeds Tier 3 standards with available CARB verified or USEPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNOx unless it is unavailable in Riverside County at the time of project construction activities. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris Building Division prior to issuance of a grading permit.

PVCCSP MM Air 7 During construction, ozone precursor emissions from mobile construction equipment shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers' specifications to the satisfaction of the City of Perris Building Division. Equipment maintenance records and equipment design specification data sheets shall be kept on- site during construction. Compliance with this measure shall be subject to periodic inspections by the City of Perris Building Division.

PVCCSP MM Air 8 Each individual implementing development project shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.

PVCCSP MM Air 9 To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g., bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in SCAQMD's Rule 1113. Construction specifications shall be included in building specifications that assure these requirements are implemented. The specifications for each implementing development project shall be reviewed by the City of Perris Building Division for compliance with this mitigation measure prior to issuance of a building permit for that project.

PVCCSP MM Air 11 Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.

PVCCSP MM Air 13 In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other state programs that restrict operations to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residentialareas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good- faith for funding for diesel truck replacement/retrofit through grant programssuch as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NOx] funding programs, as identified on SCAQMD's website

(http://www.aqmd.gov). Tenants would be required to use those funds, if awarded.

PVCCSP MM Air 14 Each implementing development project shall designate parking spaces for high-occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.

PVCCSP MM Air 18 Prior to the approval of each implementing development project, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the implementing development project that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the implementing development project, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalks and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.

NOTE: *The Initial Study for this Project indicated that early consultation with RTA had already taken place, so the Project has complied with the pre-approval portion of* ***PVCCSP MM Air 18****. However, specific input regarding local bus stops from the RTA is presented in Section 4.10, Transportation, in this EIR.*

PVCCSP MM Air 19 In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris Building Division) prior to conveyance of applicable streets.

PVCCSP MM Air 20 Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All reductions will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.

4.2.6 Cumulative Impacts

The Project area (as part of the SCAB) is designated as an extreme non-attainment area for ozone and a non- attainment area for PM_{10} and $_{PM2.5}$. The Project-specific evaluation of emissions presented in Subsection 4.2.4 demonstrates that the Project will not emit significant levels of criteria air pollutant or result in significant health risks to nearby sensitive receptors without Project-specific mitigation. Based on this, it can be concluded the Project would not contribute to cumulatively considerable air quality impacts on a regional basis. However, the Project will also be required to implement the 14 mitigation measures from the previously certified PVCCSP EIR due to its being located within the PVCCSP planning area. Implementation of PVCCSP EIR mitigation measures **MM Air 2** through **MM Air 9**, **MM Air 11**, **MM Air 13**, **PVCCSP MM Air 14**, and **MM Air 18** through **MM Air 20** will serve to further reduce potential Project air pollutant emissions and help assure the Project will not have cumulatively considerable impacts.

4.2.7 Unavoidable Significant Adverse Impacts

Based on recommended SCAQMD analysis methodologies, the preceding analysis demonstrates that both short-term construction air pollutant emissions and long-term operational pollutant emissions of the proposed Project are less than significant on a project-specific and a cumulativebasis without mitigation. However, the Project will be required to implement 14 air quality mitigation measures from the previously certified PVCCSP EIR due to its being located within the PVCCSP planning area. Implementation of mitigation measures **PVCCSP MM Air 2** through **MM Air 9**, **MM Air 11, MM Air 13**, **MM Air 14**, and **MM Air 18** through **MM Air 20** will serve to further reduce potential Project air pollutant emissions and help assure the Project will not have any project-specific significant or cumulatively considerable air quality impacts.

4.3 BIOLOGICAL RESOURCES

4.3.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of biological resources from implementation of the Project. The Biological Resources Section of the Initial Study (IS, Subchapter V.4., *Initial Study*) evaluated the following six issues:

a. Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
b. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?
c. Would the Project have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
d. Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
e. Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
f. Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Based on the analysis in the IS it was determined that the questions pertaining to issue areas c. and e., related to the biological resources **would not** require any further analysis in the Draft Environmental Impact Report (DEIR). As it pertains to these questions, the IS identified "no impact" as a result of implementation of the Project.

Based on the analysis in the IS, the remaining four (4) issue areas, a., b., d., and f., related to biological resources in the questions asked above **would** be further analyzed in the DEIR.

No standard conditions were presented in the IS that shall be carried over to this DEIR.

Mitigation measures from the PVCCSP EIR (**PVCCSP MM Bio 1** and **PVCCSP MM Bio 2**) were outlined in the IS and shall be carried over to this DEIR.

In addition to the IS, the following sources were used in the evaluation presented in this Subchapter:

- City of Perris General Plan - Final Environmental Impact Report https://www.cityofperris.org/home/showpublisheddocument/451/637203139698630000
- City of Perris General Plan https://www.cityofperris.org/departments/development-services/general-plan
- *Perris Valley Commerce Center Habitat Assessment and WRCMSHCP Consistency Analysis,* prepared by ELMT Consulting, Inc., 3-2020 (*WRCMSHCP Consistency Analysis,* **Appendix B***)*
- *Western Riverside County Multiple Species Habitat Conservation Plan* http://rctlma.org/Portals/0/mshcp/volume1/sec6.html
- *Final Environmental Impact Report Perris Valley Commerce Center Specific Plan* https://www.cityofperris.org/home/showpublisheddocument/13874/637455522381730000

Notice of Preparation (NOP)/Scoping Comments

No comment letters pertaining to biological issues have been received as a result of publishing the NOP and no comments were received at the Scoping Meeting held on May 19, 2021.

4.3.1 Environmental Setting

The Project site is situated at the southwest corner of Perris Boulevard and Ramona Expresswayin the City of Perris. Historically, farming activities have occurred on this site. One farmhouse was located on the subject site as late as 1996 but was removed by 2002. The topography of theProject site is flat, and the elevation is approximately 1,460 feet above mean sea level (AMSL).

Natural drainage at the site is generally interpreted to be toward the northeast, conforming to thenatural topography in the area.

The Project site is bounded as follows: Ramona Expressway to the north; an industrial distributioncenter to the south; Perris Boulevard to the east; and Indian Avenue to the west. The landscapefeatures of the Project site and surrounding area are best shown on **Figure 2-3, *Aerial Photo***, provided in Chapter 2 of this DEIR.

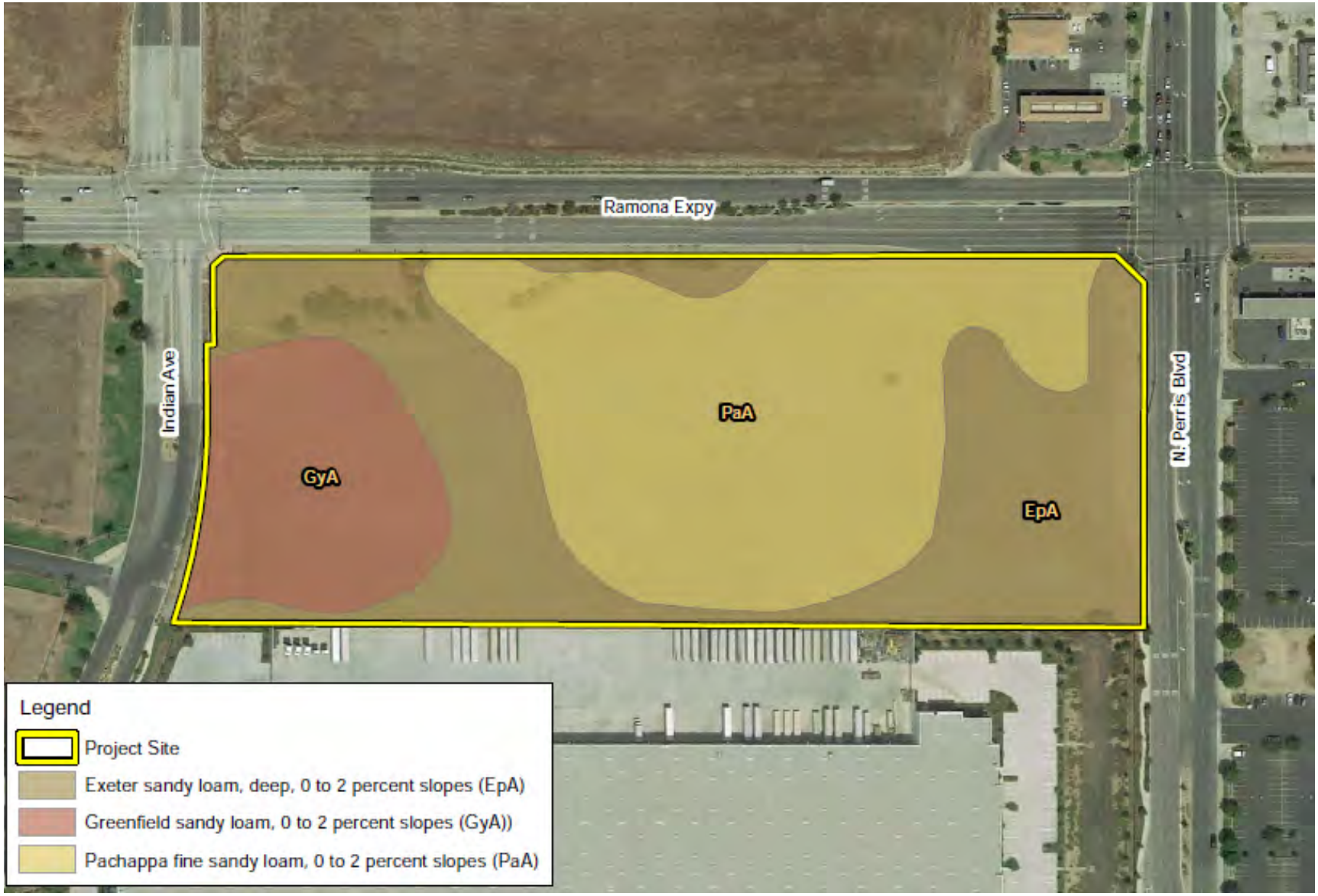
Soils at the site include Exeter sandy loam, 0 to 2 percent slopes (EnA); Greenfield sandy loam, 0 to 2 percent slopes (GyA); Pachappa fine sandy loam, 0 to 2 percent slopes (PaA); refer to **Figure 4.3-1**, ***Soils Map***.

Due to historic land uses, no native plant communities or natural communities of special concernwere observed on or adjacent to the project site. The project site primarily consists of vacant, undeveloped land that has been subject to a variety of anthropogenic disturbances that was historically used for agricultural land uses. The project site no longer is used for agricultural activities but has been subject to on-going weed abatement activities and disturbance associatedwith surrounding development. These disturbances have eliminated the natural plantcommunities that once occurred on and surrounding the project site. No native plant communitieswill be impacted from implementation of the proposed project. **Figure 4.3-2, *Vegetation***, shows vegetation and current land use.

The only special-status plant or wildlife species observed on the site is the California horned lark *(Eremophila aplestris actia).*

Ornamental trees and landscaping were historically found at the northwest corner of the site related to the residential homes. However, all ornamental trees have been removed.

Figure 4.3-1
Soils Map



Source: *WRCMSHCP Consistency Analysis* (**Appendix B**)

Figure 4.3-2
Vegetation

Source: *WRCMSHCP Consistency Analysis* (**Appendix B**)

4.3.2.1 Regulatory Setting

4.3.2.1.a Federal

Federal Endangered Species Act of 1973

The Federal Endangered Species Act of 1973 (16 U.S.C. 1531-1543) and subsequent amendments provide for the conservation of endangered and threatened species and the habitats on which they depend. Federally endangered species are ones facing extinction throughout all ora significant portion of its geographical range. A federally threatened species is one likely to become endangered within the foreseeable future throughout all of or a significant portion of its range. The presence of any federally threatened or endangered species on a site generally imposes severe constraints on development; particularly if development would result in a "take" of the species or its habitat. The term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct. Harm in this sense can include any disturbance to habitats used by the species during any portion of its life history.

Federal Clean Water Act

Pursuant to Section 404 of the Clean Water Act, the United States Army Corps of Engineers (ACOE) regulates discharges of dredged and/or fill material into waters of the United States. "Waters of the United States" are defined in ACOE regulations at 33 C.F.R. Part 328.3(a). Navigable waters of the United States are those waters of the United States that are navigable inthe traditional sense. Waters of the United States is a broader term than navigable waters of the United States and includes adjacent wetlands and tributaries to navigable waters of the United States and other waters where the degradation or destruction of which could affect interstate or foreign commerce.

Clean Water Act, Section 401 and 402

Section 401 of the CWA requires an applicant to obtain certification for any activity that may result in a discharge of a pollutant into waters of the U.S. As a result, proposed fill in waters and wetlands requires coordination with the appropriate RWQCB that administers Section 401 and provides certification. The RWQCB also plays a role in review of water quality and wetland issues, including avoidance and minimization of impacts. Section 401 certification is required prior to the issuance of a Section 404 permit. Permits requiring Section 401 certification include Corps Section 404 permits and National Pollutant Discharge Elimination System (NPDES) permits issued by the EPA under Section 402 of the CWA. NPDES permits are issued by the applicable RWQCB. The City of Perris is within the jurisdiction of the Santa Ana RWQCB (Region 8) and the San Diego RWQCB (Region 9).

Migratory Bird Treaty Act

The Federal Migratory Bird Treaty Act (MBTA), 50 C.F.R. Part 10, prohibits take of migratory birds. Under the MTBA, it is unlawful to "pursue, hunt, take, capture or kill; attempt to take, capture or kill; possess, offer to or sell, barter, purchase, deliver or cause to be shipped, exported, imported, transported, carried or received any migratory bird, part, nest, egg or product." Implementation of the Project will be required to comply with the MTBA, which prohibits the take of migratory bird species that are considered to utilize the site and their nests or eggs. In addition, Sections 3505, 3503.5, and 3800 of the California Department of Fish and Game Code prohibit

the take, possession, or destruction of birds, their nests or eggs.

4.3.2.1.b State

California Endangered Species Act

California Endangered Species Act (Fish and Game Code 2050, et seq.) (CESA) establishes thatit is the policy of the state to conserve, protect, restore, and enhance threatened or endangered species and their habitats. CESA mandates that state agencies should not approve projects which would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. CESA requires state lead agencies to notify the California Department of Fish and Wildlife (CDFW) during the CEQA process regarding potential effects to threatened or endangered species as a CEQA Trustee Agency.

California Fish and Game Code

Note the Department of Fish and Game has been renamed the California Department of Fish andWildlife (CDFW), but the state laws still fall under, under Section 1600 of the Fish and Game Code, regulates all diversions, obstructions, or changes to the natural flow or bed, channel or bank of any river, stream, or lake, which supports fish or wildlife. The Code defines a stream, including creeks and rivers, as “a body of water that flows at least periodically or intermittently through a bed or channel having surface or subsurface flow that supports or has supported riparian vegetation.” Lakes under the jurisdiction of CDFW may also include man- made features.

4.3.2.1.c Local

Multiple Species Habitat Conservation Plan (MSHCP)/MSHCP Plan Fees

On June 17, 2003, the Riverside County Board of Supervisors approved the MSHCP, certified the EIR/EIS for the Plan, and authorized the Chairman to sign the Implementing Agreement. The City of Perris, a signatory to the Implementing Agreement (IA), is required to comply with all applicable policies and requirements of the MSHCP.

The MSHCP provides for the assembly of a Conservation Area consisting of Core Areas and Linkages for the conservation of Covered Species. Covered Species are 146 species of plants and animals of various federal and state listing statuses. The Conservation Area is to be assembled from portions of the MSHCP Criteria Area, which consists of quarter-section (i.e., 160- acre) Criteria Cells, each with specific criteria for species conservation within that cell.

The MSHCP requires focused surveys for certain plant and animal species for project sites located within designated plant and animal survey areas when potential suitable habitat is present. The MSHCP also requires that an assessment be completed to determine the effects of the project on riparian/riverine areas and vernal pools and associated protected species in accordance with MSHCP Section 6.1.2, Protection of Species Associated with Riparian/RiverineAreas and Vernal Pools.

Projects located in proximity to an MSHCP Conservation Area may result in edge effects that could adversely affect biological resources within the MSHCP Conservation area. These edge effects must be addressed according to the Urban/Wildlands Interface Guidelines (MSHCP Section 6.1.4).

As outlined in Section 6 of the MSHCP, “Payment of the mitigation fee and compliance with the requirements of Section 6.0 are intended to provide full mitigation under the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), Federal Endangered Species Act, and

California Endangered Species Act for impacts to the species and habitats covered by the MSHCP pursuant to agreements with the U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife and/or any other appropriate participating regulatory agencies and as set forth in the Implementing Agreement for the MSHCP."

The Western Riverside County MSHCP Mitigation Fee has been established to provide mitigation for biological impacts from projects within the MSHCP area. All building permit applicants may pay their Western Riverside County MSHCP mitigation fees at any time after having an approved land development permit for the City of Perris Planning Division (ex: tentative tract map, conditional use permit, public use permit, plot plan) and have also paid for building permit plan review or permit fees.

At the time of this writing, the fee is $7,606/acre for industrial uses. Payment of this fee is a standard condition (**Standard Condition SC-BIO-1**) and is not considered unique mitigation under CEQA.

Stephens' Kangaroo Rat Habitat Conservation Plan/Ordinance No. 663.10

The Project is located within the boundary of the adopted Habitat Conservation Plan (HCP) for the endangered Stephens' kangaroo rat (SKR) implemented by the Riverside County Habitat Conservation Agency (RCHCA). The SKR HCP mitigates impacts from development on the SKR by establishing a network of preserves and a system for managing and monitoring them. Through implementation of the SKR HCP, more than $45 million has been dedicated to the establishmentand management of a system of regional preserves designed to ensure the persistence of SKR in the plan area. This effort has resulted in the permanent conservation of approximately 50% ofthe SKR occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. The Project is located within the SKR HCP area and will be requiredto comply with applicable provisions of this plan.

The City adopted County of Riverside Ordinance Amendment 663.10, an amendment to Ordinance No. 663, establishing the Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan Fee Assessment Area and Setting Mitigation Fees. The mitigation fees are as follows: All applicants for development permits within the boundaries of the Fee Assessment Area who cannot satisfy mitigation requirements through on-site mitigation as determined through the environmental review process shall pay a Mitigation Fee of $500.00 per gross acre of parcelsproposed for development.

Payment of this fee is a standard condition (**Standard Condition SC-BIO-2**) and is not consideredunique mitigation under CEQA.

Applicable City of Perris General Plan Goals and Policies

Conservation Element

Goal C-II: Preservation of areas with significant biotic communities.
Policy C-II.A: Comply with state and federal regulations to ensure protection andpreservation of significant biological resources.

Goal C-III: Implementation of the Multi-Species Habitat Conservation Plan (MSHCP)
Policy C-III.A: Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance withthe conservation criteria procedures and mitigation requirements set forth in the MSHCP.

4.3.3 Thresholds of Significance

As discussed in Subsection 4.3.1, the Project impacts to four (4) criteria pertaining to biological resources will be analyzed. According to Appendix G of the CEQA Guidelines, and the IS, the Project would have a significant impact if it would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department ofFish and Wildlife or U.S. Fish and Wildlife Service?
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The potential biological changes in the environment are addressed in response to the above thresholds in the following analysis.

4.3.4 Potential Impacts

THRESHOLD a: Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact With Mitigation Incorporated

Special Status Plants

According to the California Natural Diversity Database (CNDDB) and the California Native Plant Society's Electronic Inventory of Rare and Endangered Vascular Plants of California, Calflora Database, twenty-four (24) special-status plant species have been recorded in the Steele Peak and Perris quadrangles. The Project site consists of vacant, undeveloped land that has been subjected to a variety of anthropogenic disturbances from grading/disking activities, historic agricultural uses, and surrounding development. These disturbances have resulted in a majority of the Project site being dominated by early successional and non-native vegetation, which has reduced, if not eliminated, the ability of the Project site to provide suitable habitat for special-status plant species.

No special-status plant species were observed within the Project site during the field investigation, which was conducted outside of blooming season for most of the special-status plant species know to occur in the area. Based on habitat requirements for specific species and the availability and quality of on-site habitat, it was determined that the project site has a low potential to provide suitable habitat for smooth tarplant (*Centromadia pungens ssp. laevis*). Further, it was determined that the Project site does not provide suitable habitat for any of the other special-status plant species known to occur in the area and are presumed absent from the Project site. Therefore, no impact to special status plants would occur.

Special Status Wildlife

According to the CNDDB, seventy-three (73) special-status wildlife species have been reported in the Steele Peak and Perris quadrangles. The only special-status wildlife species observed on-site during the habitat assessment was California horned lark. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the proposed Project site has a moderate potential to provide suitable habitat for Cooper's hawk (*Accipiter cooperii*); and a low potential to provide suitable habitat for sharp-shinned hawk, great egret, and burrowing owl. Further it was determined that the Project site does not provide suitable habitat for any of the other special-status wildlife species known to occur in the area since the Project site has been heavily disturbed from on-site disturbances and surrounding development.

In order to ensure that impacts to the aforementioned species do not occur from site development, the Project applicant will be required to implement PVCCSP EIR mitigation measures **MM Bio 1** and **MM Bio 2**. With implementation of these PVCCSP EIR mitigation measures, impacts would be less than significant, and no additional mitigation is required.

THRESHOLD b: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

No Impact

No jurisdictional drainage features, riparian/riverine areas, or vernal pools were observed within the Project site during the field survey. Therefore, there will be no impact to riparian habitat, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. PVCCSP EIR mitigation measures MM Bio 3, MM Bio 4, and MM Bio 5 would not be applicable to the proposed Project.

THRESHOLD d: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact With Mitigation Incorporated

The Project site has not been identified as occurring in a wildlife corridor or linkage. The proposed project will be confined to existing areas that have been heavily disturbed, are isolated from regional wildlife corridors and linkages, and there are no riparian corridors, creeks, or useful patches of stepping stone habitat (natural areas) within or connecting the improvement areas to a recognized wildlife corridor or linkage. As a result, implementation of the proposed Project is not expected to impact wildlife movement opportunities.

Additionally, no active nests or birds displaying nesting behavior were observed during the field survey, which was conducted at the beginning of the nesting season. The Project site and surrounding area provides minimal foraging and nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that area adapted to urban environments. However, vegetation within and surrounding the project site has the potential to provide refuge cover from predators, perching sites and favorable conditions for avian nesting that could be impacted by construction activities associated with the project. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or

eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season. Consequently, if avian nesting behaviors are disrupted, such as nest abandonment and/or loss of reproductive effort, it is considered "take" and is potentially punishable by fines and/or imprisonment. Therefore, the Project applicant will be required to implement PVCCSP EIR mitigation measure **MM Bio 1**. With implementation of this PVCCSP EIR mitigation measure, potential impacts to nesting birds would be less than significant, and no additional mitigation is required.

THRESHOLD f: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact with Mitigation Incorporated

The Project site is located within the Mead Valley Area Plan of the MSHCP but is not located within a Criteria Area or Conservation Area, or adjacent to a Criteria Area or Conservation Area; refer to **Figure 4.3-3**, ***MSHCP Criteria Area***. While the project is not specifically identified as a Covered Activity in the MSHCP, under Section 7.1, Covered Activities Outside Criteria Area and PQP Lands, public and private development that are outside of Criteria Areas and Public/Quasi-Public (PQP) Lands are permitted under the MSHCP, subject to consistency with MSHCP policies that apply to area outside of Criteria Areas. As such, to achieve coverage, the project must be consistent with the following policies of the MSHCP:

- The policies for the protection of species associated with Riparian/Riverine areas and vernal pools as set forth in Section 6.1.2 of the MSHCP;
- The policies for the protection of Narrow Endemic Plant Species as set forth in Section 6.1.3;
- The Urban/Wildlands Interface Guidelines as set forth in Section 6.1.4;
- The requirements for conducting additional surveys as set forth in Section 6.3.2; and
- Fuels management guidelines as set forth in Section 6.4.

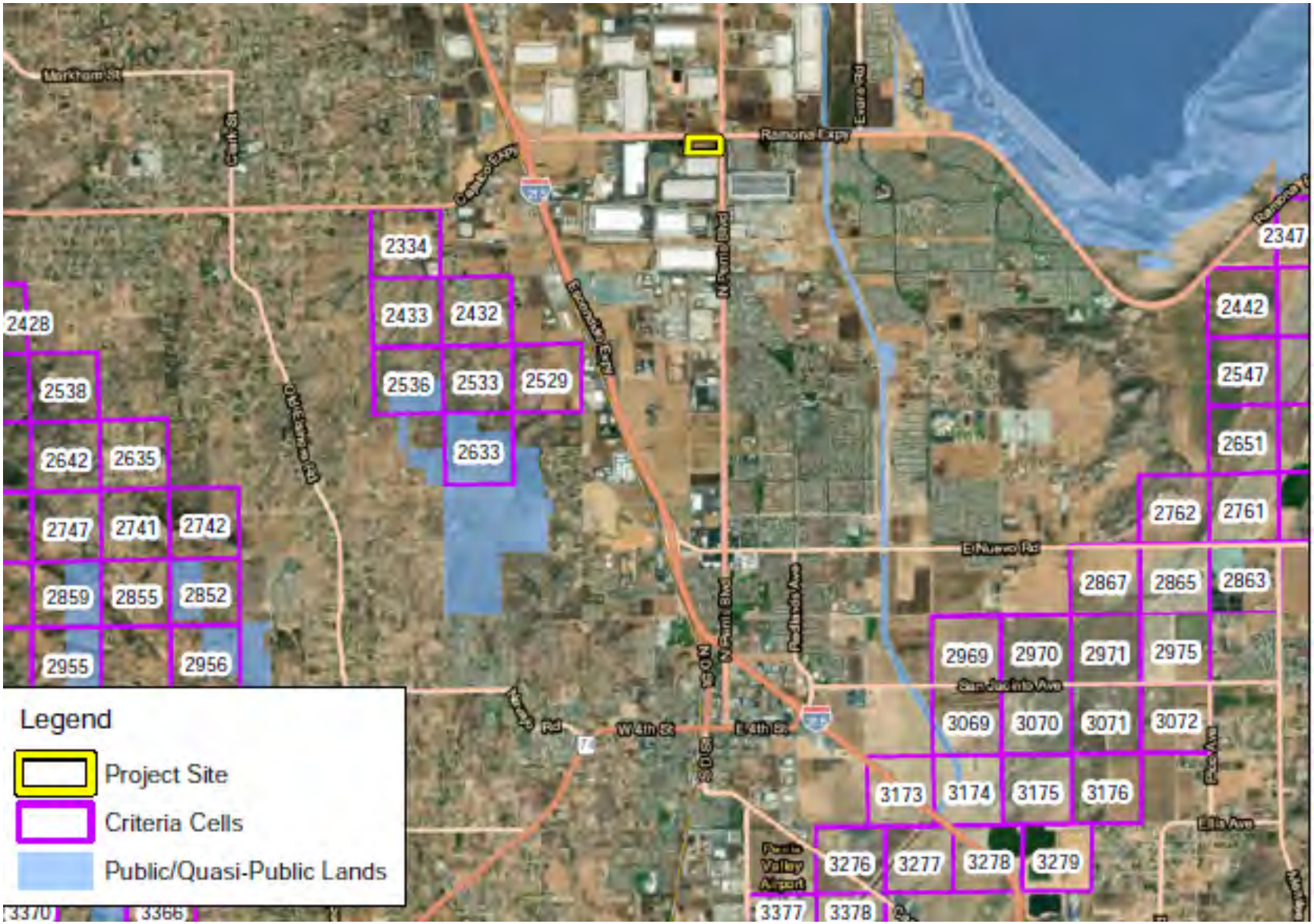
The Project site was reviewed to determine consistency with the MSHCP. Geographic Information System (GIS) software was utilized to map the project site in relation to MSHCP areas including Criteria Cells (core habitat and wildlife movement corridors) and areas proposed for conservation.

Riparian/Riverine Areas and Vernal Pools

The MSHCP requires that an assessment be completed if impacts to riparian/riverine areas and vernal pools will occur as a result of implementation of the proposed Project. According to the MSHCP, the documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species listed in Section 6.1.2 of the MSHCP, Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools.

Based on the field survey, the Project site does support any drainage features that would qualify as riparian/riverine habitat under the MSHCP or any vernal pools. Therefore, development of the proposed project will not result in impacts to riparian/riverine habitats or vernal pools.

Figure 4.3-3
MSHCP Criteria Area Map



Source: *WRCMSHCP Consistency Analysis* (**Appendix B**)

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Narrow Endemic Plants Survey Area (NEPSSA) Plants

Section 6.1.3 of the MSHCP, Protection of Narrow Endemic Plant Species, states that the MSHCP database does not provide sufficient detail to determine the extent of the presence/distribution of Narrow Endemic Plant Species within the MSHCP Plan Area. Additional surveys may be needed to gather information to determine the presence/absence of these species to ensure that appropriate conservation of these species occurs.

Based on the Western Riverside County Regional Conservation Authority (RCA) MSHCP Information Map query and review and review of the MSHCP, it was determined that the Project site is not located within the designated survey area for Narrow Endemic Plan Species. Further, based on the results of the field investigation, the Project site does not provide suitable habitat for MSHCP listed Narrow Endemic Plant Species.

Urban/Wildlands Interface Guidelines

Section 6.1.4 of the MSHCP, Guidelines Pertaining to Urban/Wildlands Interface, is intended to address indirect effects associated with development in proximity to MSHCP Conservation Areas. The Urban/Wildlife Interface Guidelines are intended to ensure that indirect project-related impacts to the MSHCP Conservation Area, including drainage, toxics, lighting, noise, invasive plant species, barriers, and grading/land development, are avoided or minimized. The project site is not located within or in close proximity of any Criteria Cells or designated conservation areas. Therefore, the proposed project will not need to comply with the Urban/Wildlands Interface Guidelines.

Additional Survey Needs and Procedures

Section 6.3.2 of the MSHCP, Additional Survey Needs and Procedures, states that additional surveys may be needed for certain species in order to achieve coverage for these species. Based on the RCA MSHCP Information Map query and review and review of the MSHCP, it was determined that the Project site is not located within the designated survey area for burrowing owl as depicted in Figure 6-4 within Section 6.3.2 of the MSHCP. However, the Project site is not located within any other species survey areas.

As discussed previously, the Project site is vegetated with a variety of low-growing plant species that allow for the line-of-sight observation opportunities favored by burrowing owl. However, no burrowing owls or recent signs (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. Further, no small mammal burrows that have the potential to provide suitable burrowing owl nesting habitat (>4 inches in diameter) were observed within the boundaries of the Project site. In addition, the site is surrounded by an assortment of tall poles, signs, walls, and structures that provide perching opportunities for large raptors (i.e., red-tailed hawk [*Buteo jamaicensis*]) that can prey on burrowing owl. Based on this information, it was determined that the Project site has a low potential to provide suitable habitat for burrowing owl and no focused surveys were recommended for burrowing owl.

Although the burrowing owl was not present on site during the burrowing owl portion of the survey, the site could eventually be reoccupied. The disturbance of the site reoccupied by burrowing owl would represent a potentially significant impact. Implementation of **Mitigation Measure PVCCSP MM Bio 2**, as outlined below in Subsection 4.3.5, will ensure that potential impacts to burrowing owls are reduced to less than significant levels by requiring that a preconstruction survey for burrowing owl is prepared no more than 30 days prior to ground disturbance in accordance with MSHCP survey requirements.

Also discussed previously is that vegetation within and surrounding the project site has the potential to

provide refuge cover from predators, perching sites and favorable conditions for avian nesting that could be impacted by construction activities associated with the project. Nesting birds are protected pursuant to the MBTA and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs).

Implementation of **Mitigation Measure PVCCSP MM Bio 1** will ensure that potential impacts to nesting birds are reduced to less than significant levels by requiring that if grading is to occur during the nesting season (February 15 – August 31), a nesting bird survey shall be conducted within ten (10) daysprior to grading permit issuance, in accordance with MSHCP survey requirements.

As stated earlier, payment of the MSHCP Mitigation Fee (**Standard Condition SC-BIO-1**), and the Stephens' Kangaroo Rat Fee (**Standard Condition SC-BIO-2**) are mandatory and require the Project applicant to pay these fees prior to the issuance of a grading permit and building permit, respectively. Payment of this fee is not considered unique mitigation under CEQA.

4.3.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

SC-BIO-1: Prior to the issuance of grading permits, the developer shall pay the MSHCP fee.

SC-BIO-2: Prior to the issuance of grading permits, the developer shall pay the Stephen's Kangaroo Rat Fee.

Mitigation Measure(s)

The proposed Project is required to comply with the following PVCCSP EIR mitigationmeasures.

PVCCSP MM Bio 1 In order to avoid violation of the MBTA and the California Fish and Game Code, site-preparation activities (removal of trees and vegetation) for all PVCCSP implementing development and infrastructure projects shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.

If site-preparation activities for an implementing project are proposed during the nesting/breeding season (February 1 to August 31), a pre- activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for such project, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the implementing project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.

PVCCSP MM Bio 2 Project-specific habitat assessments and focused surveys for burrowing owls

would be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre- construction survey for resident burrowing owls would also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity would be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.

If active nests are identified on an implementing project site during the pre-construction survey, the nests shall be avoided, or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.

4.3.6 Cumulative Impacts

Cumulative biological impacts are defined as those impacts resulting from the development within the MSHCP Plan Area as a result of build out of the Cities and County's General Plans. (MSHCP EIR/EIS). The MSHCP establishes the management of biological resources in western Riverside County (including the City of Perris) that defines cumulative biological resource values and measures the loss of biology resources that constitutes a cumulative adverse impact.

Development of the Project will contribute to the change of the general area with an intensification of development substantially greater than that which presently exists or can occur on the site or in the surrounding vicinity. The Project will not cause adverse cumulative effects related to the reduction of sensitive vegetation communities or degradation of other biology values present in western Riverside County (including the City of Perris).

With incorporation of **Mitigation Measures PVCCSP MM Bio 1** and **PVCCSP MM Bio 2,** the Project will have a less than significant substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; and will not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

The Project will have no impacts (including cumulative impacts) as it pertains to effects on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service; or on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

There are no significant biology resources located within the Project site and the Project can be implemented consistent with the criteria identified in the MSHCP, with incorporation of **Mitigation Measures PVCCSP MM Bio 1** and **PVCCSP MM Bio 2**.

Based on incorporation of the aforementioned Mitigation Measures, and the overall lack of any habitat to support sensitive species or a substantial wildlife population, the Project will not result in adverse cumulative biology resource impacts that rise to a cumulatively considerable level. Project biology impacts are less than significant.

4.3.7 Unavoidable Significant Adverse Impacts

Due to the lack of significant biological resources within the Project site, the Project is not forecast to cause any direct significant unavoidable adverse impact to sensitive biological resources. With incorporation of **Mitigation Measures PVCCSP MM Bio 1** and **PVCCSP MM Bio 2**, the Project has been determined to be consistent with the MSHCP. Thus, based on the lack of significant onsite biological resources and the mitigation that must be implemented to control potential site-specific impacts on biological resources, the Project is not forecast to cause significant unavoidable adverse impacts to biological resources. Project biology impacts are lessthan significant.

4.4 CULTURAL RESOURCES

4.4.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of cultural resources from implementation of the Project. The Cultural Resources Section of the Initial Study (IS, Subchapter 8.3, *Initial Study*) posed the following questions:

a. Would the Project cause a substantial adverse change in the significance of ahistorical resource as defined in §15064.5?
b. Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
c. Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Based on the analysis in the IS it was determined that the questions pertaining to all three (3) issue areas related to cultural resources (in the questions asked above) **would** require further analysis in the Draft Environmental Impact Report (DEIR).

No standard conditions were presented in the IS that shall be carried over to this DEIR.

Mitigation measures from the IS (**MM-CR-1** and **MM-CR-2**) have been carried over to this DEIR. PVCCSP EIR (**PVCCSP EIR MM Cultural 1**) was also presented in the IS; however, the applicant has since complied with this mitigation which requires preparation of a Phase I Cultural Resources Study.

In addition to the IS, the following sources were used in the evaluation presented in this Subchapter.

- City of Perris General Plan - Final Environmental Impact Report https://www.cityofperris.org/home/showpublisheddocument/451/637203139698630000
- *Final Environmental Impact Report Perris Valley Commerce Center Specific Plan* https://www.cityofperris.org/home/showpublisheddocument/13874/637455522381730000
- *A Phase I Cultural Resources Assessment of Perris Commerce Center, APN 303-060-020,* prepared by Jean A. Keller, Ph.D., 10-2020 (*CRA*, **Appendix J**)

Notice of Preparation (NOP)/Scoping Comments

During the NOP period, a letter was received from the Agua Caliente Band of Cahuilla Indians dated 05/06/2021 that made the following comments regarding cultural resources:

- Formal government to government consultation between the City and the Agua Caliente Band is requested per California Senate Bill 18.
- Formal government to government consultation between the City and the Agua Caliente Band is requested per California Assembly Bill 52.
- A cultural resources inventory of the Project area by a qualified archaeologist prior to any development activities in this area.
- A copy of the records search with associated survey reports and site records from theinformation center.
- Copies of any cultural resource documentation (report and site records) generated in connection with this Project.

During the NOP period, a letter was received from the Rincon Band of Luiseño Indians dated 05/14/2021 that made the following comments regarding cultural resources:

- Request for notification of, and involvement in, the CEQA environmental review process.
- Request for notification of all public hearings and scheduled approvals.
- Request for copies of documents pertaining to the project such as cultural surveys, archaeological site records, shape files, archaeological record search results, and gradingplans.

During the NOP period, a letter was received from the Native American Heritage Commission dated 05/5/2021 that made the following comments regarding cultural resources:

- The Native American Heritage Commission (NAHC) provided background information on their responsibilities regarding historical and archaeological resources relative to the CEQA Process.
- The NAHC provided guidance on Ab 52 and SB 18 regarding Tribal Consultation.
- The NAHC provided guidance on how to evaluate Tribal Cultural Resources relative to the CEQA Process.

Response: *Consistent with AB52 and SB18, consultation is in process with the Agua Caliente Band and the Rincon Band of Luiseño Indians. Recommendations for Cultural Resources Assessments were utilized in the Phase I Cultural Resources Assessment (provided the Appendices of this DEIR). Please refer to the detailed discussion in Section V.5, Cultural Resources, of the Initial Study (provided in Chapter 8, Appendices of this DEIR). Additionally, this EIR Section was prepared to be consistent with the guidance provided by NAHC on historical and archaeological resources.*

No comments regarding cultural resources were received at the Scoping Meeting held on May 19, 2021.

4.4.2 Environmental Setting

4.4.2.1 Topography and Geology

The Project site is located in the City of Perris, in western Riverside County. It is situated in PerrisValley, topographically diverse region that is defined by the Lakeview Mountains to the southeast,Steele Peak to the southwest, and Mockingbird Canyon to the northwest. Much of the drainage in the vicinity of the Project site has been channelized, but historically, the drainage pattern has been in an easterly direction toward Perris Valley and ultimately, the San Jacinto River. For the most part, drainage is intermittent, occurring only as the result of seasonal precipitation.

Topographically, the Project site is comprised of a flat alluvial plain that has been somewhat modified to facilitate residential occupation and agricultural endeavors. A permanent source of water was not observed within the property boundaries. However, a shallow, poorly defined irrigation ditch which apparently carries run-off from Indian Avenue and the Lowes warehouse tothe west, enters the subject property via a concrete culvert near the center of the western boundary, transects the northern portion of the property, paralleling the Ramona Expressway, and ending near the northeastern property corner.

The Project is situated in the Perris Peneplain, a portion of the Northern Peninsular Range Province of Southern California. The Perris Peneplain is a broad valley bounded on three sides by mountain ranges: the San Jacinto Mountains on the east, the San Bernardino Mountains on the north, and the Santa Ana Mountains on the southwest. The northwestern extent of the Perris Peneplain is the Santa

Ana River. The Peneplain is a large depositional basin composed primarily of materials eroded from the granitic bedrock surfaces of the Southern California Batholith. The geological composition of the Project site is representative of the region as a whole, with alluvial fans and terraces formed by local granitic bedrock decomposition. Bedrock outcrops suitable for use in food processing, rock art, or shelter by indigenous peoples of the region are not present within the boundaries of the Project site. Loose lithic material is very sparse, and none observed would have been suitable for tool production by Native Americans who originally occupied this area.

4.4.2.2 Project Setting

Virtually all of the Project site has been altered by agricultural endeavors and periodic vegetation clearance and various activities on adjacent land. As a result, it is difficult to determine whether adequate resources would have been available to support indigenous populations of the region. Based on resources found on portions of the Project site and on undeveloped land in its vicinity, it is probable that floral and faunal resources would have offered limited opportunities to Native Americans for procuring food, as well as components for medicines, tools, and construction materials. Bedrock outcrops suitable for use in food processing, rock art, or shelter are not present within the Project site. Loose lithic material is very sparse, and none observed would have been suitable for tool production. A permanent source of water is not located within the Project site. Due to the relative lack of available natural resources, it is likely that the Project site would only have been utilized for seasonal resource exploitation by indigenous peoples of the region and not for long-term occupation.

Criteria for occupation during the historical era were generally somewhat different than for aboriginal occupation since later populations did not depend solely on natural resources for survival. During the historical era the subject property would probably have been considered very desirable due to the availability of tillable soil, flat topography, and its proximity to urban centers and major transportation corridors.

4.4.2.3 Cultural Setting

It should be noted that while historic accounts and anthropological and linguistic theories are important in determining traditional Luiseño territory, the most critical sources of information used to define traditional territories are tribal songs, creation accounts, and oral traditions.

4.4.2.3.a Prehistoric Era

On the basis of currently available archaeological research, occupation of Southern California by human populations is believed to have begun at least 10,000 years ago. Theories proposing much earlier occupation, specifically during the Pleistocene Age, exist but at this time archaeological evidence has not been fully substantiating. Therefore, for the purposes of this discussion, only human occupation within the past 10,000 years will be addressed.

A time frame of occupation may be determined on the basis of characteristic cultural resources. These comprise what are known as cultural traditions or complexes. It is through the presence or absence of time-sensitive artifacts at a particular site that the apparent time of occupation maybe suggested.

In general, the earliest established cultural tradition in Southern California is accepted to be the San Dieguito Tradition, first described by Malcolm Rogers in the 1920's. Although absolute dates for the various phase changes have not been hypothesized or fully substantiated by a stratigraphic sequence,

the San Dieguito Tradition as a whole is believed to have existed from approximately 7000 to 10,000 years ago (8000 to 5000 B.C.).

Throughout southwestern California the La Jolla Complex followed the San Dieguito Tradition, and existed from approximately 5500 to 1000 B.C. The La Jolla Complex is recognized primarily by the presence of millingstone assemblages within shell middens. Characteristic cultural resources of the La Jolla Complex include basined millingstones, unshaped manos, flaked stonetools, shell middens, and a few Pinto-like projectile points. Flexed inhumations under stone cairns, with heads pointing north, are also present.

The Pauma Tradition, which existed from approximately 1000 B.C to 1400 A.D., may be an inlandvariant of the La Jolla Complex, exhibiting a shift to a hunting and gathering economy, rather thanone based on shellfish gathering. Implications of this shift are an increase in number and varietyof stone tools and a decrease in the amount of shell. At this time, it is not known whether the Pauma Complex represents the seasonal occupation of inland sites by La Jollan groups or whether it represents a shift from a coastal to a non-coastal cultural adaptation by the same people.

The late period is represented by the San Luis Rey Complex and is divided into two periods: SanLuis Rey I (A.D. 1400-1750) and the San Luis Rey II (A.D. 1750-1850). The San Luis Rey I type component includes cremations, bedrock mortars, millingstones, small triangular projectile points with concave bases, bone awls, stone pendants, Olivella shell beads, and quartz crystals. The San Luis Rey II assemblage is the same as San Luis Rey I, but with the addition of pottery vessels, cremation urns, tubular pipes, stone knives, steatite arrow straighteners, red and black pictographs, and such non-aboriginal items as metal knives and glass beads. Inferred San Luis Rey subsistence activities include hunting and gathering with an emphasis on acorn harvesting.

4.4.2.3.b Ethnography

According to available ethnographic research, the Project study area was included in the known territory of the Tacik-speaking Luiseño Indians during both prehistoric and historic times. The name Luiseño is Spanish in origin and was used in reference to those aboriginal inhabitants of Southern California associated with the Mission San Luis Rey.

The territory of the Luiseño was extensive, encompassing over 2000 square miles of coastal andinland Southern California. Known territorial boundaries extended as far northeast as the Santa Ana River and Box Springs Mountain Range, as far east as Mount San Jacinto, and as far southeast as Lake Henshaw, and to the west including the Southern Channel Islands. Their habitat included every ecological zone from sea level to 6000 mean feet above sea level.

Territorial boundaries of the Luiseño were shared with the Gabrieliño and Serrano to the north, the Cahuilla to the east, the Cupeño and Ipai to the south. With the exception of the Ipai, these tribes shared similar cultural and language traditions. Although the social structure and philosophy of the Luiseño were similar to that of neighboring tribes, they had a greater population density and correspondingly, a more rigid social structure.

Based on Luiseño settlement and subsistence patterns, the type of archaeological sites associated with this culture may be expected to represent the various activities involved in seasonal resource exploitation. Lithic debris and/or milling features, may be expected to occur relatively frequently. Food processing stations, often only single milling features, are perhaps themost abundant type of site found.

Isolated artifacts occur with approximately the same frequencyas food processing stations.

4.4.2.3.c History

Four principle periods of historical occupation existed in Southern California: the Explorer Period (A.D. 1540-1768), the Colonial Spanish-Mission Period (A.D. 1769-1830), the Mexican Ranch-Pastoral/Landless Indian Period (A.D. 1830-1860), and the American Developmental/Indian reservation Period (A.D. 1860-present).

In the general Project study area, the Colonial Spanish-Mission Period (A.D. 1769-1830) first represents historical occupation.

In 1798 on the site Santiago had selected, the Mission San Luis Rey de Francia was founded and all aboriginals living within the mission's realm of influence became known as the "Luiseño." By 1818 the greater Temecula Valley had become the Mission San Luis Rey's principle producer of grain and was considered one of the mission's most important holdings. This entire area continued to be an abundant producer of grain, as well as horses and cattle, for the thriving Mission San Luis Rey until the region became part of Mexico on April 11, 1822. Following this event, the Spanish missions and mission ranches began a slow decline.

During the Mexican Ranch-Pastoral/Landless Indian period (A.D. 1830-1860) the first of the Mexican ranchos were established following the enactment of the Secularization Act of 1833 by the Mexican government. Mexican governors were empowered to grant vacant land to "contractors (empresarios), families, or private citizens, whether Mexicans or foreigners, who may ask for them for the purpose of cultivating or inhabiting them." Mexican governors granted approximately 500 ranchos during this period. Although legally a land grant could not exceed 11 square leagues (about 50,000 acres or 76 square miles) and absentee ownership was officially forbidden, neither edict was rigorously enforced. The Project site was not located within any of the ranchos but was located approximately 2.5 miles southeast of the San Jacinto Nuevo y Potrero land grant.

In the final period of historical occupation, the American Developmental/Landless Indian Reservation Period (A.D. 1860-present), the first major changes in the study area took place as a result of land issues addressed in the previous decade. Following completion of the General Land Office surveys, large tracts of federal land became available for sale and for preemption purposes, particularly after Congress passed the Homestead Act of 1862. California was eventually granted 500,000 acres of land by the federal government for distribution, as well as two sections of land in each township for school purposes. Much of this land was located in the southern portion of the state. Under the Homestead Act of 1862, 160-acre homesteads were available to citizens of the United States (or those who had filed an intention to become one) whowere either the head-of-household or a single person over the age of 21 (including women).

Since 1918, the greatest influence on the Perris region has been March Air Force Base, whose southeastern corner is located approximately 1.1 miles northwest of the Perris Commerce Center property. At a time when the United States was rushing to build up its military forces in anticipation of an entry into World War I, Congress appropriated funds in 1917 in an attempt to "put the Yankee punch into the war by building an army in the air."

Although the signing of the armistice on November 11, 1918, did not initially halt training at March Field, by 1921, the decision had been made to phase down all activities at the new base in accordance with

sharply reduced military budgets (March 2010). In April 1923, March Field closed its doors with one sergeant left in charge.

In July 1926, Congress created the Army Air Corps and approved the Army's five-year plan which called for an expansion in pilot training and the activation of tactical units. Funds were appropriated for the reopening of March Field in March of 1927.

Just as March Field began to take on the appearance of a permanent military installation, the base's basic mission changed. In 1931, March Field became an operational base and soon became associated with the Air Corps' heaviest aircraft as well as an assortment of fighters. As an immediate result of the attack on Pearl Harbor in December of 1941, March Field again began training aircrews. During this period, the base doubled in area and at its peak supported approximately 75,000 troops. At the same time, the government procured a similar-sized tract to the west and established Camp Hahn as an anti-aircraft artillery training facility. It supported 85,000 troops at the height of its activity.

After the war, March reverted to its operational role and became a Tactical Air Command base. In 1949, March became a part of the relatively new Strategic Air Command.

In 1993, March Air Force Base was selected for realignment. On April 1, 1996, March officially became March Air Reserve Base.

4.4.2.6 Regulatory Setting

4.4.2.6.a Federal

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) authorized the National Register of Historic Places and coordinates public and private efforts to identify, evaluate, and protect the nation’s historical and archaeological resources. The National Register includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review refers to the federal review process designed to ensure that historical properties are considered during federal Project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process, with assistance from state historic preservation offices.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

4.4.2.6.b State

California Public Resources Code

Archaeological, paleontological, and historical sites are protected by a wide variety of state policies and regulations under the California Public Resources Code. In addition, cultural and paleontological resources are recognized as nonrenewable and therefore receive protection under the California Public Resources Code and CEQA.

- California Public Resources Code 5020–5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.
- California Public Resources Code 5079–5079.65 defines the functions and duties of the Office of Historic Preservation (OHP). The OHP is responsible for the administration of federally and state-mandated historical preservation programs in California and the California Heritage Fund.
- California Public Resources Code 5097.9–5097.991 provides protection to Native American historical and cultural resources and sacred sites and identifies the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.
- California Public Resources Code 5097.98 states that "in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation...until the coroner...has determined...that the remains are not subject to...provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible.... The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and...has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

This is reflected in **Mitigation Measure MM-CR-2.**

State California Environmental Quality Act (CEQA) Guidelines Section 15064.5(a)(1)-(3)

CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for the evaluation of historical significance, CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.(PRC §5024.1(c))

Senate Bill 18

The law provides limited protection for Native American prehistoric, archaeological, cultural, spiritual, and ceremonial places. These places may include sanctified cemeteries, religious, ceremonial sites, shrines, burial grounds, prehistoric ruins, archaeological or historic sites, Native American rock art inscriptions, or features of Native American historic, cultural, and sacred sites.

Senate Bill 18 (SB18) requires a city or county to consult with the NAHC and any appropriate Native American tribe for the purpose of preserving relevant Traditional Tribal Cultural Places (TTCP) prior to the adoption, revision, amendment, or update of a city's or county's general plan, specific plan, or designating land as open space. SB18 provides a new definition of TTCP, which requires that the site must be shown to actually have been used for activities related to traditionalbeliefs, cultural practices, or ceremonies. In addition, SB18 law also adds California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

Assembly Bill 52

Assembly Bill 52 (AB52) specifies that a Project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project. AB52 identifies examples of mitigation measures that will avoid or minimize impacts to a TCR. The bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015.AB52 amends Sections 5097.94 and adds Sections 21073, 21074, 2108.3.1, 21080.3.2, 21082.3,21083.09, 21084.2, and 21084.3 to the California PRC, relating to Native Americans.

4.4.2.6.c Local

Applicable City of Perris General Plan Goals and Policies

The following are the applicable General Plan Goals Policies and Implementation Measures:

Conservation Element

Goal IV - Cultural Resources

Protection of historical, archaeological and paleontological sites.

Policy IV.A: Comply with state and federal regulations and ensure preservation of the significanthistorical, archaeological and paleontological resources.

Implementation Measures

IV.A.1 For all private and public projects involving new construction, substantial grading, or demolition, including infrastructure and other public service facilities, staff shall require appropriate surveys and necessary site investigations in conjunction with the earliest environmental document prepared for a project.

IV.A.2 For all projects subject to CEQA, applicants will be required to submit results of an archaeological records search request through the Eastern Information Center, at the University of California, Riverside.

IV.A.3 Require Phase I Surveys for all projects located in areas that have not previously been surveyed for archaeological or historic resources, or which lie near areas where archaeological and/or historic sites have been recorded.

IV.A.5 Identify and collect previous surveys of cultural resources. Evaluate such resource and consider preparation of a comprehensive citywide inventory of cultural resources including both prehistoric sites and man-made resources.

IV.A.6 Create an archive for the City wherein all surveys, collections, records and reports can be centrally located.

IV.A.7 Strengthen efforts and coordinate the management of cultural resources with other agencies and private organizations.

4.4.3 Thresholds of Significance

As discussed in Subsection 4.4.1, the Project impacts to all three (3) criteria pertaining to cultural resources will be analyzed. According to Appendix G of the CEQA Guidelines, and the IS, the Project would have a significant impact if it would:

a. Would the Project cause a substantial adverse change in the significance of ahistorical resource as defined in §15064.5?
b. Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
c. Would the Project disturb any human remains, including those interred outside of formal cemeteries?

The potential cultural resources changes in the environment are addressed in response to the above thresholds in the following analysis.

4.4.4 Potential Impacts

THRESHOLD a: Would the Project cause a substantial adverse change in thesignificance of a historical resource pursuant to §15064.5?

Less Than Significant Impact with Mitigation

A Phase I Cultural Resources Assessment of the proposed Project site was completed by Jean A.

Keller, Ph.D. in October 20. The purpose of the Phase I Cultural Resources Assessment was two-fold: 1) information was to be obtained pertaining to previous land uses of the Project site through research and a comprehensive field survey, and 2) a determination was to be made if, and to what extent, existing cultural resources would be adversely impacted by the proposed Project. By preparing the Phase I Cultural Resources Assessment, the Project has complied with PVCCSP EIR mitigation measure MM Cultural 1.

No cultural resources of either prehistoric (Native American) or historical origin were observed within the Project boundaries during the field survey. According to a records search conducted by Eastern Information Center staff at the University of California, Riverside, 42 cultural resourcesstudies have been conducted within a one-mile radius of the proposed Project site, effectively encompassing most of the land within that radius. During the course of field surveys associated with these studies, 12 cultural resources properties have been recoded with the one-mile radius. With only one exception, all recorded sites were of historical period origin and were comprised primarily of remnant agricultural irrigation system components.

It is known that a residence existed at the northwestern corner of the property at least as early as 1939. Based on cartographic and photographic evidence, the house and associated structure were demolished between 1979 and 2002, with no remains currently existing. Several large trees that had encircled the residential compound were cut down at some time after 2018. Therefore, there is the possibility that an associated subsurface cultural deposit may exist at the site and be unearthed during Project ground-disturbing activities. Disturbance or destruction of a historical resource would be a potentially significant impact. Project **Mitigation Measure MM-CR-1** shall be implemented to reduce potentially significant impacts to previously undiscovered historical resources that may be accidentally encountered during Project implementation to a less than significant level. Project **Mitigation Measure MM-CR-1** implements PVCCSP EIR mitigation measures MM Cultural 2 through MM Cultural 4, as subsequently revised by the City of Perris. With implementation of Project **Mitigation Measure MM-CR-1, i**mpacts to historical resources will be reduced to less than significant levels.

THRESHOLD b: Would the Project cause a substantial adverse change in thesignificance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact with Mitigation

See response to Threshold a, above. As stated, no cultural resources of either prehistoric (Native American) or historical origin were observed within the Project boundaries during the field survey. In addition, no information has been obtained through Native American consultation that the subject property is culturally or spiritually significant and no Traditional Cultural Properties that currently serve religious or other community practices are known to exist within the project area. During the current cultural resources evaluation, no artifacts or remains were identified or recovered that could be reasonably associated with such practices.

However, there is the possibility that an associated subsurface cultural deposit may exist at the site and be unearthed during Project ground-disturbing activities. Disturbance or destruction of an archaeological resource would be a potentially significant impact. Project **Mitigation Measure MM-CR-1** shall be implemented to reduce potentially significantimpacts to previously undiscovered archaeological resources that may be encountered during Project implementation to a less than significant level. As stated previously, Project **Mitigation Measure MM-CR-1** implements PVCCSP EIR mitigation measures MM Cultural 2 through MM Cultural 4, as subsequently revised by the City of Perris. With

implementation of Project **Mitigation Measure MM-CR-1, i**mpacts to archaeological resources will be reduced to less than significant levels.

THRESHOLD c: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact With Mitigation

Because the Project site has been previously disturbed by agricultural uses, no human remains, or cemeteries are anticipated to be disturbed by the proposed Project. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface, which may be encountered during construction excavations associated with the proposed Project. It is also possible to encounter buried human remains during construction given the proven prehistoric occupation of the region, the identification of multiple surface archaeological resources within a half-mile of the Project site, and the favorable natural conditions that would have attracted prehistoric inhabitants to the area.

In the unlikely event that suspected human remains are uncovered during construction, all activities in the vicinity of the remains shall cease and the contractor shall notify the County Coroner immediately pursuant to Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code. Specifically, Project **Mitigation Measure MM-CR-2** identifies measures that would be taken in the event of the discovery of human remains and would be implemented to further reduce this less than significant impact. Project **Mitigation Measure MM-CR-2** implements PVCCSP EIR mitigation measures MM Cultural 6, as subsequently revised by the City of Perris. Thus, compliance with the above-referenced state laws and **MM-CR-2** will reduce impacts to less than significant levels.

4.4.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

None required.

Mitigation Measures

The proposed Project is required to comply with the following mitigationmeasures, as presented in the IS:

MM-CR-1 Prior to the issuance of grading permits, the Project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at both the subject site and any off-site Project-related improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur at the site or within the off-site Project improvement areasuntil the archaeologist has been approved by the City.

The archaeologist shall be responsible for monitoring ground-disturbing activities, maintaining daily field notes and a photographic record, and for reporting all finds to the developer and the City of Perris in a timely manner. The archaeologist shall be prepared and equipped to record and salvage cultural resources that may be unearthed during ground-disturbing activities and shall be empowered to temporarily halt or divert ground-disturbing equipment to allow time for the recording and removal of the resources.

In the event that archaeological resources are discovered at the Project site or within the off-site Project improvement areas, the handling of the discovered resource(s) will differ, depending on the nature of the find. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for Native American/tribal cultural/archaeological resources. However, it is understood that all artifacts, with the exception of human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner will commit to the relinquishing and curation of all artifacts identified as being of Native American origin. All artifacts, Native American or otherwise, discovered during the monitoring program shall be recorded and inventoried by the consulting archaeologist.

If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop and the Project proponent and Project archaeologist shall notify the City of Perris Planning Division and the Soboba Band of Luiseño Indians and the Pechanga Band of Luiseño Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians or the Pechanga Band of Luiseño Indians shall be retained to assist the Project archaeologist in the significance determination of the Native American as deemed possible. The designated Luiseño tribal representative will be given ample time to examine the find. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribe. If the find is determined to be of sacred or religious value, the Luiseño tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaking in a manner that avoids destruction or other adverse impacts.

Native American artifacts that are relocated/reburied at the Project site would be subject to a fully executed relocation/reburial agreement with the assisting Luiseño tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied on-site and in an area of permanent protection, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist.

Native American artifacts that are relocated/reburied at the Project site would be subject to a fully executed relocation/reburial agreement with the assisting Luiseño tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied on-site and in an area of permanent protection, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist.

Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. Subsequent to analysis and reporting, these artifacts will be subjected to curation, as

deemed appropriate, or returned to the property owner.

Once grading activities have ceased and/or the archaeologist, in consultation with the designated Luiseño representative, determines that monitoring is no longer warranted, monitoring activities can be discontinued following notification to the City of Perris Planning Division.

A report of findings, including an itemized inventory of artifacts, shall be prepared upon completion of the tasks outlined above. The report shall include all data outlined by the Office of Historic Preservation guidelines, including a conclusion of the significance of all recovered, relocated, and reburied artifacts. A copy of the report shall also be filed with the City of Perris Planning Division, the University of California, Riverside, Eastern Information Center (EIC) and the Luiseño tribe(s) involved with the Project.

MM-CR-2 In the event that human remains (or remains that may be human) are discovered at the Project site or within the off-site Project improvement areas during ground- disturbing activities, the construction contractors, Project archaeologist, and/or designated Luiseño tribal representative shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the Project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the Project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and the median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98I and 5097.94(k)).

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the EIC.

4.4.6 Cumulative Impacts

The cumulative study area for cultural, archaeological, and/or paleontological resources is the geographical area of the City of Perris, which is the geographical area covered by the City General Plan, including all goals and policies included therein. Future development in the City could include excavation and grading that could potentially impact cultural, archaeological, and/or paleontological resources and human remains. The cumulative effect of the Project is the continued loss of these

resources. The Project, in conjunction with other development in the City, has the potential to cumulatively impact historical and archaeological resources; however, it should be noted that each development proposal received by the City undergoes environmental review pursuant to CEQA. If there is a potential for significant impacts to cultural, archaeological, and/or paleontological resources, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures. For example, the Project will implement **Mitigation Measure MM-CR-1** which will help prevent impacts to or disturbance of unanticipated cultural resources. If subsurface historical or resources are assessed and/or protected as they are discovered, impacts to these resources would be less than significant.

With implementation of **Mitigation Measures MM-CR-1** and **MM-CR-2**, the contribution of the Project to the cumulative loss of known and unknown historical and/or archaeological resources throughout the City would be reduced to a less than significant level.

4.4.7 Unavoidable Significant Adverse Impacts

Based on the information presented above and the IS, all potential historical and archaeological resource impacts would be limited and can be reduced to a less than significant impact level with adherence to **Mitigation Measures MM-CR-1** and **MM-CR-2**. As a result, there will not be any unavoidable Project specific or cumulative adverse impacts to historical or archaeological resources from implementing the Project as proposed. The Project cultural resource impacts are less than significant.

4.5 ENERGY

4.5.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of cultural resources from implementation of the Project. The Energy Section of the Initial Study (IS, Subchapter 8.3, *Initial Study*) posed the following questions:

a. Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?
b. Would the Project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?

Based on the analysis in the IS, it was determined both of the two (2) issue areas related to energy **would** be further analyzed in the EIR.

No standard conditions related to energy use were presented in the IS that shall be carried over to this DEIR. The following Mitigation Measures from the Perris Valley Commerce Center Specific Plan EIR were presented in the IS and shall be carried over to this DEIR: **PVCCSP MM Air 14**, **PVCCSP MM Air 19**, and **PVCCSP MM Air 20** (Note the applicant has already complied with **PVCCSP MM Air 18** which was recommended in the Initial Study).

In addition to the IS, the following sources were used in the evaluation presented in this Subchapter.

- *Perris and Ramona Warehouse (DPR19-00012) Energy Conservation Analysis,* prepared byUrban Crossroads, 9-21-2021 (*ECA*, **Appendix K**)
- *Perris and Ramona Warehouse (DPR19-00012) Air Quality Study,* prepared by UrbanCrossroads, 9-21-2021 (*AQ Study* **Appendix I1**)
- *Final Environmental Impact Report Perris Valley Commerce Center Specific Plan*

https://www.cityofperris.org/home/showpublisheddocument/13874/637455522381730000

Notice of Preparation (NOP)/Scoping Comments

No comments regarding energy were received in response to the Notice of Preparation, or at theScoping Meeting held on May 19, 2021.

4.5.2 Environmental Setting

4.5.2.1 Energy Setting

4.5.2.1.a Background Information

There are many different types and sources of energy produced and consumed in the United States. The U.S. Energy Information Administration (EIA) categorizes energy by primary and secondary sources, renewable and nonrenewable sources, and by the different types of fossil fuels. Primary energy is captured directly from natural resources and includes fossil fuels, nuclear energy, and renewable sources of energy. Electricity is a secondary energy source that results from the transformation of primary energy sources. A renewable energy source includes solar energy from the sun, geothermal energy from heat inside the earth, wind energy, biomass from plants, and hydropower from flowing water. Nonrenewable energy sources include petroleum products, hydrocarbon gas liquids, natural gas, coal, and nuclear energy. Fossil fuels are non-renewable resources formed by organic matter over millions of years and include oil, coal and natural gas.

The EIA defines the five energy consuming sectors within the United States as follows:

- **Industrial Sector:** Includes facilities and equipment used for manufacturing, agriculture, mining, and construction.
- **Transportation Sector:** Includes vehicles that transport people or goods, such as cars, trucks, buses, motorcycles, trains, aircraft, boats, barges, and ships.
- **Residential Sector**: Includes homes and apartments.
- **Commercial Sector:** Includes offices, malls, stores, schools, hospitals, hotels, warehouses, restaurants, and places of worship and public assembly.
- **Electric Power Sector**: Consumes primary energy to generate most of the electricity the other four sectors consume.

Energy sources are measured in different physical units: liquid fuels are measured in barrels or gallons, natural gas in cubic feet, coal in short tons, and electricity in kilowatts and kilowatt-hours. In the United States, British thermal units (Btu), a measure of heat energy, is commonly used for comparing different types of energy to each other.

State Energy Systems

The most recent data for California's estimated total energy consumption and natural gas consumption is from 2018, released by the United States (U.S.) Energy Information Administration's (EIA) California State Profile and Energy Estimates in 2020 and included:

- Approximately 7,967 trillion British Thermal Unit (BTU) of energy was consumed;
- Approximately 681 million barrels of petroleum;
- Approximately 2,137 billion cubic feet of natural gas; and
- Approximately 1 million short tons of coal.

The California Energy Commission's (CEC) Transportation Energy Demand Forecast 2018-2030 was released in order to support the 2017 Integrated Energy Policy Report. The Transportation energy Demand Forecast 2018-2030 lays out graphs and data supporting their projections of California's future transportation energy demand. The projected inputs consider expected variable changes in fuel prices, income, population, and other variables. Predictions regarding fuel demand included:

- Gasoline demand in the transportation sector is expected to decline from approximately 15.8 billion gallons in 2017 to between 12.3 billion and 12.7 billion gallons in 2030.
- Diesel demand in the transportation sector is expected to rise, increasing from approximately 3.7 billion diesel gallons in 2015 to approximately 4.7 billion in 2030.

Data from the Department of Energy states that approximately 3.9 billion gallons of diesel fuel were consumed in 2017. The most recent data provided by the EIA for energy use in California by demand sector is from 2017 and is reported as follows:

- Approximately 40.3% transportation;
- Approximately 23.1% industrial;
- Approximately 18.0% residential; and
- Approximately 18.7% commercial.

In 2019, total system electric generation for California was 277,704 gigawatt hours (GWh). California's massive electricity in-state generation system generated approximately 200,475 GWh which accounted for approximately 72% of the electricity it uses; the rest was imported from the Pacific Northwest (9%) and the U.S. Southwest (19%). Natural gas is the main source for electricity generation at 47% of the

total in-state electric generation system power.

California is one of the nation's leading energy-producing states, and California's per capita energy use is among the nation's most efficient. Given the nature of the Project, the following analysis will focus on the three sources of energy most relevant to the Project - electricity, natural gas, and transportation fuel for vehicle trips associated with the uses planned for the Project.

a. Electricity

The usage associated with electricity use were calculated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. Electricity is currently provided to the Project by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2018 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities including out-of-state suppliers.

b. Natural Gas

Natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand. Complementing available natural gas resources, biogas may soon be available via existing delivery systems, thereby increasing the availability and reliability of resources in total. The CPUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State.

c. Transportation Fuels

The Project would generate additional vehicle trips with resulting consumption of energy resources, predominantly gasoline and diesel fuel. In March 2019, the Department of Motor Vehicles (DMV) identified 36.4 million registered vehicles in California, and those vehicles consume an estimated 17.8 billion gallons of fuel each year[1]. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets. California's on-road transportation system includes 394,383 land miles, more than 27.5 million passenger vehicles and light trucks, and almost 8.1 million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel. Petroleum comprises about 91% of all transportation energy use, excluding fuel consumed for aviation and most marine vessels. Nearly 17.8 billion gallons of on- highway fuel are burned each year, including 14.6 billion gallons of gasoline (including ethanol) and 3.2 billion gallons of diesel fuel (including biodiesel and renewable diesel). In 2019, Californians also used 194 million cubic feet of natural gas as a transportation fuel, or the equivalent of 183 billion gallons of gasoline.

4.5.2.2 Regulatory Setting

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the United States Department of Transportation, the United States Department of Energy, and the United States Environmental Protection Agency (EPA) are three federal agencies with substantial influence over energy policies and programs. On the state level, the CPUC and the CEC are two agencies with authority over different aspects of energy. Relevant federal and state energy-related laws and plans are summarized below.

[1] Fuel consumptions estimated utilizing information from EMFAC2017.

4.5.2.4.a Federal

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA). The ISTEA promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions.

Transportation Equity Act for the 21st Century (TEA-21). TEA-21was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

4.5.2.4.b State

Integrated Energy Policy Report (IEPR). Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (Public Resources Code § 25301a]). The Energy Commission prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report.

The 2019 IEPR was adopted January 31, 2020, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2019 IEPR focuses on a variety of topics such as including the environmental performance of the electricity generation system, landscape-scale planning, the response to the gas leak at the Aliso Canyon natural gas storage facility, transportation fuel supply reliability issues, updates on Southern California electricity reliability, methane leakage, climate adaptation activities for the energy sector, climate and sea level rise scenarios, and the California Energy Demand Forecast. The2020 IEPR Update is currently in progress but is not anticipated to be adopted until February 2021.

State of California Energy Plan. The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public healthand safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards. Title 24 for Residential and Nonresidential Buildings was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore,increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas (GHG) emissions.

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020.

Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction waste and demolition ordinances and defers to them as the ruling guidance, provided they establish a minimum 65% diversion requirement. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas (GHG) emissions. The 2019 version of Title 24 was adopted by the CEC) and became effective on January 1, 2020.

The 2019 Title 24 standards require solar PV systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting standards for nonresidential buildings. The CEC anticipates that nonresidential buildings will use approximately 30% less energy due to lighting upgrades compared to the prior code.

AB 1493 Pavley Regulations and Fuel Efficiency Standards. California AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions, specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption.

California Renewable Portfolio Standards. First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards requires retail sellers of electric services to increase procurement from eligible renewable resources to 33% of total retail sales by 2020.

Clean Energy and Pollution Reduction Act of 215 (SB 350). In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by2030, with interim targets of 40% by 2024, and 25% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrifytransmission markets and to improve accessibility in these markets, which will facilitatethe growth of renewable energy markets in the western United States.

4.5.2.4.c Local

Applicable City of Perris General Plan Goals and Policies

Healthy Community Element

Goal HC-6: Support efforts of local businesses and regional agencies to improve the health of our region's environment.
Policy HC 6.1: Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning.

4.4.3 Thresholds of Significance

As discussed in Subsection 4.5.1, the Project impacts to two (2) criteria pertaining to energy will be analyzed in this DEIR. The Project would have a significant impact if it would:

a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation; or
b. Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency.

Potential changes in the environment associated with energy are addressed in response to the above thresholds in the following analysis.

4.4.4 Potential Impacts

THRESHOLD a: Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Less than Significant with Mitigation Incorporated

4.4.4.1 Construction

During construction, the largest type of energy that will be consumed will be vehicle fuels, mainly diesel for grading-related equipment and heavy-duty trucks, and gasoline for medium and light duty trucks and passenger vehicles, including construction workers and vendors. Tables 4-5 through 4-12 in the *EUC* indicates all construction activities will consume 80,507 gallons of diesel fuel and 44,837 gallons of gasoline. Consumption of these fuels is equal to 16,460 Million British Thermal Units (BTUs) assuming 137,381 BTUs per gallon of diesel fuel and 120,429 BTUs per gallon of gasoline, with 67% of that consumption from diesel fuel.

Starting in 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turnover the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. The equipment used for Project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB

has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures (BACM). For example, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) requires that grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling." In this manner, construction equipment operators are required to be informed that engines are to be turned off at or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

The stationary and mobile (on-road and off-road) construction equipment will meet all emission control regulations which helps equipment run more efficiently and consume less fuel. Equipment will also be switched off if left idle for more than 5 minutes per CCR Title 13, Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction and **PVCCSP EIR Mitigation Measure MM Air 4**. In these ways, Project construction will not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts will be less than significant with implementation of the recommended mitigation.

4.4.4.2 Operation

Transportation Fuels

Energy consumption from Project operations includes transportation energy consumed by passenger car and truck vehicles accessing the Project site and facilities energy consumed by building operations and site maintenance activities. *ECA* Table 4-13 indicates the Project will produce 2,647,522 annual vehicle miles traveled (VMT) and consume an estimated 175,471 gallons of fuel of various types but mainly diesel by tractor trailer rigs. Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent state and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards.

Project annual fuel consumption estimates presented above likely represent likely "worst case" conditions for the Project. Under future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system.

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project close to regional and local roadway systems also tends to reduce VMT within the region, reducing regional vehicle energy demands as well. In addition, the Property Owner/Developer would comply with the City's transportation demand management ordinance in Chapter 17.78 of the Development Code.

Electricity and Natural Gas

Project building operations activities would result in the consumption of natural gas and electricity.Natural gas would be supplied to the Project by SoCalGas; electricity would be supplied to the Project by SCE. *ECA* Table 4-16 indicates operation of the Project will consume 699,315 thousand British Thermal Units (kBTUs) of natural gas per year and 922,964 kiloWatt-hours (kWh)of electricity each year. As previously stated, the analysis herein assumes compliance with the 2019 Title 24 Standards and the CalEEMod defaults for Title 24 – Electricity and Lighting Energy were reduced by 30% in order to reflect consistency with the 2019 Title 24 standard. However, the Project will also implement **PVCCSP EIR Mitigation Measure MM Air 20** which encourages the Project to increase the building's energy efficiency 15 percent beyond Title 24.

THRESHOLD b: Would the Project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?

Less Than Significant with Mitigation Incorporated

The Project's consistency with the applicable state and local plans is discussed below.

ISTEA. Transportation and access to the Project site is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site.

TEA-21. The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21 The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

IEPR. Electricity would be provided to the Project by SCE. SCE's *Clean Power and ElectrificationPathway* (CPEP) white paper builds on existing state programs and policies. The Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2019 IEPR. The Project will also comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. Therefore, development of the proposed Project would support the goalspresented in the 2019 IEPR.

California Energy Plan. The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access and takes advantage of existing infrastructure systems. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

CCR Title 24, Part 6, Energy Efficiency Standards. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. It should be noted that this analysis assumes compliance with the 2019 Title 24 Standards. The CEC anticipates that nonresidential buildings will use approximately 30% less energy compared to the prior code. A The CalEEMod defaults for Title 24 – Electricity and Lighting Energy were reduced by 30% in order to reflect consistency with the 2019Title 24 standard.

AB 1493. This statute is not applicable to the Project as it is a statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of therequirements

under AB 1493.

Renewable Portfolio Standards. California's RPS is not applicable to the Project as it is a statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS.

SB 350. The proposed Project would use energy from SCE, which have committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption.

PVCCSP EIR. In addition, the Project will also implement **PVCCSP EIR Mitigation Measures MM Air 14** through **MM Air 19** to further reduce future energy consumption of the Project from workers driving to and from the Project and from street lighting.

SUMMARY. As shown above, the Project would not conflict with any of the state or local plans. Therefore, a less than significant impact is expected.

4.4.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

None required.

Mitigation Measure(s)

The Project will comply with the following mitigation measures from the Perris Valley Commerce Center Specific Plan EIR to reduce the Project's impact on energy resources and help ensure the Project does not result wasteful, inefficient, or unnecessary consumption of energy.

PVCCSP MM Air 4 Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.

PVCCSP MM Air 11 Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.

PVCCSP MM Air 14 Each implementing development project shall designate parking spaces for high-occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.

PVCCSP MM Air 19 In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris Building Division) prior to conveyance of applicable streets.

PVCCSP MM Air 20 Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All reductions will be documented through a checklist to be submitted prior to

issuance of building permits for the implementing development project with building plans and calculations.

NOTE: *The Initial Study for this Project indicated that early consultation with RTA had already taken place, so the Project has complied with the pre-approval portion of* ***PVCCSP MM Air 18****. However, specific input regarding local bus stops from the RTA is presented in Section 4.10, Transportation, in this EIR.*

4.4.6 Cumulative Impacts

Energy usage is assumed to be cumulative. The proposed Project will result in an incremental use of energy during construction and operations. The energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Any impacts would bereduced to a less than significant level.

For warehousing projects in Southern California, the conversion of diesel-powered trucks to non-fossil fuels has become a major regional environmental issue. The primary state strategy for the transportation sector for medium and heavy- duty trucks is making trucks more efficient and expediting truck turnover rather than reducing VMT from trucks. This is in contrast to the passenger vehicle component of the transportation sector where both per-capita VMT reductions and an increase in vehicle efficiency are forecasted to be needed to achieve the overall state emissions reductions goals.

Heavy duty trucks involved in goods movements are generally controlled on the technology side and through fleet turnover of older trucks and engines to newer and cleaner trucks and engines. The first battery-electric heavy-heavy duty trucks are being tested this year and SCAQMD is looking to integrate this new technology into large-scale truck operations. The following state strategies reduce GHG emissions from the medium and heavy-duty trucks:

- CARB's Mobile Source Strategy focuses on reducing GHGs through the transition to zero and low emission vehicles and from medium-duty and heavy-duty trucks.
- CARB's Sustainable Freight Action Plan establishes a goal to improve freight efficiency by 25 percent by 2030, deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.
- CARB's Emissions Reduction Plan for Ports and Goods Movement (Goods Movement Plan) in California focuses on reducing heavy-duty truck-related emissions focus on establishment of emissions standards for trucks, fleet turnover, truck retrofits, and restriction on truck idling (CARB2006). While the focus of Goods Movement Plan is to reduce criteria air pollutant andair toxic emissions, the strategies to reduce these pollutants would also generally have a beneficial effectin reducing GHG emissions.
- CARB's On-Road Truck and Bus Regulation (2010) requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and olderheavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent.
- CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation requires SmartWay tractor trailers thatinclude idle-reduction technologies, aerodynamic technologies, and low-rolling resistant tires that would reduce fuel consumption and associated GHG emissions.

It should also be noted the SCAQMD recently instituted a new process of monitoring diesel truckuse

throughout the air basin in an effort to encourage conversion of diesel trucks to non-fossil fuels and improve local air quality around warehouses. On May 7, 2021, the SCAQMD adopted Rule 2305, the Warehouse Indirect Source Rule, which focuses on warehouses that are 100,000 square feet or larger and aims to slash their nitrogen oxide output using a points-based system that rewards operators for their pollution controls and charges fees depending on fleet size and rate of conversion. "About half of the air pollutants that contribute to smog come from the goods movement industry, with the largest source being heavy-duty trucks heading to warehouses across Southern California," SCAQMD Executive Officer Wayne Nastri said. "After many years of development, the adoption of this warehouse rule is a major step towards reducing air pollution and protecting the millions of people directly impacted by this type of pollution." Implementation of this rule will also help reduce future air pollutant emissions from the proposed Project, including GHGs, as well as reduce fossil fuel energy use.

In addition, the Project will implement **PVCCSP EIR Mitigation Measures MM Air 4, MM Air 11, MM Air 14**, **MM Air 19**, and **MM Air 20** to further reduce potential energy consumption related to Project construction and operation. Therefore, the Project's cumulative transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. Impacts will be less than significant,

4.4.7 Unavoidable Significant Adverse Impacts

The proposed Project will result in an incremental use of energy during construction and operations. The energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Therefore, Project-related energy usage is not considered to be significant or adverse and will not result in an unavoidable significant adverse impact with implementation of **PVCCSP EIR Mitigation Measures MM Air 4**, **MM Air 11**, **MM Air 14**, **MM Air 19**, and **MM Air 20**.

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4.6 GREENHOUSE GAS EMISSIONS

4.6.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of greenhouse gas emissions from implementation of the Project. The Greenhouse Gas Emissions Section of the Initial Study (IS, Subchapter 8.3, *Initial Study*) posed the following questions:

a. Would the Project generate greenhouse gas emissions, either directly or indirectly, that mayhave a significant impact on the environment?
b. Would the Project conflict with any applicable plan, policy or regulation of an agency adoptedfor the purpose of reducing the emissions of greenhouse gases?

Based on the analysis in the IS, it was determined both of the two (2) issue areas related to greenhouse gas emissions **would** be further analyzed in the EIR.

No standard conditions regarding GHG emissions were presented in the IS that shall be carried overto this DEIR. The following Mitigation Measures which affect GHG emissions were presented in theIS and shall be carried over to this DEIR: **PVCCSP MM Air 2**, **PVCCSP MM Air 4**, **PVCCSP MM Air 7**, **PVCCSP MM Air 11**, **PVCCSP MM Air 12**, **PVCCSP MM Air 13**, **PVCCSP MM Air 14**, and **PVCCSP MM Air 19** through **PVCCSP MM Air 20**. (NOTE: **MM Air 12** was included in the IS; it will not be carried over to the EIR as the Project is not proposing any refrigerated warehouse space;and the applicant has already complied with **MM Air-18** regarding consultation on an RTA bus turnout.)

In addition to the IS, the following sources were used in the evaluation presented in this Subchapter:

- *Perris and Ramona Warehouse Greenhouse Gas Impact Study,* prepared by UrbanCrossroads, 9-21-2021 (*GHG Analysis*, **Appendix I2**)
- *Final Environmental Impact Report Perris Valley Commerce Center Specific Plan* https://www.cityofperris.org/home/showpublisheddocument/13874/637455522381730000

Notice of Preparation (NOP)/Scoping Comments

During the NOP period, a letter was received from the South Coast Air Quality Management District (SCAQMD) dated 06/01/2021 that made the following comments regarding greenhouse gas emissions:

- Send directly to SCAQMD for review: the DEIR, the technical appendices for Air Quality (AQ) and Greenhouse Gases (GHG), including electronic versions of all air quality modeling and health risk assessment files, emission calculation spreadsheets and modeling input/output files.
- Use the SCAQMD CEQA Handbook and CalEEMod land use emissions software to forecast Project emissions.
- Quantify criteria pollutant emissions and compare the results to SCAQMD's regional pollutant emissions significance thresholds to determine air quality impacts.
- SCAQMD staff recommends that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.
- In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts.

Response: *Technical studies for Air Quality (AQ) and Greenhouse Gases (GHG) are included in the*

Technical Appendices of this EIR (provided electronically). SCAQMD CEQA Handbook and CalEEMod land use emissions software were used to forecast Project emissions. Criteria pollutant emissions were used to compare the results to SCAQMD's regional pollutant emissions significance thresholds to determine air quality impacts. Impacts of air pollutants on people who will live in a new project and mitigation (where necessary) have been provided.

In addition, the actual input files for the greenhouse gas emissions (CalEEMod) will be provided directly to the SCAQMD per their request when the DEIR is provided for public review.

No comments were received in response to the NOP with respect to greenhouse gas emissions at the scoping meeting held for the proposed Project.

Note: Any tables or figures in this section are from the *GHG Analysis*, unless otherwise noted.

4.6.2 Environmental Setting

4.6.2.1 Global Climate Change

Global climate change is the change in the average weather of the earth that is measured by such things as alterations in temperature, wind patterns, storms, and precipitation. Current data shows that the current period of warming is occurring more rapidly than past geological events. The average global surface temperature has increased approximately 1.4° Fahrenheit since the early 20th Century. 1.4° Fahrenheit may seem like a small change, but it's an unusual event in Earth's recent history, and small changes in temperature correspond to enormous changes in the environment.

The planet's climate record, preserved in tree rings, ice cores, and coral reefs, shows that the global average temperature has been stable over long periods of time. For example, at the end of the last ice age, when the Northeast United States was covered by more than 3,000 feet of ice, average global temperatures were only 5° to 9° Fahrenheit cooler than today. The Intergovernmental Panel on Climate Change (IPCC), which includes more than 1,300 scientists from the United States and other countries, forecasts a temperature rise of 2.5° to 10° Fahrenheit over the next century. Therefore, significant changes to the environment are expected in the near future.

The consequences of global climate change include more frequent and severe weather, worsening air pollution by increasing ground level ozone, higher rates of plant and animal extinction, more acidic and oxygen depleted oceans, strain on food and water resources, and threats to densely populated coastal and low-lying areas from sea level rise.

The impacts of climate change are already visible in the Southwest United States. In California, the consequences of climate change include:

- A rise in sea levels resulting in displacement of costal businesses and residencies;
- A reduction in the quality and supply of water from the Sierra snowpack;
- Increased risk of large wildfires;
- Exacerbation of air quality problems;
- Reductions in the quality and quantity of agricultural products;
- An increase temperature and extreme weather events; and a decrease in the health and productivity of California's forests.

4.6.2.2 Greenhouse Gases

Most scientists agree the main cause of the current global warming trend is anthropogenic (human-induced) augmentation of the greenhouse effect. The greenhouse effect refers to the way gases in the earth's atmosphere trap and re-emits long wave infrared radiation, acting like a blanket insulating the earth. Activities such as fossil fuel combustion, industrial processes, agriculture, and waste decomposition have elevated the concentration of greenhouse gases in the atmosphere beyond the level of naturally occurring concentrations.

GHGs comprise less than 0.1 percent of the total atmospheric composition, yet they play an essential role in influencing climate. Greenhouse gases include naturally occurring compounds such as carbon dioxide (CO_2), methane (CH_4), water vapor (H_2O), and nitrous oxide (N_2O), while others are synthetic. Man-made GHGs include the chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs) and Perfluorocarbons (PFCs), as well as sulfur hexafluoride (SF_6). Different GHGs have different effects on the Earth's warming. GHGs differ from each other in their ability to absorb energy (their "radiative efficiency") and how long they stay in the atmosphere, also known as the "lifetime". The Global Warming Potential (GWP) was developed to allow comparisons of the global warming impacts of different gases. Specifically, it is a measure of how much energy the emissions of 1 ton of a gas will absorb over a given period of time, relative to the emissions of 1 ton of CO_2. The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time period. The time period usually used for GWPs is 100 years. GWPs provide a common unit of measure, which allows analysts to add up emissions estimates of different gases and allows policymakers to compare emissions reduction opportunities across sectors and gases.

Table 4.6-1, *Global Warming Potential and Atmospheric Lifetimes*, lists the 100-year GWP of GHGs from the IPCC fourth assessment report (AR4).

Table 4.6-1
Global Warming Potential and Atmospheric Lifetimes[1,2]

Gas Name	Formula	Lifetime (years)	GWP
Carbon Dioxide	CO_2		1
Methane	CH_4	12	25
Nitrous Oxide	N_2O	114	298
Sulphur Hexafluoride	SF_6	3,200	22,800
Nitrogen Trifluoride	NF_3	740	17,200
Hexafluoroethane (PFC-116)	C_2F_6	10,000	12,200
Octafluoropropane (PFC-218)	C_3F_8	2,600	8,830
Octafluorocyclobutane (PFC-318)	C_4F_8	3,200	10,300
Tetrafluoromethane (PFC-14)	CF_4	50,000	7,390
Hydrofluorocarbon 125	HFC-125	29	3,500
Hydrofluorocarbon 134a	HFC-134a	14	1,430
Hydrofluorocarbon 143a	HFC-143a	52	4,470
Hydrofluorocarbon 152a	HFC-152a	1	124
Hydrofluorocarbon 227ea	HFC-227ea	34	3,220
Hydrofluorocarbon 23	HFC-23	270	14,800
Hydrofluorocarbon 236fa	HFC-236fa	240	9,810
Hydrofluorocarbon 245fa	HFC-245fa	8	1,030
Hydrofluorocarbon 32	HFC-32	5	675
Hydrofluorocarbon 365mfc	HFC-365mfc	9	794
Hydrofluorocarbon 43-10mee	HFC-43-10mee	16	1,640

[1] Source: IPCC Fourth Assessment Report (AR4)
[2] GWPs are used to convert GHG emission values to "carbon dioxide equivalent" (CO_2e) units

4.6.2.3 GHG Regulatory Setting

4.6.2.3.a International

Intergovernmental Panel on Climate Change. In 1988, the United Nations and the World Meteorological Organization established the Intergovernmental Panel on Climate Change to assess the scientific, technical and socio-economic information relevant to understanding the scientific basis

of risk of human-induced climate change, its potential impacts, and options for adaptation and mitigation.

United Nations. The United States participates in the United Nations Framework Convention on Climate Change (UNFCCC) (signed on March 21, 1994). Under the Convention, governments gather and share information on greenhouse gas emissions, national policies, and best practices; launch national strategies for addressing greenhouse gas emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of climate change. The 2014 UN Climate Change Conference in Lima Peru provided a unique opportunity to engage all countries to assess how developed countries are implementing actions to reduce emissions.

Kyoto Protocol. The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. It has been estimated that if the commitments outlined in the Kyoto Protocol are met, global GHG emissions could be reduced by an estimated 5 percent from 1990 levels during the first commitment period of 2008 – 2012 (UNFCCC 1997). On December 8, 2012, the Doha Amendment to the Kyoto Protocol was adopted. The amendment includes the New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 2013 – 2020, a revised list of greenhouse gases(GHG) to be reported on by Parties in the second commitment period, and Amendments to several articles of the Kyoto Protocol, which specifically referenced issues pertaining to the first commitmentperiod and which needed to be updated for the second commitment period.

The Paris Agreement. The Paris agreement is the first comprehensive global climate agreement to be ratified by the United States, United Nations, China, and India, the largest producers of greenhouse gas emissions in the world. The agreement was negotiated by a total of 195 nations and entered into force on November 4, 2016. The central aim is to strengthen the global response to the threat of climate change by keeping the global temperature rise this century well below 2 degrees Celsius compared to pre-industrial levels, and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. Additionally, the agreement aims to strengthen the ability of countries to deal with the impacts of climate change. Currently 122 parties have ratified the agreement. The Trump administration has recently indicated the United States federal government will no longer participate in the Paris agreement.

4.6.2.3.b National

Greenhouse Gas Endangerment. On December 2, 2009, the EPA announced that GHGs threaten the public health and welfare of the American people. The EPA also states that GHG emissions from on-road vehicles contribute to that threat. The decision was based on Massachusetts v. EPA (Supreme Court Case 05-1120) which argued that GHGs are air pollutants covered by the Clean Air Act and that the EPA has authority to regulate those emissions.

Clean Vehicles. Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May 19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the United States. On April 1, 2010, the EPA and the Department of Transportation's National Highway Safety Administration announced a joint final rule establishing a national program that would reduce greenhouse gas emissions and improve fuel economy for new cars and trucks sold in the United States.

The first phase of the national program would apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide per mile, equivalent to 35.5 miles per gallon if the automobile industry were to meet this carbon dioxide level solely through fuel economy improvements. Together, these standards would cut carbon dioxide emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012-2016). The second phase ofthe national program would involve proposing new fuel economy and greenhouse gas standards formodel years 2017 – 2025 by September 1, 2011.

On October 25, 2010, the EPA and the U.S. Department of Transportation proposed the first national standards to reduce greenhouse gas emissions and improve fuel efficiency of heavy-duty trucks and buses. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20 percent reduction in carbon dioxide emissions and fuel consumption by the 2018 model year. For heavy-duty pickup trucks and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10 percent reduction for gasoline vehicles and 15 percent reduction for diesel vehicles by 2018 model year (12 and 17 percent respectively, if accounting for air conditioning leakage). Lastly, for vocational vehicles, the agencies are proposing engine and vehicle standards starting in the 2014 model year which would achieve up to a 10 percent reduction in fuel consumption and carbon dioxide emissions by 2018 model year.

Mandatory Reporting of Greenhouse Gases. On January 1, 2010, the EPA started requiring large emitters of heat-trapping emissions to begin collecting GHG data under a new reporting system. Under the rule, suppliers of fossil fuels or industrial greenhouse gases, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of greenhouse gasemissions are required to submit annual reports to the EPA.

Climate Adaption Plan. The EPA Plan identifies priority actions the Agency will take to incorporate considerations of climate change into its programs, policies, rules and operations to ensure they are effective under future climatic conditions. The Plan reflects input received from States, Tribes and municipal and county officials during development, as well as comments received during a formal Tribal consultation process and a 60-day public comment period during the Winter of 2013.

EPA is also releasing final Climate Change Adaptation Implementation Plans from its National Environmental Program Offices and all 10 Regional Offices. The Implementation Plans, which also reflect responses to public comment, provide more detail on how EPA Programs and Regions will carry out the work called for in the agency wide Plan in partnership with states, tribes, and local governments.

Cap-and-Trade. Cap-and-trade refers to a policy tool where emissions are limited to a certain amount and can be traded or provides flexibility on how the emitter can comply. Successful examples in the U.S. include the Acid Rain Program and the N2O Budget Trading Program and Clean Air Interstate Rule in the northeast. There is no federal GHG cap-and-trade program currently; however, some states have joined to create initiatives to provide a mechanism for cap- and-trade.

The Regional GHG Initiative is an effort to reduce GHGs among the states of Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. Each state caps CO_2 emissions from power plants, auctions CO_2 emission allowances, and invests the

proceeds in strategic energy programs that further reduce emissions, save consumers money, create jobs, and build a clean energy economy. The Initiative began in 2008 and in 2020 has retained all participating states.

The Western Climate Initiative (WCI) partner jurisdictions have developed a comprehensive initiative to reduce regional GHG emissions to 15% below 2005 levels by 2020. The partners were originally California, British Columbia, Manitoba, Ontario, and Quebec. However, Manitoba and Ontario are not currently participating. California linked with Quebec's cap-and-trade system January 1, 2014, and joint offset auctions took place in 2015. While the WCI has yet to publish whether it has successfully reached the 2020 emissions goal initiative set in 2007, SB 32 requires that California, a major partner in the WCI, adopt the goal of reducing statewide GHG emissions to 40% below the1990 level by 2030.

Smartway Program. The SmartWay Program is a public-private initiative between the EPA, large and small trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and state agencies. Its purpose is to improve fuel efficiency and the environmental performance (reduction of both GHG emissions and air pollution) of the goods movement supply chains. SmartWay is comprised of four components:

1. SmartWay Transport Partnership: A partnership in which freight carriers and shippers commit to benchmark operations, track fuel consumption, and improve performance annually.
2. SmartWay Technology Program: A testing, verification, and designation program to help freight companies identify equipment, technologies, and strategies that save fuel and loweremissions.
3. SmartWay Vehicles: A program that ranks light-duty cars and small trucks and identifies superior environmental performers with the SmartWay logo.
4. SmartWay International Interests: Guidance and resources for countries seeking to develop freight sustainability programs modeled after SmartWay.

SmartWay effectively refers to requirements geared towards reducing fuel consumption. Most large trucking fleets driving newer vehicles are compliant with SmartWay design requirements. Moreover, over time, all HDTs will have to comply with the CARB GHG Regulation that is designed with the SmartWay Program in mind, to reduce GHG emissions by making them more fuel-efficient. For instance, in 2015, 53 foot or longer dry vans or refrigerated trailers equipped with a combination of SmartWay-verified low-rolling resistance tires and SmartWay-verified aerodynamic devices would obtain a total of 10% or more fuel savings over traditional trailers.

Through the SmartWay Technology Program, the EPA has evaluated the fuel saving benefits of various devices through grants, cooperative agreements, emissions and fuel economy testing, demonstration projects and technical literature review. As a result, the EPA has determined the following types of technologies provide fuel saving and/or emission reducing benefits when used properly in their designed applications, and has verified certain products:

- Idle reduction technologies – less idling of the engine when it is not needed would reduce fuel consumption.
- Aerodynamic technologies minimize drag and improve airflow over the entire tractor-trailer vehicle. Aerodynamic technologies include gap fairings that reduce turbulence between the tractor and trailer, side skirts that minimize wind under the trailer, and rear fairings that reduce turbulence and pressure drop at the rear of the trailer.

- Low rolling resistance tires can roll longer without slowing down, thereby reducing theamount of fuel used. Rolling resistance (or rolling friction or rolling drag) is the force resisting the motion when a tire rolls on a surface. The wheel will eventually slow down because of this resistance.
- Retrofit technologies include things such as diesel particulate filters, emissions upgrades (to a higher tier), etc., which would reduce emissions.
- Federal excise tax exemptions.

4.6.2.3.c State

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation such as the landmark AB 32 was specifically enacted to address GHG emissions. Other legislation such as Title 24 and Title 20 energy standards were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the major provisions of thelegislation.

AB 32. The California State Legislature enacted AB 32, which required that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met[1]). GHGs as defined under AB 32 include CO_2, CH4, N2O, HFCs, PFCs, and SF_6. Since AB 32 was enacted, a seventh chemical, NF3, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

> *"Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other humanhealth-related problems."*

SB 375. On September 30, 2008, SB 375 was signed by Governor Schwarzenegger. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40% of the total GHG emissions in California. SB 375 states, "Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32." SB 375 does the following: it (1) requires metropolitan planning organizations (MPOs) to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementationof the strategies.

SB 375 requires MPOs to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions.

[1] Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 $MMTCO_2e$. This is less than the 2020 emissions target of 431 $MMTCO_2e$.

Although SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

Concerning CEQA, SB 375, as codified in Public Resources Code Section 21159.28, states that CEQA findings for certain projects are not required to reference, describe, or discuss (1) growth inducing impacts, or (2) any project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network, if the project:

1. Is in an area with an approved sustainable communities strategy or an alternative planningstrategy that CARB accepts as achieving the GHG emission reduction targets.
2. Is consistent with that strategy (in designation, density, building intensity, and applicablepolicies).
3. Incorporates the MMs required by an applicable prior environmental document.

SB 32. On September 8, 2016, Governor Brown signed SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee tooversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature.

CARB Scoping Plan Update. In November 2017, CARB released the Final 2017 Scoping Plan *Update* (2017 Scoping Plan), which identifies the State's post-2020 reduction strategy. The 2017 Scoping Plan reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH4 emissions from agricultural and other wastes.

The 2017 Scoping Plan establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030. California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero and near-zero emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbonfuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH_4, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the 2017 Scoping Planframework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, whichinclude increasing zero-emission vehicles (ZEV) buses and trucks.
- LCFS, with an increased stringency (18% by 2030).
- Implementing SB 350, which expands the RPS to 50% RPS and doubles energyefficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency,

utilizes near-zero emissions technology, and deployment of ZEV trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH4 and HCF emissions by 40% and anthropogenic black carbon emissions by 50% by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20% reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's landbase as a net carbon sink.

Note, however, that the 2017 Scoping Plan acknowledges that:

> *"[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."*

Executive Order S-3-05. California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following reduction targets for GHG emissions:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80% below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Title 24 CCR Part 6 – California Energy Code. The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods.

Title 24 CCR Part 11 – California Green Building Standards Code. The California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission (CBSC). CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020.

4.6.2.3.d Regional

South Coast Air Quality Management District. In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, that could be applied by lead agencies. The working group has not provided additional guidance since release ofthe interim guidance in 2008 (see Section 4.6.3.1).

4.6.2.3.e Local

City of Perris Climate Action Plan (CAP). The City of Perris CAP was adopted by the City Council (Resolution Number 4966) on February 23, 2016. The CAP was developed to address global climate change through the reduction of harmful GHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals under AB 32. Perris's CAP, including the GHG inventories and forecasts contained within, is based on WRCOG's Subregional CAP (see Section 4.6.3.2).

Applicable City of Perris General Plan Goals and Policies

Conservation Element

Goal XI: The City shall lead the development community by example in green building, and energyand resource conservation practices.

Policy XI.B: The City shall actively reduce greenhouse gas emissions from public facilities throughout the community.

4.6.2.4 GHG Emissions Inventory

The CARB is responsible for maintaining and updating California's annual GHG Inventory per California Global Warming Solutions Act (AB 32) and H&SC §39607.4. The GHG inventory is a critical piece in demonstrating the state's progress in achieving the statewide GHG target. An updated emission inventory is published annually to include additional years and improved estimation methods. Based upon the 2019 GHG inventory data (i.e., the latest year for which dataare available) for the 2000- 2018 GHG emissions period, California emitted an average 425.3 million metric tons of CO_2e per year ($MMTCO_2e/yr$) or 425,320 Gg CO_2e (6.37% of the total United StatesGHG emissions).

4.6.3 Thresholds of Significance

As discussed in Subsection 4.6.1, the Project impacts to two (2) criteria pertaining to Greenhouse Gas Emissions will be analyzed. According to the IS, the Project would have a significant impact ifit would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

The potential greenhouse gas emissions changes in the environment are addressed in response tothe above thresholds in the following analysis.

4.6.3.1 GHG Significance Thresholds

In the absence of a formal GHG threshold established by the State, the SCAQMD has published the Interim CEQA Greenhouse Gas (GHG) Significance Thresholds, December 2008 (GHG Significance Thresholds) to assist local agencies with determining the impact of a project for CEQA. SCAQMD's objective in providing the GHG guidelines is to establish a performance standard that will

ultimately contribute to reducing GHG emissions below 1990 levels, and thus achieve the requirements of the California Global Warming Solutions Act (AB 32). The SCAQMD has held several GHG Significance Thresholds Stakeholder Working Group meetings where staff has presented updated recommendations that serve in addendum to the interim document.

The SCAQMD describes a five-tiered approach for determining GHG Significance Thresholds.

- **Tier 1 -** If a project is exempt from CEQA, project-level and cumulative GHG emissions are lessthan significant.

- **Tier 2 -** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.

For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment based on the following tiers.

- **Tier 3 -** Consists of screening values that are intended to capture 90 percent of the GHG emissions from projects. If a project's emissions are under the screening thresholds, then the project is less than significant. SCAQMD has presented two options that lead agencies could choose for screening values. Option #1 sets the thresholds for residential projects to 3,500 $MTCO_2e$/year, commercial projects to 1,400 $MTCO_2e$/year), and the mixed use to 3,000 $MTCO_2e$/year. Option #2 sets a single numerical threshold for all non-industrial projects of 3,000 $MTCO_2e$/year. The current SCAQMD staff recommendation is to use option #2 but allows lead agencies to choose option #1 if they prefer. Regardless of which option a lead agency chooses to follow, it is recommended that the same option is consistently uses for all projects.

Table 4.6-2, *SCAQMD Tier 3 GHG Screening Values*, shows the screening levels described inoption #2, which has been used previously in the City of Perris.

Table 4.6-2
SCAQMD Tier 3 GHG Screening Values

Land Use	Screening Value
Industrial Projects	10,000 $MTCO_2e$/year
Residential/Commercial Projects	3,000 $MTCO_2e$/year

- **Tier 4 -** includes three performance standard compliance options to demonstrate the project in significant for GHG emissions. If Project GHG emissions are expected to exceed 3,000 $MTCO_2e$ with all reasonably feasible mitigation measures the SCAQMD Tier 4 thresholds are applicable. Reference **Table 4.6-3, *SCAQMD Tier 4 Efficiency Thresholds***.

Compliance Option 1 consists of achieving a target percentage reduction in emission compared tothe business as usual (BAU) methodology. The project proponent would need to incorporate designfeatures into the Project and/or implement GHG mitigation measures to demonstrate a 30 percent reduction in GHG emissions below BAU that is consistent with the current applicable goals of AB 32 inthe State of the California. **Compliance Option 2** consists of early compliance with AB 32 through early implementation of CARB's Scoping Plan Measures. This option is intended for projects in sectors subject to the Scoping Plan Measures.

Compliance Option 3 consists of establishing efficiency-based performance standards at the planlevel (program-level projects such as general plans) and project level. Efficiency standards are based on the amount of GHG emissions ($MTCO_2e$/year) per Service Population (SP) which is defined as the sum of the residential and employment populations provided by a project.

Table 4.6-3
SCAQMD Tier 4 Efficiency Thresholds

Project Type	Efficiency Thresholds[1]	
	Target Year 2020	Target Year 2035
Plan (Program) Level	6.6 $MTCO_2e$/year/SP	4.1 $MTCO_2e$/year/SP
Project Level	4.8 $MTCO_2e$/year/SP	3.0 $MTCO_2e$/year/SP

SP = Service Population

- **Tier 5 –** involves implementing off-site mitigation or the purchasing of offsets to reduce GHG emissions to less than the proposed screening level. The project proponent would be required to provide offsets for the life of the project, which is defined as 30 years.

By complying with the SCAQMD GHG thresholds of significance, a project is considered to be in compliance with the applicable State GHG legislation.

4.6.3.2 City of Perris Climate Action Plan (CAP) Thresholds

The City of Perris CAP was adopted by the City Council (Resolution Number 4966) on February 23, 2016. The CAP was developed to address global climate change through the reduction of harmfulGHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals under AB 32. Perris's CAP, including the GHG inventories and forecasts contained within, is based on WRCOG's Subregional CAP. The Perris CAP utilized WRCOG's analysis of existing GHG reduction programs and policies that have already been implemented in the subregion and applicable best practices from other regions to assist in meeting the 2020 subregional reduction target. The CAP reduction measures chosen for the City's CAP were basedon their GHG reduction potential, cost-benefit characteristics, funding availability, and feasibility of implementation in the City of Perris. The CAP used an inventory base year of 2010 and included emissions from the following sectors: residential energy, commercial/industrial energy, transportation, waste, and wastewater. The CAP's 2020 reduction target is 15% below 2010 levels, and the 2035 reduction target is 47.5% below 2010 levels. The City of Perris is expected to meet these reduction targets through implementation of statewide and local measures. Beyond 2020, Executive Order S-03-05 calls for a reduction of GHG emissions to a level 80% below 1990 levels by 2050.

4.6.4 Potential Impacts

THRESHOLD a: Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact

The following assessment of greenhouse gas emissions is based on the latest version of the California Emissions Estimator Model (CalEEMod) and the Emissions Factor Model (EMFAC) as recommended by the South Coast Air Quality Management District (SCAQMD). The SCAQMD recommends only analyzing direct and indirect project GHG emissions generated within California and not life-cycle

emissions because the science to calculate life cycle emissions is not yet well established or defined adequately to apply to specific local projects.

4.6.4.1 Construction Emissions

Construction related emissions are expected from the following construction activities: Site Preparation; Grading; Building Construction; Paving; and Architectural Coatings. For purposes of analysis, construction of Project is expected to commence in December 2022 and will November 2023. The construction schedule utilized in the analysis represents a "worst-case" scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment shown in **Table 4.6-4, *Construction Equipment Assumptions***, represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines.*

Table 4.6-4
Construction Equipment Assumptions

Phase/Duration	Equipment[1]	Amount	Hours Per Day
Site Preparation (10 days)	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading (30 days)	Crawler Tractors	2	8
	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
Building Construction (200 days)	Cranes	2	8
	Crawler Tractors	4	8
	Forklifts	4	8
	Generator Sets	2	8
	Welders	2	8
Paving (20 days)	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coatings (60 days)	Air Compressors	1	8

Greenhouse gas emissions are estimated for on-site and off-site construction activity using CalEEMod. **Table 4.6-5, *Construction Greenhouse Gas Emissions***, shows the construction greenhouse gas emissions, including equipment and worker vehicle emissions for all phases of construction. Construction emissions are averaged over 30 years and added to the long-term operational emissions, pursuant to SCAQMD recommendations. CalEEMod annual GHG output calculations are provided in the *GHG Analysis*.

Table 4.6-5
Construction Greenhouse Gas Emissions

Year	Emissions ($MTCO_2e$)			
	CO_2	CH_4	N_2O	Total
2022	56.35	0.02	0.00	56.87
2023	1,093.93	0.18	0.03	1,107.57
Total	1,150.29	0.20	0.03	1,164.44
Amortized Construction Emissions[1]	**38.34**	**0.01**	**<0.01**	**38.81**

[1] The emissions are averaged over 30 years and added to the operational emissions, pursuant to SCAQMD recommendations.

The Project will result in a total of approximately 1,164.44 $MTCO_2e$/year from construction, area, energy, waste, and water usage. Even if all these emissions occurred in one year, they would still be under the SCAQMD Tier 3 industrial threshold of 10,000 $MTCO_2e$ and even the residential threshold of 3,000 $MTCO_2e$.

4.6.4.2 Operation Emissions

Operational activities associated with the Project will result in emissions of CO_2, CH_4, and N_2O from the following primary sources: Area Sources; Energy Sources; Mobile Sources; Onsite Cargo Handling Equipment; Water Supply, Treatment, and Distribution; and Solid Waste.

Electricity and natural gas are used by almost every project; however, the applicant has stated the Project would not utilize natural gas and therefore no air quality emissions from energy sources would occur. The CalEEMod defaults for Title 24 – Electricity and Lighting Energy were reduced by 30% in order to reflect consistency with the 2019 Title 24 standard. The Project GHG emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses based on the Project traffic study. For purposes of analysis, CalEEMod default parameters were used to determine mobile-source emissions from all non-industrial land uses. In order to determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length of 40 miles and an assumption of 100% primary trips for the proposed industrial land uses.

Indirect GHG emissions result from the production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used. Industrial land uses will result in the generation and disposal of solid waste. A percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters.

The annual GHG emissions associated with the operation of the proposed Project are summarized in **Table 4.6-6, *Project Operational GHG Emissions***. As shown in **Table 4.6-6**, construction and operation of the Project would generate a net total of approximately 2,539.85 $MTCO_2e$ per year and would not exceed the Tier 3 SCAQMD standard or threshold of 10,000 $MTCO_2e$ per year. Therefore, the Project will not result in significant impacts related to GHG emissions during Project construction and operation. The impact of the project would be less than significant.

Table 4.6-6
Project Operational GHG Emissions

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Annual construction-related emissions amortized over 30 years	38.34	<0.01	<0.01	38.81
Area Source	0.03	0.01	<0.01	0.03
Energy Source	184.71	0.16	0.05	185.69
Mobile Source	1,641.01	0.04	0.19	1,697.20
On-Site Equipment	101.50	0.03	0.00	102.32
Waste	66.43	3.93	0.00	164.58
Water Usage	217.23	2.64	0.06	302.21
Reductions from EV Charging Stations	(-49)			
Total CO_2e (All Sources)	**2,539.85**			
SCAQMD Threshold	**10,000.00**			
Exceeds SCAQMD Threshold?	**No**			

4.6.4.3 Summary of GHG Emissions and Impacts

The City of Perris does not have an adopted threshold of significance for GHG emissions. For CEQA purposes, the City has discretion to select an appropriate significance criterion, based on substantial evidence. The SCAQMD's adopted Tier 3 numerical threshold of 10,000 $MTCO_2e$/year for industrial stationary source emissions is selected as the significance criterion. The SCAQMD-adopted industrial threshold was selected by the City because the proposed Project is more analogous to anindustrial use than any other land use such as commercial or residential in terms of its expected operating characteristics. The Project proposes a warehouse use that will serve mid-stream functions in the goods movement chain between manufacturers and consumers, characteristic of an industrial operation. Further, analysis of the Project's traffic generation in this report is based onwarehouse and industrial land use categories. The 10,000 $MTCO_2e$ threshold has been used by many local government lead agencies for logistics projects throughout the SCAG region since the SCAQMD adopted this threshold for its own use. To ensure that the threshold is conservative in its application, although the SCAQMD uses their adopted 10,000 $MTCO_2e$/year threshold to determine the significance of stationary source emissions for industrial projects, the 10,000 $MTCO_2e$/year threshold used in this CEQA document is applied to all sources of Project-related GHG emissions whether stationary source, mobile source, area source, or other.

Use of this threshold is also consistent with guidance provided in the CAPCOA *CEQA and Climate Change* handbook, so the City has opted to use a non-zero threshold approach based on Approach2 of the handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90% of emissions from future development.The latest threshold developed by SCAQMD using this method is 10,000 $MTCO_2e$/year based on the review of 711 CEQA projects.

The Project will result in approximately 2,539.85 $MTCO_2e$/year from construction, area, energy, waste, and water usage so the Project would not exceed the SCAQMD's numeric threshold of 10,000 $MTCO_2e$. Therefore, the Project would not have the potential to result in a cumulatively considerable

impact with respect to GHG emissions.

THRESHOLD b: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Less than Significant Impact

The Project could have the potential to conflict with applicable plans, policies or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. The following evaluates the Project's consistency with SB 32 (2017 Scoping Plan) and the City's CAP.

4.6.4.4 Consistency with the CARB Scoping Plan

The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. **Table 4.6-7, *2017 Scoping Plan Consistency***, summarizes the project's consistency with the 2017 Scoping Plan. **Table 4.6-7** demonstrates that the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project. Recent studies also show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40% below 1990 levels by 2030.

Table 4.6-7
2017 Scoping Plan Consistency

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure gridreliability.	CPUC, CEC, CARB	Consistent. The Project would use energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		Consistent. The Project would be constructed in compliance with current California Building Code requirements. Specifically, new buildings must achieve compliance with 2019 Building and Energy Efficiency Standards andthe 2019 California Green Building Standardsrequirements. The proposed Project includesenergy efficient field lighting and fixtures that meet the current Title 24 Standards throughout the Project Site and would be a modern development with energy efficient boilers, heaters, and air conditioning systems.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures asdescribed in IRPs.		

Action	Responsible Parties	Consistency
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore complywith the strategy.
At least 4.2 million zero emission and plug-in hybrid light-duty EVs by 2030.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore complywith the strategy.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstructor interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.
Medium- and Heavy-Duty GHG Phase 2.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHGPhase 2. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will thereforecomply with the strategy.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_X standard.		**Not applicable.** This measure is not within thepurview of this Project.

Action	Responsible Parties	Consistency
Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	**Not applicable.** This Project is not responsible for implementation of SB 375 and would therefore not conflict with this measure
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		**Consistent.** This Project would not obstruct or interfere with implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	**Not applicable.** The Project is not within the purview of SB 375 and would therefore not conflict with this measure.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	**Consistent.** The Project would not obstructor interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR,	**Consistent.** The Project would not obstruct or interfere with agency efforts to develop pricing policies to support low-GHG transportation.

Action	Responsible Parties	Consistency
	SGC, CARB	
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	**Consistent.** This measure would apply to all trucks accessing the Project sites, this may include existing trucks or new trucks that are part of the statewide goods movement sector. The Project would not obstruct or interfere with agency efforts to Improve freight system efficiency.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		**Not applicable.** This measure is not within thepurview of this Project.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	**Consistent.** When adopted, this measure would apply to all fuel purchased and used by the Project in the state. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, California State Water Resource Control Board (SWRCB), Local Air Districts	**Not applicable.** This measure is not within thepurview of this Project.
50% reduction in black carbon emissions below 2013 levels.		
By 2019, develop regulations and programs to support organic waste landfill reduction goalsin the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	**Not applicable.** This measure is not within the purview of this Project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Consistent.** The Project would be required to comply with any applicable Cap-and- Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap- and-Trade Program.

Action	Responsible Parties	Consistency
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base asa net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	**Not applicable.** This measure is not within the purview of this Project. However, the Project site is not an identified property that needs to be conserved.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.		**Consistent.** The Project site is vacant disturbed property and does not comprise an area that would effectively provide for carbon sequestration. The Project would not obstruct or interfere agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		**Consistent.** To the extent appropriate for the proposed industrial buildings, wood products would be used in construction, including for the roof structure. Additionally, the proposed project includes landscaping, including shrubs and trees.
Establish scenario projections to serve as the foundation for the Implementation Plan.		**Not applicable.** This measure is not within thepurview of this Project.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	**Not applicable.** This measure is not within thepurview of this Project.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not applicable.** This measure is not within the purview of this Project.

Source: California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017 and CARB, Climate Change Scoping Plan, December 2008.

4.6.4.5 Consistency with the City's Climate Action Plan

The City of Perris adopted its Climate Action Plan (CAP) in February 2016. The measures identified in the CAP represent the City's actions to achieve the GHG reduction targets of AB 32 for target year 2020. Local measures incorporated in the CAP include:

- An energy measure that directs the City to create an energy action plan to reduce energy consumption citywide;

- Land use and transportation measures that encourage alternative modes of transportation (walking, biking, and transit), reduce motor vehicle use by allowing a reduction in parking supply, voluntary transportation demand management to reduce vehicle miles traveled, and land use strategies that improve jobs-housing balance (increased density and mixed-use); and
- Solid waste measures that reduce landfilled solid waste in the City.

The Project would comply with the CAP through compliance with the PVCCSP EIR mitigation measures for air pollutant emissions (**PVCCSP MM Air 2**, **Air 4**, **Air 7**, **Air 11**, **Air 13**, **Air 14**, an**Air 19**, and **Air 20** as outlined below). These measures would also further reduce the Project's contribution of GHG emissions from both construction and operation. The Project would not conflict with local strategies and state/regional strategies listed in the Perris CAP.

The Project is also subject to California Building Code requirements. New buildings must achieve the 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements, which include energy conservation measures and solid waste reduction measures. While the Project does not include reduced parking, increased density, or a mixed- use development, it would provide sidewalks, bike racks, pedestrian walkways, and TDM measures to encourage the use of alternative modes of transportation (walking, biking, and transit). Therefore, the Project would not conflict with applicable GHG reduction measures in theCAP.

SUMMARY. The preceding analysis has demonstrated the Project will be consistent with the 2017 CARB Scoping Plan and the City's CAP. Therefore, the Project will not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts will be less than significant, and no mitigation is required.

4.6.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

None are required.

Mitigation Measure(s)

The proposed Project is required to comply with the following PVCCSP EIR mitigation measures as presented in the IS. (NOTE: MM Air 12 was included in the IS, it will not be carried over to theEIR as the Project is not proposing any refrigerated warehouse space, and the applicant alreadycomplied with MM Air 18 regarding consultation with RTA on a bus turnout.) Additional mitigationis not required.

PVCCSP MM Air 2 Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting ofconstruction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

PVCCSP MM Air 4 Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.

PVCCSP MM Air 7 During construction, ozone precursor emissions from mobile construction equipment shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers' specifications to the satisfaction of the City of Perris Building Division. Equipment maintenance records and equipment design specification data sheets shall be kept on- site during construction. Compliance with this measure shall be subject to periodic inspections by the City of Perris Building Division.

PVCCSP MM Air 11 Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.

PVCCSP MM Air 13 In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other state programs that restrict operations to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero- Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NOx] funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants would be required to use those funds, if awarded.

PVCCSP MM Air 14 Each implementing development project shall designate parking spaces for high-occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.

PVCCSP MM Air 18 *Prior to the approval of each implementing development project, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the implementing development project that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the implementing development project, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalks and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.*

NOTE: *The Initial Study for this Project indicated that early consultation with RTA had already taken place, so the Project has complied with the pre-approval portion of* ***PVCCSP MM Air 18****. However, specific input regarding local bus stops from the RTA is presented in Section 4.10, Transportation, in this EIR.*

PVCCSP MM Air 19 In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris Building Division) prior to conveyance of applicable streets.

PVCCSP MM Air 20 Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All reductions will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.

4.6.6 Cumulative Impacts

GHG emissions are assumed to be cumulative because an individual project such as the proposed Project cannot generate enough greenhouse gas emissions to effect a discernible change in global climate. For example, statewide GHG source emissions totaled about 425.3 $MMTCO_2e$ in 2019. The proposed Project will generate less than annual equivalent emission of 9,510.65 $MTCO_2e$ (from **Table 4.6-6**), or about 0.002% of the 2019 amount.

A project may contribute to global climate change if it contributes a significant amount of greenhouse gases. However, the Project's construction and operational emissions will be below applicable significance threshold (SCAQMD Tier 3 Industrial Threshold of 10,000 $MTCO_2e$/year). Therefore, the proposed Project would not result in significant GHG impacts nor would it result in a substantial increase in the severity of GHG impacts. In addition, the Project will implement **PVCCSP EIR Mitigation Measures MM Air 2**, **Air 4**, **Air 7**, **Air 11**, **Air 13**, **Air 14**, **Air 19** and **Air 20** which will help further reduce potential Project GHG emissions. Therefore, Project-related GHG emissions are not considered to be cumulatively considerable and would not result in a significant impact on global climate change. Project GHG emissions are a less than significant impact.

4.6.7 Unavoidable Significant Adverse Impacts

As stated above, an individual project cannot generate enough greenhouse gas emissions to effect a discernible change in global climate. In this case, the proposed Project will not make a significant contribute to global climate change by its incremental contribution of greenhouse gasses. Project-related GHG emissions are not considered to be significant or adverse and will not result in an unavoidable significant adverse impact on global climate change.

4.7 HYDROLOGY AND WATER QUALITY

4.7.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of hydrology and waterquality from implementation of the Project. The Hydrology and Water Quality Section, of the Initial Study (IS, Subchapter 8.3, *Initial Study*) prepared as part of the Notice of Preparation for the EIR posed the following questions:

a. Would the Project violate any water quality standards or waste dischargerequirements or otherwise substantially degrade surface or ground water quality?
b. Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?
c. i. Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or throughthe addition of impervious surfaces, in a manner which would result in substantialerosion or siltation on- or off-site?
c.ii. Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or throughthe addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?
Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or throughthe addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
c.iii. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?
d. Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?
e. Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Based on the analysis in the IS it was determined that all of the issue areas related to hydrology and water quality (in the questions asked above) would be further analyzed in the DEIR.

In addition, **Standard Conditions SC-HYD-1** through **SC-HYD-5** and **SC-USS-1** shall be carriedover to this DEIR.

No mitigation measures were presented in the IS that shall be carried over to this DEIR.

In addition to the IS, the following sources were used in the evaluation presented in this Subchapter:

- *Preliminary Drainage Report For SWC of Ramona and Perris DPR 19-00012 Perris, CA*,prepared by United Engineering Group CA, Inc., 7-2021 (*Drainage Report*, **Appendix L1**)
- *Project Specific Water Quality Management Plan, SWC Ramona & Perris Industrial (DPR19-00012)*, prepared by United Engineering Group CA, Inc., 7-29-2021 (*WQMP*, **Appendix L2**)
- *Geotechnical Update and Percolation Test Report, Warehouse Building, Southwest Corner of Ramona Expressway and Perris Boulevard*, prepared by Geocon West, Inc. 4-28-2020 (*Geotechnical Update,* **Appendix C1**)

- *Geotechnical Investigation, Ramona Crossings, Ramona Expressway and Perris Boulevard, Perris, CA*, prepared by Geocon Inland Empire, Inc., 8-30-2006 (*Geo Investigation*, **Appendix C2**)
- *Revised Phase I Environmental Site Assessment, 155 Ramona Expressway, APN: 303- 060-20, Perris, CA*, prepared by Krazan and Associates, Inc. dated 3-26-2020 *Phase I ESA,* (**Appendix E**)
- Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map (FIRM), Panel 06065C1430H in the City of Perris. FEMA website https://msc.fema.gov/portal/home
- City of Perris General Plan - Final Environmental Impact Report https://www.cityofperris.org/home/showpublisheddocument/451/637203139698630000
- *Final Environmental Impact Report Perris Valley Commerce Center Specific Plan* https://www.cityofperris.org/home/showpublisheddocument/13874/63745552238173000 0
- Ordinance No. 458 (An Ordinance of the County of Riverside Regulating Special Flood Hazard Areas and Implementing the National Flood Insurance Program, adopted by the City of Perris as Municipal Code Title 15, Floodplain Regulations) https://library.municode.com/ca/perris/codes/code_of_ordinances?nodeId=COOR_TIT15 FLRE
- *Metropolitan Water District (MWD), 2020 Urban Water Management Plan* prepared byMWD (MWD 2020 UWMP), 3-2021 https://www.mwdh2o.com/media/18118/draft_metropolitan_2020_uwmp_march_2021.p df
- *Eastern Municipal Water District, 2020 Urban Water Management Plan*, prepared byEMWD (EMWD 2020 UWMP), 7-1-2021 https://www.emwd.org/post/urban-water-management-plan
- U.S. Environmental Protection Agency (USEPA), 2012. National Pollutant Discharge Elimination System (NPDES), Integrated Planning for Municipal Stormwater and Wastewater. USEPA website https://www.epa.gov/npdes/integrated-planning-municipal-stormwater-and-wastewater

Notice of Preparation (NOP)/Scoping Comments

During the NOP period, a letter was received from the Riverside County Flood Control and Conservation District dated 06/03/2021 that made the following comments regarding hydrology, drainage, flood control, and regional improvements:

- This project involves District proposed Master Drainage Plan facilities, namely, Perris Valley Master Drainage Plan (MDP) Lateral E-2. The District will accept ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and Districtplan check, and inspection will be required for District acceptance. Plan check, inspection, andadministrative fees will be required.
- The project is located within the limits of the District's Perris Valley Master Drainage Plan forwhich drainage fees have been adopted. Applicable fees should be paid prior to issuance of grading or building permits.
- An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely Perris Valley MDP Lateral E and E-1.
- The project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board.
- 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 otherinformation required to meet FEMA requirements, and should further require the applicant to 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.
- If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements.

No comments regarding hydrology and water quality were received at the Scoping Meeting heldon May 19, 2021.

Response: *The applicable information about the Perris Valley Master Drainage Plan has been incorporated into this section and evaluated relative to potential Project impacts - see Impact Section 4.7.4 (Threshold c) for more information. The Project will also obtain permits and approvals under regional water quality permitting as needed – see Impact 4.7.4 (Threshold a) formore information. The Project is not within an identified flood zone so no FEMA map revisions orpermitting is required. The site also does not contain any natural drainages or resources of concern to federal or state resource agencies, and no permitting related to modifications to suchresources is required.*

4.7.2 Environmental Setting

4.7.2.1 Drainage and Water Quality

Regional Drainage

The Project site is located in the Perris Valley within the Santa Ana River watershed. The PerrisValley is situated just north of the Menifee Valley between the Santa Rosa and San Jacinto Mountains to the east and Santa Ana Mountains to the west and south. The uplands surrounding the valley are predominately sedimentary rocks consisting of sandstone, conglomerate, and interbedded mudstone and siltstone as well as granitic rocks. The Menifee/Perris Valley has beenfilled with a variable thickness of relatively young, heterogeneous alluvial deposits. The Perris Valley, in the vicinity of the Project site, is drained by the Salt Creek Flood Control Channel and its tributaries that flow toward the Railroad Canyon Reservoir. Regional drainage flows relative to the Project site are shown in **Figure 4.7-1, *Local Receiving Waters***. Portions of the Salt Creek Flood Control Channel have been realigned and channelized as development has occurred.

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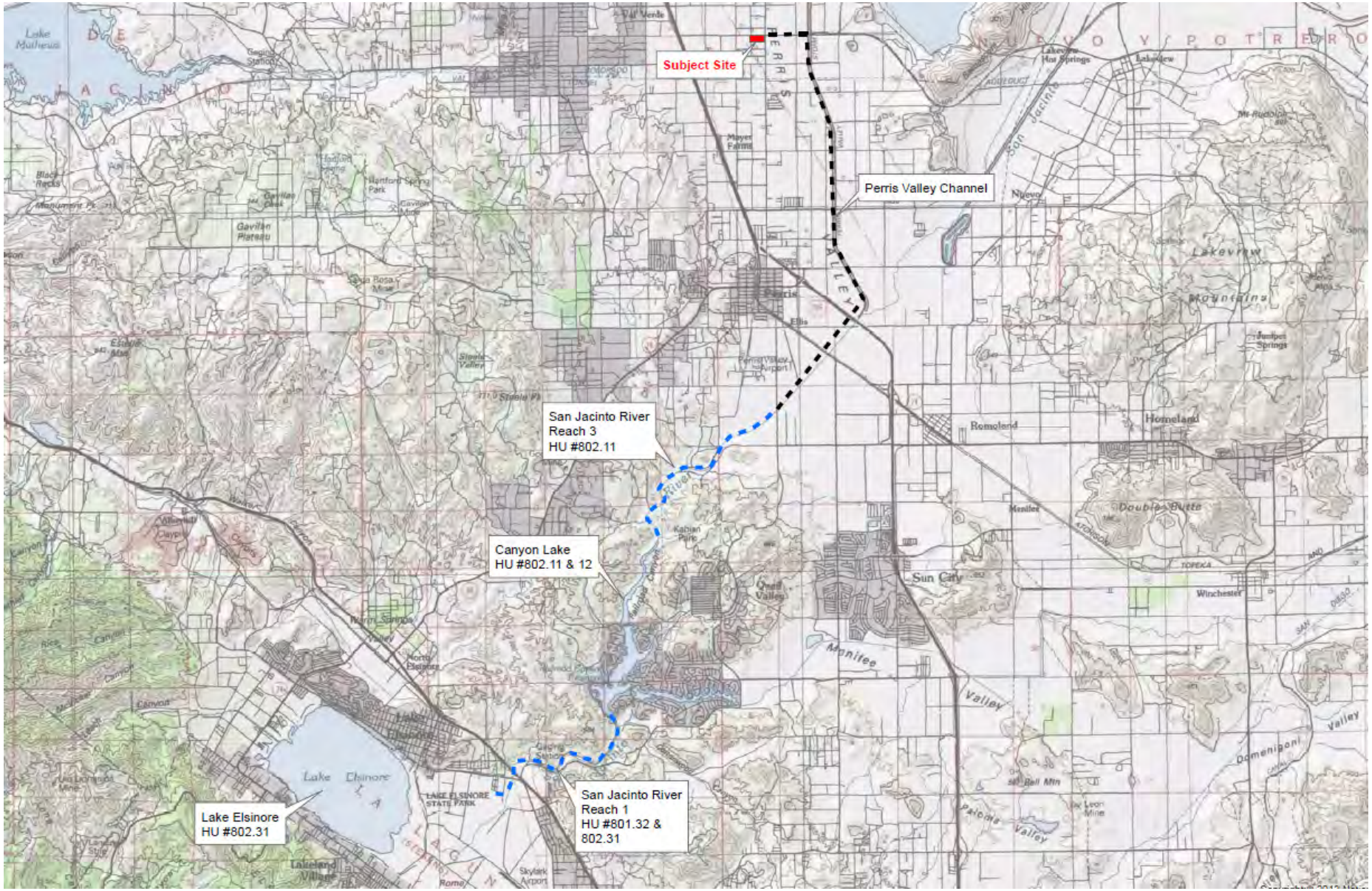
Figure 4.7-1
Local Receiving Waters



Source: WQMP (**Appendix L1**)

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Local Drainage

The Project site is currently vacant and undeveloped. It is relatively flat with a slope of about 0.3percent and drains gradually west to east over uneven terrain. The general area supports existing or planned suburban development and the site is bordered by developed properties. There is aninformal flow path that enters the site from the storm drain outlet along the western edge of the site. That storm drain outlets the flows from Indian Avenue and provides overflow for the existingretention basin of the Lowes center west of the site which is the only source of surface flow that directly affects the site.

The site is within the Perris Valley Master Drainage Plan (MDP) planning area, with regional lines located north(Line E) and east (Line E-01) of the property. As previously indicated, there is an existing storm drain outlet at Indian Avenue. Two 18-inch reinforced concrete pipes (RCPs) outlet into a small informal surface channel that traverses the site from west to east before entering a lateral to LineE-01. The Indian Avenue outlet conveys the offsite flow from the Lowes center to the west, as well as the Indian Avenue sheet flow via a catch basin at the southeast corner of Indian and Ramona Expressway. The drainage report for the Lowes Center indicates a peak runoff from the18-inch pipes of 39 cubic feet per second (cfs). The property to the south blocks any potential offsite flow in that direction.

Runoff from the region west of the site will eventually be collected and conveyed as part of the Line E system. That system is not yet in place and as such regional flows drain easterly along Ramona Expressway. The Perris Valley Commerce Center – Line E Update identifies aconcentration point at the corner of Indian and Ramona with a peak flow of 1,064 cfs which splits north and south of Ramona Expressway. At that flow rate, there is inundation of all intersections in the immediate area, as confirmed by the City of Perris in recent discussions.

Flooding

The site is mapped in an area of minimal flood hazard as per information provided by the Federal Emergency Management Agency Flood Map Service Center, Flood Map 06065C1430H, effectiveAugust 18, 2014. The Flood Insurance Rate Map shows this site falls within Zone X which denotes areas determined to be outside of the 0.2% annual chance floodplain. Local flood zonesare shown in **Figure 4.7-2, *Local Flood Zones***.

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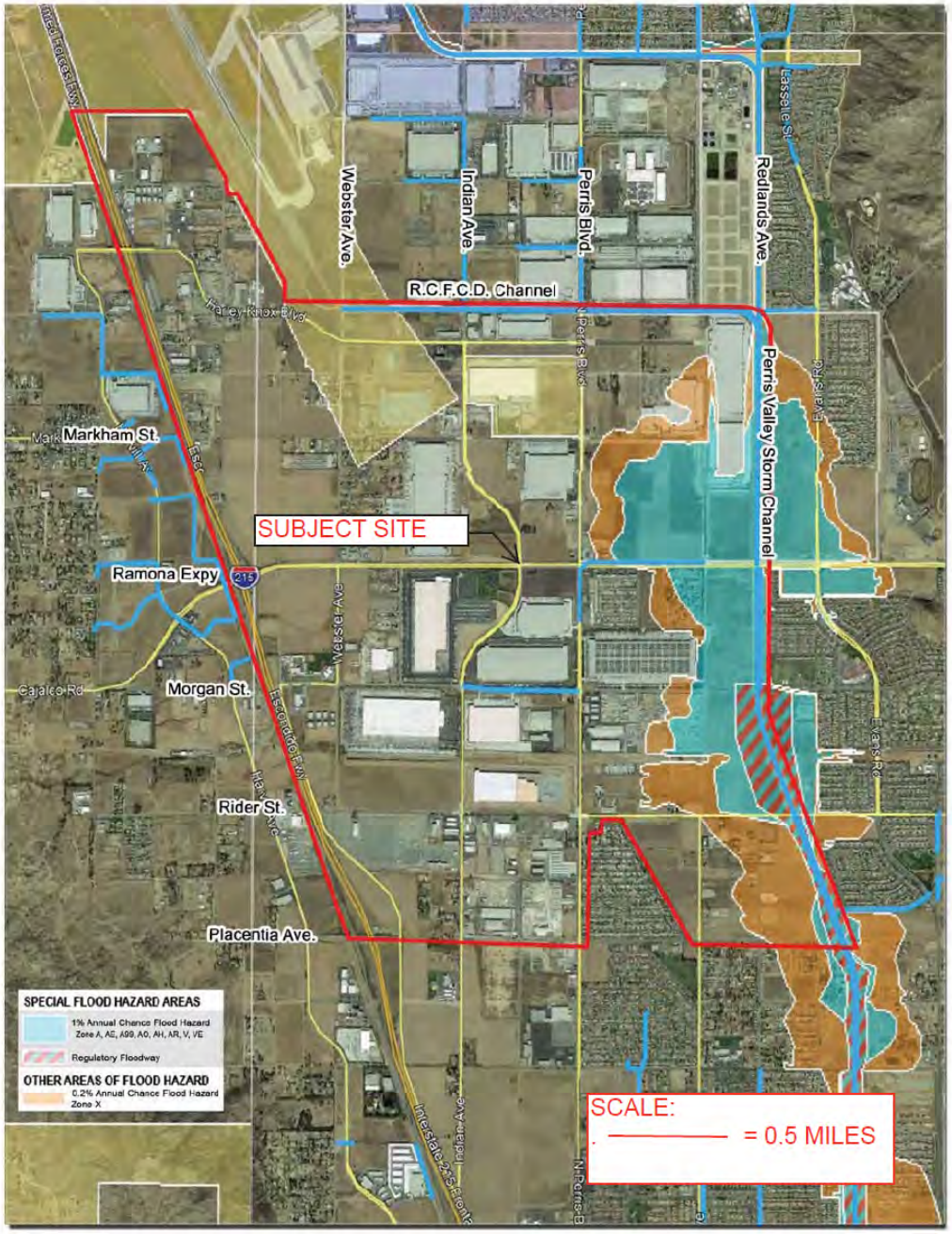
Figure 4.7-2
Local Flood Zones



Source: WQMP (**Appendix L1**)

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4.7.2.2 Groundwater Resources and Quality

The *Geotechnical Update* indicates that according to the California Department of Water Resources' Water Data Library, well data recorded within the last ten years indicates the depth to groundwater ranges from 9 and 53 feet below ground surface within two miles of the site. Although groundwater was not encountered during the geotechnical field investigation, it is not uncommon for seepage conditions to develop as perched water and seepage are dependent on seasonal precipitation, irrigation, land use, among other factors, and vary as a result. The *Geotechnical Update* concluded that proper surface drainage would be important to protect the proposed development in the future.

Additionally, the *Phase I ESA* indicated the depth to groundwater in the vicinity of the subject site is reported to be approximately 80 feet below ground surface (bgs). The groundwater flow direction in the Project area is reported to be generally towards the southwest to southeast.

4.7.2.3 Water Quality

Water quality in this region is regulated under the jurisdiction of the Santa Ana Regional Water Quality Control Board (SARWQCB). Surface water quality may be impacted by both point source and non-point source discharges of pollutants. Point source discharges are regulated through National Pollution Discharge Elimination System (NPDES) permitting. Non-point source pollution is now considered to be the leading cause of water quality impairments in the state, as well as the entire nation. Non-point source pollution is not as readily quantifiable as pollution that is derived from point sources, since it occurs through numerous diffuse source locations. Rainwater, snowmelt, or irrigation water can pick up and transport pollutants as it moves across land or paved surfaces, and these pollutants may ultimately be discharged into streams, lakes, the ocean, and groundwater. Urban areas and agriculture are both considered to substantially contribute to nonpoint source pollution in surface waters; pollutants associated with agricultural areas include fertilizers, pesticides, fecal coliform, salts, and sediments. Pollutants associated with urban areas include pathogens, organic compounds, sediment, oil and grease, metals, trash and debris, and nutrients.

The water quality of receiving waters downstream of the Project site varies due to historic development within the San Jacinto Subbasin of the Santa Ana River Watershed. **Table 4.7-1, *Local Receiving Waters***, provides a list of the designated beneficial uses and any known pollutants (impairments) in these downstream waters. The four (4) downstream surface water locations are: San Jacinto River (Reach 3 HU #802.11); Canyon Lake (HU #802.11 & 12); San Jacinto River (Reach 1 HU #801.32 & #802.31); and Lake Elsinore (HU #802.31). The locations of these downstream bodies are shown in the previous **Figure 4.7-1, *Local Receiving Waters***.

Table 4.7-1
Local Receiving Waters

Receiving Waters[1]	EPA Approved 303(d) List Impairments[2]	Designated Beneficial Uses[3]	Proximity to RARE Beneficial Uses
San Jacinto River - Reach 3 (HU #802.11)	None	AGR, GWR, REC1, REC2, WARM, WILD	Not designated as RARE
Canyon Lake (HU #802.11 & 12)	Nutrients & Pathogens	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not designated as RARE
San Jacinto River - Reach 1 (HU #801.32 & #802.31)	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not designated as RARE
Lake Elsinore (HU #802.31)	Mercury, Nutrients, Organics, Low Dissolved Oxygen PCBs, Sediment Toxicity, Sedimentation/Siltation, Unknown Toxicity	REC1, REC2, WARM, WILD	Not designated as RARE

Source: Basin Plan per the State Water Resources Control Board website 2021
[1] HU = Hydrographic Unit
[2] Polychlorinated Biphenyls
[3] See description of beneficial use acronyms in the text following the table

Beneficial Uses. The beneficial uses of water are defined in the Basin Plan as the uses necessary for the survival or well-being of humans, plants, and wildlife. As listed in **Table 4.7-1**,the existing beneficial uses designated by the RWQCB in the Basin Plan for the four identified reaches are as follows (in alphabetical order):

- Agricultural Supply (AGR) - Includes uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.
- Groundwater (GRW) - Uses of water for natural or artificial recharge of ground water for purposes of future extraction, maintenance of water quality, or halting of saltwater intrusion into freshwater aquifers.
- Municipal and Domestic Supply (MUN) – Includes uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.
- Rare, Threatened, or Endangered Species (RARE) Uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.
- Water Contact Recreation (REC1) – Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, whitewater activities, fishing, or use of natural hot springs.
- Non-Contact Water Recreation (REC2) – Uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tide pool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
- Warm Freshwater Habitat (WARM) – Includes uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish or wildlife, including invertebrates.
- Wildlife Habitat (WILD) – Uses of water that support terrestrial ecosystems including, but notlimited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

Table 4.7-1 shows that all of the downstream receiving bodies are used for contact and non- contact recreation as well as providing habitat for aquatic and terrestrial wildlife associated with them ("WARM" and "WILD"). The table also shows none of the downstream bodies themselves are considered habitat for listed or otherwise sensitive species ("RARE"). In uncontrolled conditions, varying amounts of sediment and urban pollutants such as nutrients, pesticides, motor oil, antifreeze, gasoline, brake dust, detergents, and trash can degrade the water quality of stormwater flows**.**

4.7.2.4 Regulatory Setting

4.7.2.4.a Federal

Federal Clean Water Act

The Federal Water Pollution Control Act (also known as the Clean Water Act [CWA]) is the principal statute governing water quality. The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and gives the Environmental Protection Agency (EPA) the authority to implement pollution control programs, such as setting wastewater standards for industry. The statute's goal is to end all discharges entirely and to restore, maintain, and preserve the integrity of the nation's waters. The CWA regulates both the direct and indirect discharge of pollutants into the nation's waters. The CWA sets water quality standards for all contaminants in surface waters and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and stormwater discharges, requires states to establish site-specific water quality standards for navigable bodies of water, and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The CWA also funded the construction of sewage treatment plants and recognized the need for planning to address nonpoint sources of pollution. Section 402 of the CWA requires a permit for all point source (a discernible, confined, and discrete conveyance, such as a pipe, ditch, or channel) discharges of any pollutant (except dredge or fill material) into waters of the U.S.

Safe Drinking Water Act

The Federal Safe Drinking Water Act (SDWA) provides regulations on drinking water quality in Perris. The SDWA gives the U.S. Environmental Protection Agency (EPA) the authority to set drinking water standards, such as the National Primary Drinking Water regulations (NPDWRs or primary standards). The NPDWRs protect drinking water quality by limiting the levels of specific contaminants that are known to occur or have the potential to occur in water and can adversely affect public health. All public water systems that provide service to 25 or more individuals are required to satisfy these legally enforceable standards. Water purveyors must monitor for these contaminants on fixed schedules and report to the EPA when a maximum contaminant level (MCL) has been exceeded. MCL is the maximum permissible level of a contaminant in water that is delivered to any user of a public water system. Drinking water supplies are tested for a variety of contaminants, including organic and inorganic chemicals (e.g., minerals), substances that are known to cause cancer (e.g., carcinogens), radionuclides (e.g., uranium and radon), and microbial contaminants (e.g., coliform and *Escherichia coli*). Changes to the MCL list are typically made every three years as the EPA adds new contaminants, or based on new research or new case studies, revises MCLs for some contaminants. The California Department of Health Services, Division of Drinking Water and Environmental Management, is responsible for implementation of the SDWA in California.

National Pollutant Discharge Elimination System

Under the NPDES program promulgated under Section 402 of the CWA, all facilities that discharge pollutants from any point source into waters of the U.S. are required to obtain an NPDES permit. The

term pollutant broadly includes any type of industrial, municipal, and agricultural waste discharged into water. Point sources are discharges from publicly owned treatment works (POTWs), from industrial facilities, and associated with urban runoff. Though the NPDES program addresses certain specific types of agricultural activities, the majority of agricultural facilities are defined as nonpoint sources and are exempt from NPDES regulation. Pollutant contributors come from direct and indirect sources. Direct sources discharge directly to receiving waters, and indirect sources discharge wastewater to POTWs, which in turn dischargeto receiving waters. Under the national program, NPDES permits are issued only to direct point source discharges. The National Pretreatment Program addresses industrial and commercial indirect dischargers.

Municipal sources are POTWs that receive primarily domestic sewage from residential and commercial customers. Specific NPDES program areas applicable to municipal sources are the National Pretreatment Program, the Municipal Sewage Sludge Program, Combined Sewer Overflows, and the Municipal Storm Water Program. Non-municipal sources include industrial and commercial facilities. Specific NPDES program areas applicable to these industrial/commercial sources are Process Wastewater Discharges, Non-Process Wastewater Discharges, and the Industrial Storm Water Program. NPDES issues two basic permit types, individual and general. Also, the EPA has recently focused on integrating the NPDES program further into watershed planning and permitting.

The NPDES has a variety of measures designed to minimize and reduce pollutant discharges. All counties with storm drain systems that serve a population of 50,000 or more, as well as construction sites one acre or more in size, must file for and obtain an NPDES permit. Another measure for minimizing and reducing pollutant discharges to a publicly owned conveyance or system of conveyances (including roadways, catch basins, curbs, gutters, ditches, man-made channels and storm drains, designed or used for collecting and conveying stormwater) is the EPA's Storm Water Phase II Final Rule. The Phase II Final Rule requires an operator (such as aCity) of a regulated small municipal separate storm sewer system (MS4) to develop, implement, and enforce a program (e.g., best management practices [BMPs], ordinances, or other regulatorymechanisms) to reduce pollutants in post-construction runoff to the City's storm drain system from new development and redevelopment projects that result in the land disturbance of greater than or equal to one acre. The City of Perris Public Works Department is the local enforcing agency of the MS4 NPDES permit.

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code sections 13000 et seq.) is the basic water quality control law for California. Under this act, the State Water Resources Control Board (SWRCB) has ultimate control over state water rights and water quality policy. In California, the EPA has delegated authority to issue NPDES permits to the SWRCB. The state is divided into nine regions related to water quality and quantity characteristics. The SWRCB, through its nine Regional Water Quality Control Boards carries out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a Water Quality Control Plan or Basin Plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water quality conditions and problems. The City of Perris, including the Project site, is in the Santa Ana River Basin, Region 8, in the Upper Santa Ana Watershed. The Water Quality Control Plan for the Santa AnaRiver Basin (8) was updated in 2008. (At their January 21, 2014 meeting, the State Water Resources Control Board adopted Resolution No. 2014-0005, approving amendments to the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) that revise recreational standards for inland fresh surface waters in the Region. The Regional Board had adopted these amendments under Resolution No. R8-2012-0001 on June 15, 2012. The amendments must be approved by the Office of Administrative Law (OAL) and the United States Environmental Protection Agency (USEPA) to become effective.) This Basin Plan gives direction on the beneficial uses of the state waters within Region 8, describes the water quality that must be maintained to support such

uses, and provides programs, projects, and other actions necessary to achieve the standards established in the Basin Plan.

Approximately 1.25 square miles of the southeast corner of the City is in the Santa Margarita River watershed in the San Diego RWQCB Region (Region 9). However, Order No. R8-2013- 0024, issued by the Santa Ana RWQCB in 2013, placed the entire City of Perris within the jurisdiction of the Santa Ana RWQCB regarding the MS4 Permit regulating discharges to municipal storm drainage systems in the part of Riverside County in Region 8.

National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate the Federal Emergency Management Act (FEMA) to evaluate flood hazards. FEMA provides Flood Insurance Rate Maps (FIRMs) for local and regional planners to promote sound land use and floodplain development, identifying potential flood areas based on the current conditions. To delineate a FIRM, FEMA conducts engineering studies referred to as Flood Insurance Studies (FISs). The most recent FIS and FIRM was completed and published for the County of Riverside in August 2008. Using information gathered in these studies, FEMA engineers and cartographers delineate Special Flood Hazard Areas (SFHAs) on FIRMs. The Project site is located within Zone A (Special flood hazard areas subject to inundation by the 1% annual chance flood), as identified on FIRM Panel 2070 of 3805, Map Number 06065C2070H, Revised August 18, 2014.

The Flood Disaster Protection Act (FDPA) requires owners of all structures in identified SFHAs to purchase and maintain flood insurance as a condition of receiving federal or federally related financial assistance, such as mortgage loans from federally insured lending institutions. Community members within designated areas are able to participate in the National Flood Insurance Program (NFIP) afforded by FEMA. The NFIP is required to offer federally subsidized flood insurance to property owners in those communities that adopt and enforce floodplain management ordinances that meet minimum criteria established by FEMA. The National Flood Insurance Reform Act of 1994 further strengthened the NFIP by providing a grant program for state and community flood mitigation projects. The act also established the Community Rating System, a system for crediting communities that implement measures to protect the natural and beneficial functions of their floodplains, as well as managing erosion hazards.

4.7.2.4.b State

Water Quality Control Plan, Santa Ana River Basin

Under the Porter-Cologne Water Quality Act discussion, the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) establishes water quality standards for groundwater and surface water in the basin; that is, standards for both beneficial uses of specific water bodies and the water quality levels that must be maintained to protect those uses. The Basin Plan includes an implementation plan describing actions by the Santa Ana RWQCB and others needed to achieve and maintain the water quality standards. The Santa Ana RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface waters. The Basin Plan lists water quality problems for the region, along with causes, where they are known. Plans for improving water quality are included for water bodies with quality below the levels needed to enable all the beneficial uses of the water.

Storm Water Pollution Prevention Plans (SWPPP)

Pursuant to the CWA, in 2009, the SWRCB issued a statewide general NPDES permit for stormwater

discharges from construction sites (NPDES No. CAS000002). Under this Statewide General Construction Activity permit, discharges of storm water from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for stormwater discharges or to be covered by the General Permit. Coverage by the General Permit is accomplished by completing and filing a Notice of Intent with the SWRCB and developing and implementing a SWPPP. Each applicant under the General Construction Activity Permit must ensure that a SWPPP is prepared prior to grading and is implemented during construction. The SWPPP must list BMPs implemented on the construction site to protect stormwater runoff and must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a monitoring plan if the site discharges directly to a water body listed on the state's 303(d) list of impaired waters.

4.7.2.4.c Local

Applicable City of Perris General Plan Goals and Policies

The Conservation and Safety Elements of the City General Plan are related to hydrology (including flooding) and water quality:

Conservation Element

Goal VI – Water Quality. Achieve regional water quality objectives and protect the beneficial uses of the region's surface and groundwater.

Policy VI.A: Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).

Goal VIII – Sustainable Future. Create a vision for energy and resource conservation and the use of green building design for the City, to protect the environment, improve quality of life, and promote sustainable practices.

Policy VIII.A: Adopt and maintain development regulations that encourage water and resource conservation.

Safety Element

Goal I: Reduced risk of damage to property or loss of life due to a natural or man-made disasters

Policy I.B: Flooding. The City of Perris shall restrict future development in areas of high floodhazard until it can be shown that risk is or can be mitigated.

City Municipal Code

The City of Perris has adopted Chapter 14.22 of the City's Municipal Code (Storm Water/Urban Runoff Management and Discharge Control), which includes the requirement for preparation and adoption of a Project-Specific Water Quality Management Plan (WQMP). A site specific WQMP identifies BMPs to ensure that water quality of receiving waters is not degraded following development. New projects submitted to City are required to submit a project specific WQMP prior to the first discretionary project approval or permit. Project applicants may submit a preliminary project specific WQMP for discretionary project approval (land use permit); however, a final version must be submitted for review and approval prior to the issuance of any grading or building permits. It should be noted that a preliminary project-specific WQMP has been prepared and submitted to the City and this preliminary project-specific WQMP is being used for this analysis.

4.7.3 Thresholds of Significance

As discussed in Subsection 4.7.1, the Project impacts to eight (8) criteria pertaining to hydrology and water quality will be analyzed. According to the IS, the Project would have a significant impact if it would:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?
c. i. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site.
c.ii. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.
c.iii. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
c.iv. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation.
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The potential hydrology and water quality changes in the environment are addressed in response to the above thresholds in the following analysis.

4.7.4 Potential Impacts

THRESHOLD a: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact

The federal Clean Water Act (CWA) establishes the framework for regulating municipal storm water discharges (construction and operational impacts) via the NPDES program. A project would have an impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Water Code Section 13050, or that cause regulatory standards to be violated as defined in the applicable NPDES storm water permit or Water Quality Control Plan for a receiving water body.

Relative to this specific issue, a significant impact could occur if the Project would discharge water that does not meet the quality standards of the agencies that regulate surface water quality and water discharge into storm water drainage systems. Significant impacts could also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include preparation of a SWPPP for short-term construction-related water quality impacts, and a WQMP to control potential long-term post- construction water quality impacts.

On January 29, 2010, the SARWQCB issued the 4th-term area wide NPDES and Municipal Separate Storm Sewer System Permit (MS4 Permit) to the City of Perris and other applicable Permittees. All new development in the City of Perris is required to comply with provisions of the NPDES program, including Waste Discharge Requirements (WDR), and the City's Municipal Separate Sewer Permit (MS4), Order No. R8-2010-0033, NPDES Permit No. CAS618033, as enforced by the SARWQCB. All design submittals and construction projects are required to conform to the permit requirements. Furthermore, all projects are required to install BMPs in compliance with the 2010 SARWQCB permit. The *WQMP* states the Project will need to comply with the Statewide Construction General Permit and the Statewide Industrial General Permit requirements.

Construction Impacts

Three general sources of potential short-term, construction-related stormwater pollution associated with the proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

The Project requires the preparation of a SWPPP for control of pollutants during construction of the Project site. The SWPPP must be prepared and implemented in compliance with the requirements of the Construction General Permit. The City has adopted standard BMPs designed to control discharges of pollution during construction and occupancy that could cause a significant adverse impact to surface water quality. The SWPPP must address the treatment of the surface runoff from construction of the site before discharge to San Jacinto Creek, then to Canyon Lake, and finally to Lake Elsinore.

As stated previously, significant impacts could occur if the Project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include preparation of a SWPPP to reduce potential construction-related water quality impacts Implementation of **Standard Condition SC-HYD-1** requires preparation of the SWPPP per City and applicable regulatory standards. This standard condition is considered regulatory compliance and not unique mitigation under CEQA. With implementation of that standard condition, no additional actions or mitigation are required to address short-term construction- related water quality impacts.

Operational Impacts

The City has adopted standard BMPs designed to control discharges of pollution during project operations or occupancy that could cause a significant long-term adverse impact to surface water quality. The WQMP must address the hydrologic conditions of concern by maintaining pre-development flows once the Project is developed and treatment of the surface runoff from the site before discharge to the San Jacinto Creek, Canyon Lake, and Lake Elsinore.

Construction of the proposed Project will increase the impervious area at the Project site by replacing vacant property with associated paving and the warehouse rooftop. Landscaping is proposed as part of Project design in the form of landscaped planters containing various trees, shrubs, and ground covers [see discussion below regarding Airport Land Use Commission (ALUC) restrictions on the site]. The Project proponent has already submitted a Water Quality Management Plan (*WQMP*) to the City for review and approval.

The pending *WQMP* will identify approved post-construction BMPs in addressing increases in impervious surfaces, methods to decrease incremental increases in off-site stormwater flows, and methods for decreasing pollutant loading in off-site discharges as required by the applicable NPDES requirements. At this time the draft *WQMP* proposes a number of BMPs for the Project as shown in

Table 4.7-2, *Permanent and Operational BMPs*.

The Project *Drainage Report* indicated that to effectively handle the increased runoff from the proposed development, three underground storage facilities will be provided to offset the difference in runoff volume between the pre-developed to post-developed condition for the 24- hour duration, 10-year return frequency design storm. In addition, the *WQMP* indicates the Project has already undergone review by the County Airport Land Use Commission and determination was made that no surface basins would be allowed due to the threat of bird strike (a portion of the site is within an airport hazard zone, see the NOP Initial Study Section 9.e, Hazards). In order to comply with both ALUC and water quality regulations, the City has allowed bio-swales or filtration trenches along the north and west sides of the industrial building which will prevent long-term ponding. The channels are designed to treat the 2-year 24-hour flows at a maximum depth of 6 inches with additional capacity provided to carry larger storm flows safely. A storm drain will collect and route the runoff from the paved areas into the three underground storage facilities. Water in the underground system will then be pumped to the surface for treatment through bio-swales then be carried by storm drains into the Line E-01 system.

The bio-swales/water quality channels are planned at locations throughout the Project site to clean and discharge onsite runoff. These structures will be designed per Riverside County Low Impact Development – Bio-swale standards. Detailed design of the channels, outlet structures, underdrains, and any landscaping will be prepared at final design and must treat the flows indicated in the Project *WQMP*. Final design of the channels, complete with landscaping and pipe plans, will be provided with final construction plans and landscape plans.

As stated previously, significant impacts could occur if the Project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include preparation of a WQMP to reduce potential long-term water quality impacts from Project operation. Implementation of **Standard Condition SC-HYD-2** requires preparation of the WQMP per City and applicable regulatory standards. This standard condition is considered regulatory compliance and not unique mitigation under CEQA. With implementation of that standard condition, no additional actions or mitigation are required to address long-term operational water quality impacts of the Project.

Table 4.7-2
Permanent and Operational BMPs

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
A. On site storm drain inlets	Mark all inlets with "Only Rain Down the Storm Drain".	Maintain markings and provide info to owners. Add Language to lease agreements to prevent tenants from allowing discharges to storm drain.
B. Interior Floor Drains	To be connected to Sewer	Inspect and maintain drains
D2. Landscaping	Preserve existing native trees, shrubs, and ground cover to the maximum extent possible. Design landscaping to minimize irrigation and runoff, to promote surface infiltration where appropriate, and to minimize the use of fertilizers and pesticides that can contribute to stormwater pollution. Where landscaped areas are used to retain or detain stormwater, specify plants that are tolerant of saturated soil conditions. Consider using pest-resistant plants, especially adjacent to hardscape. To ensure successful establishment, select plants appropriate to site soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions.	Maintain landscaping using minimum or no pesticides. See applicable operational BMPs in "What you should know for Landscape and Gardening" at… http://rcflood.org/stormwater/ Provide IPM information to new owners, lessees and operators.
G. Refuse Area	Trash enclosures to be built per City of Perris Standards with Signs noting "Do not dump Hazardous Materials"	Trash enclosures to be built per City of Perris Standards. A regular inspection and maintenance program to be required by tenants/owner.
P. Parking Lots	Sweep plazas, sidewalks, and parking lots regularly to prevent accumulation of litter and debris.	Collect debris from pressure washing to prevent entry into the storm drain system. Collect washwater containing any cleaning agent or degreaser and discharge to the sanitary sewer not to a storm drain.

Source: *WQMP* Table G.1 Permanent and Operational Source Control Measures

Other Issues

In addition to surface runoff, the Project will generate wastewater which could pollute local surface and groundwater supplies if its release is not controlled in an appropriate manner. The Project does not propose septic or leach field systems for wastewater treatment but will instead connect to the existing sewer system maintained. Implementation of **Standard Condition SC-HYD-3** requires connection of the Project to the existing EMWD sewer system. All wastewater associated with the Project's interior plumbing systems will therefore be discharged into the local sewer system for treatment at the regional wastewater treatment plant. In addition, **SC-USS-1** requires payment of appropriate sewer connection fees so that **SC-HYD-3** can be properly implemented. These standard conditions are considered regulatory compliance and not unique mitigation under CEQA. With implementation of these standard conditions, no additional actions or mitigation are required to address long-term operational water quality impacts of wastewater discharges of the Project.

One additional issue is the offsite runoff the proposed drainage system shall currently crosses the Project site is proposed to be rerouted north and connect to the existing line in the Ramona Expressway so there will be no mixing of on- and offsite runoff, therefore the offsite runoff does not need to be treated by the proposed onsite facilities.

THRESHOLD b: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Less Than Significant Impact

A potentially significant impact could occur if a project removes an existing groundwater rechargearea or substantially alters drainage that results in a reduction in groundwater recharge such thatexisting wells in the vicinity would no longer be able to operate. The *Geo Investigation* and *Geotechnical Update* for the Project stated groundwater was not encountered at the Project site in the geotechnical borings which extended to a maximum depth of 51 feet. According to the California Department of Water Resources' Water Data Library, well data recorded within the last ten years indicates the depth to shallow groundwater to range between 9 and 53 feet below ground surface within two miles of the site, although groundwater was not encountered during theGeocon field investigations.

Groundwater in the Project area and this portion of the Perris Valley is managed by EMWD. The Project site overlies the bounds of the San Jacinto Groundwater Basin 8-005 and the Perris North Groundwater Management Zone. EMWD has implemented the West San Jacinto Groundwater Management Plan. The Project would be subject to all applicable City and EMWD regulations, and a project-specific WQMP will be approved for the Project by the City to manage and treat stormwater flows – the reader should also see Subsection 4.7.4 (Threshold a) regarding the proposed water quality improvements. While the Project will increase the amount of impervious surface area on site in comparison to existing conditions, it will also install landscaping and bio- swales onsite would allow for some percolation back into the local groundwater.

Due to the Project's design and small size (16 acres) relative to the size of the San Jacinto Groundwater Basin, there will not be a substantial effect upon groundwater recharge within the groundwater basin. Furthermore, the project would have a low water demand and would not uselocal groundwater sources for potable water supply. With implementation of Project-specific BMP's, the Project is not expected to directly cause a decrease in groundwater supplies or interfere substantially with groundwater recharge. Impacts are determined to be less than significant, and no mitigation is required.

THRESHOLD c.i: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact

The runoff from the site is primarily sheet flow to the northeast and the ultimate outfall is a stormdrain inlet near the northeast corner of the site. The site is within the Perris Valley Master Drainage Plan (MDP) with regional lines located north (Line E) and east (Line E-01) of the Project site. Since the Project is within the MDP it is required to participate in funding/installing regional facilities as appropriate. The MDP is a financing mechanism used to fund construction of new orimproved drainage facilities. MDP fees are imposed on new land development activity within the MDP area. The Subdivision Map Act requires that agencies imposing fees have a general drainage plan for the fee

area, a special fund for the fees, and an equitable distribution of the feesprior to implementation.

The proposed future improvements will preserve the current flow patterns. The Project will provide drainage facility improvements in compliance with the PVCCSP and the Perris Valley Master Drainage Plan. Line E is proposed to be constructed north of Ramona Expressway and the Project proposes to construct a connection of the storm drain system in Indian Avenue to Line E. At this time the connection is proposed to be a 36-inch pipe within Ramona Expressway connecting to the existing Line E channel at the northeast corner of Perris Boulevard and Ramona Expressway. The connection of this line to the Line E channel will help reduce existing ponding/flooding at the local intersections in the immediate area, including Perris and Ramona, with the combined capacity of the 36-inch and 54-inch lines. Permanent resolution of the existing ponding problems will occur when Line E is built. The existing onsite connection to Line E-01 will be maintained with the onsite inlet being replaced with another connection in conjunction with the onsite design. The Project *Drainage Report* indicated that three (3) underground storage facilities will be provided to effectively handle the increased runoff from the Project in the post-development condition based on the 24-hour duration, 10-year return frequency design storm.

The City's development review process requires a hydrology/drainage study to be submitted to the City for review and approval prior to the start of grading for a project. The Project applicant has already submitted a *Drainage Report* to the City for review. Implementation of **Standard Condition SC-HYD-4** will help assure completion of the hydrology report prior to the start of Project construction. In addition, **Standard Condition SC-HYD-5** requires payment of storm drain fees to help assure necessary offsite and/or regional flood control facilities are adequately funded in the future. Standard conditions are considered regulatory compliance and not unique mitigation under CEQA.

Based on the Project design and with implementation of these standard conditions, the Project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site. The part of this conclusion regarding erosion or siltation is supported by the analysis in Subsection 4.7.4 (Threshold a) above regarding water quality. Therefore, impacts will be less than significant with the recommended standard conditions and no mitigation is required.

THRESHOLD c.ii: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant Impact

Subsection 4.7.4 (Threshold b) concludes the Project will not substantially alter the existing drainage patterns on the site or in the surrounding area and will not adversely affect the course of any existing stream or river. The FEMA Flood Insurance Rate Map shows this site falls within Zone X which denotes areas determined to be outside of the 0.2% annual chance floodplain (i.e., it is outside the 100-year and 500-year storm limits).

Future project-specific development within the Project site boundaries would increase the impervious surface area from zero percent (0%) at present, to an estimated 85% for the proposed Project (including landscaping which is pervious). The Project *Drainage Report* indicated that to effectively handle the increased runoff from the proposed development, three underground storage facilities will be provided to offset the difference in runoff volume between the pre- developed to post-developed condition for the

24-hour duration, 10-year return frequency designstorm.

The Project will be required to pay Development Impact Fees for storm drainage facilities in accordance with the fee structure in place at the time of development and at the current rate. Implementation of **Standard Condition SC-HYD-4** will help assure completion of a drainage/hydrology report prior to the start of Project construction. In addition, **Standard Condition SC-HYD-5** requires payment of storm drain fees to help assure necessary offsite and/or regional flood control facilities are adequately funded in the future. Standard conditions are considered regulatory compliance and not unique mitigation under CEQA.

Based on this information, the Project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Any impacts will be less than significant.

THRESHOLD c.iii: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact

Please reference the discussion set forth in Thresholds a., c.i. and c.ii., relative to the Project site's interim (existing) and ultimate drainage conditions as a portion of the PVCCSP and in the context of the larger approved Perris Valley Master Drainage Plan (MDP) which will ensure the Project will not substantially alter the existing drainage pattern of the site or the area.

While development of the proposed Project would increase the impervious area on the Project site from zero percent (0%) to an estimated 85 percent, the Project-specific development within the Project site boundaries will be required and conditioned to provide a final Hydrology/DrainageStudy and WQMP to demonstrate the Project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoffwater which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Any impacts will be less than significant,and no mitigation is required.

THRESHOLD c.iv: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Less Than Significant Impact

Subsection 4.7.4 (Threshold b) concludes the Project will not substantially alter the existing drainage patterns on the site or in the surrounding area and will not adversely affect the course of any existing stream or river. The FEMA Flood Insurance Rate Map shows this site falls withinZone X which denotes areas determined to be outside of the 0.2% annual chance floodplain (i.e.,it is outside the 100-year and 500-year storm limits).

Future project-specific development within the Project site boundaries would increase the impervious surface area from zero percent (0%) at present, to an estimated 85% for the proposed Project (including landscaping which is pervious). The Project *Drainage Report* indicated that to effectively handle the increased runoff from the proposed development, three underground storage facilities will be provided to offset the difference in runoff volume between the pre- developed to post-developed condition for the 24-hour duration, 10-year return frequency designstorm.

For these reasons, the proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. Therefore, impacts will be less than significant, and no mitigation is required.

THRESHOLD d: Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

Less Than Significant Impact

The FEMA Flood Insurance Rate Map shows this site falls within Zone X which denotes areas determined to be outside of the 0.2% annual chance floodplain (i.e., it is outside the 100-year and 500-year storm limits). Therefore, the Project site would not have a significant risk of flooding soit would not result in the release of pollutants by inundation.

The Project site is located approximately 37 miles from the nearest coastline and at an elevation 1,465 feet above the level of the ocean. Therefore, there is no risk associated with tsunamis.

A seiche is a run-up of water within a lake or embayment triggered by fault- or landslide inducedground displacement. There are no lakes in the vicinity of the Project site, however, the Project site is located approximately two (2) miles southwest of Lake Perris (Perris Reservoir). Strong seismic shaking from a large earthquake could result in damage to the dam. Although inundation from dam failure is a slight possibility, the potential for that event to actually occur is relatively small. In addition, Exhibit 4.5-12, Dam Inundation Map from the City of Perris General Plan EIR indicates that except for a small area at the very northeast corner of the Project site, the east boundary of the Project site along N. Perris Boulevard coincides with western extent of the maximum Dam Inundation Area. The design of the Project will raise the northeastern corner of the site out of the identified inundation area.

Based on the above, the risk of pollutant release due to Project inundation caused by a flood, tsunami, or seiche is less than significant and no mitigation is required.

THRESHOLD e: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact

Surface Water Quality Control Plan. The Project site is located in the Santa Ana Region Watershed, within the jurisdiction of the Santa Ana Regional Board. Under the Porter-Cologne Water Quality Act discussion, the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) establishes water quality standards for groundwater and surface water in the basin; that is, standards for both beneficial uses of specific water bodies and the water quality levels that mustbe maintained to protect those uses. The Basin Plan includes an implementation plan describing actions by the Santa Ana RWQCB and others needed to achieve and maintain the water quality standards. The Santa Ana RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface waters. The RWQCB also regulates discharges from Riverside County's Phase I MS4s are

regulated through the Riverside County MS4 Permit (Order No. R8-2010-0033 NPDES No. CAS618033, as amended by Order No. R8- 2013-0024) pursuant to section 402(p) of the Federal Clean Water Act.

Subsection 4.7.4 (Threshold a) evaluated the Project's potential impacts to regional surface waterquality and determined that with approval of a Drainage Plan, a SWPPP, and a WQMP, as outlined in implementation of **Standard Conditions SC-HYD-1** through **SC-HYD-5**, would reduce potential short- and long-term surface water quality impacts of the Project to less than significantlevels.

Groundwater Management Plan. Groundwater in the Project area and this portion of the PerrisValley is managed by the EMWD. The Project site overlies the bounds of the San Jacinto Groundwater Basin 8-005 and the Perris North Groundwater Management Zone. The EMWD has implemented the West San Jacinto Groundwater Management Plan. Subsections 4.7.4 (Thresholds a and b) evaluated the Project's potential impacts on regional groundwater quality and determined that with approval of a Drainage Plan, a SWPPP, and a WQMP, as outlined in implementation of **Standard Conditions SC-HYD-1** through **SC-HYD-5**, would reduce potential short- and long-term groundwater quality impacts of the Project to less than significant levels.

Conclusion. With adherence to, and implementation of the conclusions and recommendations set forth in the *Drainage Study* and *WQMP*, the Project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. With implementation of standard conditions identified in Subsections 4.7.4 (Thresholds a through d), any impacts will be less than significant, and no mitigation is required.

4.7.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

As outlined in the Initial Study prepared for this Project, **Standard Conditions SC-HYD-1** through **SC-HYD-5** and **SC-USS-1** are applicable to all Projects within the City and are not considered unique mitigation under CEQA.

SC-HYD-1 **SWPPP.** Erosion and siltation reduction measure BMPs contained in the required SWPPP will be implemented during construction. At the completion of construction, the Project will consist of impervious surfaces, landscaped planters, and post-construction BMPs.

SC-HYD-2 **WQMP.** The Project proponent is required to submit a Water Quality Management Plan (WQMP) for review and approval. The WQMP identifies post-construction BMPs in addressing increases in impervious surfaces, methods to decrease incremental increases in off-site stormwater flows, and methods for decreasing pollutant loading in off-site discharges as required by the applicable NPDES requirements.

SC-HYD-3 **Wastewater.** All wastewater associated with the Project's interior plumbing systems will be discharged into the local sewer system for treatment at the regional wastewater treatment plant.

SC-HYD-4 **Site Drainage Plan.** A site drainage plan is required by the City of Perris and will be reviewed by the City Engineering Department. The final grading and drainage plan will be approved by the City Engineering Department during plan check review.

SC-HYD-5 **Storm Drainage Facilities.** The Project applicant shall pay Development Impact Fees

(DIF) for nonresidential development prior to the issuance of a building permit.

SC-USS-1 **Sewer Connection Fees.** Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable sewer connection fees to EMWD.

Mitigation Measure(s)

No Mitigation Measures are required.

4.7.6 Cumulative Impacts

The Project has been evaluated as to whether it will have a potential to cause significant flood hazards and a potential to substantially degrade water quality onsite and downstream. **StandardConditions SC-HYD-1** through **SC-HYD-5** and design measures to control the Project's contributions to flood hazards and water quality degradation have been defined and are availableto control future hydrology and water quality degradation to a less than significant impact level. With implementation of the proposed stormwater management design, as outlined in the ProjectSpecific WQMPs, and **Standard Conditions SC-HYD-1** through **SC-HYD-5**, future stormwater runoff after development of the Project site is not forecast to make a cumulatively considerable contribution to downstream flood hazards and water quality in the Santa Ana River Watershed. This conclusion is based on the findings that the proposed **Standard Conditions SC-HYD-1** through **SC-HYD-5** and design measures will not increase runoff from the Project site and will provide adequate attenuation of water pollutants in runoff from this residential area so as not to make a cumulatively considerable contribution to the runoff volume or water pollution within the Santa Ana River Watershed. Project hydrology and water quality cumulative impacts are less than significant.

4.7.7 Unavoidable Significant Adverse Impacts

The Project has a potential to result in generation of new pollutants from the proposed urban/suburban environment that can degrade water quality. However, through a combination of design measures included in the drainage design (Project Specific) and **Standard Conditions SC-HYD-1** through **SC-HYD-5**, these potential hydrology and water quality impacts can be controlled to a less than significant impact level. The Project will not cause unavoidable significant hydrology or water quality impacts. Project hydrology and water quality impacts are less than significant.

4.8 LAND USE AND PLANNING

4.8.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of land use and planning from implementation of the Project. The Land Use and Planning Section, of the Initial Study (IS, Subchapter 8.3, *Initial Study*) posed the following questions:

a. Would the Project physically divide an established community?
b. Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction adopted for the purpose of avoiding or mitigating an environmental effect?

Based on the analysis in the IS it was determined that the question pertaining to issue area (a), related to land use and planning (in the questions asked above), **would not** require any further analysis in the Draft Environmental Impact Report (DEIR). As it pertains to this question, the IS identified "less than significant impact" to this issue area, as a result of implementation of the Project.

Based on the analysis in the IS, the remaining one (1) issue area b., related to land use and planning in the questions asked above, **would** be further analyzed in the DEIR.

No standard conditions or mitigation measures were presented in the IS that shall be carried overto this DEIR.

In addition to the IS, the following sources were used in the evaluation presented in this Subchapter:

- City of Perris General Plan https://www.cityofperris.org/departments/development-services/general-plan
- *Perris And Ramona Warehouse (DPR19-00012) Mobile Source Health Risk Assessment Cityof Perris,* prepared by Urban Crossroads, 3-15-2021 (*HRA*, **Appendix I3**)
- Southern California Association of Governments website http://www.scag.ca.gov/about/Pages/Home.aspx
- 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (*2020 RTP/SCS*) http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf
- SCAG Sustainability Planning Grant website http://sustain.scag.ca.gov/Pages/Grants%20and%20Local%20Assistance/GrantsLocalAssistance.aspx
- Western Riverside Council of Governments websitehttp://www.wrcog.cog.ca.us
- 2020-2045 RTP/SCS Final Program EIR (SCH#2019011061) – Section 3.11 Land Use and Planning http://scagrtpscs.net/Documents/2020/peir/draft/2020PEIR_3_11_LandUseandPlanning.pdf

Notice of Preparation (NOP)/Scoping Comments

During the NOP period, the following letters were received:

- Letter was received from Daniel Zerda with the Riverside County Transportation and Land Management Agency (TLMA) dated 5-6-21 that indicated the Project as proposed was consistent with the airport safety zone designations on the site (this issue is evaluated in thissection).
- Letter was received from Robert Krieger with the California Air Resources Board (CARB) dated 6-4-

21 expressing concerns about health risks to the surrounding community from the proposed land uses of the Project.

- Letter was received from Lijin Sunn with the South Coast Air Quality Management District (SCAQMD) dated 6-1-21 indicating concerns about health risks from construction and operation of the Project land uses which should be studied in the EIR.
- Letter was received from Alma Marquez with the Center for Community Action and Environmental Justice (CCAEJ) dated 6-4-21 expressing concerns about health risks to the surrounding community from the proposed land uses.

During the EIR Scoping Meeting, no comments from agencies or the public were received. However, the Planning Commissioners discussed potential land uses for the Project site. The City will take all of these comments into account when making a decision on the Project.

Response: *The land use issues related to airport safety zone restrictions (letter from County TLMA) are addressed later in this Subchapter. The land use issues related to health risks from air pollutants (letters from CARB, SCAQMD, and CCAEJ) are fully quantified per applicable regulations in Subchapter 4.2, Air Quality.*

4.8.2 Environmental Setting

4.8.2.1 Land Use Setting

The Project site is located within the PVCCSP planning area which is in the City of Perris in western Riverside County. The PVCCSP is located in the North Perris area of the City and generally bordered by Interstate-215 (I-215) to the west, March Air Reserve Base and Oleander Avenue to the north, the Perris Valley Storm Channel (PVSC) to the east, and Placentia Avenue to the south. in the City of Perris.

The ±3,500-acre PVCCSP was originally approved by the Perris City Council on January 10, 2012, as Ordinance No. 1284. There are twelve (12) amendments to date, the most recently approved being Amendment No. 11, approved on October 26, 2021, as Ordinance No. 1410. The Project site is located along the Ramona Expressway corridor, a primary east-west arterial for the light industrial and commercial uses of the PVCCSP (although not a designated truck route per the PVCCSP).

At the time the PVCCSP was originally adopted in 2012, the general area was largely undeveloped land used for agricultural purposes (sod farming, other) with scattered development consisting of some warehousing/distribution facilities, neighborhood and community commercial, small scale industrial facilities, a rural residential neighborhood and a mobile home park. In the eight years since its adoption, a substantial amount of new development activity (primarily logistics/distribution warehouses) and infrastructure (i.e., road improvements, dry and wet utilities, other) has been built within the PVCCSP planning area, including a 579,708-square-foot distribution warehouse immediately south of the Project site (3900 Indian Avenue) which was completed in 2014.

The Project site is located just over a mile east of I-215 with extensive frontage along Ramona Expressway, a six-lane “expressway” with a 184-foot ultimate design width and a raised center median where it extends east/west through the PVCCSP and continuing east as a divided four- lane arterial past Lake Perris (Perris Reservoir) towards the unincorporated agricultural community of Lakeview, then on into the City of Hemet and the City of San Jacinto. The Project site’s Ramona Expressway frontage extends from Indian Avenue on the west to Perris Boulevard on the east; both are full service signalized intersections with pocket turn lanes.

The Project site is surrounded by lands within the PVCCSP designated for Commercial use to the north

and east, and by lands designated for Light Industrial use to the south and west, as shown in **Figure 4.8-1, *Existing and Proposed General Plan Land Use Designation*** and **Figure 4.8-2, *Existing and Proposed* Zoning *Classification***.

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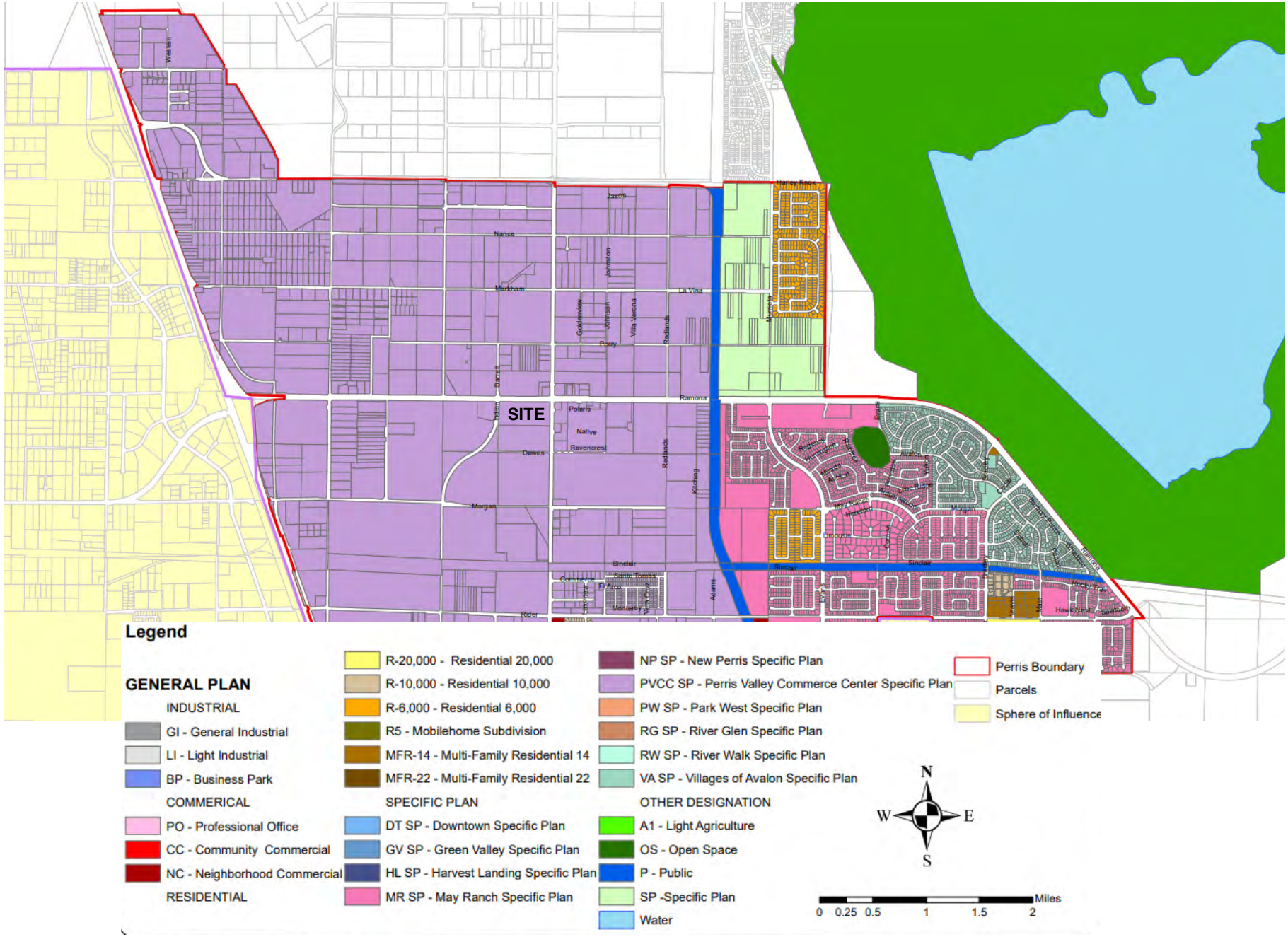
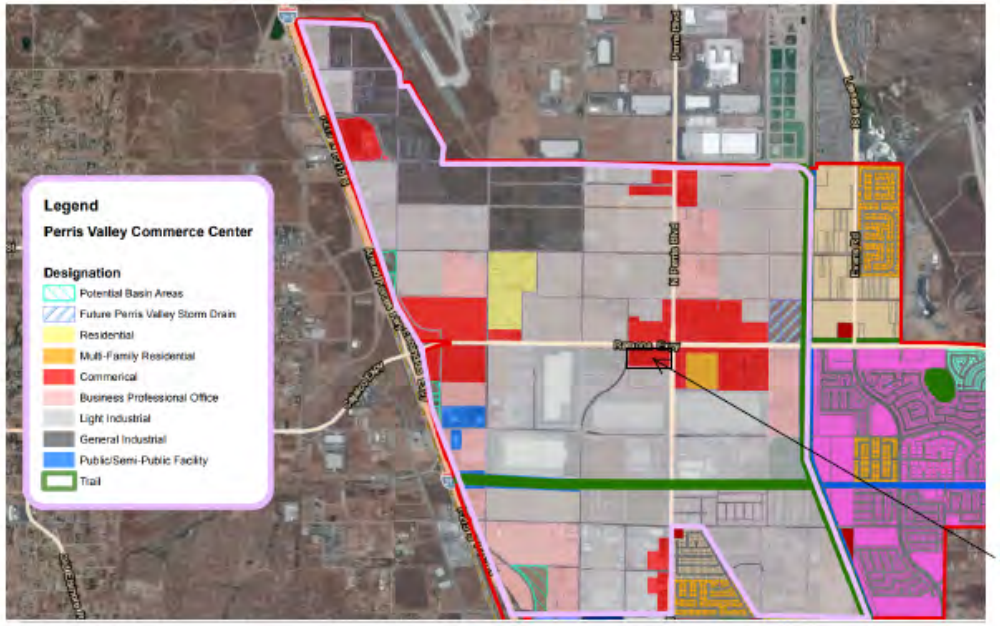
Figure 4.8-1
Existing and Proposed General Plan Land Use Designations



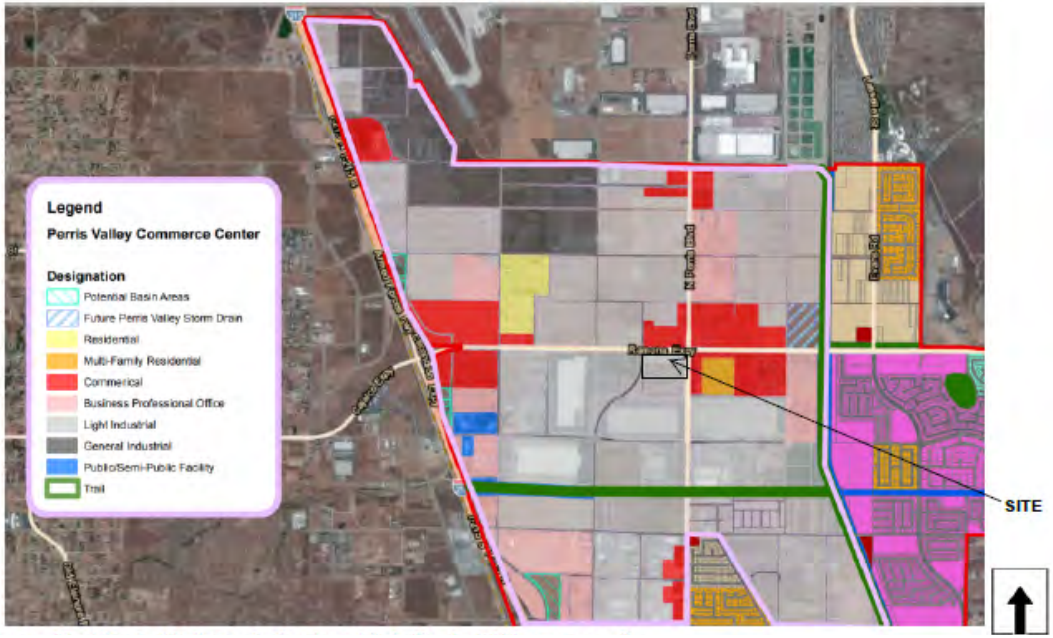
Source: City of Perris http://www.cityofperris.org/city-hall/general-plan/Land_Use_Map.pdf

Figure 4.8-2
Existing and Proposed Zoning Classification

EXISTING



PROPOSED



Source: City of Perris http://www.cityofperris.org/city-hall/zoning/2016-zone-map.pdf

The Project site's existing General Plan land use designation and Zoning classification are both Specific Plan (SP). As set forth on Figure 2.0-1 of the PVCCSP - Land Use Plan, the Project site is currently designated Commercial (C). This designation allows retail, professional office, and service-oriented business activities which serve the entire City as well as the surrounding neighborhoods. This zone combines the General Plan Land Use designations of Community Commercial and Commercial Neighborhood.

The following commercial and industrial land uses are in the area surrounding the Project site:

Commercial

North: (across Ramona Expressway) Most of the acreage on the north side of Ramona Expressway, with the exception of the northwest corner (NWC) of the Ramona Expressway and Perris Boulevard, is vacant, unimproved land with an underlying PVCCSP land use designation of Commercial (APN 302-060-041; 17.71 acres). The NWC of Ramona Expressway and Perris Boulevard is improved with an Arco gas station and convenience store (APN 302-060-39).

East: (across Perris Boulevard) Improved local serving commercial retail development with an underlying PVCCSP land use designation of Commercial (multiple APNs including 303- 100-017, 021, 032, 033 & 037). The southeast corner of Ramona Expressway and Perris Boulevard is improved with a Mobil gas station and Circle K convenience store (APN 303-100-017).

Light Industrial

South: Improved 579,708-square foot distribution warehouse on a 28.80-acre site, completed in 2014 (3900 Indian Avenue; APNs 303-060-021 &022).

West: (across Indian Avenue) Improved 1.25-million square foot Lowe's Regional Distribution Center on an approximate 100-acre site at 3984 Indian Avenue (APNs 303-030-019+).

Table 4.8-1, *Surrounding Land Uses*, lists the different uses that are located immediately adjacent to the proposed Project site.

Table 4.8-1
Surrounding Land Uses

Direction	General Plan Land Use Designations	Existing Zoning Classifications	Existing Land Uses
Project Site	Perris Valley Commerce Center Specific Plan (PVCCSP)	Existing: PVCCSP Commercial (C) Proposed: PVCCSP Light Industrial (LI)	Vacant, former agricultural use
North	Perris Valley Commerce Center Specific Plan (PVCCSP)	PVCCSP Commercial (C)	Vacant land and some local serving commercial uses along Ramona Expressway
South	Perris Valley Commerce Center Specific Plan (PVCCSP)	PVCCSP Light Industrial	Fallas Distribution Center
East	Perris Valley Commerce Center Specific Plan (PVCCSP)	PVCCSP Commercial (C) and mobile home park (MFR-14)	Local-serving commercial and Park Place mobile home park
West	Perris Valley Commerce Center Specific Plan (PVCCSP)	PVCCSP Light Industrial (LI)	Lowe's Distribution Warehouse

Source: IS (DEIR Subchapter 8.3)

4.8.2.2 Regulatory Setting

4.8.2.2.a State

State Planning Law

State planning law (California Government Code Section 65300) requires every city in California to adopt a comprehensive, long-term general plan for the physical development of the city, and of any land outside its boundaries (sphere of influence) that in the planning agency's judgment bears relation to its planning. A general plan should consist of an integrated and internally consistent set of goals and policies that are grouped by topic into a set of elements and are guided by a citywide vision. State law requires that a general plan address seven elements or topics (land use, circulation, housing, conservation, open space, noise, and safety), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in the state planning law (as provided in California Government Code Section 65300) should be examined to determine if there are environmental issues within the community that the general plan should address, including but not limited to hazards and flooding.

4.8.2.2.b Regional

Southern California Association of Governments (SCAG)

Founded in 1965, the Southern California Association of Governments (SCAG) is a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law as a Regional Transportation Planning Agency and a Council of Governments.

The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles. Theagency develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and a portion of the South Coast Air Quality management plans. In 1992, SCAG expanded its governing body, the Executive Committee, to a 70-memberRegional Council to help accommodate new responsibilities mandated by the federal and state governments, as well as to provide more broad-based representation of Southern California's cities and counties. With its expanded membership structure, SCAG created regional districts toprovide for more diverse representation. The districts were formed with the intent to serve equal populations and communities of interest. Currently, the Regional Council consists of 86 members.

In addition to the six counties and 191 cities that make up SCAG's region, there are six County Transportation Commissions that hold the primary responsibility for programming and implementing transportation projects, programs and services in their respective counties. Additionally, SCAG Bylaws provide for representation of Native American tribes and Air Districts in the region on the Regional Council and Policy Committees.

Regional Transportation Plan/Sustainable Communities Strategy

On May 7, 2020, SCAG's Regional Council adopted Connect SoCal - the 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy. The Plan is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. The Plan charts a course for closely integrating land use and transportation – so that the region can grow smartly and sustainably. It outlines more than $600 billion in transportation system investments through 2045. The Plan was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

Sustainability Planning Grant Program

The Sustainability Planning Grant Program (formerly known as Compass Blueprint Grant Program) was established as an innovative vehicle for promoting local jurisdictional efforts to testlocal planning tools. Since starting in 2005, over 200 projects have been completed through theprogram by the end of 2019. By supporting exemplary projects, the Sustainability Planning Grants Program illustrates the value effective growth planning can bring to our regional partners and theregion as a whole. The Sustainability Planning Grants Program provides direct technical assistance to SCAG member jurisdictions to complete planning and policy efforts that enable implementation of the regional SCS. Grants are available in the following three categories:

- Integrated Land Use – Sustainable Land Use Planning, Transit Oriented Development (TOD) and Land Use & Transportation Integration
- Active Transportation – Bicycle, Pedestrian and Safe Routes to School Plans
- Green Region – Natural Resource Plans, Climate Action Plans (CAPs) and Green House Gas(GHG) Reduction programs

Western Riverside Council of Governments

Councils of Governments (COGs) are voluntary associations that represent member localgovernments, mainly cities and counties, that seek to provide cooperative planning, coordination, and technical assistance on issues of mutual concern that cross jurisdictional lines. In this sense, COGs serve to

develop consensus on many issues that need to be addressed in a sub-regional or regional context. If properly structured, COG duties complement and do not duplicate jurisdictional activities, and serve to unify jurisdictions and agencies on matters of mutual concern, but independent of the responsibilities traditionally exercised by the individual members within their own communities.

Jurisdictions typically agree to form COGs following discussion and negotiation on common goals and objectives, which are usually consummated by execution of a Joint Powers Agreement (JPA). In most cases, adoption of a JPA is specifically authorized by state law. In the case of California, JPA authority is granted under Section 6500 et. seq. of the Government Code.

The Western Riverside Council of Governments (WRCOG) is a joint-powers agency that conducts interagency regional coordination and planning for local governments in western Riverside County and serves as the council of governments and local transportation planning agency for the western Riverside subregion of SCAG. Its member agencies are 18 cities, including the City of Perris, Riverside County, Eastern and Western Municipal Water Districts, and the Morongo Band of Mission Indians. WRCOG administers the Riverside County Measure A, a half-cent transportation sales tax that supports freeway construction projects and designates smaller revenue allocations for arterial roadway improvements in western Riverside County. WRCOG also administers western Riverside County's Transportation Uniform Mitigation Fee (TUMF) Program to mitigate the cumulative regional impacts of new development on the subregion's arterial highway system identified on the Regional System of Highways and Arterials. Payment of TUMF is a standard condition and is not considered unique mitigation under CEQA.

Recognizing that many issues related to growth are not constrained by political boundaries, WRCOG focuses on a number of regional matters important to the subregion's future. By working together through its committee structure and utilizing resources, WRCOG is cost-effective by reducing duplication of effort and sharing information, enabling strong advocacy and strengthening Western Riverside's standing in the region and the State. WRCOG's program areas are varied and include transportation, environment, energy, economy, and health.

4.8.2.2.c Local

City of Perris General Plan and Zoning

The Project site is located within Planning Area 3 of the City of Perris Comprehensive General Plan 2030. The 2030 General Plan states…" Planning Area 3: Agricultural Conversion Area. This Planning Area consists of large tracts of land currently used for agriculture. Proximity to the Interstate 215 corridor suggests conversion of agricultural land, over the long term, to uses that are compatible with surrounding commercial and industrial uses. Conversion could enhance the economy of the City by attracting new uses that complement the existing Lowe's and Ross distribution centers and provide jobs for local residents. Nearby residential development may support some level of retail uses in this planning area. Infrastructure demands will depend on the ultimate uses of the land. Business park uses including product distribution centers will require upgraded roadways to accommodate significant numbers of large trucks. Roadway widths may require revisions and future roadway maintenance intervals may be shortened. Storm drains, water lines, and sanitary sewer lines will be needed as agricultural uses are discontinued.

The 2030 General Plan indicates that Planning Area 3 will support mainly light industrial uses in the future as shown in **Table 4.8-2, *Planning Area 3 Land Uses***. **Table 4.8-2** shows that over three quarters or 76% of the Planning area will eventually be light industrial uses, increasing from almost 1 million to almost 11 million square feet at buildout.

Table 4.8-2
Planning Area 3 Land Uses

Land Use	2030 General Plan		Estimated Building Area		
	Acres	Percent	2002	2030	Buildout
Light Industrial	1,080	76.1	917,681	3,613,974	10,891,380
Commercial	217	15.3	102,962	333,500	1,521,000
Residential[1]	22	1.5	NA	NA	NA
Other[2]	101	7.1	58,000	267,000	267,000
Total	**1,420**	**100.0**	**1,078,043**	**4,304,774**	**12,769,380**

[1] Existing mobile home park (MFR-14)
[2] Public facilities
Sources: Tables LU-16 and LU-28, 2030 General Plan Land Use Element (2005)

Applicable City of Perris General Plan Goals and Policies

Land Use Element

Goal II New development consistent with infrastructure capacity and municipal servicescapabilities

Policy II.A Require new development to pay its full, fair-share of infrastructure costs
Goal III Commerce and industry to provide jobs for residents at all economic levels
Policy III.A Accommodate diversity in the local economy
Goal V Protection from natural or man-made disasters

Policy V.A Restrict development in areas at risk of damage due to disasters

4.8.3 Thresholds of Significance

As discussed in Subsection 4.8.1, the Project impacts to one (1) criterion pertaining to land use and planning will be analyzed. According to the IS, the Project would have a significant impact ifit would:

b. Cause a significant environmental impact due to a conflict with any applicable landuse plan, policy, or regulation of an agency with jurisdiction adopted for the purpose of avoiding or mitigating an environmental effect.

The potential land use and planning changes in the environment are addressed in response to the above threshold in the following analysis.

4.8.4 Potential Impacts

THRESHOLD b: Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact

City of Perris General Plan/Zoning

The City's 2030 General Plan EIR states:

"The 1991 General Plan Land Use Element redesignated all agricultural lands for uses other

than agriculture. Remaining land zoned for agricultural use is subject to a Williamson Act contract for which a notice of non-renewal has been filed indicating that the land will be takenout of agricultural production. Adoption and implementation of the project General Plan will have no impact on the non-renewal."

The PVCCSP is designed to encourage a mix of land uses that provide interrelated opportunities. The commerce center land use designations include General Industrial (GI), Light Industrial (LI), Business/Professional Office (BPO) and Commercial (C). There are two areas of residential designations that are intended to recognize two existing communities: (1) Residential (R) for the community located south of Markham, east of Webster, and north of Ramona Expressway; and (2) Multi-Family Residential (MFR-14) for the mobile home community located north of Dawes and easterly of Perris Boulevard (one block east of the Projectsite).

The City's future development emphasizes mixed-use, commercial, industrial, and residential projects rather than supporting the continuation of agricultural uses, which are becoming less economically viable and suburban development encroaches on the former agricultural lands. The proposed Project's light industrial use would contribute to the economic and employment base of the City. Based on the policy direction contained in the City's General Plan and the PVCCSP, Project impacts related to consistency with the local General Plan will be less than significantand no mitigation is required.

Table 4.8-3, *General Plan Consistency Analysis Relative to New Development,* evaluates the consistency of the Project with the applicable policies of the Comprehensive General Plan 2030 that have been adopted for the purpose of avoiding or mitigating an environmental impact. **Table 4.8-3** demonstrates the proposed Project is consistent with the City's General Plan policies that have been adopted for the purpose of avoiding or mitigating an environmental impact.

Table 4.8-3
General Plan Consistency Analysis Relative to New Development

Applicable Policy	Consistency Analysis
Land Use Element	
Policy II.A: Require new developmentto pay its full, fair-share of infrastructurecosts	**Consistent.** The proposed Project will install or make fair-share contributions toward necessary infrastructure, pay established development impact fees (DIF), and pay regional impact fees (Traffic Uniform Mitigation Fee or TUMF for traffic, Multiple Species Habitat Conservation Plan fees to protect biological species and habitat, etc.).
Policy III.A: Accommodate diversity in the local economy	**Consistent.** The Project will provide dozens of new short-term jobs during construction and from 239 to 738 long-term employment for warehouse and office workers (see page 4.8-12). Long-term jobs may be part-time or full-time depending on duties and need and will provide employment for a number of income levels.
Policy V.A: Restrict development inareas at risk of damage due to disasters	**Consistent.** The analysis in the Initial Study and other sections of this EIR conclude the Project will not result in significant impacts related to hazards or hazardous conditions (e.g., flooding, wildfires, earthquakes) with implementation of the recommended standard conditions and mitigation measures.
Circulation Element	

Applicable Policy	Consistency Analysis
Policy II.B: Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.	**Consistent.** Section 4.10 of the EIR demonstrates the Project will help further the City's circulation goals and policies regarding non-vehicular transportation. It also demonstrates the Project will have less than significant impacts relative to VMT and will make various adjacent street improvements for planning and engineering purposes (LOS is no longer a CEQA consideration)
Policy III.A: Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities. (Impl. Measure III.A.4) Require developers to be primarily responsible for the improvement of streets and highways to developing commercial, industrial, and residential areas. These may include road construction or widening, installation of turning lanes and traffic signals, and the improvement of any drainage facility or other auxiliary facility necessary for the safe and efficient movement of traffic or the protection of road facilities.	**Consistent.** Although LOS is no longer a CEQA-required topic, the Project will make and/or fund appropriate street, traffic signal, and other appropriate intersection improvements to support the proposed development consistent with the City's development review process.
Policy V.A: Provide for safe movement of goods along the street and highway system,	**Consistent.** The Project provides additional warehousing space proximate to the I-215 Freeway to the west.
Conservation Element	
Policy II.A: Comply with state and federal regulations to ensure protection and preservation of significant biological resources. (Impl. Measure II.A.2) For public and private projects located in areas with potential for moderate or high plant and wildlife sensitivity, require biological surveys as part of the development review process.	**Consistent.** A biological assessment was conducted on the Project site. Section 4.3 of the EIR demonstrates the Project will not have significant impacts on biological resources with implementation of a number of standard conditions and mitigation measures previously recommended in the PVCCSP EIR.
Policy III.A: Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.	**Consistent.** A biological assessment was conducted on the Project site. Section 4.3 of the EIR demonstrates the Project will not have significant impacts on biological resources addressed in the MSHCP. The Project will pay the established MSHCP mitigation fee and implement a number of standard conditions and mitigation measures previously recommended in the PVCCSP EIR consistent with the MSHCP.
Policy IV.A: Comply with state and federal regulations and ensure preservation of the significant historical, archaeological and paleontological resources.	**Consistent.** A cultural resources assessment was conducted on the Project site. Section 4.4 of the EIR demonstrates the Project will not have significant impacts on archaeological or historical resources with implementation of a number of standard conditions and mitigation measures previously recommended in the PVCCSP EIR. In addition, the Initial Stuy for the NOP concluded the Project would not have significant impacts on paleontological resources with implementation of standard conditions.
Policy V.A: Coordinate land-planning efforts with local water purveyors.	**Consistent.** EIR Section 4.12 demonstrates the Project has and is being coordinated with the local water purveyor

Applicable Policy	Consistency Analysis
	(EMWD) and will not result in significant impacts.
Policy VI.A: Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).	**Consistent.** Section 4.7 of the EIR demonstrates the Project will not result in significant impacts to either short- or long-term water quality through preparation and implementation of a Storm Water Pollution Prevent Plan and a Water Quality Management Plan.
Policy VIII.A: Adopt and maintain development regulations that encourage water and resource conservation.	**Consistent.** The Project will comply with current State Green Buidling Code and EMWD water conservation requirements. The Project will not result in significant impacts relative to solid waste generation.
Policy VIII.B: Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.	**Consistent.** EIR Section 4.12 demonstrates the Project will comply with established waste reduction and recycling programs including construction waste.
Noise Element	
Policy I.A: The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development. (Impl. Measure I.A.1) All new development proposals will be evaluated with respect to the State Noise/Land Use Compatibility Criteria. Placement of noise sensitive uses will be discouraged within any area exposed to exterior noise levels that fall into the "Normally Unacceptable" range and prohibited within areas exposed to "Clearly Unacceptable" noise ranges.	**Consistent.** EIR Section 4.9 demonstrates the Project will not generate significant noise impacts on surrounding land uses, including sensitive residential uses to the east.
Policy V.A: New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.	**Consistent.** Section 4.9 of the EIR demonstrates the Project will not generate significant noise impacts on sensitive residential uses located 432 feet to the east and a sensitive institutional use 273 feet to the southeast.
Safety Element	
Policy I.B: The City of Perris shall restrict future development in areas of high flood hazard until it can be shown that risk is or can be mitigated (Impl. Measure I.B.4) Require that new development projects must incorporate facilities for on-site control of storm water run-off (Impl. Measure I.B.5) Require flood mitigation plans for all proposed projects in the 100 year floodplain (Areas A and AE)	**Consistent.** Section 4.7 of the EIR demonstrates the Project will not be subject to flooding and the proposed drainage system will accommodate onsite runoff so that there will be no significant increase in downstream offsite runoff.
Policy I.D: Consult the AICUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area development restrictions when considering development project applications.	**Consistent.** The proposed Project is consistent in terms of land use with the ALUP and AICUZ limitations placed on the site due to the presence of the March Air Reserve Base to the north.

Applicable Policy	Consistency Analysis
Policy I.E: All development will be required to include adequate protection from damage due to seismic incidents	**Consistent.** The Initial Study for the NOP and an onsite geotechnical report demonstrate the Project will not suffer significant damage from expected seismic conditions.
Healthy Communities Element	
Policy HC 1.3: Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space.	**Consistent.** The Project will comply with the City's requirements regarding adequate lighting, street visibility, and defensible space through compliance with the City's development review process.
Policy HC 6.3: Promote measures that will be effective in reducing emissions during construction activities. o Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations. o All construction equipment for public and private projects will also comply with California Air Resources Board's vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD o Project proponents will be required to prepare and implement a Construction Management Plan which will include Best Available Control Measures among others. Appropriate control measures will be determined on a project by project basis, and should be specific to the pollutant for which the daily threshold is exceeded	**Consistent.** A detailed air quality ad health risk assessment was prepared for the Project. EIR Section 4.2 demonstrates the Project will have less than significant air quality impacts overall as well as less than significant health risks on nearby sensitive receptors from construction and diesel truck emissions from warehouse operations. The Project will implement a number of standard conditions and mitigation measures previously recommended in the PVCCSP EIR.

Source: 2030 General Plan, various Elements

ALUC Consistency

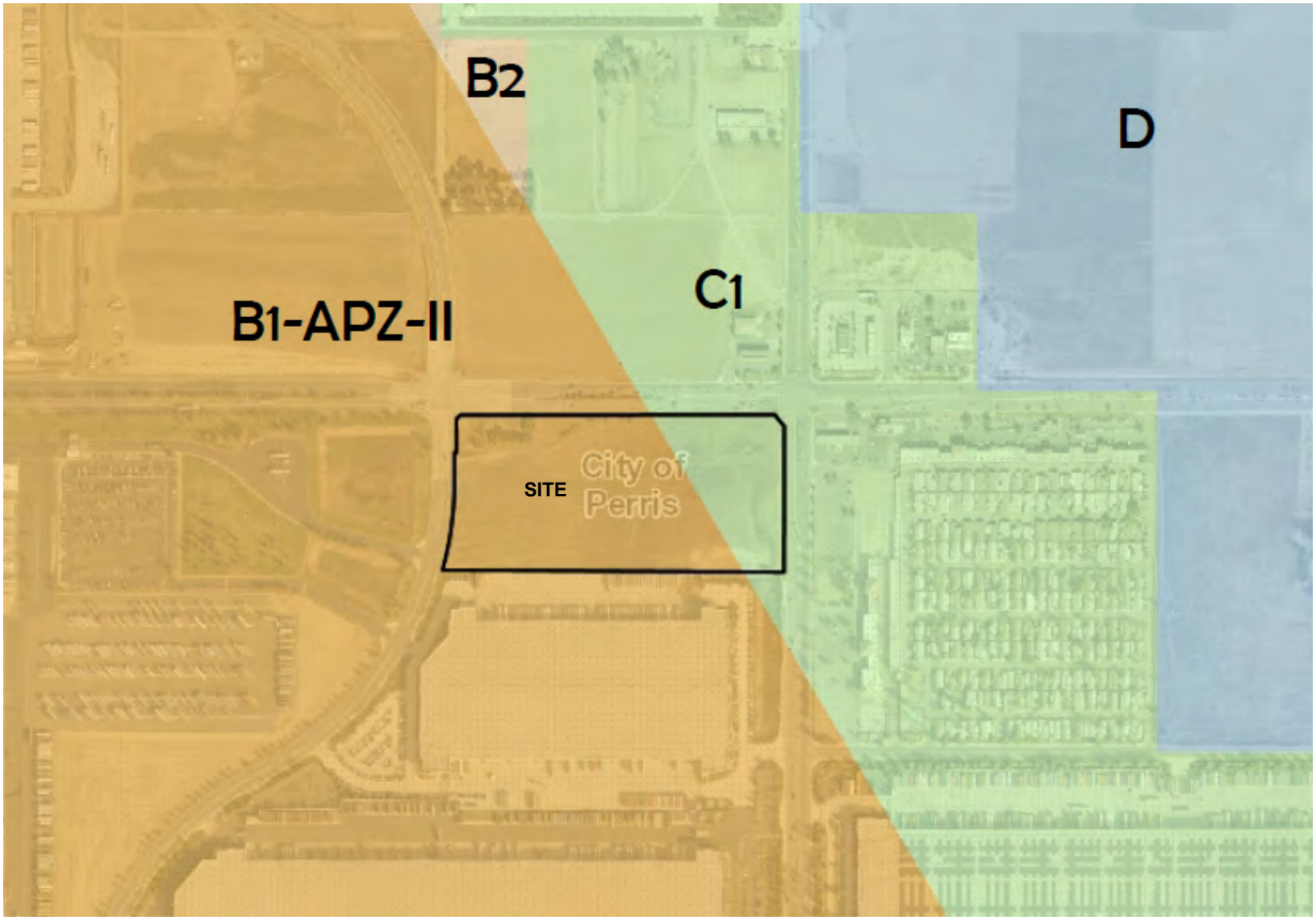
The Project site is within the boundaries of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (March ALUCP) which is monitored and maintained by the Riverside County Airport Land Use Commission (ALUC). The Project site is designated for commercial uses at present under the City's General Plan and zoning, but the Project proposes light industrial (warehousing) uses. The 16-acre site falls within two March ALUCP Compatibility Zones[1] – the western 11.8 acres is within Zone B1-APZ-II and the eastern 3.90 acres is within Zone C1 (see **Figure 4.8-3, *Airport Compatibility***).

The Project was submitted to ALUC for consideration and on July 9, 2020, ALUC determined the Project was consistent with the March ALUCP as long as it complied with a number of site and building design conditions (see sub-section 9, Hazards and Hazardous Materials, and Mitigation Measure MM-HAZ-3). The ALUC staff report indicated the Project as proposed was consistent with the various compatibility criteria established for the two onsite zones (B1-APZ-II and C1 – these two zones have different criteria with Zone C1 being the less restrictive. The reason the Project is consistent with the compatibility criteria of the two zones is most of the Project is proposed as high cube logistics warehousing which has very few employees per square foot, while the office area is located in the C1 zone which has less stringent density requirements (i.e., employees or persons per acre). One of the compatibility measures

is the maximum single acrefigure. The warehouse portion of the Project that is within Zone B1-APZ-II has 44 persons per acre while the density criteria for that zone is 50 persons per acre, so the proposed low intensitywarehouse use would reach almost 90 percent of the density criteria.

[1] Zone B1 = inner approach/departure zone, Zone C1 = primary approach/departure zone, APZ = Accident Potential Zone

Figure 4.8-3
Airport Compatibility



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

Zone B1, APZ II allows 50 people per acre and prohibited uses include children's schools, day care centers, libraries, hospitals, congregate care facilities, hotels/ motels, restaurants, and places of assembly.

Zone C1 allows 100 people per acre and prohibited uses include children's schools, day care centers, libraries, hospitals, congregate care facilities, and places of assembly.

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Summary of Local Planning Impacts

The Project is consistent with General Goals and Policies listed in Section 4.8.2.2.c, Local, City of Perris General Plan (Environmental Setting) of this DEIR. The polices listed in this Section are those that are applicable from the General Plan that have been adopted for the purpose of avoiding or mitigating an environmental impact. Based on the consistency with the applicable General Plan policies and consistencywith the March ALUCP, any land use conflicts with the General Plan or zoning from the Project are considered less than significant.

Regional Plans

The proposed industrial uses of the Project were not anticipated or analyzed in the GPEIR; however, the General Plan did anticipate 16 acres of commercial uses on this site (approximately 273,557 square feet based on a floor area ratio or FAR of 0.4) and this amount of commercial square footage would have equivalent or greater regional impacts (e.g., traffic, air quality) compared to the proposed light industrial uses. In contrast, the proposed light industrial use could have different localized impacts compared to commercial uses relative to potential health risks from more truck traffic relative to passenger vehicle traffic. However, the overall impacts of the proposed Project would most likely be equivalent to those of commercial uses which are currently planned for the site, and which was the basis for the 2020 RTP/SCS. In addition, the size of the Project does not exceed the thresholds established by CEQA for regionally significant projects, therefore, the proposed Project does not need to be evaluated against the specific goals or policies of SCAG's regional plan, Connect SoCal - the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS). In this regard, the proposed Project would not have substantially different impacts relative to regional land use and environmental plans (like the 2020 RTP/SCS) compared to the current planned use (i.e.,commercial).

Although the industrial land uses of the Project were not specifically anticipated under the existing General Plan land use designation (i.e., commercial), the proposed land uses would not significantly intensify the development and would not change the population or housing projections planned for under the City's General Plan (i.e., no new residential uses proposed). Therefore, the Project would not conflict in a substantial or significant way or exceed the overall assumptions used to develop the RTP/SCS as they relate to the City of Perris. This minor land use inconsistency can be corrected whenever the Southern California Association of Governments (SCAG) updates its growth projections at some point after the Project has been approved.

4.8.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

No standard conditions are required.

Mitigation Measure(s)

No mitigation measures are required.

4.8.6 Cumulative Impacts

Implementation of the proposed Project, when considered in conjunction with other existing and planned developments in the Project area, would result in developing a vacant 16-acre site into 347,918 square feet of light industrial (warehouse and office) uses. The cumulative study area analyzed for potential land use impacts is the PVCCSP within the City of Perris. The proposed change from commercial use to industrial use is generally consistent with the goals of the City General Plan and is required to be consistent with the regional ALUC restrictions. The amount of land that would be

dedicated to industrial use under the proposed Project would be only an incremental amount of land already dedicated for industrial uses in the rest of the City and would generate much needed employment.

The Project would generate no new permanent residents in the City as it is assumed most of the new jobs created by the Project would be filled by local workers and/or residents. The analysis in Subsection 4.8.5 above concluded that the proposed light industrial development of the Project was equivalent in terms of regional impacts compared to the existing planned commercial uses. Therefore, the Project would generally be within the growth assumptions estimated in the SCAGRTP/SCS. Project impacts are considered to be less than significant, and no mitigation is required.

The IS determined that the Project would not physically divide an established community. No impacts will occur.

Therefore, based on the analysis contained above in this Section 4.8, the Project will not result in significant cumulative land use or planning impacts.

4.8.7 Unavoidable Significant Adverse Impacts

The proposed Project would not represent a change to the City's General Plan Land Use Plan or Zoning Map (i.e., Project still in the PVCCSP), but it would represent a change to the Specific Plan (from commercial to light industrial use). Based on the data and analysis presented in this section, implementation of the proposed Project will not cause significant unavoidable adverse impacts relative to the land use and planning in the City of Perris and no mitigation is required.

4.9 NOISE

4.9.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of noise fromimplementation of the Project. The Noise Section of the Initial Study (IS, Subchapter 8.3, *Initial Study*) posed the following questions:

a. Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
b. Would the Project result in exposure of persons to or generation of excessive groundbornevibration or groundborne noise levels?
c. For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public useairport, would the Project expose people residing or working in the Project area to excessive noise levels?

Based on the analysis in the IS it was determined that all of the questions related to noise (in the questions asked above), **would** be further analyzed in the DEIR.

No standard conditions were presented in the IS that shall be carried over to this DEIR.

Mitigation Measures **PVCCSP EIR MM Noise 1** through **PVCCSP EIR MM Noise 4** from the PVCCSP EIR were outlined in the IS and have been carried over to this DEIR.

In addition to the IS the following resources were utilized in the preparation of this Subchapter:

- *Perris And Ramona Warehouse (DPR19-00012) Noise Impact Analysis, City of Perris,* prepared by Urban Crossroads, 9-6-2021 (*Noise Study*, **Appendix M**)
- *Perris And Ramona Warehouse (DPR19-00012) Air Quality Impact Analysis City of Perris,* prepared by Urban Crossroads, 9-21-2021 (*AQ Analysis*, **Appendix I1**)
- *Perris And Ramona Warehouse (DPR19-00012) Traffic Generation Assessment and Vehicle Miles Traveled (VMT) Screening Evaluation, City of Perris*, prepared by Urban Crossroads, 9-7-2021 (**Appendix N**)
- City of Perris General Plan https://www.cityofperris.org/departments/development-services/general-plan
- City of Perris General Plan - Final Environmental Impact Report https://www.cityofperris.org/home/showpublisheddocument/451/637203139698630000

Notice of Preparation (NOP)/Scoping Comments

No comments concerning Noise were received in response to the NOP for the proposed Project. Additionally, no comments were received in response to the NOP at the scoping meeting held forthe proposed Project on May 19, 2021.

Note: Any tables or figures in this section are from the *Noise Study*, unless otherwisenoted.

4.9.2 Environmental Setting

4.9.2.1 Existing Conditions

4.9.2.1.a Fundamentals of Noise

This section basic information about noise and presents some of the terms used in this Section.

Sound, Noise, and Acoustics

The sound is a disturbance created by a moving or vibrating source and is capable of being detected by the hearing organs. The sound may be thought of as mechanical energy of a moving object transmitted by pressure waves through a medium to a human ear. For traffic or stationary noise, the medium of concern is air. Noise is defined as sound that is loud, unpleasant, unexpected, or unwanted.

Frequency and Hertz

A continuous sound is described by its frequency (pitch) and its amplitude (loudness). Frequency relates to the number of pressure oscillations per second. Low-frequency sounds are low in pitch and high-frequency sounds are high in pitch. These oscillations per second (cycles) are commonly referred to as Hertz (Hz). The human ear can hear from the bass pitch starting out at 20 Hz all the way to the high pitch of 20,000 Hz.

Sound Pressure Levels and Decibels

The amplitude of a sound determines its loudness. The loudness of sound increases or decreases, as the amplitude increases or decreases. Sound pressure level (SPL or Lp) is used to describe in logarithmic units the ratio of actual sound pressures to a reference pressure squared. These units are called decibels and abbreviated as dB. Because decibels are on a logarithmic scale, sound pressure levels cannot be added or subtracted by simple plus or minus addition. When two (2) sounds or equal SPL are combined, they will produce an SPL 3 dB greater than the original single SPL. In other words, sound energy must be doubled to produce a 3dB increase. If two (2) sounds differ by approximately 10 dB the higher sound level is the predominant sound.

Human Response to Changes in Noise Levels

In general, the healthy human ear is most sensitive to sounds between 1,000 Hz and 5,000 Hz, (A-weighted scale) and it perceives a sound within that range as being more intense than a sound with a higher or lower frequency with the same magnitude. The A-scale weighing is typically reported in terms of A-weighted decibel (dBA). Typically, the human ear can barely perceive the change in the noise level of 3 dB, a change in 5 dB is readily perceptible, and a change in 10 dB is perceived as being twice or half as loud. As previously discussed, a doubling of sound energy results in a 3 dB increase in sound, which means that a doubling of sound energy (e.g., doubling the volume of traffic on a highway), would result in a barely perceptible change in sound level. **Table 4.9-1, *Typical Noise Levels***, compares typical sound levels for urban activities and shows the noise levels for typical outdoor and indoor activities.

Table 4.9-1
Typical Outdoor Noise Levels

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	SLEEP DISTURBANCE
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

Noise Descriptors

In the daily environment noise fluctuates over time. Some noise levels occur in regular patterns, others are random. Some noise levels are constant, while others are sporadic. Noise descriptors were created to describe the different time-varying noise levels. Following are the most commonly used noise descriptors along with brief definitions.

A-Weighted Sound Level: The sound pressure level in decibels as measured on a sound level meter using the A-weighted filter network. The A-weighting filter de-emphasizes the very low and very high-frequency components of the sound in a manner similar to the response of the human ear. A numerical method of rating human judgment of loudness.

Ambient Noise Level: The composite of noise from all sources, near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.

Community Noise Equivalent Level (CNEL): The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five (5) decibels to sound levels in the evening from 7:00 to 10:00 PM and after addition of ten (10) decibels to sound levels in the night before 7:00 AM and after 10:00 PM.

Decibel (dB): A unit for measuring the amplitude of a sound, equal to 20 times the logarithm to the base

10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micro-Pascal's.

dB(A): A-weighted sound level (see definition above).

Equivalent Sound Level (LEQ): The sound level corresponding to a steady noise level over a given sample period with the same amount of acoustic energy as the actual time-varying noise level. The energy average noise level during the sample period.

Habitable Room: Any room meeting the requirements of the Uniform Building Code or other applicable regulations which is intended to be used for sleeping, living, cooking or dining purposes, excluding such enclosed spaces as closets, pantries, bath or toilet rooms, service rooms, connecting corridors, laundries, unfinished attics, foyers, storage spaces, cellars, utility rooms, and similar spaces.

L(n): The A-weighted sound level exceeded during a certain percentage of the sample time. For example, L10 in the sound level exceeded 10 percent of the sample time. Similarly, L50, L90, and L99, etc.

Noise: Any unwanted sound or sound which is undesirable because it interferes with speech and hearing, or is intense enough to damage hearing, or is otherwise annoying. The State Noise Control Act defines noise as "...excessive undesirable sound...".

Outdoor Living Area: Outdoor spaces that are associated with residential land uses typically used for passive recreational activities or other noise-sensitive uses. Such spaces include patio areas, barbecue areas, jacuzzi areas, etc. associated with residential uses; outdoor patient recovery or resting areas associated with hospitals, convalescent hospitals, or rest homes; outdoor areas associated with places of worship which have a significant role in services or other noise-sensitive activities; and outdoor school facilities routinely used for educational purposes which may be adversely impacted by noise. Outdoor areas usually not included in this definition are: front yard areas, driveways, greenbelts, maintenance areas and storage areas associated with residential land uses; exterior areas at hospitals that are not used for patient activities; outdoor areas associated with places of worship and principally used for short-term social gatherings; and, outdoor areas associated with school facilities that are not typically associated with educational uses prone to adverse noise impacts (for example, school play yard areas).

Sound Level (Noise Level): The weighted sound pressure level obtained by use of a sound levelmeter having a standard frequency-filter for attenuating part of the sound spectrum.

Single Event Noise Exposure Level (SENEL): The dBA level which, if it lasted for one (1) second, would produce the same A-weighted sound energy as the actual event.

Traffic Noise Prediction

Noise levels associated with traffic depends on a variety of factors: (1) volume of traffic, (2) speed of traffic, (3) auto, medium truck (2 – 6 wheels) and heavy truck percentage (3 axles and greater), and sound propagation. The greater the volume of traffic, higher speeds and truck percentages equate to a louder volume of noise. A doubling of the Average Daily Traffic (ADT) along a roadway will increase noise levels by approximately 3 dB.

Sound Propagation

As sound propagates from a source it spreads geometrically. The sound from a small, localized source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates at a rate of 6 dB per doubling of distance. The movement of vehicles down a roadway makes the source of the sound appear to propagate from a line (i.e., line source) rather than a point source. This line source results in the noise propagating from a roadway in a cylindrical spreading versus a spherical spreading that results from a point source. The sound level attenuates for a line source at a rate of 3 dB per doubling of distance.

As noise propagates from the source, it is affected by the ground and atmosphere. Noise models use the hard site (reflective surfaces) and soft site (absorptive surfaces) to help calculate predicted noise levels. Hard site conditions assume no excessive ground absorption between the noise source and the receiver. Soft site conditions such as grass, soft dirt or landscaping attenuate noise at an additional rate of 1.5 dB per doubling of distance. When added to the geometric spreading, the excess ground attenuation results in an overall noise attenuation of 4.5 dB per doubling of distance for a line source and 6.0 dB per doubling of distance for a point source.

Research has demonstrated that atmospheric conditions can have a significant effect on noise levels when noise receivers are located 200 feet from a noise source. Wind, temperature, air humidity, and turbulence can further impact how far sound can travel.

4.9.2.1.b Fundamentals of Vibration

Vibration Descriptors

Ground-borne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of ground-borne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Although ground- borne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Ground-borne noise is an effect of ground-borne vibration and only exists indoors since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves. Several different methods are used to quantify vibration amplitude:

- PPV: Known as the peak particle velocity (PPV) which is the maximum instantaneous peak in vibration velocity, typically given in inches per second;
- RMS: Known as the root mean squared (RMS) can be used to denote vibration amplitude; and
- VdB: A commonly used abbreviation to describe the vibration level (VdB) for a vibration source.

Vibration Perception

Typically, developed areas are continuously affected by vibration velocities of 50 VdB or lower. These continuous vibrations are not noticeable to humans whose threshold of perception is around 65 VdB. Outdoor sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely produce perceptible ground-borne noise or vibration. To counter the effects of ground- borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to

the FTA, fragile buildings can be exposed to ground-borne vibration levels of 0.3 inches per second without experiencing structural damage.

Vibration Propagation

There are three main types of vibration propagation: surface, compression, and shear waves:

- Surface waves, or Rayleigh waves, travel along the ground's surface. These waves carry most of their energy along an expanding circular wavefront, similar to ripples produced by throwing a rock into a pool of water.
- P-waves, or compression waves, are body waves that carry their energy along an expanding spherical wavefront. The particle motion in these waves is longitudinal (i.e., in a "push-pull" fashion). P-waves are analogous to airborne sound waves.
- S-waves, or shear waves, are also body waves that carry energy along an expanding spherical wavefront. However, unlike P-waves, the particle motion is transverse, or side-to- side and perpendicular to the direction of propagation.

As vibration waves propagate from a source, the vibration energy decreases in a logarithmic nature and the vibration levels typically decrease by 6 VdB per doubling of the distance from the vibration source. This drop-off rate can vary greatly depending on the soil but has been shown to be effective enough for screening purposes, in order to identify potential vibration impacts that may need to be studied through actual field tests.

4.9.2.1.c Land Use and Adjacent Land Uses

The proposed Project site is located on the southwest corner of Perris Boulevard and Ramona Expressway within the Perris Valley Commerce Center Specific Plan (PVCCSP) while the March Air Reserve Base/Inland Port Airport (MARB/IPA) is located approximately 1.29 miles northwest of the Project site boundary. As per the PVCCSP, the Project site is designated as a Light Industrial use which provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. The Project site is currently vacant and adjacent to existing light industrial uses to the south and west, existing and approved commercial uses to the north and west. Noise sensitive residential homes are located further to the east (i.e., east of an existing shopping center). All of the surrounding land uses are also within the PVCCSP.

4.9.2.1.d Existing Noise Environment

A comprehensive noise impact assessment (*Noise Study*) was prepared for the proposed Project. As part of that study, ambient or existing noise levels around the site were measured to establish baseline noise conditions. The noise measurements presented below focus on the average or equivalent sound levels (L_{eq}). The equivalent sound level (L_{eq}) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. **Table 4.9-2, *24-Hour Ambient Noise Level Measurements***, identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at three (3) noise level measurement locations around the site as shown in **Figure 4.9-1, *Noise Measurement Locations***. Noise levels in the Project area range from a low of 56.0 dBA at night up to a high of 64.3 dBA during the day.

Table 4.9-2
24-Hour Ambient Noise Level Measurements

Location[1]	Description	Energy Average Noise Level (dBA L_{eq})[2]		CNEL
		Daytime	Nighttime	
L1	Located north of the Project site on Barret Avenue near existing single-family residential homes.	57.5	57.2	64.1
L2	Located north of the Project site on Perry Street near existing single-family residential home at 77 Perry Street.	56.7	56.0	62.9
L3	Located east of the Project site and Perris Boulevard near a church and existing single-family residential homes.	64.3	62.4	69.5

[1] See Figure 4.9-1 for the noise level measurement locations.
[2] Energy (logarithmic) average levels. Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

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Figure 4.9-1
Noise Measurement Locations

Source: Noise Study (Appendix M)

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Sensitive Receptor Locations

As identified in the PVCC SP EIR, sensitive receivers are areas where humans are participating in activities that may be subject to the stress of significant interference from noise and often include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities, and libraries. Other receivers include office and industrial buildings, which are not considered as sensitive as single-family homes, but are still protected by City of Perris land use compatibility standards. The selection of receiver locations was based on FHWA guidelines and is consistent with additional guidance provided by Caltrans and the FTA. Based on the Project environment, four (4) local sensitive receptors were identified and are shown on **Figure 4.9-2, *Local Sensitive Receptor Locations***, and are described below:

R1 Location R1 represents the property line of the existing noise sensitive residence at 4111Barrett Avenue, approximately 740 feet north of the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.

R2 Location R2 represents the property line of the existing noise sensitive residence at 77 Perry Street, approximately 738 feet north of the Project site. A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment.

R3 Location R3 represents the property line of the existing noise sensitive residence at 80 EDawes Street, approximately 432 feet east of the Project site. A 24-hour noise measurement was taken near this location, L3, to describe the existing ambient noise environment.

R4 Location R4 represents the property line of The Islamic Center of Perris at 3895 North Perris Boulevard, approximately 273 feet southeast of the Project site. A 24-hour noise measurement was taken near this location, L3, to describe the existing ambient noise environment.

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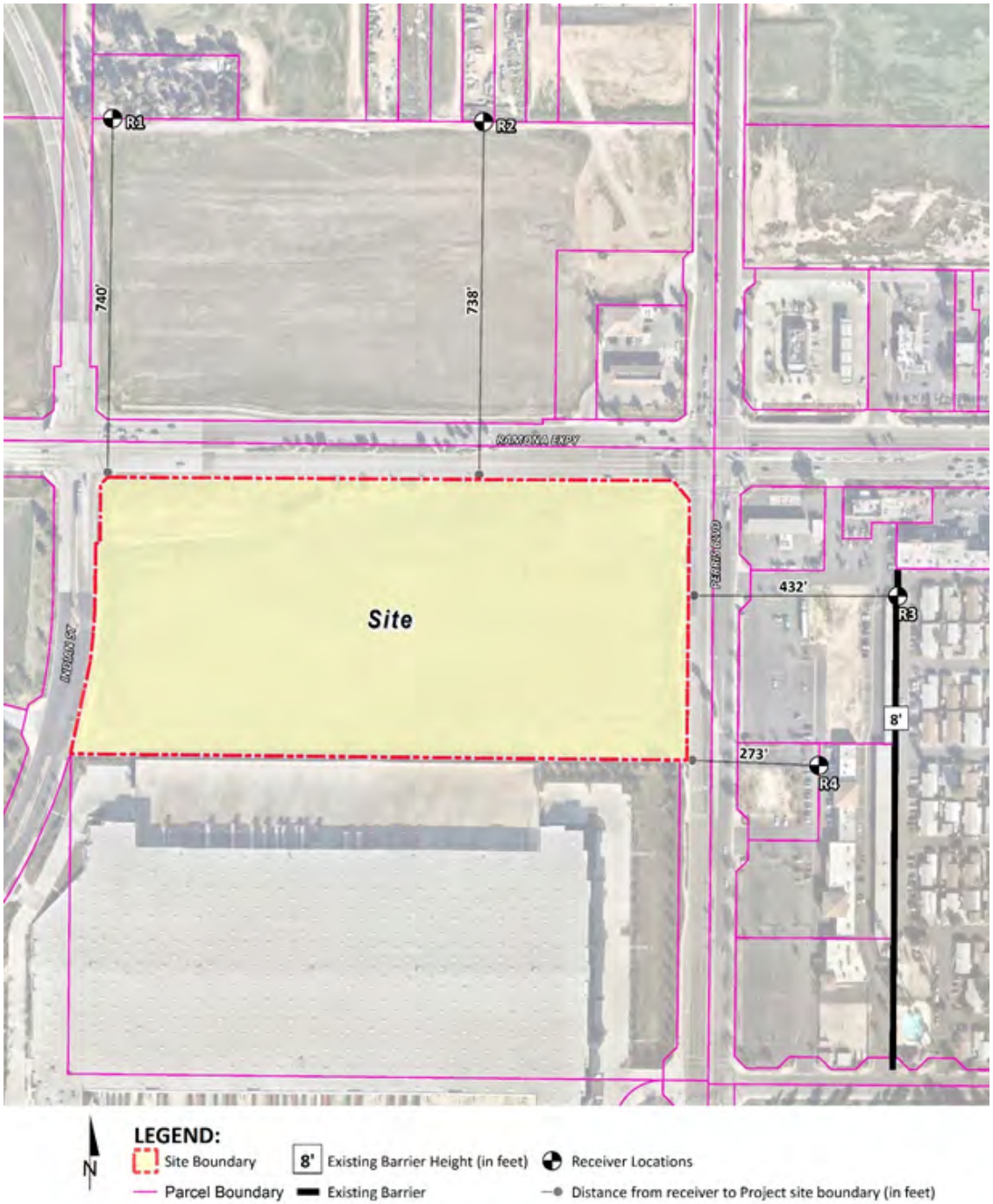
Figure 4.9-2
Local Sensitive Receptor Locations



Source: Noise Study (Appendix M)

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4.9.2.2 Regulatory Setting

4.9.2.2.a Federal Noise Control Act of 1972

The adverse impact of noise was officially recognized by the federal government in the Noise Control Act of 1972, which serves three (3) purposes:

- Publicize noise emission standards for interstate commerce
- Assist state and local abatement efforts
- Promote noise education and research

The Federal Office of Noise Abatement and Control (ONAC) was originally tasked with implementing the Noise Control Act. However, it was eventually eliminated leaving other federal agencies and committees to develop noise policies and programs. Some examples of these agencies are as follows: The Department of Transportation (DOT) assumed a significant role in noise control through its various agencies; The Federal Aviation Agency (FAA) is responsible to regulate noise from aircraft and airports; The Federal Highway Administration (FHWA) is responsible to regulate noise from the interstate highway system; The Occupational Safety and Health Administration (OSHA) is responsible for the prohibition of excessive noise exposure to workers.

The Federal government and the State advocate that local jurisdiction use their land use regulatory authority to arrange new development in such a way that “noise sensitive” uses are either prohibited from being constructed adjacent to a highway or, or alternatively that the developments are planned and constructed in such a manner that potential noise impacts are minimized.

Since the Federal government and the State have preempted the setting of standards for noise levels that can be emitted by the transportation source, the City is restricted to regulating the noisegenerated by the transportation system through nuisance abatement ordinances and land use planning.

4.9.2.2.b State

California Department of Health Services Office of Noise Control

Established in 1973, the California Department of Health Services Office of Noise Control (ONC) was instrumental in developing regularity tools to control and abate noise for use by local agencies. One significant model is the “Land Use Compatibility for Community Noise Environments Matrix.” The matrix allows the local jurisdiction to clearly delineate compatibility of sensitive uses with various incremental levels of noise.

State General Plan Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared per guidelines adopted by the Governor’s Office of Planning and Research (OPR). The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, the California Environmental Quality Act (CEQA) requires that all known environmental effects of a project be analyzed, including environmental noise impacts. Local

noise elements must recognize the land use compatibility guidelines published by the State Department of Health Services. The guidelines rank noise land use compatibility in terms of normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable.

State Green Building Code

The State of California's Green Building Standards Code (CALGreen) contains mandatorymeasures for non-residential building construction in Section 5.507 on Environmental Comfort. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noiselevels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, andother areas where noise contours are not readily available. If the development falls within an airport or freeway 65 dBA CNEL noise contour, the combined sound transmission class (STC) rating of the wall and roof-ceiling assemblies shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly equivalent noise levelof 50 dBA L_{eq} in occupied areas during any hour of operation (Section 5.507.4.2).

4.9.2.2.c Local

Applicable City of Perris General Plan Goals and Policies

The City of Perris has adopted a Noise Element of the General Plan to control and abate environmental noise, and to protect the citizens of Perris from excessive exposure to noise. The Noise Element specifies the maximum allowable unmitigated exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the Noise Element identifies the following noise goals and polices applicable to the Project designed to protect, create, and maintain an environment free from noise that may jeopardize the health or welfare of sensitive receptors, or degrade the qualityof life for City residents:

Noise Element

Goal I: Land Use Siting. Future land uses compatible with projected noise environments

Policy I.A: The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.

Goal II: Existing Sensitive Receptors. Roadway improvements compatible with existing with existing noise-sensitive land uses

Policy II.A: Appropriate measures shall be taken in the design phase of future roadway wideningprojects to minimize impacts on existing sensitive noise receptors.

Goal IV: Air Traffic Noise. Future land uses compatible with noise from air traffic

Policy IV.A: Reduce or avoid the existing and potential future impacts from air traffic on new sensitive noise land uses in areas where air traffic noise is 60 dBA CNEL or higher.

Goal V: Stationary Source Noise. Future non-residential land uses compatible with noise sensitive

land uses

Policy V.A: New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.

The noise standards identified in the Noise Element are guidelines to evaluate the acceptability of the transportation related noise level impacts. These standards are based on the Governor's Office of Planning and Research (OPR) and are used to assess the long-term traffic noise impacts on land uses. According to the City's Land Use Compatibility for Community Noise Exposure, noise-sensitive land uses such as single-family residences are *normally acceptable* with exterior noise levels below 60 dBA CNEL and *conditionally acceptable* with noise levels below 65 dBA CNEL. Industrial uses, such as the Project, are considered *normally acceptable* with exterior noise levels of up to 70 dBA CNEL, and *conditionally acceptable* with exterior noiselevels between 70 to 80 dBA CNEL.

City of Perris Municipal Code

The City of Perris Municipal Code, Chapter 7.34 *Noise Control*, Section 7.34.040, establishes the permissible noise level at any point on the property line of the affected residential receivers. Therefore, for residential properties, the exterior noise level shall not exceed a maximum noise level of 80 dBA L_{max} during daytime hours (7:01 a.m. to 10:00 p.m.) and shall not exceed a maximum noise level of 60 dBA L_{max} during the nighttime hours (10:01 p.m. to 7:00 a.m.), as shown on **Table 4.9-3, *Operational Noise Standards***.

Additional exterior noise level standards are identified in the General Plan Noise Element Implementation Measure V.A.1 which requires that new industrial facilities within 160 feet of the property line of existing noise-sensitive land uses must demonstrate compliance with a 60 dBA CNEL exterior noise level standard. **Table 4.9-3** shows the Municipal Code and General Plan standards used in this analysis to evaluate the potential operational noise levels from the Project.

Table 4.9-3
Operational Noise Standards

Land Use	Time Period	Noise Level Standard (dBA)
Residential[1]	Daytime (7:01 a.m. - 10:00 p.m.)	80 dBA L_{max}
	Nighttime (10:01 p.m. - 7:00 a.m.)	60 dBA L_{max}
Within 160 Feet of Property Line[2]	24-Hours	60 dBA CNEL

[1] Source: City of Perris Municipal Code, Sections 7.34.040 & 7.34.050
[2] Source: City of Perris General Plan Noise Element, Implementation Measure V.A.1.

Construction Standards

The City of Perris Municipal Code (PMC) Section 7.34.060 identifies the City's construction noise standards and permitted hours of construction activity. Further, the City of Perris Municipal Code, Section 7.34.060, noise level standard of 80 dBA L_{max} at residential properties shall apply to the noise-sensitive receiver locations located in the City of Perris. Appendix 3.1 of that PMC Section states the

permitted hours of construction activities are "7:00 a.m. to 7:00 p.m. on any day except Sundays and legal holidays with the exception of Columbus Day and Washington's birthday. It also states the construction noise level standard at the property line is 80 dBA L_{max}.

Vibration Standards

The City of Perris has not identified or adopted specific vibration level standards. However, the United States Department of Transportation Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment* methodology provides guidelines for maximum-acceptable vibration criteria for different types of land uses. These guidelines allow 90 VdB for industrial (workshop) use, 84 VdB for office use and 78 VdB for daytime residential uses.

4.9.3 Thresholds of Significance

As discussed in Subchapter 4.9.1, the Project impacts to three (3) criteria pertaining to noise will be analyzed. According to the IS, the Project would have a significant impact if it would:

a. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
b. Result in exposure of persons to or g Generation of excessive groundborne vibration or groundborne noise levels.
c. For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the Project area to excessive noise levels?

The questions posed in the IS are included for each topical section to guide the impact analysis and the above significance criteria represent a summary of the thresholds raised in the City's IS. The potential noise changes in the environment are addressed in response to the above thresholds in the following analysis.

PVCCSP EIR Criteria

According to the PVCCSP EIR, there is no official "industry standard" of determining significance of noise impacts. However, typically, a jurisdiction will identify either 3 dBA or 5 dBA increase as being the threshold because these levels represent varying levels of perceived noise increases. The PVCCSP EIR indicates that a 5 dBA noise level increase is considered discernable to most people in an exterior environment when the resulting noise levels are below 60 dBA. Further, it identifies a 3 dBA increase threshold when the noise levels already exceed 60 dBA. In addition, according to the PVCCSP EIR, an increase of 5 dBA or more above without Project noise levels is considered a significant impact at all other sensitive land uses. For the purposes of this EIR, noise impacts shall be considered significant if any of the following occur as a direct result of the proposed Project. **Table 4.9-4, *Summary of Noise Significance Criteria***, summarizes the various significance criteria for Project noise impacts.

Vibration Criteria

The frequency of a vibrating object describes how rapidly it is oscillating, measured in hertz (Hz). The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than 1 Hz to a high of about 200 Hz. Typical vibration from transportation and

construction sources typically falls in the range of 10 to 30 Hz and usually centers around 15 Hz. While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration (i.e., 8 to 80 Hz). Vibration in buildings caused by construction activities may be perceived as motion of building surfaces or rattling of windows, items on shelves, and pictures hanging on walls.

Table 4.9-4
Summary of Noise Significance Criteria

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site	Noise-Sensitive[1]	if resulting noise level is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		if resulting noise level is > 60 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	Perris	At residential land use[2]	80 dBA Lmax	60 dBA Lmax
		Within 160 Feet of residential use[3]	60 dBA CNEL	
	Noise-Sensitive[1]	if resulting noise level is < 60 dBA Leq	≥ 5 dBA Leq Project increase	
		if resulting noise level is > 60 dBA Leq	≥ 3 dBA Leq Project increase	
Construction	Noise-Sensitive	Noise Level Threshold[5]	80 dBA Lmax	
		Vibration Level Threshold[4]	78 VdB	
	Office[4]	Vibration Level Threshold	84 VdB	
	Industrial[4]	Vibration Level Threshold	90 VdB	

[1] PVCCSP EIR, Page 4.9-20.
[2] City of Perris Municipal Code, Section 7.34.040 (Appendix 3.1).
[3] City of Perris General Plan Noise Element, Implementation Measure V.A.1.
[4] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.
[5] City of Perris Municipal Code, Section 7.34.060 (Appendix 3.1).
Daytime" = 7:01 a.m. - 10:00 p.m.; "Nighttime" = 10:01 p.m. - 7:00 a.m.

4.9.4 Potential Impacts

THRESHOLD a: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan ornoise ordinance, or applicable standards of other agencies?

Less Than Significant Impact

4.9.4.1 Construction Noise

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when operating at the project site boundaries closest the nearest sensitive receiver locations can reach high levels. The number and mix of construction equipment are expected to occur in the following stages: Site Preparation; Grading; Building Construction; Paving; and Architectural Coatings. **Table 4.9-5, *Typical Construction Equipment Noise Levels***, shows typical noise levels for the type of construction equipment anticipate on the Project site. Key noise parameters include distance from the nearest sensitive receptors, equipment type and usage, construction hours as permitted by the City, and other baseline conditions of the Project site. The *Noise Study* also evaluates potential vibration impacts on-site and the surrounding area based on the typical construction vibration levels referenced from the *Transit Noise and Vibration Impact Assessment* of the

Federal Transit Administration (FTA).

Table 4.9-5
Typical Construction Equipment Noise Levels

Construction Stage	Construction Activity	Reference Noise Level @ 50 Feet (dBA L_{max})[1]	Highest Reference Noise Level (dBA L_{max})
Site Preparation	Crawler Tractors	82	82
	Rubber Tired Dozers	79	
Grading	Crawler Tractors	82	85
	Excavators	81	
	Graders	85	
	Rubber Tired Dozers	79	
	Graders	85	
Building Construction	Cranes	81	82
	Crawler Tractors	82	
	Rubber Tired Dozers	79	
	Generator Sets	73	
	Welders	74	
Paving	Pavers	77	80
	Hauling Trucks	76	
	Rollers	80	
Arch. Coating	Air Compressors	78	78

[1] FHWA's Roadway Construction Noise Model, January 2006.

As shown in **Table 4.9-6, *Project Construction Noise Levels***, the *Noise Study* estimated that construction noise levels would range from 53.8 to 73.4 dBA L_{max}, and the highest construction levels are expected to range from 60.8 to 73.4 dBA L_{max} at the nearby receiver locations.

Table 4.9-6
Project Construction Noise Levels

Receiver Location[1]	Construction Noise Levels (dBA L_{max})					
	Site Preparation	Grading	Building Construction	Paving	Arch. Coating	Highest Levels[2]
R1	67.1	70.1	67.1	65.1	63.1	70.1
R2	67.8	70.8	67.8	65.8	63.8	70.8
R3	57.8	60.8	57.8	55.8	53.8	60.8
R4	70.4	73.4	70.4	68.4	66.4	73.4

[1] Noise receiver locations are shown on Figure 4.9-2.
[2] Construction noise level calculations based on distance from the project site boundaries (construction activity area) tonearby receiver locations. CadnaA construction noise model inputs are included in Noise Study Appendix 9.1.

Table 4.9-7, *Project Construction Noise Impacts* indicates noise from Project construction will have less than significant impacts (i.e., be less than identified significance thresholds) at all of the nearby sensitive receptors (R1 through R4 as shown in Figure 4.9-2).

Table 4.9-7
Project Construction Noise Impacts

Receiver Location[1]	Construction Noise Levels (dBA L_{max})		
	Highest Construction Noise Levels[2]	Threshold[3]	Threshold Exceeded?[4]
R1	70.1	80	No
R2	70.8	80	No
R3	60.8	80	No
R4	73.4	80	No

[1] Noise receiver locations are shown on Figure 4.9-2.
[2] Highest construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations.
[3] Construction noise level thresholds are limited to the noise sensitive receiver locations.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?

Although the *Noise Study* determined the noise impacts of Project construction will be less than significant, the Project is required to comply with Mitigation Measures **PVCCSP EIR MM Noise 1** through **PVCCSP EIR MM Noise 4** from the PVCCSP EIR.

4.9.4.2 Project Traffic Noise

Traffic generated by the operation of the proposed Project will influence the traffic noise levels in surrounding off-site areas and at the Project site. According to the *Traffic Generation Assessment and Vehicle Miles Traveled (VMT) Screening Evaluation* prepared by Urban Crossroads, Inc., the proposed Project is anticipated to generate a total of 492 actual vehicle trip-ends per day with 82 truck trip-ends per day. The *Traffic Generation Assessment* determined that the Project is anticipated to generate fewer than 50 peak hour trips.

The City maintains Level of Service (LOS) policies as part of their General Plan and discretionary review process. As such, the *Traffic Generation Assessment* was developed to determine whether a full traffic study with LOS is required. Per the City's guidelines, a traffic study for LOS evaluation is required for projects which exceed 50 peak hour trips. The Project is anticipated to generate fewer than 50 peak hour trips. Additionally, the Project meets the Daily Trip Screening criteria and is presumed to have a less than significant VMT impact. As such, traffic and VMT analysis is not required for this Project based on the City's traffic study guidelines.

Therefore, traffic generated by the operation of the proposed Project is not expected to meaningfully influence the traffic noise levels in surrounding off-site areas. The expected Project traffic represents an incremental increase to the existing roadway volumes, which is not expected to generate a *barely perceptible* noise level increase of 3 dBA CNEL at nearby sensitive land uses adjacent to study area roadways, since a doubling of the existing traffic volumes would be required to generate a 3 dBA CNEL increase. (5) Due to the low traffic volumes generated by the Project, the off-site traffic noise levels generated by the Project are considered less than significant and no mitigation or further analysis is required in terms of noise impacts from Project traffic.

4.9.4.3 Operational Noise

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearby receiver locations potentially impacted by Project operational noise sources. Typical noise-generating operations include loading dock activity, truck movements, roof-top air conditioning units, and trash enclosure activity. The *Noise Study* calculated the daytime and nighttime noise levels from these operational activities, as shown in **Table 4.9-8, *Daytime Operational Noise Levels (dBA)***, and **Table 4.9-9, *Nighttime Operational Noise Levels (dBA)***. The daytime hourly noise levels from individual operational activities at the off-site receiver locations are expected to range from 47.7 to 57.1 dBA L_{max}. while the nighttime hourly noise levels at the off-site receiver locations are expected to range from 46.7 to 56.1 dBA L_{max}.

Table 4.9-8
Daytime Operational Noise Levels (dBA)

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA L_{max})			
	R1	R2	R3	R4
Loading Dock Activity	56.1	56.8	47.6	57.0
Truck Movements	30.8	23.3	26.8	40.0
Roof-Top Air Conditioning Units	23.5	28.6	22.4	32.7
Trash Enclosure Activity	8.4	8.8	12.0	35.2
Total (All Noise Sources)	**56.1**	**56.8**	**47.7**	**57.1**

[1] Noise receiver locations are shown on Figure 4.9-2.
CadnaA noise model calculations are included in Noise Study Appendix 8.1.

Table 4.9-9
Nighttime Operational Noise Levels (dBA)

Noise Source	Operational Noise Levels by Receiver[1] Location (dBA L_{max})			
	R1	R2	R3	R4
Loading Dock Activity	55.1	55.8	46.6	56.0
Truck Movements	30.8	23.3	26.8	40.0
Roof-Top Air Conditioning Units	21.1	26.2	20.0	30.3
Trash Enclosure Activity	7.4	7.8	11.0	34.2
Total (All Noise Sources)	**55.1**	**55.8**	**46.7**	**56.1**

[1] Noise receiver locations are shown on Figure 4.9-2.
CadnaA noise model calculations are included in Noise Study Appendix 8.1.

Consistent with the General Plan Noise Element, Implementation Measure V.A.1, Project operational noise levels at nearest sensitive receiver locations cannot exceed 60 dBA CNEL. The CNEL metric is typically used to describe 24-hour transportation-related noise levels, however, the General Plan Noise Element requires new industrial land use such as the Project to demonstrate compliance at any noise-sensitive land use within 160 feet of the Project site. **Table 4.9-10, *Operational Noise Increase Impacts (dBA)***, includes the evening and nighttime adjustments made to the operational noise levels during the applicable hours to convert the worst-case hourly operational noise levels (L_{eq}) to 24-hour

CNELs. To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the exterior noise level standards at nearby noise-sensitive receiver locations. **Table 4.9-10** shows the operational noise levels associated with Project will satisfy the " 80 dBA L_{max} daytime and 60 dBA L_{max} nighttime exterior noise level standards at all nearby receiver locations.

Table 4.9-10
Operational Noise Increase Impacts (dBA)

Receiver Location[1]	Project Operational Noise Levels (dBA L_{max})[2]		Exterior Noise Level Standards (dBA L_{max})[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	56.1	55.1	80	60	No	No
R2	56.8	55.8	80	60	No	No
R3	47.7	46.7	80	60	No	No
R4	57.1	56.1	80	60	No	No

[1] See Figure 4.9-2 for the receiver locations.[2] Proposed Project operational noise levels.[3] Exterior noise level standard.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?"Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.

In addition, **Table 4.9-11, *Operational Noise Increase Impacts (CNEL)***, indicates that the 24- hour noise levels associated with the Project at the nearest receiver locations are expected to range from 39.1 to 49.6 dBA CNEL. The Project-related operational noise levels shown on **Table4.9-11** will satisfy the 60 dBA CNEL exterior noise level standards at the nearest receiver locations.

Table 4.9-11
Operational Noise Increase Impacts (CNEL)

Receiver Location[1]	Project Operational Noise Levels[2]			Exterior Noise Level Standards (CNEL)[3]	Noise Level Standards Exceeded?[4]
	Daytime (dBA L_{eq})	Nighttime (dBA L_{eq})	24-Hour (CNEL)		
R1	41.3	40.4	46.8	60	No
R2	41.9	40.9	47.3	60	No
R3	33.5	32.6	39.1	60	No
R4	43.8	43.0	49.6	60	No

[1] See Figure 4.9-2 for the receiver locations.
[2] Proposed Project operational noise level calculations are included in Noise Study Appendix 8.2.
[3] City of Perris General Plan Noise Element Implementation Measure V.A.1
[4] Do the estimated Project operational noise source activities exceed the noise level standards?"Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.

Finally, the *Noise Study* concluded the Project is not expected to generate a measurable daytime and nighttime operational noise level increase dBA L_{eq} at the nearby receiver locations, as shown in **Table 4.9-12, *Daytime Operational Noise Increase Impacts (dBA)***, and **Table 4.9-13, *Nighttime Operational Noise Increase Impacts (dBA)***. Therefore, the incremental noise level increases from

Project operations are less than significant at all receiver locations.

Table 4.9-12
Daytime Operational Noise Increase Impacts (dBA)

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	41.3	L1	57.5	57.6	0.1	5	No
R2	41.9	L2	56.7	56.8	0.1	5	No
R3	33.5	L3	64.3	64.3	0.0	3	No
R4	43.8	L3	64.3	64.3	0.0	3	No

[1] See Figure 4.9-2 for the receiver locations.
[2] Total Project daytime operational noise levels.
[3] Reference noise level measurement locations on Figure 4.9-1.
[4] Observed daytime ambient noise levels.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria from Table 4.9-4.

Table 4.9-13
Nighttime Operational Noise Increase Impacts (dBA)

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	40.4	L1	57.2	57.3	0.1	5	No
R2	40.9	L2	56.0	56.1	0.1	5	No
R3	32.6	L3	62.4	62.4	0.0	3	No
R4	43.0	L3	62.4	62.4	0.0	3	No

[1] See Figure 4.9-2 for the receiver locations.
[2] Total Project nighttime operational noise levels.
[3] Reference noise level measurement locations on Figure 4.9-1.
[4] Observed nighttime ambient noise levels.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria from Table 4.9-4.

4.9.4.5 Summary of Noise Impacts

Although the *Noise Study* determined the noise impacts of Project construction and operation willbe less than significant, the Project is required to comply with Mitigation Measures **PVCCSP EIRMM Noise 1** through **PVCCSP EIR MM Noise 4** from the PVCCSP EIR to further reduce construction impacts. Therefore, the Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

THRESHOLD b: Would the Project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact

The *Noise Study* also evaluated potential vibration impacts on-site and the surrounding area based on the typical construction vibration levels referenced from the *Transit Noise and Vibration Impact Assessment* of the Federal Transit Administration. Operational activities are separated into two different categories. The vibration can be transient or continuous in nature. Each category can result in varying degrees of ground vibration, depending on the equipment used on the site. Operation of equipment causes ground vibrations that spread through the ground and diminish in strength with distance. **Table 4.9-14, *Typical Construction Vibration Levels***, shows the range of vibration that can be expected by using typical construction equipment.

Table 4.9-14
Typical Construction Vibration Levels

Equipment	Peak Particle Velocity (PPV) (inches/second) at 25 feet	Approximate Vibration Level (LV) at 25 feet
Pile driver (impact)	1.518 (upper range)	112
	0.644 (typical)	104
Pile driver (sonic)	0.734 upper range	105
	0.170 typical	93
Clam shovel drop (slurry wall)	0.202	94
Hydromill	0.008 in soil	66
(slurry wall)	0.017 in rock	75
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, May 2006

Buildings in the vicinity of the Project area site respond to these vibrations with varying results ranging from no perceptible effects at the low levels to slight damage at the highest levels. The thresholds from Caltrans Transportation and Construction Induced Vibration Guidance Manual are shown in the previous **Table 4.9-4, *Summary of Significance Threshold Criteria*** (i.e., 78 VdB at sensitive receptors).

Table 4.9-15, *Project Construction Vibration Impacts*, presents the expected typical construction equipment vibration levels at the nearby receiver locations. At distances ranging from 273 feet to 740 feet from typical Project construction activities (at the Project site boundary), construction vibration levels are estimated to range from 42.9 to 55.9 VdB and will satisfy the FTA *Transit Noise and Vibration Impact Assessment* methodology provides guidelines for maximum-acceptable vibration criteria for different types of land uses. Therefore, the vibration impacts due to Project construction will be less than

significant at all receiver locations.

Table 4.9-15
Project Construction Vibration Impacts

Receiver Location[1]	Distance to Construction Activity (Feet)	Receiver Vibration Levels (VdB)[2]					Threshold VdB[3]	Threshold Exceeded?[4]
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Highest Vibration Levels		
R1	740'	13.9	34.9	41.9	42.9	42.9	78	No
R2	738'	13.9	34.9	41.9	42.9	42.9	78	No
R3	432'	20.9	41.9	48.9	49.9	49.9	78	No
R4	273'	26.9	47.9	54.9	55.9	55.9	78	No

[1] Noise receiver locations are shown on Figure 4.9-2.
[2] Based on the Vibration Source Levels of Construction Equipment included on Noise Study Table 9-4.[3] FTA Transit Noise and Vibration Impact Assessment Manual maximum acceptable vibration criteria. [4] Does the vibration level exceed the maximum acceptable vibration threshold?

Although the *Noise Study* determined the vibration impacts of Project construction will be less than significant, the Project is required to comply with Mitigation Measures **PVCCSP EIR MM Noise 1** through **PVCCSP EIR MM Noise 4** from the PVCCSP EIR.

THRESHOLD c: For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

Less Than Significant Impact

According to the *Noise Study*, the March Air Reserve Base/Inland Port Airport (MARB/IPA) is located approximately 1.3 miles northwest of the Project site boundary. The *March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan* (MARB/IPA LUCP) includes the policies for determining the land use compatibility of the Project. The MARB/IPA, Map MA-1, indicates that the Project site is located within Compatibility Zone B-1, and the Table MA-1 Compatibility Zone Factors indicates that this area is considered to have a *high* noise impact, and is mostly within ornear the 65 to 70 dBA CNEL noise level contour boundaries. Consistent with the Basic Compatibility Criteria, listed in Table MA-2 of the MARB/IPA LUCP, noise sensitive outdoor usesare not permitted. The MARB/IPA LUCP does not identify industrial-use specific noise compatibility standards, and therefore, the OPR Land Use Compatibility for Community Noise Exposure (discussed in *Noise Study* Section 3.3), is used to assess potential aircraft-related noiselevels at the Project site. The OPR guidelines indicate that industrial uses, such as the Project, are considered *normally acceptable* with exterior noise levels of up to 70 dBA CNEL. The noisecontour boundaries of MARB/IPA are presented on **Figure 4.9-3, *MARB/IPA Future Airport Noise Contours***, and show that the Project is considered *normally acceptable* land use since it is located outside the 70 dBA CNEL noise level contour boundaries. Therefore, the Project will not expose people residing or working in the Project area to excessive noise levels from the MARB/IPA. Impacts will be less than significant, and no mitigation is required.

Figure 4.9-3
MARB/IPA Future Airport Noise Contours

Source: Noise Study (Appendix M)

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4.9.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

None required.

Mitigation Measures

The proposed Project is required to comply with the following **PVCCSP EIR** mitigation measures.

PVCCSP MM Noise 1: During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.

PVCCSP MM Noise 2: During all construction, stationary construction equipment, stockpiling and vehicle staging areas will be placed a minimum of 446 feet from the closest sensitive receptor.

PVCCSP MM Noise 3: No combustion-powered equipment, such as pumps or generators, shall be allowed to operate within 446 feet of any occupied residence unless the equipment is surrounded by a noise protection barrier.

PVCCSP MM Noise 4: Construction contractors of implementing development projects shall limit haul truck deliveries to the same hours specified for construction equipment. To the extent feasible, haul routes shall not pass sensitive land uses or residential dwellings.

4.9.6 Cumulative Impacts

For the proposed Project, cumulative impacts are the incremental effects of the proposed Project when viewed in connection with the effects of past, current, and potential future projects within the cumulative impact area of the City of Perris. The cumulative impact area for the Project is the site and its immediate environs.

It is expected that the nearest sensitive receiver locations may also experience additional background construction noise impacts due to other project construction activities. Consistent with the cumulative impact significance thresholds outlined in the *AQ Study*, this noise analysis used the same construction significance thresholds for project specific and cumulative impacts. Since the Project construction-noise and vibration levels satisfy the thresholds, the proposed Project construction-activities are considered less than significant on a project-specific and cumulative basis.

In addition, the Municipal Code Section 7.33.060 limits the days and hours of construction activity to avoid disturbances during the hours when persons are most to noise include recognized sleep hour for residences. Because construction activities are typically limited to weekdays, during daylight hours, this noise impact is considered a nuisance or annoying, rather than a significant impact upon surrounding land uses.

Although the *Noise Study* determined the Project would have less than significant noise impacts from Project traffic and operations, it is recommended the Project implement **Mitigation Measures PVCCSP EIR MM Noise 1** through **PVCCSP EIR MM Noise 4** to further reduce construction noise impacts. In addition, the T*raffic Generation Assessment* determined the Project would have less than significant direct and cumulative traffic impacts and no mitigation was required, similar to the conclusions of the *AQ Study* as well. The limited Project traffic would not make significant contributions to cumulative traffic impacts; therefore, Project traffic is not expected to make any significant contributions to cumulative noise impacts. Similarly, Project operational noise is less than significant without mitigation, so it is also not expected to make a significant contribution to any cumulative noise impacts.

As vibration levels would generally not be perceptible to the average person and would not result in cosmetic nor structural damage to buildings, vibration impacts from Project construction would be less than significant. Since Project traffic impacts are less than significant, and there are no sensitive receptors immediately adjacent to the site, offsite vibration from Project traffic is also not expected to make a significant contribution to any cumulative vibration impacts in the surrounding region.

Based on this information, no cumulative impacts related to noise or vibration are anticipated from the implementation of the proposed Project.

4.9.7 Unavoidable Significant Adverse Impacts

As stated above in the analysis above, with implementation of Mitigation Measures **PVCCSP EIR MM Noise 1** through **PVCCSP EIR MM Noise 4** construction-related noise impacts will be reduced to less than significant levels. The *Noise Study* determined the Project would have less than significant noise impacts from Project traffic or operations and no mitigation was required. As vibration levels would generally not be perceptible to the average person and would not result in cosmetic nor structural damage to buildings, vibration impacts from Project construction or operation would be less than significant and no mitigation is required.

No unavoidable, significant adverse noise or vibration impacts will occur as a result of Project implementation.

4.10 TRANSPORTATION

4.10.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of transportation from implementation of the Project. The Transportation Section of the Initial Study (IS, Subchapter 8.3, *Initial Study*) posed the following questions:

a. Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
b. Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
c. Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
d. Would the Project result in inadequate emergency access?

Based on the analysis in the IS it was determined that the questions pertaining to issue areas c., and d., related to transportation (in the questions asked above), **would not** require any further analysis in the Draft Environmental Impact Report (DEIR). As it pertains to these questions, the IS identified "less than significantimpact" as a result of implementation of the Project.

Based on the analysis in the IS, the remaining two (2) issue areas, a. and b., related to transportation in thequestions asked above, **would** be further analyzed in the DEIR.

Standard Conditions SC-TR-1 through **SC-TR-4** were presented in the IS and shall be carried over to thisDEIR.

PVCCSP EIR mitigation measures **PVCCSP EIR MM Air 2**, **PVCCSP MM Trans 1**, **Trans 2**, **Trans 4**, and **Trans 5** were presented in the IS and shall be carried over to this DEIR.

In addition to the IS, the following sources were used in the evaluation presented in this Subchapter:

- *Perris And Ramona Warehouse (DPR19-00012) Trip Generation Analysis and Vehicle Miles Traveled Screening Evaluation,* prepared by Urban Crossroads, 9-7-2021 (*Traffic Study,* **Appendix N**)
- Ordinance No. 2009-62 "Western Riverside County Transportation Uniform Mitigation FeeProgram Ordinance of 2009" http://riversidecounty-ca.elaws.us/code/coor_title4_ch4.58_sec4.58.060
- WRCOG Transportation Uniform Mitigation Fee Calculation Handbook, PB 10-7-2015 https://wrcog.us/DocumentCenter/View/268/TUMF-Fee-Calculation-Handbook-PDF?bidId=
- WRCOG Regional System of Highways and Arterials, Transportation Uniform Mitigation Fee Program – Figure 4.4 https://wrcog.us/DocumentCenter/View/280/2011-Regional-System-of-Highways-and-Arterials-RSHA-Map-PDF?bidId=
- Project Plans (**Appendix H**)
- Table 1, Surrounding Land Uses, Figure 3, Existing and Proposed General Plan Land Use Designations, and Figure 4, Existing and Proposed Zoning Classifications in Section I. of the Initial Study as part of the Notice of Preparation (Subchapter 8.3, *Initial Study*)
- City of Perris General Plan https://www.cityofperris.org/departments/development-services/general-plan
- City of Perris General Plan - Final Environmental Impact Report https://www.cityofperris.org/home/showpublisheddocument/451/637203139698630000

- *Perris Valley Commerce Center Specific Plan (PVCCSP), Amendment No.9, May 2018, Chapter 3, Infrastructure Plan* https://www.cityofperris.org/home/showpublisheddocument/2647/637672237415470000
- *Final Environmental Impact Report Perris Valley Commerce Center Specific Plan* https://www.cityofperris.org/home/showpublisheddocument/13874/637455522381730000
- *City of Perris – Municipal Code, Title 19, Zoning, Chapter 19.68, Fees, Section 19.68.020 Development Impact Fees* https://www.cityofperris.org/departments/development-services/municipal-code
- *City of Perris Ordinance No. 1352 "Western Riverside County Transportation Uniform Mitigation FeeProgram Ordinance of 2017"* https://www.cityofperris.org/home/showpublisheddocument/2823/637250455869830000
- *North Perris Road and Bridge Benefit District Analysis Report, Albert A. Webb and Associates, June2008;* https://www.cityofperris.org/home/showpublisheddocument/6063/637250732251000000
- *City of Perris, Perris Trail Master Plan, adopted February 26, 2013, Resolution No. 4562;* https://www.cityofperris.org/home/showdocument?id=467
- State of California Code of Regulations § 15064.3. https://regulations.justia.com/states/california/title-14/division-6/chapter-3/article-5/section-15064-3/
- Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017) https://www.ite.org/technical-resources/topics/trip-and-parking-generation/trip-generation-10th-edition-formats/

Notice of Preparation (NOP)/Scoping Comments

No comments concerning Transportation were received in response to the NOP for the proposed Project. During the EIR Scoping Meeting, no comments from agencies or the public were received. However, the Planning Commissioners discussed potential land uses for the Project site. The City will take the followingcomments into account when making a decision on the Project.

Planning Commissioner Comments (Summarized from 16-page recording)

- The entire 16-acre site is zoned commercial but is located within restrictive accident potential zones of the March Air Reserve Base which limit the type and amount of commercial uses that can actuallybe build (limited public assembly).

- Accessibility is a big issue – Perris is currently a truck route, but staff believes it might be some kind of error. Have to study this more – trucks coming out onto Perris would have to go south then turn around – lots of potential for conflicts.

- EIR should look at Alternatives involving commercial uses at the southeast corner of Ramona/Perris. City wants Ramona to be a commercial corridor through the City, not just a lot of warehouses. Understand options are limited but what about a car dealership, storage facilities, nursery, small businesses, retail professional offices, service-oriented businesses, gas station, etc.

- City also looking at how to build more affordable housing, more housing, apartments, condos, that would also require more retail opportunities and other types of supporting uses, should not just focuson warehouses.

- Concerns about the pollution in the area (e.g., air quality, health risks, water quality, greenhouse emissions, etc. and local streets may not be designed to handle truck traffic long-term.

- Concerns about "mixing" passenger vehicle traffic, pedestrian access, parking, and truck traffic –

should try to separate as much as practical, especially in light of trying to limit trucks on Perris Blvd.

- Discussion of non-CEQA issues like building design, color, economic development and warehouses,etc. This is a main entry to the City and should be attractive.

Applicant and City Staff Clarifications

- Applicant stated construction loans and insurance would be difficult if not impossible to obtain for commercial uses due to ALUC restrictions.

- Applicant stated trucks going south of Perris Blvd. will be able to access new interchange on Placentia which is fully funded and RCTC has already awarded the contract for construction.

- City Attorney stated economic information and traffic congestion now no longer considerations underCEQA, only physical impacts on the environment.

- Director of Development Services (Kenneth Phung) said current Caltrans timeline for the interchange looks like summer 2023 right now. Then the City Engineer's office will take the remaining portion from Indian to Perris Boulevard.

- City Engineer said no plans right now for acceleration/deceleration lanes on Perris Blvd. to support the Project but in discussions with applicant to provide those with private funding. He said they have to dedicate the required right away per general plan and widen per general plan requirements. That would be a standard condition of approval and not a city project.

Note: Any tables or figures in this section are from the *Traffic Study*, unless otherwise noted.

4.10.2 Environmental Setting

The Project site is located within the PVCCSP planning area of the City of Perris. The ±3,500-acre PVCCSP was originally approved by the Perris City Council on January 10, 2012 and it is located in the North Perris area of western Riverside County, generally bordered by Interstate-215(I-215) to the west, March Air Reserve Base and Oleander Avenue to the north, the Perris Valley Storm Channel (PVSC) to the east, and Placentia Avenue to the south. The PVCCSP location contiguous to the I-215 freeway is key to the rapidly expanding distribution warehouse development taking place within the specific plan boundaries. I-215 runs along the western boundary of the PVCCSP and existing freeway on and off-ramps are located at Harley Know Boulevard and Ramona Expressway. A future interchange is planned at Placentia Avenue.

Regional east-west access to the PVCCSP area is provided by through points of entry along I-215 from theRamona Expressway/Cajalco Road, Harley Knox Boulevard, Rider Street and future Placentia Avenue alongthe southern boundary. Ramona Expressway and Harley Knox Boulevard also provide direct and indirect regional access to Interstate-15, State Route-60, and Interstate-10 all to the north.

Points of entry from the San Jacinto region to the east include Ramona Expressway/Cajalco Road, future Rider Street and future Placentia. Regional north-south access to the Perris Valley Commerce Center Specific Plan area is provided via Interstate-215, Perris Boulevard, and Indian Avenue. The vehicular circulation plan for the PVCCSP is illustrated in **Figure 4.10-1, *PVCCSP Circulation Plan***, although there are some inconsistencies with the City of Perris Circulation roadway designations. For

example, both the Circulation Element[1] and the PVCCSP Circulation Plan[2] show Perris Boulevard and Indian Avenue as designated truck routes, but only the Circulation Element shows Ramona Expressway as a designated truck route.

Ramona Expressway is the principal east/west travel route through the center portion of the specific plan. It is classified as an "Expressway" in Figure 3.0-1, Circulation Plan of the PVCCSP (revisedJuly 12, 2017) which is consistent with the Circulation Element of the City of Perris General Plan 2030 (adopted June 14, 2005; amended August 26, 2008, as GPA 08-07-0010). An expressway is a limited access divided highway built to accommodate high-speed travel by automobiles within a 184-foot right-of- way. At least two traffic lanes in each direction are physically separated within a 134-foot curb-to-curb width. The Ramona Expressway provides direct access to I-215. The cross-section for Ramona Expressway was modified for the City's General Plan to provide non-curb adjacent sidewalks and provide for the future regional trail.

The PVCCSP planning area is primarily intended to accommodate commercial and industrial uses and as such, requires a greater need for established truck routes to serve existing and future businesses. The City has adopted specific truck routes throughout the Perris Valley Commerce Center area in an effort to separate passenger and truck traffic and move truck traffic efficiently through the project area while avoiding residential communities as much as possible. As discussed above, both Perris Boulevard and Indian Avenue adjacent to the Project site are presently identified as designated Truck Routes. However, the City has recently proposed to remove Perris Boulevard from its approved list of truck routes.

At the time the PVCCSP was adopted in 2012 the area was largely undeveloped land used for agricultural purposes (sod farming, other) with smaller elements of development consisting of some warehousing/distribution facilities, neighborhood and community commercial, small scale industrial facilities, a rural residential neighborhood and a mobile home park. Over the past nine (9) years since its adoption, asubstantial amount of new development activity (primarily warehouses) and infrastructure (i.e., road improvements, dry and wet utilities, other) has been built within the PVCCSP boundary, including a 579,708-square-foot distribution warehouse just south of the Project site at 3900 Indian Avenue, which was completedin 2014.

The Project site is located less than 1.25 mile east of I-215 with extensive frontage along three public street rights-of-ways. It is situated on the north side of Ramona Expressway and bounded by Perris Boulevard to the east and Indian Avenue to the west. Existing designations of and conditions on the adjacent roadwaysare as follows:

Ramona Expressway frontage along the Project site consists of a fully dedicated six-lane public right-of- way. Project site development will require street frontage improvements (6-lane asphalt paving with a dedicated right-turn lane onto Perris Boulevard) are already in place. There is no sidewalk at present on Ramona Expressway adjacent to the site. The General Plan Circulation Element shows Ramona as a designated truck route although the PVCCSP does not show it as a truck route only as an expressway. The City has recently proposed to remove Ramona Expressway from the General Plan Circulation Element.

Perris Boulevard is identified as an "Arterial" roadway in both the City of Perris General Plan (PGP) and the PVCCSP. An arterial serves major traffic movements or major traffic corridors within 128-foot right-of- way. While they may provide access to abutting land, their primary function is to serve traffic moving throughthe area. Arterial streets generally have a curb-to-curb width of 94-feet. Perris Boulevard

[1] Circulation Element Exhibit CE-9, Existing Designated Truck Routes, dated 8/26/08
[2] PVCCSP Figure 3.0-3, Truck Route Plan, in SPA 10 dated 9/21

provides direct access to Moreno Valley and the 60 Freeway to the north and is currently a designated Truck Route (see **Figure 4.10-2, *Designated Truck Routes***). However, the City has recently proposed to remove Perris Boulevard from its approved list of truck routes. The Perris Boulevard frontage along the Project site consists of a fully dedicated asphalt paved 6-lane public right-of-way with concrete curb. A sidewalk extends along the northeastern portion of the Project site from Ramona Expressway 170 feet south to an existing RTA bus stop. There is no sidewalk from the bus top south 410 feet to the southeastern corner of the site where a sidewalk along the existing warehouse building continues south.

Indian Avenue is identified as a "Secondary Arterial" in both the PGP and PVCCSP. A secondary arterial is designed to carry local traffic between the local street system and the primary arterial system. Secondary arterial streets generally vary from a curb-to-curb width of 64-feet to 70-feet and may have one or two lanes in each direction. Indian Avenue runs north/south extending the entire length of the PVCCSP and points beyond. Like Perris Boulevard and Redlands Avenue to the east it is one of three designated north/south Truck Routes serving the PVCCSP. The Indian Avenue frontage along the Project site consists of a fully dedicated asphalt paved 4-lane public right-of-way with concrete curb (no sidewalk currently in place).

Non-Vehicular Circulation. Bus transit in the Project area is provided by the Riverside Transportation Authority (RTA) while train transit is available via Metrolink facilities along the west side of the I-215 corridor with a station at I-215/Ramona Expressway/Cajalco Road which was completed several years ago (see PVCCSP Section 3.2.3, Mass Transit Circulation). Sidewalks in the Project area are discontinuous based on the location of developed properties. The City of Perris has designated a community trail system including existing and proposed pedestrian trails and bike paths in the Project area, as shown in **Figure 4.10-3, *PVCCSP Non-Vehicular Circulation***.

Fair Share Improvements. All new development in the City is subject to the Transportation Uniform Mitigation Fee (TUMF) and the Development Impact Fee (DIF) programs. In addition, all new development within the PVCCSP boundary is subject to the North Perris Road and Bridge Benefit District (NPRBBD). The TUMF, DIF and NPRBBD programs are briefly summarized below.

- **TUMF.** The County of Riverside Board of Supervisors and the Councils of the Cities of Western Riverside County enacted the TUMF to fund the mitigation of cumulative regional transportation impacts resulting from new development (Riverside County Ordinance No. 2009-62). The mitigation fees collected through the TUMF program are utilized to complete capital improvements to the regional transportation system necessary to meet the increased travel demand and to sustain appropriate levels of service (LOS).
- **DIF.** The Project site is subject to City of Perris – Municipal Code, Section 19.68.020 Development Impact Fees (DIF). Payment of the DIF is required and is not considered unique mitigation under CEQA. DIF is used to pay for the following traffic improvements: transportation – roads, bridges, major improvements; and transportation signals. Credits may be afforded to the applicant if improvements are made to these facilities as part of the Project development.
- **NPRBBD.** The North Perris Road and Bridge Benefit District (NPRBBD) encompasses approximately 3,500 acres (five square-miles) of land in north Perris. The NPRBBD boundary is the same as the PVCCSP boundary. The purpose of the NPRBBD is to streamline the financing of specific regional road and bridge improvements determined to provide benefit to the developing properties within the boundaries of the NPRBBD. The road and bridge improvement fee for the NPRBBD is a one-time fee paid to the City prior to recordation of a final tract map or parcel map, or prior to issuance of a building permit.

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Figure 4.10-1
PVCCSP Circulation Plan

Source: PVCC SPA 11 https://www.cityofperris.org/home/showpublisheddocument/2647/637672237415470000

Figure 4.10-2
Designated Truck Routes

Source: PVCC SPA 11 https://www.cityofperris.org/home/showpublisheddocument/2647/637672237415470000

Figure 4.10-3
PPVCCSP Non-Vehicular Circulation

Source: PVCC SPA 11 https://www.cityofperris.org/home/showpublisheddocument/2647/637672237415470000

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4.10.2.1 Regulatory Setting

State and local laws, regulations, plans or guidelines that are potentially applicable to this analysis aresummarized in this section.

4.10.2.1.a State

California Assembly Bill 32 (2006) and Senate Bill 375 (2008)

Assembly Bill 32, the Global Warming Solutions Act of 2006 (AB 32), is the primary state policy created withthe purpose of reducing greenhouse gas emissions in California. AB 32 created emissions reduction targetsand granted authority over emissions reduction to the California Air Resources Board (CARB). Senate Bill 375, the Sustainable Communities and Climate Protection Act of 2008 (SB 375), which was passed by the legislature as a tool for working towards AB 32's reduction goals, requires CARB to set regional greenhousegases (GHG) emissions targets and requires each California metropolitan planning organizations to develop a Sustainable Community Strategy (SCS) that integrates housing, transportation, and land use policy. These mandates were designed with the intention of reducing vehicle miles traveled, and thus, GHG emissions. Additionally, the CARB Scoping Plan outlines ways to achieve GHG reductions in California as required byAB 32.

AB 1358 California Complete Streets Act of 2008

The Complete Street Act of 2008 (Assembly Bill 1358) was developed in response to and in support of other legislation aimed at reducing vehicle emissions through reduced trip length and frequency combined with changes in land use policies. The bill includes several key provisions including a requirement that the stateamend guidelines to show how "appropriate accommodation varies depending on its transportation and landuse context." Reducing vehicle miles travelled and enabling short trips in an automobile to be replaced by biking, walking, neighborhood electric vehicles NEVs/golf carts, and use of public transit is the goal. Ultimately, a well-balanced transportation system can move more people (rather than vehicles) efficiently and at a reasonable cost.

The Complete Streets Act is supported by Caltrans Deputy Directive DD-64-R1. DD-64-R1 memorializes the importance of pedestrian and bicycle facilities to the state's transportation system and outlines responsibilities for Caltrans employees to ensure that travelers of all ages and abilities can move safely andefficiently along and across a network of complete streets throughout the state.

4.10.2.1.b Regional

Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

Connect SoCal - the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy is a long- term vision of how the region will address regional transportation and land use challenges and opportunities. Connect SoCal identifies goals, which are intended to help carry out the vision for improved mobility, a strong economy, and sustainability. The guiding policies for Connect SoCal are intended to help focus future investments on the best-performing projects and strategies to preserve, maintain, and optimize the performance of the existing transportation system.

Connect SoCal focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management

measures.

Connect SoCal achieves greenhouse gas emission-reduction targets set by the CARB by achieving a 17 percent reduction by 2035 compared to the 2005 level on a per capita basis. This air quality benefit is made possible largely by more sustainable planning, integrating transportation and land use decisions to allow Southern Californians to live closer to where they work and play and to high-quality transit service. As a result, more residents will be able to use transit and active transportation as a safe and attractive means of travel.

4.10.2.1.c County

Riverside County General Plan Circulation Element

Since incorporation of the City in 2008, the County of Riverside's General Plan Circulation Element has been utilized for the purposes of providing a regional transportation framework. The county's Circulation Element was adopted in 2003 through the Riverside County Integrated Project (RCIP) which represented a comprehensive planning process to determine future placement of buildings, roads, and open spaces for Riverside County. The purpose of the RCIP was to create plans that are coherent and consistent for transportation, land use, and the environment.

The adopted RCIP roadway network provides the basis for the City of Perris General Plan roadway network. This is critical since any changes to the roadway classifications and/or cross-sections will impact future development within the City. The General Plan roadway network defines the right-of-way dedications and capacity requirements needed to support buildout of proposed General Plan land uses. Figure 5.17-3 of the *GPEIR* shows the RCIP roadway network adopted in the County of Riverside General Plan Circulation Element in 2003.

Riverside County Congestion Management Program

The CMP in effect in Riverside County was approved by the RCTC in 2010. All freeways and selected arterialroadways in the county are designated elements of the CMP system of highways and roadways. There are two CMP system roadways in the City, I-215 and SR-74. Riverside County Transportation Commission (RCTC) has adopted a minimum LOS threshold of LOS "E" for CMP facilities.

Transportation Uniform Mitigation Fee (TUMF)

The Board of Supervisors of the County of Riverside and the Councils of the Cities of Western Riverside County enacted the Transportation Uniform Mitigation Fee (TUMF) to fund the mitigation of cumulative regional transportation impacts resulting from future development. The mitigation fees collected through the TUMF program will be utilized to complete transportation system capital improvements necessary to meet the increased travel demand and to sustain current traffic levels of service.

The fee calculations are based on the proportional allocation of the costs of proposed transportation improvements based on the cumulative transportation system impacts of different types of new development. Fees are directly related to the forecast rate of growth and trip generation characteristics of different categories of new development. Payment of the TUMF is required and is not considered unique mitigation under CEQA. TUMF roadways in the City, in proximity of the Project site include Briggs Road, Newport Road, Scott Road and Menifee Road. TUMF bridge improvements in the City, in proximity of the Project site include Holland Road and Briggs Road at Newport Road. Credits may be afforded to the applicant if improvements are made to these facilities as part of the Project development.

4.10.2.1.d Local

Applicable City of Perris General Plan Goals and Policies

The following goals and policies are applicable to the proposed Project:

Circulation Element

Goal I: A comprehensive transportation system that will serve projected future travel demand, minimize congestion, achieve the shortest feasible travel times and distances, and address future growth and development in the City.

Policy I.A: Design and develop the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the designated Transportation System, Exhibit 4.2 Future Roadway Network.

Goal II: A well planned, designed, constructed and maintained street and highway system that facilitates the movement of vehicles and provides safe and convenient access to surrounding developments.

Policy II.A: Maintain the following target Levels of Service: LOS “D” along all City maintained roads (including intersections) and LOS “D” along I-215 and SR 74 (including intersections with local streets and roads). An exception to the local road standard is LOS “E”, at intersections of any Arterials and Expresswayswith SR 74, the Ramona-Cajalco Expressway or at I-215 freeway ramps.

Policy II.B: Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.

Goal V: Efficient goods movement.

Policy V.A: Provide for safe movement of goods along the street and highway system.

Goal VII: A transportation system that maintains a high level of environmental quality.

Policy VII.A: Implement the Transportation System in a manner consistent with federal, State, and local environmental quality standards and regulations.

Goal VIII: Enhanced traffic flow, reduced travel delay, reduced reliance on single-occupant vehicles, and improved safety along the City and State roadway system.

Policy VIII.A: Encourage the use of Transportation Demand Management (TDM)/ Transportation Control Measure (TCM) strategies and programs that provide attractive, competitive alternatives to the single- occupant vehicle.

City Municipal Code

CMC Section 19.68.020. - Development Impact Fees. The purpose of this section is to implement a unified development impact fee program to fund the acquisition, design, and construction of certain public facilitiesnecessary to serve new development within the city. The public facilities to be funded by the development impact fees (the "Public Facilities") are in the following categories: (1) police; (2) fire; (3) community amenities; (4) government services; (5) parks; (6) transportation; and (7) administration. The public facilities are described in detail in the facilities study adopted by the city council from time to time and incorporated herein by reference. The development impact fees imposed under this section

are in addition to any other fees, dedications, construction requirements, or other exactions imposed as a condition of approval for a development project, or under the provisions of any state or federal law, or other provisions of this code, orcity resolutions and policies.

4.10.3 Thresholds of Significance

As discussed in Subsection 4.10.1, the Project impacts to two (2) criteria pertaining to transportation will beanalyzed in this DEIR. According to the IS, the Project would have a significant impact if it would:

a. Conflict with a program plan, ordinance or policy addressing the circulation system, includingtransit, roadway, bicycle and pedestrian facilities.

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Cumulative Impacts: If a project does not have significant direct impacts on the circulation network, does not have significant VMT impacts, provides its onsite and adjacent offsite improvements, pays its Development Impact Fee (DIF), and pays its regional Traffic Uniform Mitigation Fee (TUMF) contribution, it will not makeany significant contributions to cumulatively considerable traffic impacts.

The potential transportation changes in the environment are addressed in response to the above thresholdin the following analysis.

4.10.4 Potential Impacts

THRESHOLD a: Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less than Significant with Mitigation Incorporated

Overview. Although the vehicle miles traveled (VMT) methodology is now applied in evaluating potential transportation impacts of a project, the City's General Plan identifies standards for maintaining an adequatelevel of service (LOS) for City streets and intersections not only to minimize congestion but also to help protect public health and safety. To be consistent with the 2020 CEQA Guidelines, LOS analysis is no longer required for purposes of this Initial Study impact analysis. However, a VMT Analysis was included inthe *Traffic Study* for this Project (see Section 4.10.4.b).

Non-Vehicular Circulation. Employers, employees, and vendors utilizing the proposed Project will have the opportunity to use a variety of transportation modes including automobile, mass transit and non-vehicular travel. As set forth in the PVCCSP, the City of Perris encourages the use of mass transit whenever possible.

Train Transit. With the recent extension of Metrolink facilities along the west side of the I-215 corridor thereis now a local station at I-215/Ramona Expressway/Cajalco Road which is 1.35 mile west of the Project siteon the south side of Ramona Expressway.

Bus Transit. Bus service in western Riverside County is provided by the Riverside Transit Authority (RTA). The Project is currently served by RTA Route 41 along Ramona Expressway and Perris Boulevard and Route 19 along Perris Boulevard. The closest bus stop to the Project site is on the west side of Perris Boulevard adjacent to the site approximately 170 feet south of Ramona Expressway which is regularly served by Routes 41 and 19. Regional express bus service is also available from the Project area via Route27 along the I-215 west of the site.

Per **PVCCSP EIR Mitigation Measure MM Trans 4**, the applicant has consulted with RTA and has agreed to construct a new bus stop on the south side of Ramona Expressway just east of Indian Boulevard adjacentto the Project site. The new bus stop will be constructed per RTA standards and has been incorporated into the Project site plan. Therefore, **MM Trans 4** will not be included in the recommended mitigation for the Project.

Pedestrian Access. There is no sidewalk on the south (Project) side of Ramona Parkway adjacent to the Project site. On Perris Boulevard, a sidewalk extends along the northeastern portion of the Project site fromRamona Expressway 170 feet south to the existing RTA bus stop. There is no sidewalk from the bus stop south 410 feet to the southeastern corner of the site where a sidewalk along the existing warehouse buildingcontinues south. Indian Boulevard has no sidewalk adjacent to the Project site but there is one at the southwest corner of the site that continues south along the west side of the street adjacent to the existing warehouse development.

Bicycle/Trail Access. The City of Perris has a designated community trail system with existing and proposed pedestrian trails and bike paths as depicted on Figure 3.0-5, Trails System, of the PVCCSP. Thisnetwork is generally consistent with the City's Park and Trails with the exception of expansions to some of the bike trails. At present, there are no bicycle lanes on any of the adjacent three roadways to the Project site. However, a Regional Trail is eventually planned for the north side of Ramona Expressway and Class II bicycle lanes are planned for Perris Boulevard south of Ramona Boulevard and along Morgan Street.

Vehicular Circulation. Every county in California is required to develop a Congestion Management Program (CMP) that looks at the links between land use, transportation, and air quality. In its role as Riverside County's Congestion Management Agency, the Riverside County Transportation Commission (RCTC) prepares and periodically updates the County's CMP to meet federal Congestion Management System guidelines as well as state CMP legislation. The Southern California Association of Governments (SCAG) is required under federal planning regulations to determine that CMPs in the region are consistent with the Regional Transportation Plan. The RCTC's current CMP includes Ramona Expressway adjacent to the Project site.

The RCTC CMP does not require traffic impact assessments for development proposals. However, local agencies are required to maintain the minimum level of service (LOS) thresholds included in their respective general plans. If a street or highway segment included as part of the CMP falls below the adopted minimumlevel of service of E, a deficiency plan is required. The Project could conflict with the CMP if the Project were to cause the CMP facility to operate at an unacceptable LOS.

As set forth in the PVCCSP, the City of Perris General Plan has established a city-wide target of a minimumLevel of Service D (LOS D) along all City maintained roads (including intersections), and LOS D along I-215and SR-74 (including intersections with local streets and roads). An exception to the local road standard is LOS E at intersections of any Arterials or Expressways with SR-74, the Ramona /Cajalco Expressway or atI-215 freeway ramps.

Trip Generation. Table 2 of the *Traffic Study* estimates the Project will generate 32 AM peak hour trips, 39PM peak hour trips, and 492 total daily trips or average daily traffic (ADT) for all vehicles. A more accurate measure of roadway impacts from truck traffic is represented by Passenger Car Equivalent (PCE) which takes into account the length of various kinds of trucks which factors into road and intersection congestion. Table 2 of the *Traffic Study* estimates the Project will generate 42 AM peak hour PCE trips, 48 PM peak hour PCE trips, and 612 total PCE trips. These estimates are based on trip generation rates for High-CubeTransload/Short-term Storage Warehousing developed by the Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017). According to the Traffic Study, this Project will not generate more than 50 peak hour trips (either total vehicles or PCE trips) so a detailed LOS traffic study is not required according to the City's Traffic Impact Assessment

Procedures. Because of this low trip generation, no significant traffic impacts are expected along area roadways or at intersections served by the Project.

Fair Share Contributions and Improvements. In addition to installing onsite and adjacent offsite road improvements, the Project will be required to pay the regional (County) Transportation Uniform Mitigation Fee (TUMF), City Development Impact Fee (DIF), Traffic Signal Mitigation Fee (TSMF), and the County North Perris Road and Bridge Benefit District (NPRBBD) fee which are assessed on all new development which collectively help reduce overall impacts to the transportation system (i.e., roads, intersections, signals,and bridges). These fees are reflected in **Standard Conditions SC-TR-2**, **SC-TR-3**, and **SC-TR-4** which are considered regulatory compliance and are not considered unique mitigation under CEQA. The Project will be required to implement the following Mitigation Measures from the PVCCSP:

PVCCSP MM Trans 1 Construct required on- and offsite roadway improvements

PVCCSP MM Trans 2 Access points must have adequate sight distance

PVCCSP MM Trans 5 Install bike racks in all parking lots

Project Trip Distribution. Trip distribution represents the directional orientation of traffic to and from the Project site. Trip distribution is heavily influenced by the geographical location of the site, the location of residential, employment, and recreational opportunities, and the proximity to the regional freeway system. The directional orientation of traffic was determined by evaluating existing and proposed land uses, and highways within the community and discussions with City staff. At this time City staff has recommended that passenger vehicles take access to and from the Project via driveways on Indian Boulevard and Perris Boulevard, while trucks will take access solely from Indian Boulevard. However, the applicant has requested the City consider a different access "option" with truck traffic being split between Indian Boulevard and Perris Boulevard, as outlined in Chapter 3, Project Description.

Access Options. While LOS and road/intersection congestion is no longer a specific CEQA threshold or topic, this is a very important local issue and could affect the layout of the Project site plan. Therefore, the following discussion focuses on **"Option A"** which has all truck access via Indian Boulevard, and **"Option B"** which splits truck access evenly between Indian Boulevard and Perris Boulevard. A major reason the applicant is requesting consideration of Access Option B is the warehouse may be split between two users and using both adjacent roads for access would minimize potential conflicts or confusion for trucks or passenger vehicles associated with each user.

The current and past versions of Figure 3.0-1, Circulation Plan, of the PVCCSP designates Perris Boulevard and Indian Boulevard as truck routes. In addition, Exhibit CE-9: Existing Designated Truck Routes, in the City's Circulation Element of the General Plan shows Perris Boulevard, Indian Boulevard, and Ramona Expressway as designated truck routes. However, City staff considers the PVCCSP truck route designation for Perris Boulevard to be inaccurate or a mistake made at the time the SP was originally approved and later revised. According to the Planning Commission discussion during the Scoping Meeting, there is also community concern about continuing to allow truck traffic on Perris Boulevard.

Under **Access Option A**, 100% of Project truck traffic would enter and exit the site on Indian Boulevard, with 50% turning going south and 50% going north. Northbound traffic would travel to Harley Knox Boulevard then turn west to access I-215. Southbound traffic would travel to Nuevo Road then turn west to access I- 215.

Under **Access Option B**, 50% of Project trucks would enter and exit the site on Indian Boulevard while theother 50% would enter and exit on Perris Boulevard. It is assumed under this option 25% of Project

trucks would go north on Indian Boulevard, 25% would go north on Perris Boulevard, 25% would go south of Indian Boulevard, and 25% would go south on Perris Boulevard. Trucks exiting the site onto Perris Boulevard would require a "right turn only" restriction due to the short distance to the Perris/Ramona intersection a fewhundred feet to the north as this distance is too short to install a traffic signal at the Project driveway. With the existing circulation network, trucks traveling south on Perris Boulevard would have to U-Turn at E. Morgan Street (about 1600 feet south of the site) if they wished to ultimately travel north on Perris Boulevardto Harley Knox Boulevard.

Under Option B it is assumed approximately 50% of the Project trucks would access the I-215 southbound at Nuevo Road, however, an interchange is planned and funded at Placentia Avenue which would reduce the on-road distance Project trucks would have to travel before reaching the freeway. This interchange would be built as part of the Mid-County Parkway (see PVCCSP Figure 3.02, Mid-County Parkway).

Either Access Option appears to be generally consistent with the General Plan goals and policies regarding vehicular circulation in the City (including truck routes). However, the selection of an access option for this Project would not be based on CEQA considerations but rather planning, engineering, and public safety concerns.

Standard Condition SC-TR-1 requires preparation of a Traffic Control Plan during construction to minimizetemporary impacts on the adjacent streets. The Project will be required to pay TUMF, DIF, and NPRBBD fees. These are reflected in **Standard Conditions SC-TR-2**, **SC-TR-3**, and **SC-TR-4**. Payment of TUMF, DIF, and NPRBBD fees are standard requirements and are not considered unique mitigation under CEQA. In addition, the Project will implement the following Mitigation Measures from the PVCCSP:

PVCCSP MM Trans 1 Construct required on- and offsite roadway improvements

PVCCSP MM Trans 2 Access points must have adequate sight distance

PVCCSP MM Trans 5 Install bike racks in all parking lots

Summary. Based on this information, the Project will not conflict with a program, plan, ordinance, or policyaddressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities and the City General Plan with implementation of the Standard Conditions and PVCCSP Mitigation Measures. Project impacts related to this CEQA threshold will be less than significant (including those for either Access Option).

THRESHOLD b: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) [VMT]?

Less Than Significant Impact

In response to Senate Bill (SB) 743, the California Natural Resource Agency certified and adopted new CEQA Guidelines in December 2018, which now identify Vehicle Miles Traveled (VMT) as the most appropriate metric to evaluate a project's transportation impact under CEQA (Section 15064.3). Effective July 1, 2020, the previous CEQA metric of level of service (LOS), typically measured in terms of automobile delay, roadway capacity and congestion, will no longer constitute a significant environmental impact. A separate VMT analysis was prepared for this Project (*Traffic Study*, Urban Crossroads 2021).

<u>VMT Screening Evaluation</u>

CEQA now requires all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. TheGovernor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December of 2018) and based on OPR's guidance, it is our understandingthat the City of Perris has released its Transportation Impact Analysis Guidelines for CEQA (*City Guidelines*). The following screening evaluation follows the VMT analysis methodology and recommended thresholds identified in the *City Guidelines*.

The *City Guidelines* provide details on appropriate screening criteria that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed analysis. Screening criteria are broken into the five types and a land use project need only to meetone of the five criteria below to result in a less than significant traffic impact. Based on their applicability tothis Project, the following screening criteria will be evaluated further:

- Daily Trip Screening
- Qualifying Transit Screening
- Local Serving Land Use Screening
- Low VMT Area Screening
- Affordable Housing Screening

Daily Screening

As noted on page 5 of in the City Guidelines, "projects that generate less than 500 average daily trips (ADT) would not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT." As mentioned previously and as noted in Table 2 of the *TrafficStudy*, the proposed Project is anticipated to generate 492 trip-ends per day, which is below the 500 ADT threshold established by the City. Therefore, the Project meets the Daily Trip Screening criteria and is presumed to have a less than significant VMT impact and no further screening criteria evaluation or VMT analysis is required.

4.10.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

Standard Conditions SC-TR-1 through **SC-TR-4** from the Initial Study are applicable to all Projects withinthe City and are not considered unique mitigation under CEQA.

SC-TR-1 Prior to any Project construction the Project Applicant shall develop and implementa City-approved Traffic Control Plan (TCP) addressing potential construction- related traffic detours and disruptions. In general, the TCP will ensure that to the extent practical, construction traffic would access the Project site during off-peak hours; and that construction traffic would be routed to avoid travel through, or proximate to, sensitive land uses.

SC-TR-2 The Board of Supervisors of the County of Riverside and the Councils of the Cities of Western Riverside County enacted the Transportation Uniform Mitigation Fee (TUMF) to fund the mitigation of cumulative regional transportation impacts resulting from future development. The mitigation fees collected through the TUMF program will be utilized to complete transportation system capital improvements necessary to meet the increased travel demand and to sustain current traffic levels of service.

The fee calculations are based on the proportional allocation of the costs of proposed transportation improvements based on the cumulative transportation

system impacts of different types of new development. Fees are directly related to the forecast rate of growth and trip generation characteristics of different categories of new development. Fees shall be paid at the time a certificate of occupancy is issued for the Development Project or upon final inspection, whichever comes first. Payment of the TUMF is required and is not considered unique mitigation under CEQA.

SC-TR-3 The Project applicant shall pay Development Impact Fees (DIF) for non-residential development prior to the issuance of a building permit.

SC-TR-4 The Project applicant shall pay the North Perris Road and Bridge Benefit District (NPRBBD) fee for non-residential development prior to the issuance of a buildingpermit.

It should be noted that PVCCSP Mitigation Measure MM Trans 3 required payment of the applicable TUMF, DIF, and NPRBBD fees which is covered by Standard Conditions SC-TR-2 through SC-TR-4, so PVCCSP MM Trans 3 it is not included in the following Project requirements.

Mitigation Measure(s)

The proposed Project is required to comply with the following **PVCCSP EIR** mitigation measures.

PVCCSP MM Air 2: Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

PVCCSP MM Trans 1: Future implementing development projects shall construct on-site roadway improvements pursuant to the general alignments and right-of-way sections set forth in the PVCC Circulation Plan, except where said improvements have previously been constructed.

PVCCSP MM Trans 2: Sight distance at the project entrance roadway of each implementing development project shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

The Initial Study analysis as part of the Notice of Preparation included early consultation with RTA so the Project has complied with the pre-approval portion of the following PVCCSP EIR MitigationMeasure PVCCSP MM Trans 4:

PVCCSP MM Trans 4: Prior to the approval of individual implementing development projects, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing in the project area that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that would serve the project area, road

improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalk and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.

The applicant subsequently consulted with RTA and has agreed to construct a new bus stop on the south side of Ramona Expressway just east of Indian Boulevard adjacent to the Project site. The new bus stop will be constructed per RTA standards and has been incorporated into the Project site plan. Therefore, ***MM Trans 4*** *will not be included in the recommended mitigation forthe Project.*

PVCCSP MM Trans 5: Bike racks shall be installed in all parking lots in compliance with City of Perris standards.

It should be noted that ***MM Trans 7*** *requires traffic studies for new development within the PVCCSP, as shown below. However, the proposed Project does not exceed the City's thresholdfor preparing a full Traffic Impact Assessment (TIA). Therefore, the Project will not need to implement this measure.*

PVCCSP MM Trans 7: Implementing project-level traffic impact studies shall be required for all subsequent implementing development proposals within the boundaries of the PVCCSP as approved by the City of Perris Engineering Department. These subsequent traffic studies shall identify specific project impacts and needed roadway improvements to be constructed in conjunction with each implementing development project. All intersection spacing for individual tracts or maps shall conform to the minimum City intersection spacing standards. All turn pocket lengths shall conform at least to the minimum City turn pocket length standards. If any of the proposed improvements are found to be infeasible, the implementing development project applicant would be required to provide alternative feasible improvements to achieve levels of service satisfactory to the City.

4.10.6 Cumulative Impacts

Some of the vehicle trips generated by the development on the Project site will connect to the regional CMPnetwork. While the Project does represent an incremental increase in trips to the CMP network, this increase is not considered cumulatively considerable due to the relatively small percentage increase in regional tripsit represents, and all Project-level impacts are mitigated to less than significant levels.

The proposed Project will generate an incremental amount of additional traffic on local roadways. The proposed Project is not consistent with the land use designation of the current, adopted Specific Plan (commercial), however, the use is consistent with the current ALUC land use restrictions as well as the PVCCSP Circulation Plan and the General Plan's Circulation Element. In addition, the proposed Project willinstall adjacent roadways to General Plan standards and will pay fair share funds to improvements on arearoadways (e.g., through payment of TUMF, DIF, etc.).

The Project will be required to implement the following Mitigation Measures from the PVCCSP:

PVCCSP MM Air 2 Submit a traffic control plan

PVCCSP MM Trans 1 Construct required on- and offsite roadway improvements

PVCCSP MM Trans 2 Access points must have adequate sight distance

PVCCSP MM Trans 5 Install bike racks in all parking lots

Not Required

PVCCSP MM Trans 3 Requires payment of TUMF, DIF, and NPRBBD fees (covered by **Standard Conditions SC-TR-2** through **SC-TR-4**)

PVCCSP MM Trans 4 Coordinate bus stop requirements with RTA (completed and part of site plan)

PVCCSP MM Trans 7 Prepare traffic study (Project does not generate sufficient traffic)

With implementation of **Standard Conditions SC-TR-1** through **SC-TR-4** and **PVCCSP EIR Mitigation Measures MM Trans 1**, **MM Trans 2**, and **MM Trans 5**, impacts from Project implementation will not makea significant contribution to any cumulatively considerable transportation impacts.

4.10.7 Unavoidable Significant Adverse Impacts

Based on the analysis above, with the implementation of **Standard Conditions SC-TR-1** through **SC-TR-4** and **PVCCSP Mitigation Measures MM Air 2**, **MM Trans 1**, **MM Trans 2**, and **MM Trans 5**, all Project impacts would be reduced to less than significant levels. Therefore, the Project will have less than significant impacts on transportation resources with implementation of the recommended mitigation.

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4.11 TRIBAL CULTURAL RESOURCES

4.11.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of tribal cultural resources from implementation of the Project. The Tribal Cultural Resources Section of the Initial Study (IS, Subchapter 8.3, *Initial Study*) posed the following questions:

a.i Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is listed or eligible for listing in the California Register of Historical resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

a.ii. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Based on the analysis in the IS it was determined that both questions pertaining to issue areas related to tribal cultural resources (in the questions asked above), **would** require further analysis in the Draft Environmental Impact Report (DEIR).

No standard conditions were presented in the IS that shall be carried over to this DEIR.

Mitigation measures from the IS (**MM-CR-1** and **MM-CR-2**) were outlined in the IS and have been carried over to this DEIR. PVCCSP EIR (**PVCCSP EIR MM Cultural 1**) was also presented in the IS; however, the applicant has since complied with this mitigation which requires preparation of a Phase I Cultural Resources Study.

In addition to the IS, the following sources were used in the evaluation presented in this Subchapter:

- City of Perris General Plan - Final Environmental Impact Report https://www.cityofperris.org/home/showpublisheddocument/451/637203139698630000
- *Final Environmental Impact Report Perris Valley Commerce Center Specific Plan* https://www.cityofperris.org/home/showpublisheddocument/13874/637455522381730000
- *A Phase I Cultural Resources Assessment of Perris Commerce Center, APN 303-060-020,* prepared by Jean A. Keller, Ph.D., October 2020 (*CRA*, **Appendix J**)

Notice of Preparation (NOP)/Scoping Comments

During the NOP period, a letter was received from the Agua Caliente Band of Cahuilla Indians dated 05/06/2021 that made the following comments regarding cultural resources:

- Formal government to government consultation between the City and the Agua Caliente Band is requested per California Senate Bill 18.
- Formal government to government consultation between the City and the Agua Caliente Band is

requested per California Assembly Bill 52.

- A cultural resources inventory of the Project area by a qualified archaeologist prior to any development activities in this area.
- A copy of the records search with associated survey reports and site records from theinformation center.
- Copies of any cultural resource documentation (report and site records) generated inconnection with this Project.

During the NOP period, a letter was received from the Rincon Band of Luiseño Indians dated 05/14/2021 that made the following comments regarding cultural resources:

- Request for notification of, and involvement in, the CEQA environmental review process.
- Request for notification of all public hearings and scheduled approvals.
- Request for copies of documents pertaining to the project such as cultural surveys, archaeological site records, shape files, archaeological record search results, and gradingplans.

During the NOP period, a letter was received from the Native American Heritage Commission dated 05/5/2021 that made the following comments regarding cultural resources:

- The Native American Heritage Commission (NAHC) provided background information on their responsibilities regarding historical and archaeological resources relative to the CEQA Process.
- The NAHC provided guidance on AB 52 and SB 18 regarding Tribal Consultation.
- The NAHC provided guidance on how to evaluate Tribal Cultural Resources relative to the CEQA Process.

Response: *Consistent with AB52 and SB18, consultation is in process with the Agua Caliente Band and the Rincon Band of Luiseño Indians. Recommendations for Cultural Resources Assessments were utilized in the Phase I Cultural Resources Assessment (provided in the Appendices of this DEIR). Please refer to the detailed discussion in Section V.5, Cultural Resources, of the Initial Study (provided in Chapter 8, Appendices of this DEIR). Additionally, this EIR Section was prepared to be consistent with the guidance provided by NAHC on Tribal Cultural Resources.*

No comments regarding cultural resources were received at the Scoping Meeting held on May 19, 2021.

4.11.2 Environmental Setting

4.11.2.1 Topography and Geology

The Project is located in the north-central portion of the City of Perris, in western Riverside County. It is situated in a topographically diverse region that is defined by the Lakeview Mountains to thenortheast, Double Butte to the southeast, Perris Valley to the southwest, and the San Jacinto River to the northwest. Much of the drainage in the vicinity of the subject property has been channelized, but historically, the drainage pattern has been in a westerly direction toward Perris Valley and ultimately, the San Jacinto River. For the most part, drainage is intermittent, occurringonly as the result of seasonal precipitation.

Topographically, the Project site is comprised of a flat alluvial plain. Elevations range from a low of 1465.0 feet above mean sea level (AMSL) at the southwestern corner of the property to a highof 1483.0 feet AMSL at the northeastern property corner. A permanent source of water is not located within the Project boundaries.

The Project is situated in the Perris Peneplain, a portion of the Northern Peninsular Range Province of Southern California. The Perris Peneplain is a broad valley bounded on three sides by mountain ranges: the San Jacinto Mountains on the east, the San Bernardino Mountains on the north, and the Santa Ana Mountains on the southwest. The northwestern extent of the Perris Peneplain is the Santa Ana River. The Peneplain is a large depositional basin composed primarily of materials eroded from the granitic bedrock surfaces of the Southern California Batholith. The geological composition of the Project site is representative of the region as a whole, with alluvial fans and terraces formed by local granitic bedrock decomposition. Bedrock outcrops suitable for use in food processing, rock art, or shelter by indigenous peoples of the region are not present within the boundaries of the Project site. Loose lithic material is very sparse, and none observed would have been suitable for tool production by Native Americans who originally occupied this area.

4.11.2.2 Project Setting

Virtually all of the Project site has been altered by agricultural endeavors and periodic vegetation clearance and various activities on adjacent land. As a result, it is difficult to determine whether adequate resources would have been available to support indigenous populations of the region. Based on resources found on portions of the Project site and on undeveloped land in its vicinity, it is probable that floral and faunal resources would have offered limited opportunities to Native Americans for procuring food, as well as components for medicines, tools, and construction materials. Bedrock outcrops suitable for use in food processing, rock art, or shelter are not present within the Project site. Loose lithic material is very sparse, and none observed would have been suitable for tool production. A permanent source of water is not located within the Project site. Due to the relative lack of available natural resources, it is likely that the Project site would only have been utilized for seasonal resource exploitation by indigenous peoples of the region and not for long-term occupation.

Criteria for occupation during the historical era were generally somewhat different than for aboriginal occupation since later populations did not depend solely on natural resources for survival. During the historical era the subject property would probably have been considered very desirable due to the availability of tillable soil, flat topography, and its proximity to urban centers and major transportation corridors.

4.11.2.3 Cultural Setting

It should be noted that of the many anthropologists and historians who have presented boundaries of the Luiseño traditional territory, few have excluded the Perris area from their descriptions (Drucker 1955; Sparkman 1908; Kroeber 1925; Smith and Freers 1994), and such territory descriptions correspond with that communicated to the Pechanga people by tribal elders. While historic accounts and anthropological and linguistic theories are important in determining traditional Luiseño territory, the most critical sources of information used to define traditional territories are tribal songs, creation accounts, and oral traditions.

4.4.2.3.a Prehistoric Era

On the basis of currently available archaeological research, occupation of Southern California by human populations is believed to have begun at least 10,000 years ago. Theories proposing much earlier occupation, specifically during the Pleistocene Age, exist but at this time archaeological evidence has not been fully substantiating. Therefore, for the purposes of this discussion, only human occupation within the past 10,000 years will be addressed.

A time frame of occupation may be determined on the basis of characteristic cultural resources. These comprise what are known as cultural traditions or complexes. It is through the presence or absence of time-sensitive artifacts at a particular site that the apparent time of occupation maybe suggested.

In general, the earliest established cultural tradition in Southern California is accepted to be the San Dieguito Tradition, first described by Malcolm Rogers in the 1920's. Although absolute dates for the various phase changes have not been hypothesized or fully substantiated by a stratigraphic sequence, the San Dieguito Tradition as a whole is believed to have existed from approximately 7000 to 10,000 years ago (8000 to 5000 B.C.).

Throughout southwestern California the La Jolla Complex followed the San Dieguito Tradition, and existed from approximately 5500 to 1000 B.C. The La Jolla Complex is recognized primarily by the presence of millingstone assemblages within shell middens. Characteristic cultural resources of the La Jolla Complex include basined millingstones, unshaped manos, flaked stone tools, shell middens, and a few Pinto-like projectile points. Flexed inhumations under stone cairns, with heads pointing north, are also present.

The Pauma Tradition, which existed from approximately 1000 B.C to 1400 A.D., may be an inland variant of the La Jolla Complex, exhibiting a shift to a hunting and gathering economy, rather than one based on shellfish gathering. Implications of this shift are an increase in number and variety of stone tools and a decrease in the amount of shell. At this time, it is not known whether the Pauma Complex represents the seasonal occupation of inland sites by La Jollan groups or whether it represents a shift from a coastal to a non-coastal cultural adaptation by the same people.

The late period is represented by the San Luis Rey Complex and is divided into two periods: San Luis Rey I (A.D. 1400-1750) and the San Luis Rey II (A.D. 1750-1850). The San Luis Rey I type component includes cremations, bedrock mortars, millingstones, small triangular projectile points with concave bases, bone awls, stone pendants, Olivella shell beads, and quartz crystals. The San Luis Rey II assemblage is the same as San Luis Rey I, but with the addition of pottery vessels, cremation urns, tubular pipes, stone knives, steatite arrow straighteners, red and black pictographs, and such non-aboriginal items as metal knives and glass beads. Inferred San Luis Rey subsistence activities include hunting and gathering with an emphasis on acorn harvesting.

4.4.2.3.b Ethnography

According to available ethnographic research, the Project study area was included in the known territory of the Tacik-speaking Luiseño Indians during both prehistoric and historic times. The name Luiseño is Spanish in origin and was used in reference to those aboriginal inhabitants of Southern California associated with the Mission San Luis Rey.

The territory of the Luiseño was extensive, encompassing over 2000 square miles of coastal and inland Southern California. Known territorial boundaries extended as far northeast as the Santa Ana River and Box Springs Mountain Range, as far east as Mount San Jacinto, and as far southeast as Lake Henshaw, and to the west including the Southern Channel Islands. Their habitat included every ecological zone from sea level to 6000 mean feet above sea level.

Territorial boundaries of the Luiseño were shared with the Gabrieliño and Serrano to the north, the Cahuilla to the east, the Cupeño and Ipai to the south. With the exception of the Ipai, these tribes shared similar cultural and language traditions. Although the social structure and philosophy of the Luiseño were similar to that of neighboring tribes, they had a greater population density and correspondingly, a more rigid social structure.

Based on Luiseño settlement and subsistence patterns, the type of archaeological sites associated with this culture may be expected to represent the various activities involved in seasonal resource exploitation. Lithic debris and/or milling features, may be expected to occur relatively frequently. Food processing stations, often only single milling features, are perhaps the most abundant type of site found.

Isolated artifacts occur with approximately the same frequencyas food processing stations.

4.4.2.3.c History

Four principle periods of historical occupation existed in Southern California: the Explorer Period(A.D. 1540-1768), the Colonial Spanish-Mission Period (A.D. 1769-1830), the Mexican Ranch-Pastoral/Landless Indian Period (A.D. 1830-1860), and the American Developmental/Indian reservation Period (A.D. 1860-present).

In the general Project study area, the Colonial Spanish-Mission Period (A.D. 1769-1830) first represents historical occupation.

In 1798 on the site Santiago had selected, the Mission San Luis Rey de Francia was founded andall aboriginals living within the mission's realm of influence became known as the "Luiseño." By 1818 the greater Temecula Valley had become the Mission San Luis Rey's principle producer ofgrain and was considered one of the mission's most important holdings. This entire area continued to be an abundant producer of grain, as well as horses and cattle, for the thriving Mission San Luis Rey until the region became part of Mexico on April 11, 1822. Following this event, the Spanish missions and mission ranches began a slow decline.

During the Mexican Ranch-Pastoral/Landless Indian period (A.D. 1830-1860) the first of the Mexican ranchos were established following the enactment of the Secularization Act of 1833 by the Mexican government. Mexican governors were empowered to grant vacant land to "contractors (empresarios), families, or private citizens, whether Mexicans or foreigners, who mayask for them for the purpose of cultivating or inhabiting them." Mexican governors granted approximately 500 ranchos during this period. Although legally a land grant could not exceed 11square leagues (about 50,000 acres or 76 square miles) and absentee ownership was officially forbidden, neither edict was rigorously enforced. The Project site was not located within any of the ranchos but was located approximately 2.5 miles southeast of the San Jacinto Nuevo y Potrero land grant.

In the final period of historical occupation, the American Developmental/Landless Indian Reservation Period (A.D. 1860-present), the first major changes in the study area took place as a result of land issues addressed in the previous decade. Following completion of the General Land Office surveys, large tracts of federal land became available for sale and for preemption purposes, particularly after Congress passed the Homestead Act of 1862. California was eventually granted 500,000 acres of land by the federal government for distribution, as well as two sections of land in each township for school purposes. Much of this land was located in the southern portion of the state. Under the Homestead Act of 1862, 160-acre homesteads were available to citizens of the United States (or those who had filed an intention to become one) whowere either the head-of-household or a single person over the age of 21 (including women).

Since 1918, the greatest influence on the Perris region has been March Air Force Base, whose southeastern corner is located approximately 1.1 miles northwest of the Perris Commerce Center property. At a time when the United States was rushing to build up its military forces in anticipation of an entry into World War I, Congress appropriated funds in 1917 in an attempt to "put the Yankeepunch into the war by building an army in the air."

Although the signing of the armistice on November 11, 1918, did not initially halt training at MarchField, by 1921, the decision had been made to phase down all activities at the new base in accordance with sharply reduced military budgets (March 2010). In April 1923, March Field closed its doors with one sergeant left in charge.

In July 1926, Congress created the Army Air Corps and approved the Army's five-year plan whichcalled

for an expansion in pilot training and the activation of tactical units. Funds were appropriated for the reopening of March Field in March of 1927.

Just as March Field began to take on the appearance of a permanent military installation, the base's basic mission changed. In 1931, March Field became an operational base and soon became associated with the Air Corps' heaviest aircraft as well as an assortment of fighters. As an immediate result of the attack on Pearl Harbor in December of 1941, March Field again began training aircrews. During this period, the base doubled in area and at its peak supported approximately 75,000 troops. At the same time, the government procured a similar-sized tract to the west and established Camp Hahn as an anti-aircraft artillery training facility. It supported 85,000 troops at the height of its activity.

After the war, March reverted to its operational role and became a Tactical Air Command base. In 1949, March became a part of the relatively new Strategic Air Command.

In 1993, March Air Force Base was selected for realignment. On April 1, 1996, March officially became March Air Reserve Base.

4.11.2.4 Regulatory Setting

4.11.2.2.a Federal

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) authorized the National Register of Historic Places and coordinates public and private efforts to identify, evaluate, and protect the nation’s historical and archaeological resources. The National Register includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review refers to the federal review process designed to ensure that historical properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process, with assistance from state historic preservation offices.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

4.11.2.2.b State

California Public Resources Code

Archaeological, paleontological, and historical sites are protected by a wide variety of state policies and regulations under the California Public Resources Code. In addition, cultural and paleontological resources are recognized as nonrenewable and therefore receive protection under the California Public Resources Code (PRC) and the California Environmental Quality Act(CEQA).

- California Public Resources Code 5020–5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the

administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.

- California Public Resources Code 5079–5079.65 defines the functions and duties of the Office of Historic Preservation (OHP). The OHP is responsible for the administration of federally and state-mandated historical preservation programs in California and the California Heritage Fund.
- California Public Resources Code 5097.9–5097.991 provides protection to Native American historical and cultural resources and sacred sites and identifies the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.
- California Public Resources Code 5097.98 states that "in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation...until the coroner...has determined...that the remains are not subject to...provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible.... The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and... has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

This is reflected in **Mitigation Measure MM-CR-2**, as outlined in Subsection 4.11.5.

California Environmental Quality Act (CEQA) Guidelines Section 15064.5(a)(1)-(3)

California Environmental Quality Act (CEQA) guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for the evaluation of historical significance, CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

Senate Bill 18

The law provides limited protection for Native American prehistoric, archaeological, cultural, spiritual, and ceremonial places. These places may include sanctified cemeteries, religious, ceremonial sites, shrines, burial grounds, prehistoric ruins, archaeological or historic sites, Native American rock art inscriptions, or features of Native American historic, cultural, and sacred sites.

Senate Bill 18 (SB18) requires a city or county to consult with the NAHC and any appropriate Native American tribe for the purpose of preserving relevant Traditional Tribal Cultural Places (TTCP) prior to the adoption, revision, amendment, or update of a city's or county's general plan, specific plan, or designating land as open space. SB18 provides a new definition of TTCP, which requires that the site

must be shown to actually have been used for activities related to traditionalbeliefs, cultural practices, or ceremonies. In addition, SB18 law also adds California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

Assembly Bill 52

Assembly Bill 52 (AB52) specifies that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQAcomplete to notify the requesting tribe as an invitation to consult on the project. AB52 identifies examples of mitigation measures that will avoid or minimize impacts to a TCR. The bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015.AB52 amends Sections 5097.94 and adds Sections 21073, 21074, 2108.3.1, 21080.3.2, 21082.3,21083.09, 21084.2, and 21084.3 to the California PRC, relating to Native Americans.

4.11.2.2.c Local

Applicable City of Perris General Plan Goals and Policies

The following are the applicable General Plan Goals Policies and Implementation Measures:

Conservation Element

Goal IV - Cultural Resources

Protection of historical, archaeological and paleontological sites.

Policy IV.A

Comply with state and federal regulations and ensure preservation of the significant historical, archaeological and paleontological resources.

Implementation Measures

IV.A.1 For all private and public projects involving new construction, substantial grading, or demolition, including infrastructure and other public service facilities, staff shall require appropriate surveys and necessary site investigations in conjunction with the earliest environmental document prepared for a project.

IV.A.2 For all projects subject to CEQA, applicants will be required to submit results of an archaeological records search request through the Eastern Information Center, at the Universityof California, Riverside.

IV.A.3 Require Phase I Surveys for all projects located in areas that have not previously been surveyed for archaeological or historic resources, or which lie near areas where archaeological and/or historic sites have been recorded.

IV.A.5 Identify and collect previous surveys of cultural resources. Evaluate such resource and consider preparation of a comprehensive citywide inventory of cultural resources including bothprehistoric sites and man-made resources.

IV.A.6 Create an archive for the City wherein all surveys, collections, records and reports can becentrally located.

IV.A.7 Strengthen efforts and coordinate the management of cultural resources with other agencies and private organizations.

4.11.3 Thresholds of Significance

As discussed in Subsection 4.11.1, the Project impacts to two (2) criteria pertaining to tribal cultural resources will be analyzed. According to Appendix G of the CEQA Guidelines, and the IS, the Project would have a significant impact if it would:

a.i Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape,sacred place, or object with cultural value to a Cultural Native American tribe, and that is listed or eligible for listing in the California Register of Historical resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

a.ii. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape ,sacred place, or object with cultural value to a Cultural Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance ofthe resource to a California Native American tribe.

The potential tribal cultural resources changes in the environment are addressed in response to the above thresholds in the following analysis.

4.11.4 Potential Impacts

THRESHOLD a.i.: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public ResourcesCode section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is listed or eligible for listing in the California Register of Historical resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Less Than Significant with Mitigation

A Phase I Cultural Resources Assessment of the proposed Project site was completed by Jean A. Keller, Ph.D. in October 20. The purpose of the Phase I Cultural Resources Assessment was two-fold: 1) information was to be obtained pertaining to previous land uses of the Project site through research and a comprehensive field survey, and 2) a determination was to be made if, and to what extent, existing cultural resources would be adversely impacted by the proposed Project. By preparing the Phase I Cultural Resources Assessment, the Project has complied with PVCCSP EIR mitigation

measure MM Cultural 1.

Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB 52 requires tribes interested in development projects within a traditionally and culturally affiliatedgeographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project. AB 52 identifies examples of mitigation measures that will avoid or minimize impacts to a TCR. The bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015. AB 52 amends Sections 5097.94 and adds Sections 21073, 21074, 2108.3.1., 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to the California PRC, relating to Native Americans.

Because the Project includes a Specific Plan Amendment, the Project is also subject to the requirements of Senate Bill (SB) 18. SB 18 requires a city or county to consult with the NAHC and any appropriate Native American tribe for the purpose of preserving relevant Traditional TribalCultural Places (TTCP) prior to the adoption, revision, amendment, or update of a city's or county's general plan, specific plan, or designating land as open space. SB 18 provides a new definition of TTCP, which requires that the site must be shown to actually have been used for activities related to traditional beliefs, cultural practices, or ceremonies. In addition, SB 18 law also adds California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

With input from the Native American Heritage Commission (NAHC), SB 18 Notices were sent to the following 16 Tribes on April 2, 2021. The NAHC uses a broad range for notification.

- Agua Caliente Band of Cahuilla Indians;
- Augustine Band of Cahuilla Mission Indians;
- Cabazon Band of Mission Indians;
- Cahuilla Band of Mission Indians;
- La Jolla Band of Mission Indians;
- Los Coyotes Band of Mission Indians;
- Luiseño Indians;
- Morongo Band of Mission Indians;
- Pala Band of Mission Indians;
- Pauma Band of Luiseño Indians – Pauma & Yuima Reservation;
- Pechanga Band of Luiseño Indians;
- Ramona Band of Cahuilla Mission Indians;
- Rincon Band of Luiseño Indians;
- San Luis Rey Band of Mission Indians;
- Santa Rosa Band of Mission Indians; and
- Soboba Band of Luiseño Indians.

The City received a written response on April 14, 2021, from the Pechanga Band of Luiseño Indians regarding the AB 52 and SB 18 notices the City sent out on April 02, 2021. The Pechanga representative requested formal consultation with the City.

The Agua Caliente Band of Cahuilla Indians provided a written response to the City on May 06, 2021, regarding the IS/NOP that was circulated for review, and they also requested formal consultation. The City received a follow up Letter from the Tribe on September 14, 2021, requesting language for

mitigation and to receive a copy of the mitigation measures. **Mitigation Measures MM-CR-1** and **MM-CR-2** provide all of the items requested by the Tribe. Additionally, a copy of this DEIR is being provided to the Tribe for review, as requested.

The Rincon Band of Luiseño Indians provided a written response to the City on May 14, 2021, regarding the IS/NOP that was circulated for review. They did not request formal consultation; however, they did request to remain on the distribution list for this Project.

All three Tribes were sent a copy of the *Phase I Cultural Resources Assessment* (*CRA*). The *CRA* is also included as an Appendix to this DEIR.

As a result of the consultation process, **Mitigation Measures MM-CR-1** and **MM-CR-2** shall be applied to the Project. Implementation of these measures will ensure that in the event that native cultural resources are discovered during ground-disturbing activities all construction activities around the find will be halted, a qualified archaeologist will be notified, uncovered resources will be evaluated, and local tribes will be notified if the find is determined to be prehistoric or historic in nature.

The City has not formally concluded consultation yet with either the Pechanga Band of Luiseño Indians or the Agua Caliente Band of Cahuilla Indians, as they typically they will not provide a conclusion letter until they have reviewed the Project Conditions of Approval and have had the opportunity to review and comment on this DEIR.

With implementation of **Mitigation Measures MM-CR-1** and **MM-CR-2** as outlined in Subsection 4.11.5, impacts to tribal cultural resources will be less than significant.

THRESHOLD a.ii.: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscapethat is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a CaliforniaNative American tribe?

Less Than Significant with Mitigation

Please reference the discussion in Threshold a.i.

With implementation of **Mitigation Measures MM-CR-1** and **MM-CR-2** as outlined in Subsection 4.11.5, impactsto tribal cultural resources will be less than significant.

4.11.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

None required.

Mitigation Measure(s)

The proposed Project is required to comply with the following mitigation measures, as presented in the

IS:

MM-CR-1 Prior to the issuance of grading permits, the Project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at both the subject site and any off-site Project-related improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur at the site or within the off-site Project improvement areas until the archaeologist has been approved by the City.

The archaeologist shall be responsible for monitoring ground-disturbing activities, maintaining daily field notes and a photographic record, and for reporting all finds to the developer and the City of Perris in a timely manner. The archaeologist shall be prepared and equipped to record and salvage cultural resources that may be unearthed during ground-disturbing activities and shall be empowered to temporarily halt or divert ground-disturbing equipment to allow time for the recording and removal of the resources.

In the event that archaeological resources are discovered at the Project site or within the off-site Project improvement areas, the handling of the discovered resource(s) will differ, depending on the nature of the find. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for Native American/tribal cultural/archaeological resources. However, it is understood that all artifacts, with the exception of human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner will commit to the relinquishing and curation of all artifacts identified as being of Native American origin. All artifacts, Native American or otherwise, discovered during the monitoring program shall be recorded and inventoried by the consulting archaeologist.

If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop and the Project proponent and Project archaeologist shall notify the City of Perris Planning Division and the Soboba Band of Luiseño Indians and the Pechanga Band of Luiseño Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians or the Pechanga Band of Luiseño Indians shall be retained to assist the Project archaeologist in the significance determination of the Native American as deemed possible. The designated Luiseño tribal representative will be given ample time to examine the find. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribe. If the find is determined to be of sacred or religious value, the Luiseño tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaking in a manner that avoids destruction or other adverse impacts.

Native American artifacts that are relocated/reburied at the Project site would be subject to a fully executed relocation/reburial agreement with the assisting Luiseño tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied on-site and in an area of permanent protection, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist.

Native American artifacts that are relocated/reburied at the Project site would be subject to a fully executed relocation/reburial agreement with the assisting Luiseño tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied on-site and in an area of permanent protection, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist.

Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. Subsequent to analysis and reporting, these artifacts will be subjected to curation, as deemed appropriate, or returned to the property owner.

Once grading activities have ceased and/or the archaeologist, in consultation with the designated Luiseño representative, determines that monitoring is no longer warranted, monitoring activities can be discontinued following notification to the City of Perris Planning Division.

A report of findings, including an itemized inventory of artifacts, shall be prepared upon completion of the tasks outlined above. The report shall include all data outlined by the Office of Historic Preservation guidelines, including a conclusion of the significance of all recovered, relocated, and reburied artifacts. A copy of the report shall also be filed with the City of Perris Planning Division, the University of California, Riverside, Eastern Information Center (EIC) and the Luiseño tribe(s) involved with the Project.

MM-CR-2 In the event that human remains (or remains that may be human) are discovered at the Project site or within the off-site Project improvement areas during ground- disturbing activities, the construction contractors, Project archaeologist, and/or designated Luiseño tribal representative shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the Project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the Project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and the median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98I and 5097.94(k)).

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the EIC.

4.11.6 Cumulative Impacts

The cumulative study area for tribal cultural resources is the geographical area of the City of Perris, which is the geographical area covered by the City General Plan, including all goals and policies included therein, as well as the historic tribal area contained therein. Future development in the City could include excavation and grading that could potentially impact tribal cultural resources and human remains. The cumulative effect of the proposed Project is the continued loss of these resources. The proposed Project, in conjunction with other development in the City, has the potential to cumulatively impact tribal cultural resources; however, it should be noted thateach development proposal received by the City undergoes environmental review pursuant to CEQA. If there is a potential for significant impacts to tribal cultural resources, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures. If subsurface tribal cultural resources are assessed and/or protected as they are discovered, impacts to these resources would be less than significant. In addition, the City's General Plan policies would be implemented as appropriate to reduce the effects of additional development within the City.

With implementation of **Mitigation Measures MM-CR-1** and **MM-CR-2**, the contribution of the Specific Plan to the cumulative loss of known and unknown tribal cultural resources throughout the City would be reduced to a less than significant level.

4.11.7 Unavoidable Significant Adverse Impacts

Based on the information presented above, all potential tribal cultural resources impacts would be limited and can be reduced to a less than significant impact level with adherence to **Mitigation Measures MM-CR-1** and **MM-CR-2**. As a result, there will not be any unavoidable Project specific or cumulative adverse impacts to tribal cultural resources from implementing the Project as proposed. The Project tribal cultural resource impacts are less than significant.

4.12 UTILITIES AND SERVICE SYSTEMS

4.12.1 Introduction

This Subchapter will evaluate the environmental impacts to the issue area of utilities and service systems from implementation of the Project. The Utilities and Service Systems Section, of the Initial Study (IS, Subchapter 8.3, *Initial Study*) posed the following questions:

a. Would the Project require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?
b. Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?
c. Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?
d. Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
e. Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Based on the analysis in the IS it was determined that the question pertaining to issue areas b. through e., related to utilities and service systems (in the questions asked above), **would not** require any further analysis in the Draft Environmental Impact Report (DEIR). As it pertains to these questions, the IS identified "less than significant impact" as a result of implementation of the Project.

Based on the analysis in the IS, the remaining one (1) issue area, a. related to utilities and service systems in the questions asked above, **would** be further analyzed in the DEIR. In particular, only the issue pertaining to storm water drainage was identified as a potentially significant issue.

Standard Conditions SC-USS-1 through **SC-USS-4**, and **SC-HYD-1** through **SC-HYD-4** shall be carried over to this DEIR.

No mitigation measures were presented in the IS that shall be carried over to this DEIR.

In addition to the IS, the following sources were used in the evaluation presented in this Subchapter:

- City of Perris General Plan - Final Environmental Impact Report https://www.cityofperris.org/home/showpublisheddocument/451/637203139698630000
- *Perris Valley Commerce Center Specific Plan, Amendment No. 13 DRAFT* (Sections 3.4, ExistingInfrastructure and Services and 3.5, Proposed Infrastructure and Services) (**Appendix O**)
- *Perris Valley Regional Water Reclamation Facility – Fact Sheet*, issued by EMWD, dated January 2021 https://www.emwd.org/sites/main/files/file-attachments/pvrwrffactsheet.pdf
- Eastern Municipal Water District *2020 Urban Water Management Plan* (*EMWD 2020 UWMP*); Metropolitan Water District *2020 Urban Water Management Plan* (*2020 RUWMP*) https://www.emwd.org/post/urban-water-management-plan
- CalRecycle, SWIS Facility Detail, El Sobrante Landfill (33-AA-0217) https://www2.calrecycle.ca.gov/swfacilities/Directory/33-AA-0217
- El Sobrante Landfill Fact Sheet, issued by Waste Management of California, accessed May2019 https://www.wmsolutions.com/pdf/factsheet/El_Sobrante_Landfill.pdf

- El Sobrante Landfill Annual Monitoring Report, Jan 1, 2020 through Dec 31, 2020, by USAWaste of CA, Inc., dated August 2021 (Final) http://www.rcwaste.org/Portals/0/Files/ElSobrante/2021/Final%202020%20Annual%20Repo rt-%20El%20Sobrante%20Landfill.pdf
- Water Efficient Guidelines for New Development, July 19, 2013 http://www.emwd.org/home/showdocument?id=6987
- EMWD Consolidated Schedule of Rates, Fees and Charges (proposed for June 16, 2021Board Approval) https://www.emwd.org/sites/main/files/file-attachments/ratebook.pdf?1609791522
- EMWD Charges and Deposits https://www.emwd.org/post/charges-and-deposits
- *Eastern Municipal Water District Comprehensive Annual Financial Report for the Fiscal YearEnded June 30, 2020* https://www.emwd.org/sites/main/files/file-attachments/2020_cafr_-_final_for_web.pdf?1608140100
- *SAN 53 – Will Serve Letters – APN: 303-060-020*, prepared by Eastern Municipal Water District, 8-26-2020 (**Appendix G**)

Notice of Preparation (NOP)/Scoping Comments

No comments regarding utilities and service systems were received in response to the Notice of Preparation or at the Scoping Meeting held on March 1, 2021.

Therefore, the above issues 4.12.1a through 4.12.1d are the focus of the following evaluation ofutilities and service systems.

4.12.2 Environmental Setting

The Project is comprised of approximately 16 acres in the City of Perris and consists of undeveloped property in the Commercial land use designation within the PVCCSP planning area, although the Project applicant is proposing a change in land use designation to Light Industrial. The Project site is located south of Ramona Expressway, east of Indian Avenue, and west of Perris Avenue. Each of these roadways are major transportation corridors in the City of Perris.

The Project site itself is bordered on three sides (west, south, and east) by fully developed properties. Lands to the north across Ramona Expressway are designated for commercial development, portions of which has been developed.

4.12.2.1 Regulatory Setting

4.12.2.1.a Federal

In 1972, the Federal Water Pollution Control Act (Clean Water Act) was amended to prohibit the discharge of pollutants to waters of the United States unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The Clean Water Act focused on tracking point sources, primarily from wastewater treatment facilities and industrial waste dischargers, and required implementation of control measures to minimize pollutant discharges. The Clean Water Act was amended again in 1987, adding Section 402(p), to providea framework for regulating municipal and industrial stormwater discharges. In November 1990, the U.S. Environmental Protection Agency published final regulations that establish application requirements for specific categories of industries, including construction Projects that encompass greater than or equal to five acres of land. The Phase II Rule became final in December 1999, expanding regulated construction sites to those greater than or equal to one acre.

The regulations require that stormwater and non-stormwater runoff associated with construction activity, which discharges either directly to surface waters or indirectly through municipal separate storm sewer systems (MS4s), must be regulated by an NPDES permit.

4.12.2.1.b State

California Water Quality Laws

Under California law, the State Board and nine Regional Water Quality Control Boards (RWQCB) are responsible for implementing the Federal Clean Water Act (CWA) and the California Porter-Cologne Water Quality Control Act (Porter- Cologne Act). The Porter-Cologne Act, California Water Code section 13000 et seq., directs each RWQCB to develop a Water Quality Control Plan (Basin Plan) for all areas within its region. The Basin Plan is the basis for each RWQCB's regulatory programs. The proposed project is located within the purview of the Santa Ana RWQCB (Region 8) and must comply with applicable elements of the region's Basin Plan, as well as other requirements of the Porter- Cologne Act.

AB 1881 – Model Water Efficient Landscape Ordinance 2006

Assembly Bill (AB) 1881, the Water Conservation in Landscaping Act was passed by the California legislature in 2006. AB 1881 requires the California Department of Water Resources (DWR) to update the California Model Landscape Ordinance established through AB 325 in accordance with specified requirements, reflecting many of the recommendations from the AB 2717 Task Force.

Under AB 1881, local agencies were required to adopt the updated Model Ordinance (or a stricter local landscape ordinance) by 1/1/2010. The Model Ordinance establishes a formal structure for planning, designing, installing, maintaining, and managing water efficient landscapes in new construction and rehabilitated projects and establishes provisions for water management practices and water waste prevention on existing landscapes.

20x2020 Water Conservation Plan (SBx7-7)

The 20x2020 Water Conservation Plan, issued by the DWR in 2010 pursuant to the Water Conservation Act of 2009 (SBX7-7), established a water conservation target of 20 percent reduction in water use by 2020 compared to 2005 baseline use.

Recycled Water Policy

The Recycled Water Policy issued by the SRWCB in 2009 requires increased use of recycled water by 200,000 afy by 2020 and by 300,000 afy by 2030. The policy further contains the goals of increasing recycled water use statewide by at least 1,000,000 afy by 2020, and at least 2,000,000 afy by 2030, over 2002 levels. The policy states:

> ...Pursuant to Water Code sections 13550 et seq., it is a waste and unreasonable use of water for water agencies not to use recycled water when recycled water of adequate quality is available and is not being put to beneficial use, subject to the conditions established in sections 13550 et seq. The State Water Board shall exercise its authority pursuant to Water Code section 275 to the fullest extent possible to enforce the mandates of this subparagraph. (SWRCB 2009)

California Water Supply Laws

In regard to water supply, California Water Code sections 10910–10915 (commonly referred to as SB

610 according to the enacting legislation) require the preparation of a Water Supply Assessment (WSA) for certain projects, generally including those having a water demand equivalent to a project with 500 dwelling units or more. (Water Code § 10912(a)) Under SB 610, at the time the lead agency determines a project is subject to CEQA, the agency must identify the public water system that will provide water service to the project and request the water provider to prepare a WSA for the project. (Water Code § 10910(b)) As indicated above, the proposed project is within the EMWD's service territory and, therefore, will be served by the EMWD. In accordance with SB 610, due to the size of the Project, a WSA is not required.

4.12.2.1.c Local

Eastern Municipal Water District

The EMWD has created Water Efficient Guidelines for New Development (July 19, 2013). The focus of the Water Efficiency Guidelines is on incentive-driven, cost-effective, voluntary water efficiency measures for new residential development. The Water Efficiency Guidelines are divided into two primary sections – (1) indoor guidelines; and (2) outdoor guidelines.

1. Indoor guidelines – designed primarily for builders, developers, and those involved in the design and construction of residential housing who make decisions about what appliance and fixtures are installed. The indoor guidelines are also applicable to existing residents who may be seeking to improve water efficiency in their home or apartment.
2. Outdoor guidelines – designed primarily for residents, landscape architects and designers, builders, and others who make decisions about creating landscapes in new residences. The outdoor guidelines are also applicable to existing residents seeking to re-develop their landscape.

The EMWD's conservation programs encourage existing and future customers to make water efficiency a way of life through installation of efficient fixtures and appliances, water budgets to help manage outdoor irrigation, and water use efficiency regulations.

Indoor Guidelines

The EMWD currently sets indoor water budgets based on water use estimated at 60 gallons per capita per day (GPCD). Homes built to meet the current California Green Building Standards Code (CALGreen) specification are expected to have water demands as low as 35.0 GPCD for a household of 3 people. Homes that include the efficiency recommendations in Water Efficiency Guidelines are expected to have water demands of only 31 GPCD. Compared with the current EMWD water budget allocation of 60 GPCD, new homes may use substantially less water indoors. The following are taken from the Water Efficiency Guidelines and will apply to the Project:

- Toilets – 1.0 Gallons per Flush (GPF) or better, WaterSense labeled toilet or better.
- Clothes Washer – High Efficiency: Install an ENERGY STAR rated clothes washer with an average volume allowance of 15 gallons per load or less.
- Showers and Showerheads: Install 1.5 - 1.75 GPM maximum flow rate showerhead at 80 PSI.
- Bathroom Faucets: Install 0.5 GPM maximum flow aerators in all lavatory/bathroom sink.
- Leak Detection: Detect Leaks Using the Existing Water Meter.

Outdoor Guidelines

Indoor water use largely takes place while we are present and aware that it's happening. Outdoor use is far less intuitive and is often controlled by automatic timers that operate when no one is present. There are three sets of outdoor water use regulations to consider:

1. The Water Budget Rate Structure of EMWD, which sets the maximum water budget for new landscapes at 70% of evapotranspiration (ETo). The rate structure applies to all of EMWD new residential and landscape only customers and provides a strong economic incentive to stay within the water budget.
2. The California Model Efficient Landscape Ordinance (MELO), which sets out detailed requirements for planning, design, and installation of new or renovated landscapes.
3. The California Green Building Standards Code (CALGreen), which sets out some voluntary (or mandatory depending on the locality) goals for additional water savings in new construction.

For practical purposes the MELO is the governing document for new and rehabilitated landscapesin the EMWD service area, as all of the communities in the area that have adopted it, or an equivalent ordinance, into their regulations. MELO complies with the EMWD water budget rate structure in that both regulations are based on a maximum applied water allowance (MAWA) of no more than 70% of ETo. CALGreen standards however go beyond MELO using the concept oflower water allowances, and in suggesting the use of dedicated landscape water meters. EMWDencourages new and rehabilitated landscapes to go beyond the 70% requirements and to consider landscapes at 60% or even 50% of ETo.

The Project will be required to comply with shall be required to comply with the EMWD Water Efficient Guidelines for New Development which are in effect at the time of building permit issuance. This is reflected in **Standard Condition SC-USS-2**, as outlined in Subsection 4.12.5.

Applicable City of Perris General Plan Goals and Policies

Conservation Element

Goal V - Water Supply

Provide an adequate water supply to support existing and future land uses, as anticipated in theLand Use Element.

Policy V.A

Coordinate land-planning efforts with local water purveyors.

Implementation Measures

V.A.1 Work with Eastern Municipal Water District to ensure that development does not outpace projections consistent with the Water Districts Urban Water Management Plan.

V.A.2 Require use of new technologies and water conserving plant materials for landscaping.

VI.A.3 Participate with the Eastern Municipal Water District to develop and implement water conservation programs and to encourage use of water conserving technologies

4.12.3 Thresholds of Significance

As discussed in Subsection 4.12.1, the Project impacts to one (1) criterion pertaining to utilities and service systems will be analyzed. According to the IS, the Project would have a significant impact if it would:

a. Require or result in the relocation or construction of new or expanded water, or wastewatertreatment

or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects.

The potential utility and service systems changes in the environment are addressed in response to the above threshold in the following analysis.

4.12.4 Potential Impacts

THRESHOLD a: Would the Project require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact

4.12.4.1 Water

It is noted, the *Perris Valley Commerce Center Specific Plan, Amendment No. 13 (PVCCSP) - Existing Water Plan* (Figure 3.0-7) indicates that 12" water service lines exist within Perris Avenue along the Project frontage and Indian Avenue south of the Project site. Water services are provided by the EMWD. It should also be noted that the Project applicant is proposing a change from a Commercial land use designation to a Light Industrial land use designation.

As was discussed in the Initial Study (IS) prepared for the Notice of Preparation (NOP) associated with this Project, the Project's proposed specific plan land use designation change from Commercial (C) to Light Industrial (LI) for the 16-acre Project site is anticipated to have a nominal impact on the overall PVCC water supply/demand. Moreover, the water supply/demand associated with Project's proposed Light Industrial use is anticipated to be less than the water supply/demand associated with the existing Commercial land use reflected in the above PVCC water supply/demand analysis. This conclusion is supported by data from the EMWD website which indicates the water consumption rate for light industrial/manufacturing uses is 120 gallons per thousand square feet compared to the rate for commercial uses at 150 gallons per thousand square feet. Therefore, since there will be less of a demand for water than the PVCCSP EIR anticipated, there is not a significant impact to water supplies or water demand. It should also be noted the EMWD has issued a Will Serve Letter dated 8/26/20 to the applicant indicating it can provide adequate water supply and service to this Project.

Connections to the local EMWD water system will involve temporary and less than significant construction impacts that will occur in conjunction with other on-site Project improvements. Furthermore, operational impacts related to the proposed Project are considered incremental and less than significant and no mitigation is required. However, adherence to standard conditions will be required; reference **Standard Condition SC-USS-2** (EMWD Water Efficient Guidelines), and **Standard Condition SC-USS-3** (Water Connection Fees).

4.12.4.2 Wastewater

As was discussed in IS prepared for the NOP associated with this Project, similar to the previous discussion of water supply/demand, the Project's proposed PVCCSP land use designation change from Commercial (C) to Light Industrial (LI) for the 16-acre Project site is anticipated to have a nominal impact on the larger PVCC wastewater supply/demand. Moreover, the wastewater supply/demand associated with Project's proposed Light Industrial use is anticipated to be less than the water supply/demand

associated with the existing Commercial land use reflected in the PVCCSP EIR wastewater supply/demand analysis. This conclusion is supported by data from the EMWD website which indicates the wastewater generation rate for light industrial/manufacturing uses is 80 gallons per thousand square feet compared to the rate for commercial uses at 100 gallons per thousand square feet. It should also be noted the EMWD has issued a Will Serve Letter dated 8/26/20 to the applicant indicating it can provide adequate wastewater/sewer service to this Project.

Implementation of the proposed Project will not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Adherence to standard conditions will be required; reference **Standard Condition SC-USS-1** (Sewer Connection Fees), and **Standard Condition SC-HYD-3** (Wastewater). Any impacts will be less than significant, and no mitigation is required.

4.12.4.3 Recycled Water

As was discussed in IS prepared for the NOP associated with this Project, The Project's proposed specific plan land use designation change from Commercial (C) to Light Industrial (LI) for the 16-acre Project site is anticipated to have a nominal impact on the overall PVCC water supply/demand. Moreover, the water supply/demand associated with Project's proposed Light Industrial use is anticipated to be less than the water supply/demand associated with the existing Commercial land use reflected in the above PVCC water supply/demand analysis. This conclusion is supported by data from the EMWD website which indicates the water consumption rate for light industrial/manufacturing uses is 120 gallons per thousand square feet compared to the rate for commercial uses at 150 gallons per thousand square feet.

Connections to the local EMWD water system will involve temporary and less than significant construction impacts that will occur in conjunction with other on-site Project improvements. Furthermore, operational impacts related to the proposed Project are considered incremental and less than significant and no mitigation is required. Adherence to standard conditions will be required; reference **Standard Condition SC-USS-2** (EMWD Water Efficient Guidelines), and **Standard Condition SC-USS-3** (Water Connection Fees).

4.12.4.4 Electric Power

As was discussed in IS prepared for the NOP associated with this Project, operation of the proposed Project would consume electricity for building power, lighting, and water conveyance, among other operational requirements. Pursuant to PVCCSP EIR mitigation measure MM Air 20, the Project will be required to exceed Title 24 energy conservation requirements by at least 15 percent. However, it should be noted that this is a Specific Plan – wide mitigation measure, and not specific to this Project.

Because the proposed Project design is required to exceed all applicable local, state, and federal requirements and represents an incremental and relatively modest increase in area wide electrical consumption, the Project would not result in potentially significant environmental effects from wasteful, inefficient, or unnecessary consumption of energy.

Adequate commercial electricity supplies are presently available in Southern California to meet the incremental increase in demand attributed to the proposed Project. The proposed Project will not require new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects. Impacts will be less than significant, and no project- specific mitigation is required.

4.12.4.5 Natural Gas

The Southern California Gas Company (SCG) is the nation's largest natural gas distribution utility, providing service to 21.8 million customers in 220 cities and 12 counties from San Luis Obispo to the Mexican border; including service to the Project site. SCG owns and operates 3,526 miles of transmission pipelines, 49,715 miles of distribution pipelines and 48,888 miles of service lines. SCG also operates eleven transmission compressor stations and four underground storage facilities with a combined capacity to store 134.1 billion cubic feet of natural gas.

As was mentioned in IS prepared for the NOP for the Project, the proposed Project will be connected to SCG's natural gas distribution system. Based on a review of PVCCSP, Figure 3.0-12 (Existing Natural Gas), natural gas lines are in place contiguous to the Project site within the Ramona Expressway and Perris Boulevard public rights-of-way.

Adequate natural gas supplies are available to meet the incremental increase in demand attributed to the Project. The proposed Project will not require new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects. Potential impacts in this regard will be less than significant, and no mitigation is required.

4.12.4.6 Telecommunications Facilities

Telephone service to the Project site and the greater City of Perris is provided by Verizon. Verizon is a private company that provides connection to the communication system on an as needed basis.

4.12.4.7 Stormwater/Drainage

As set forth in Subchapter 4.7 of this EIR (Hydrology and Water Quality), all new development in the City of Perris is required to comply with provisions of the National Pollutant Discharge Elimination System (NPDES) program, including Waste Discharge Requirements (WDR), and the 2010 Santa Ana Municipal Separate Sewer Permit (MS4) Permit, as enforced by the Santa Ana Regional Water Quality Control Board (SARWQCB).

The Project site consists of approximately 16 acres of vacant, undeveloped land located on the south side of Ramona Expressway, extending from Indian Avenue east to Perris Boulevard, in the Perris Valley Commerce Center Specific Plan.

As discussed, the Project applicant proposes to amend the existing PVCCSP by changing the existing land use designation on the Project Site from the existing Commercial land use to Light Industrial uses.

The Project site is relatively flat and at street grade with a gentle gradient of less than 2% to the southwest. On-site elevations are approximately 1,465' AMSL.

At present, the Project site is vacant, undeveloped land with a 100 percent pervious earthen surface. It is relatively flat with a slope of about 0.3 percent and drains gradually west to east over uneven terrain. The general area supports existing or planned suburban development and the site is bordered by developed properties. There is an informal flow path that enters the site from the storm drain outlet along the western edge of the site. That storm drain outlets the flows from Indian Avenue and provides overflow for the existing retention basin of the Lowes center west of the site which is the only source of surface flow that directly affects the site.

The site is within the Perris Valley Master Drainage Plan (MDP), with regional lines located north (Line E) and east (Line E-01) of the property. As previously indicated, there is an existing storm drain outlet at

Indian Avenue. Two 18-inch reinforced concrete pipes (RCPs) outlet into a small informal surface channel that traverses the site from west to east before entering a lateral to Line E-01. The Indian Avenue outlet conveys the offsite flow from the Lowes center to the west, as well as the Indian Avenue sheet flow via a catch basin at the southeast corner of Indian and Ramona Expressway. The drainage report for the Lowes Center indicates a peak runoff from the 18-inch pipes of 39 cubic feet per second (cfs). The property to the south blocks any potential offsite flow in that direction.

Runoff from the region west of the site will eventually be collected and conveyed as part of the Line E system. That system is not yet in place and as such regional flows drain easterly along Ramona Expressway. The Perris Valley Commerce Center – Line E Update identifies a concentration point at the corner of Indian and Ramona with a peak flow of 1,064 cfs which splits north and south of Ramona Expressway. At that flow rate, there is inundation of all intersections in the immediate area, as confirmed by the City of Perris in recent discussions.

In a memo dated April 5, 2021, the City Engineer stated that a study analyzing the downstream 54-inch storm drain in Perris Boulevard was needed to determine if the Project will have sufficient storm drain service.

Since the Project is within the MDP it is required to participate in funding/installing regional facilities as appropriate. The MDP is a financing mechanism used to fund construction of new or improved drainage facilities. MDP fees are imposed on new land development activity within the MDP area. The Subdivision Map Act requires that agencies imposing fees have a general drainage plan for the fee area, a special fund for the fees, and an equitable distribution of the fees prior to implementation.

The proposed future improvements will preserve the current flow patterns. The Project will provide drainage facility improvements in compliance with the PVCCSP and the Perris Valley Master Drainage Plan. Line E is proposed to be constructed north of Ramona Expressway and the Project proposes to construct a connection of the storm drain system in Indian Avenue to Line E. At this time the connection is proposed to be a 36-inch pipe within Ramona Expressway connecting to the existing Line E channel at the northeast corner of Perris Boulevard and Ramona Expressway. The connection of this line to the Line E channel will help reduce existing ponding/flooding at the local intersections in the immediate area, including Perris and Ramona, with the combined capacity of the 36-inch and 54-inch lines. Permanent resolution of the existing ponding problems will occur when Line E is built. The existing onsite connection to Line E-01 will be maintained with the onsite inlet being replaced with another connection in conjunction with the onsite design. The Project *Drainage Report* indicated that three (3) underground storage facilities will be provided to effectively handle the increased runoff from the Project in the post-development condition based on the 24-hour duration, 10-year return frequency design storm.

The proposed has been reviewed and conditioned by the City of Perris Engineering Department, and the City of Perris Building & Safety Department, among others, to mitigate any potential impacts as listed above through site design and compliance with the PVCC Drainage Study. Additionally, **Standard Conditions SC-HYD-1 (SWPPP)**, **SC-HYD-2 (WQMP)**, **SC-HYD-3 (Wastewater)**, **SC-HYD-4 (Site Drainage Plan)**, and **SC-HYD-5 (Storm Drainage Fees)** are required in order to ensure that the Project's potential impacts to hydrology and water quality resources would remain less than significant. **Standard Conditions SC-HYD-1** through **SC- HYD-5** are not considered unique mitigation under CEQA.

With the implementation of these standard conditions, impacts will be less than significant.

4.12.5 Standard Conditions and Mitigation Measures

Standard Conditions

The following Standard Conditions are applicable to all Projects within the City and is not considered unique mitigation under CEQA.

SC-USS-1 Sewer Connection Fees. Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable sewer connection fees to EMWD.

SC-USS-2 EMWD Water Efficient Guidelines. The Project will be required to comply with shall be required to comply with the EMWD Water Efficient Guidelines for New Development which are in effect at the time of building permit issuance.

SC-USS-3 Water Connection Fees. Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable water connection fees to EMWD.

SC-USS-4 Solid Waste. The Project applicant shall comply with the requirements of AB 939 ("California Integrated Waste Management Act of 1989") and AB 341 (which amends and clarifies portions of AB 939), which requires waste diversion mandates. During construction and operation, the applicant shall achieve diversion of 50 percent of all solid waste through source reduction, recycling, andcomposting activities.

SC-HYD-1 SWPPP. Erosion and siltation reduction measure BMPs contained in the required SWPPP will be implemented during construction. At the completion of construction, the Project will consist of impervious surfaces, landscaped planters, and post-construction BMPs.

SC-HYD-2 WQMP. The Project proponent has submitted a Water Quality Management Plan (WQMP) for review and approval. The WQMP identifies post-construction BMPs in addressing increases in impervious surfaces, methods to decrease incrementalincreases in off-site stormwater flows, and methods for decreasing pollutant loading in off-site discharges as required by the applicable NPDES requirements.

SC-HYD-3 Wastewater. All wastewater associated with the Project's interior plumbing systems will be discharged into the local sewer system for treatment at the regional wastewater treatment plant.

SC-HYD-4 Site Drainage Plan. A site drainage plan is required by the City of Menifee and will be reviewed by the City Engineering Department. The final grading and drainageplan will be approved by the City Engineering Department during plan check review.

SC-HYD-5 Storm Drainage Facilities. The Project applicant shall pay Development Impact Fees (DIF) for residential development at the time a certificate of occupancy is issued for the Development Project or upon final inspection, whichever occurs first. DIF for nonresidential development shall be paid prior to the issuance of a buildingpermit.

Mitigation Measure(s)

No mitigation measures are required.

4.12.6 Cumulative Impacts

According to the EMWD, there is an adequate water supply and wastewater treatment capacity, respectively, to meet the demand of the Project(s). The EMWD has already issued a Will Serve Letter dated 8/26/20 to the applicant indicating it can provide adequate water supply and wastewater/sewer service to this Project. Based on the analysis above, and in the referenced documentation, water and wastewater management systems are capable of meeting the cumulative demand for these systems. The EMWD will have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years with adherence **Standard Conditions SC-USS-1** through **SC-USS-4** impacts to water, wastewater, and solid waste are considered less than significant. Thus, the Project will not cause cumulatively considerable significant adverse impacts on these systems. With implementation of the proposed stormwater management design, as outlined in the Project Specific WQMPs, and **Standard Conditions SC-HYD-1** through **SC-HYD-5**, future stormwater runoff after development of the Project site will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and is not forecast to make a cumulatively considerable contribution to downstream flood hazards in the Santa Ana River Watershed.

Cumulative impacts to landfill capacity will be less than significant due to the Project construction debris and operational waste representing a less than substantial cumulative increment with adherence to **Standard Condition SC-USS-4**. Additionally, this Project implements the stormwater/drainage infrastructure requirements as laid out in the Perris Valley Commerce Center Specific Plan. Therefore, due to available capacity and implementation of **SC-USS-4**, which provides for recycling on site to reduce Project operational waste, cumulative impacts to the existing landfills resulting from waste generated by Project implementation are considered less than significant.

Lastly, the Project will not require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. No cumulative impacts will result from the Project.

4.12.7 Unavoidable Significant Adverse Impacts

The foregoing evaluation demonstrates that even though the Project will cause an unavoidable change in the demand for water and wastewater water utility systems, these various systems can be expanded to meet this increased demand and the facilities required to sustain these systems can be installed without causing an unavoidable significant adverse impact with adherence **Standard Conditions SC-USS-1** through **SC-USS-4**.

Implementation of the Project will result in the additional generation of construction and operational solid waste. Standard conditions address construction debris recycling and reuse to achieve a reduction in waste beyond the County requirement of a 50 percent reduction by weight. Implementation of this measure would reduce the construction waste from the Project at a higher level than required by the City. Lastly, the Project will not require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. Therefore, no significant and unavoidable impacts are anticipated.

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CHAPTER 5 – ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines require an evaluation of alternatives to the proposed action. The purpose of the alternatives evaluation under CEQA is to determine whether one or more feasible alternatives is capable of reducing potentially significant impacts of a preferred project to a less than significant level.

5.1.1 CEQA Requirements for Alternatives

State CEQA Guidelines Section 15126 states the following:

Section 15126.6 (a) *Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.*

Section 15126.6 (b) *Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.*

CEQA requires the EIR to examine a reasonable range of alternatives as well as alternatives that reduce or eliminate one or more significant impacts of the project. However, it should be noted that, as analyzed in Section 4, Environmental Impact Evaluation and as summarized in Section 1, Executive Summary, the DEIR concluded the Project would not have any significant impacts that could not be mitigated to less than significant levels. Therefore, no alternatives are necessarily needed to reduce one or more significant impacts of the Project as normally required by CEQA. The selection of a reasonable range of alternatives would therefore depend more on preferred or acceptable land uses and the degree to which they achieve the objectives of the Project.

5.1.2 Proposed Project

The Project applicant proposes a Specific Plan Amendment to accommodate the development of a 347,918- square-foot light-industrial warehouse building with 8,000 square feet of office area on a 16-acre site. The existing and proposed General Plan Land Use Designation for the Project site is Perris Valley Commerce Center Specific Plan (PVCCSP). The existing Zoning Classification is PVCCSP Commercial) while the proposed Zoning Classification is PVCCSP Light Industrial. Land uses adjacent to the Project site include undeveloped land and commercial uses to the north; light industrial Fallas Distribution Center to the south; commercial uses and a mobile home park to the east; and light industrial Lowes Distribution Center to the west.

The PVCCSP is designed to encourage a mix of land uses that provide interrelated opportunities. The commerce center land use designations include General Industrial (GI), Light Industrial (LI), Business/Professional Office (BPO) and Commercial (C). There are two areas of residential designations that are intended to recognize two existing communities: (1) Residential (R) for the community located south of Markham Street, east of Webster Avenue, and north of Ramona

Expressway; and (2) Multi-Family Residential (MFR-14) for the mobile home community located north of Dawes Street and easterly of Perris Boulevard (one block east of the Project site).

5.1.3 Project Objectives

The proposed Project has the following objectives as indicated in the PVCCSP:

- Provides a development plan of superior environmental sensitivity including a high quality of visual aesthetics, suppression of noise, protection of health and safety, and the promotion of community and region.
- Considers topographic, geologic, hydrologic, and environmental opportunities and constraints to create a design that generally conforms to the character of the land by retaining and utilizing basic, existing landforms, as much as possible.
- Reflects anticipated market needs and public demand by providing a range of housing types which will be marketable within the developing economic profile of the Southern Perris Valley Area as well as the County of Riverside.
- Provides residential uses with specific emphasis on employing natural and created open spacefor a heightened aesthetic environment.
- Provides direct and convenience access to clustered neighborhoods via a convenient and efficient circulation system.
- Provides additional employment opportunities for the current and future residents of the region and surrounding communities.
- Creates a unique residential character that provides for a distinct environment through architectural treatment, viewshed, and natural terrain.

While a number of these objectives refer specifically to planned residential uses, the proposed Project supports the overall goals and land plan of the PVCCSP by providing employment and non-residential uses that integrally support the planned residential uses.

5.1.4 Constraints on Alternatives Selection

Section 4.8 of the DEIR, Land Use and Planning, provides the following information regarding the Project's consistency with the Airport Land Use Compatibility Plan (ALUCP) for the nearby March Air Reserve Base as well as related Air Force Safety Zones:

ALUCP Consistency

The Project site is within the boundaries of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (March ALUCP) which is monitored and maintained by the Riverside County Airport Land Use Commission (ALUC). The Project site is designated for commercial uses at presentunder the City's General Plan and zoning, but the Project proposes light industrial (warehousing) uses. The 15.7-acre site falls within two March ALUCP Compatibility Zones[1] - the western 11.8 acres are within Zone B1-APZ-II and the eastern 3.90 acres are within Zone C1 ("Clear Zone") (see **Figure 4.8-3, *Airport Compatibility***). The Project was submitted to ALUC for consideration and on July 9, 2020, ALUC determined the Project was consistent with the March ALUCP as long as it complied with a number of site and building design conditions (see Initial Study Subsection V.9, Hazards and Hazardous Materials, and **Mitigation Measure MM-HAZ-3**). The ALUC staff report indicated the Project as proposed was consistent with the various compatibility criteria established for the two onsite zones (B1-APZ-II and C1 – these two zones have different criteria with Zone C1 being the less restrictive).

The reason the proposed Project is consistent with the compatibility criteria of the two zones is mostof the Project is warehousing which has very few employees per square foot, while the office use is located in the C1 zone which has less stringent density requirements (i.e., employees or persons per acre). One of the compatibility measures is the maximum single acre figure. The warehouse portion of the Project that is within Zone B1-APZ-II has 44 persons per acre while the density criteriafor that zone is 50 persons per acre, so the proposed low intensity warehouse use would reach almost 90 percent of the density criteria. It should be noted that the density criteria for commercial uses is substantially higher than the criteria for warehousing or office uses. Given this, it is likely thatany reasonable type of commercial project proposed on this site, especially any portion in Zone B1-APZ-II, would exceed the March ALUCP single acre density criteria. Under those circumstances, ALUC staff would be unlikely to recommend approval of all commercial uses on the Project site.

Air Force Safety Zones

In addition to the ALUCP safety zones, the Air Force maintains its own safety zone restrictions around the March Base as part of its Air Installations Compatible Use Zones (AICUZ) program (lastupdated in 2018). Under AICUZ, the Project site has a maximum density limit of 50 persons per acre in the APZ-II zone as well.

5.1.5 Alternatives Considered but Rejected

The General Plan currently designates the site for 15.7 acres of commercial uses (approximately 273,557 square feet based on a floor area ratio or FAR of 0.4). This typically becomes the **"No Project – General Plan"** alternative to be evaluated in the EIR. A variety of commercial uses were considered for the site. While it might be possible to place retail commercial uses on the eastern 3.9 acres of the site in Zone C1, it is problematic whether any type of standard retail commercial project would be consistent with the March ALUCP density criteria for the western 11.8 acres of the site.

Due to the ALUCP and AICUZ per one acre density limitations, any retail commercial space on the western portion of the site (11.8 acres) would have to be divided up and arranged in eleven (11) separate "units" with 5,750 square feet per acre (FAR 0.13) and two small restaurants on the eastern 3.9 acres. Even this limited physical arrangement would still constitute a "shopping center" which isnot allowed within the APZ-II zone per AICUZ. For the purposes of this analysis, the term commercialcould also apply to office uses depending on the number of employees generated per square foot. Due to the ALUCP/AICUZ limitations, there does not appear to be any feasible "all retail commercial"or "small offices" alternatives that could be developed on the Project site. Compared to the proposed light industrial use, an "all retail commercial" alternative, could have different localized impacts, primarily potential health risks from more truck traffic relative to passenger vehicle traffic. However, the commercial square footage currently allowed under the General Plan, if developed as retail commercial uses, would have equivalent or greater regional impacts (e.g., traffic, air quality, airport safety) compared to the proposed light industrial use.

The only type of "all commercial" alternative that could be feasible is to place retail uses like a gas station and possibly a small restaurant at the northeast corner of the site, within the C1 zone (i.e., itis also the southwest corner of the Ramona Expressway/Perris Boulevard intersection). The rest ofthe site could be developed as one or more types of low occupancy commercial uses such as a car dealership, nursery, and/or public storage. Different combinations of these uses are considered under the "No Project – General Plan" Alternative. Several other "low intensity" storage-oriented commercial uses that could meet the ALUCP/AICUZ limitations were also considered under the "No Project – General Plan" Alternative including truck parking/storage or equipment/materials storage. However, these would detract visually from this City "gateway", so these two specific uses were not considered further. Additionally, in general, lower intensity commercial uses would not generate asmany jobs as higher intensity uses. As previously stated, all of the potential "all retail commercial" or "mixed-use

commercial/residential" alternatives were rejected as being infeasible due to ALUCP/AICUZ limitations.

In addition to all of the "all commercial" alternatives outlined above; several lower intensity mixed- use (commercial/residential) alternatives were considered. These alternatives would place retail commercial uses on 3.9 acres in the eastern portion of the site within the C1 zone and low or very low density residential in the western 11.8 acres of the site within the APZ-II zone. However, there were no mixed-use alternatives with medium or higher density residential uses that would meet the ALUCP/AICUZ density limitations. Although higher density residential uses may be consistent in terms of surrounding land uses, the size and location of the site, and especially the ALUCP/AICUZ density limitations, would preclude all but extremely low-density residential uses. Additionally, residential uses do not generate any additional long-term employment opportunities in the City. Therefore, no mixed-use commercial-residential alternatives were selected for more detailed analysis.

The only other non-residential or non-commercial alternatives that would not detract visually from this entry point to the City, provide added employment, and meet the other objectives of both the PVCCSP and the proposed Project to some degree would be "lower intensity warehousing" (with retail at the northeast corner) and "low intensity business/office park" uses.

5.1.6 Alternatives Selected for Consideration

Based on the preceding analysis, the DEIR will examine the following reasonable range of alternatives to the proposed Project in detail (and as shown in **Table 5-1, *Summary of Alternatives***):

1) **No Project – No Development.** This alternative would leave the site in its vacant condition.

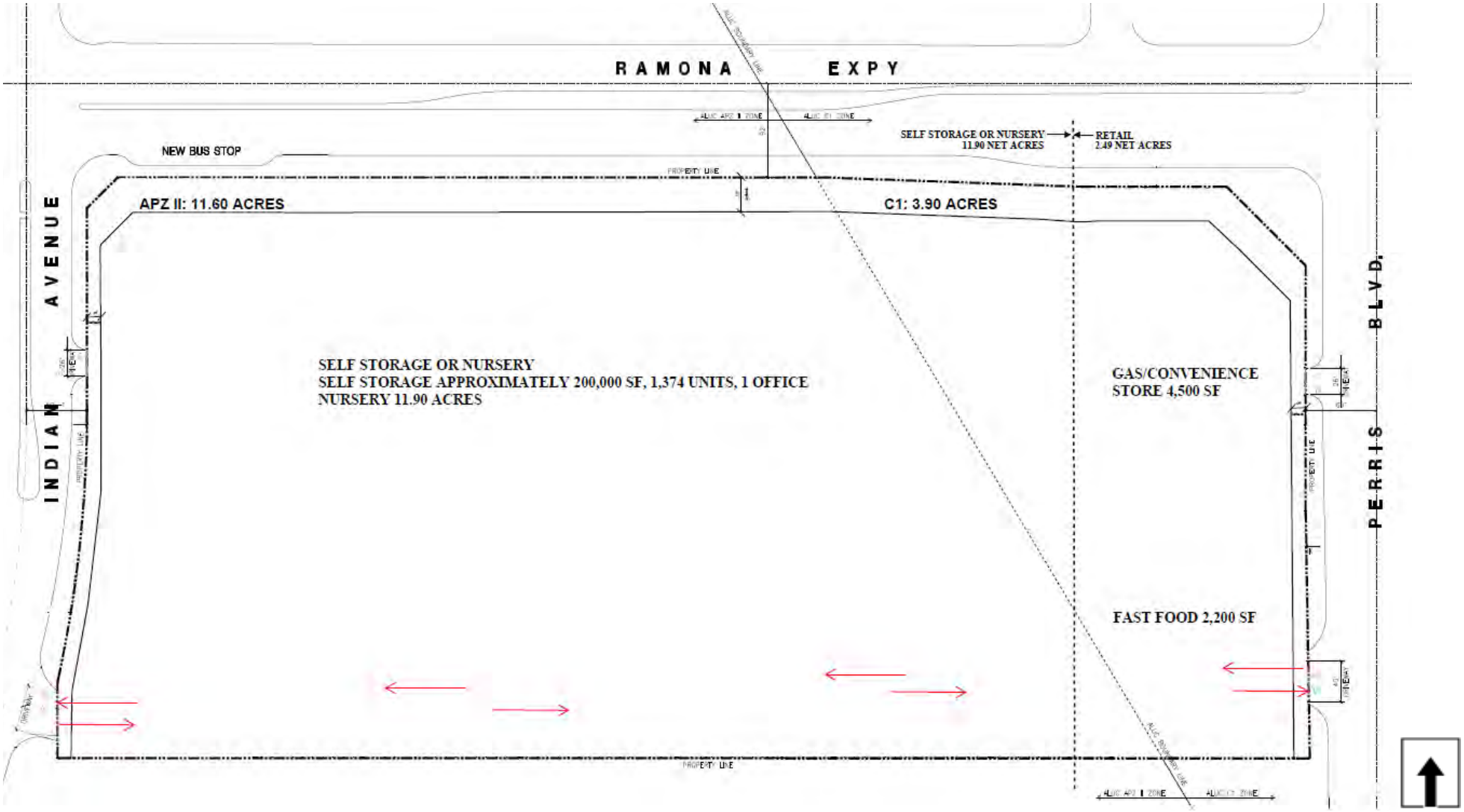
2) **Alternative 1 - Commercial Use.** This "No Project" alternative would implement the existing General Plan and PVCCSP designation on the site. This alternative includes development of agas station with 4,500 square foot convenience store and 16 vehicle fueling positions, 2,200 square foot fast-food restaurant with drive-through window use in the northeast portion of the site to stay within the C1 zone. This alternative also includes the following **two options** for low intensity or low occupancy commercial uses on the rest of the site (see **Figure 5-1, *No Project - Commercial Use Alternative)***:

   (a) 1,374-unit Self-Storage Facility; or
   (b) 11.90-acre Nursery.

3) **Alternative 2 - Lower Intensity Industrial.** This alternative would have 290,000 square feet of only high cube warehousing, not general warehousing, located in the central and western portions of the site. This alternative would have 83% of the floor area compared to347,918 square feet for the proposed Project. This alternative would also have retail commercial (a gas station and one small restaurant pad as described under Alternative 1) in the northeast portion of the site) (see **Figure 5-2, *Lower Intensity Industrial Alternative)***.

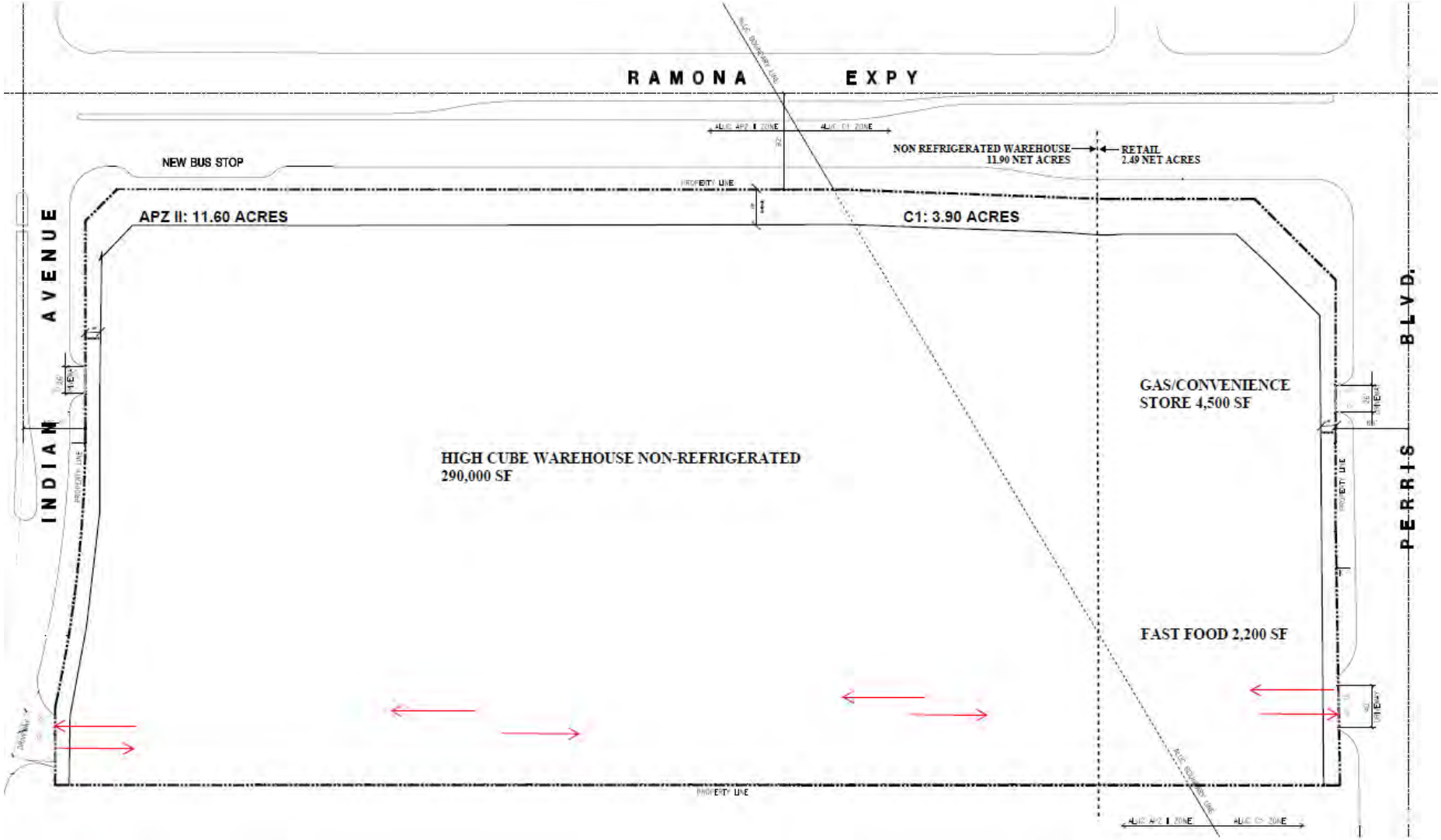
4) **Alternative 3 – Low Intensity Business/Office Park.** This alternative would have 76,920 square feet of lower intensity business park/office uses in 4 buildings in the central and westernportions of the site. This alternative would also have retail commercial (a gas station and one small restaurant pad as described under Alternative 1) in the northeast portion of the site) (see **Figure 5-3, *Business Park/Office Alternative***).

Figure 5-1
No Project – Commercial Use Alternative



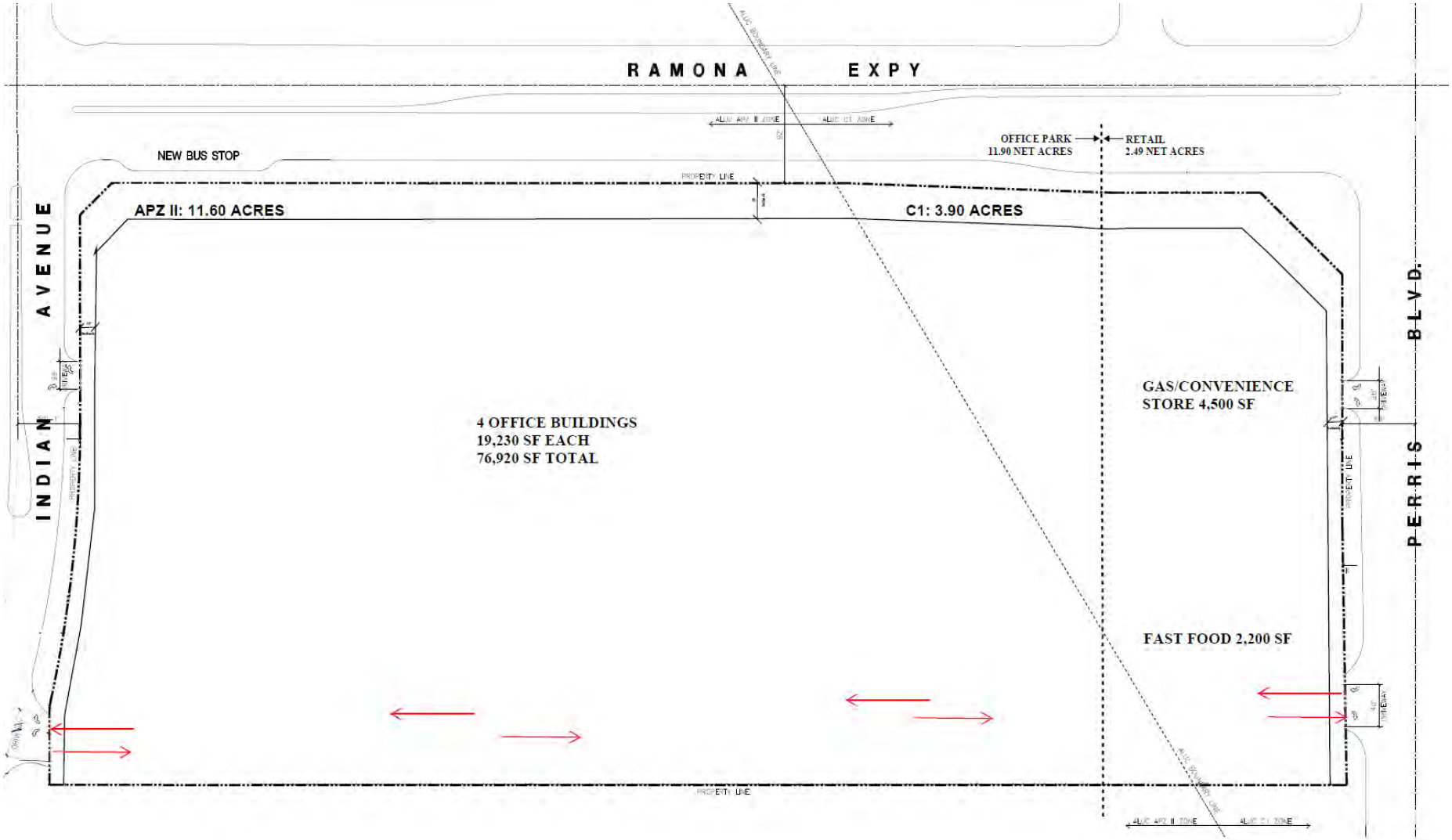
Source: Project Architect

Figure 5-2
Lower Intensity Industrial Alternative



Source: Project Architect

Figure 5-3
Business Park/Office Alternative



Source: Project Architect

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Table 5-1
Summary of Alternatives

Characteristics	Proposed Project	Alternative 1 Commercial Use		Alternative 2 Lower Intensity Industrial	Alternative 3 Low Intensity Business/Office
Land Use					
Industrial[1]	347,918 SF	0		290,000 SF	0
Retail	0	6,700 SF		6,700 SF	6,700 SF
Commercial	0			0	
Bus. Park/Office	0	0		0	76,920 SF
Other	0	1,374-unit SSF **OR** 11.9-acre Nursery		0	0
Trip Generation		**SSF**	**Nursery**		
Total Vehicles	492	1,704	1,402	1,812	2,152
Trucks	82			68	
PCE[2]	612	0	0	1,912	0
Peak AM	42	172	155	158	241
Peak PM	48	159	130	180	213
VMT[3]		**SSF**	**Nursery**		
Amount	<500	>500 (LS)	>500 (LS)	>500 (GS=LS)	>500 (GS=LS)
Significant?	No	No	No	No	No

Sources: MFCS 2021 and Urban Crossroads 2021, Tables 2, 4-6 SF = Square Feet SSF = Self-Storage Facility

[1] High-Cube Transload/Short-term Storage Warehouse

[2] Passenger Car Equivalent (PCE) factors were applied to the trip generation rates for heavy trucks (large 2-axles, 3-axles, 4+- axles). PCEs allow the typical "real-world" mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses.

[3] <500 = projects with under 500 daily trips are considered to have less than significant VMT impacts.
>500 = projects with over 500 daily trips require more analysis, but presence of a gas station (GS), which generates the majorityof trips, is a local serving (LS) use which is considered to have a less than significant VMT impact.

5.2 NO PROJECT ALTERNATIVE (NPA)

5.2.1 Overview of the NPA

The No Project Alternative (NPA) is required under CEQA to evaluate the environmental effects associated with no action on the part of the Lead Agency. The NPA assumes the property remains in its current state – vacant land.

5.2.2 Impact Analysis

Aesthetics

The NPA would not result in any change to the current aesthetics of the Project site. The Project site is currently vacant and is part of a relatively flat alluvial plain. The natural setting of the City of Perris, the Perris Valley, and the larger northwest Riverside County region is one of rolling hills separated by relatively flat valleys. There are distant mountain and hillside views that are significant to the area's visual character, and which provide scenic vistas from various locations within the local community. Subsection V.1 of the Initial Study prepared as part of the Notice of Preparation concluded that, although the surrounding area did have views of rolling hills, valleys, and rock outcroppings, the Project site did not have any significant scenic vistas. Subsection V.1 also determined there were no scenic highways in the vicinity of the Project site and it contains no trees or other important visual resources. The Project site is located in the central portion of the Perris Valley Commerce Center Specific Plan

(PVCCSP) which is located in an urban and urbanizing area. Finally, the surrounding area already has sources of light and glare from urban and suburban uses.

The NPA would leave the Project site in its current condition (i.e., vacant with little or no scenic resources) in an area that already experiences urban light and glare. This proposed Project as implemented will continue to implement the Goals and Policies of the General Plan and the PVCCSP. While the impacts are unavoidable, they are not considered significant or adverse. Aesthetic impacts from the NPA would be even less than those of the proposed Project although the Project could improve the aesthetics of a vacant site from an urban perspective. However, this alternative would not generate any new sources of light and glare. For this reason, the potential aesthetic impacts on the NPA are considered to be less than those of the proposed Project.

Agriculture and Forest Resources

The NPA would retain the property in its current use and would have no adverse impacts on any agricultural resources. Subsection V.2 of the Initial Study prepared as part of the Notice of Preparation indicated the Project site is located in Planning Area 3 (Agriculture Conversion Area) of the City of Perris, General Plan 2030 (GP 2030), Land Use Element. As of the 2005 adoption date of the GP 2030, Planning Area 3 consisted of large tracts of land used for agriculture, much of which has since been converted to urban use in conjunction with the PVCCSP. GP 2030 acknowledges that "proximity to the Interstate 215 corridor suggests conversion of agricultural land, over the long term, to uses that are compatible with surrounding commercial and industrial uses. Conversion could enhance the economy of the City by attracting new uses that complement the existing Lowe's and Ross distribution centers and provide jobs for local residents". According to Riverside County's *Map My County*, the Project site is located within an Agricultural Preserve identified as Perris Valley No. 1 Map No. 56; however, it is not identified as being subject to an existing Williamson Act contract. In addition, the Project site is vacant land and there have been no recent agricultural activities on site.

Under the NPA there would be no conversion of the site to urban/suburban residential uses. The NPA alternative has no impact on agricultural and forest resources, which is less than the proposed Project.

Air Quality

The Project site, along with the entire City of Perris and much of the County of Riverside, is located in the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). EIR Subsection 4.2 indicates that new development must be consistent with the SCAQMD's 2016 Air Quality Management Plan and the Southern California Association of Governments pending Connect SoCal - 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (Connect SoCal).

Since no construction activity would occur, the NPA would not have any short-term impacts on air quality other than that caused by occasional fugitive dust from the vacant Project site. Also, no new long-term sources of air pollution would result from increased traffic or increased use of energy resources at the site. The site would remain vacant and so would not develop or intensify any uses on the site, so it would not conflict with population projections planned for under the City's General Plan. Therefore, the NPA would not conflict with or exceed the assumptions used to develop the 2016 AQMP.

Biological Resources

The Project site is located within the Mead Valley Area Plan of the MSHCP but is not within any Criteria Cells or MSHCP Conservation Areas and does not contain any Core Habitat or Wildlife Movement Corridors under the MSHCP. The Project site contains no Critical Habitat for any listed species but is

within the designated survey area for burrowing owl (*Athene cuincularia*). It was determined the Project site had a low potential as suitable habitat for burrowing owl, and no focused surveys were recommended. In addition, the MSHCP Compliance Document indicates the site contains no drainage features that would fall under the jurisdiction of the Regional Water Quality Control Board (RQWCB), U.S Army Corps of Engineers (ACOE), or the California Department of Fish and Wildlife (CDFW). The Project site is located within the Mitigation Fee Area of the Stephens'Kangaroo Rat Habitat Conservation Plan (SKR HCP) so the applicant will be required to pay the SKR HCP Mitigation Fee prior to development of the site. Several special-status plant and wildlife species identified by the CDFW's California Natural Diversity Database and other electronic databases as potentially occurring in the vicinity of the Project site. These include the smooth tarplant, California horned lark, several raptors, and possibly local bat species. The Project site consists of vacant, undeveloped land that was historically used for agriculture. It no longer supports agricultural activities but has been subject to on-going weed abatement and disturbance by surrounding development.

The NPA would not result in a change to the existing biology of the Project site. The biology information presented in EIR Subsection 4.3 indicates that, due to the lack of significant biological resources, the Project is not forecast to cause any direct significant unavoidable adverse impact to sensitive biological resources, natural drainages or water features, riparian or other sensitive habitat, wildlife migration, or local ordinances for the protection of biological resources.

The NPA would have less overall impact to biological resources than the proposed Project, but neither alternative would have any significant biological resource impacts.

Cultural Resources

There are no structures or other resources on the proposed Project site that meet any of the criteria for a historic resource defined in Section 15064.5 of the State CEQA Guidelines. The Project site is also not listed with the State Office of Historic Preservation or the National Register of Historic Places. The Perris Valley is considered sensitive for archaeological prehistoric (Native American) resources and artifacts. Although much of the Project area has been disturbed by past agriculture and other human activity, grading could lead to the discovery of buried cultural resources. Several local Native American Tribes have also expressed concern and interest in development activities in the Perris Valley pursuant to SB 18 and AB 52.

EIR Subsection 4.4 concluded that development of the Project site had the potential to disturb cultural resources but that implementation of the recommended mitigation measures would reduce impacts to less than significant levels. The NPA would not disturb the Project site so there would be no potential for impacts to cultural resources.

Energy

The growing Perris Valley area consumes energy resources including electricity and natural gas commensurate with development. EIR Subsection 4.5 determined the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The proposed Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Any impacts would be reduced to a less than significant level.

The NPA would leave the site in its vacant undeveloped state so would not result in any increase in energy demand, which is less than the proposed Project.

The proposed Project would increase consumption of electricity and natural gas for space and water

heating, air conditioning, lighting, and operation of miscellaneous equipment and appliances. It would also consume fossil fuels for car and truck trips to and from the proposed warehouse. According to the evaluation in Subchapter 4.4, the NPA would have no impact to energy resources,which is less than the proposed Project.

Geology and Soils

Subsection V.7 of the Initial Study for the Notice of Preparation determined that, although the Projectsite is located in the seismically active region of Southern California, it is not located within an Alquist- Priolo Earthquake Fault Zone. Furthermore, there are no known active or potentially active faults trending towards or through the Project site. The closest known active fault is the San Jacinto Valleysegment of the San Jacinto Fault located approximately eight (8) miles northeast of the Project site.The Project site is subject to strong seismic ground shaking as are virtually all properties in the Southern California region. Due to the depth of groundwater (over 50'), the potential for liquefaction or lateral spreading beneath the site is considered very low.

The site is located in the central portion of the ±3,500-acre Perris Valley Commerce Center SpecificPlan (PVCCSP) surrounded by similar relatively flat lands. There is no potential for seismically- induced landslides or debris flows on Project site. The site has the potential to expose surficial soilsto wind and water erosion if it is subjected to grading and construction activities. The near-surface on-site soil at the Project site consists predominantly of sand with varying amounts of clay and silt and sandy clay which generally possess a *very low* expansion potential.

The Project site is mapped as a "High B" sensitivity area, denoting a high sensitivity for paleontological resources. Areas classified as high sensitivity may contain buried paleontological deposits at or below 4 feet of depth and may be impacted during construction.

Development of the proposed Project would be subject to a number of geologic, seismic, and soil constraints. However, Subsection V.7 of the Initial Study indicated development of the Project wouldhave less than significant impacts related to geology and soils with implementation of standard conditions and recommended mitigation.

The NPA would not involve any development on the site so additional no people or structures wouldbe subject to onsite geologic or soil constraints. The NPA has no risk to structures and future residents compared to the Project which would have less than significant geology and soil impacts with implementation of standard conditions and recommended mitigation.

Greenhouse Gas Emissions

Operational greenhouse gas (GHG) emissions associated with the proposed Project would include mobile sources (transportation), energy, water use and treatment, waste disposal, and area sources. GHG emissions from electricity use are indirect GHG emissions from the energy (purchased energy)that is produced off-site. Area sources are owned or controlled by the Project (e.g., natural gas combustion and furnaces) and produced on-site. Construction activities are short-term and cease to emit greenhouse gases upon completion, unlike operational emissions that are continuous year after year until operation of the use ceases.

EIR Subsection 4.6 indicates the City of Perris 2016 Climate Action Plan (CAP) utilizes Western Riverside County Council of Government's (WRCOG's) analysis of existing greenhouse gas reduction programs and policies that have already been implemented in the sub-region and of applicable best practices from other regions to assist in meeting the 2020 subregional reduction target. The proposed Project will comply with the GHG reduction strategies contained in the City's CAP as well as mitigation measures to mitigate potentially significant impacts.

The Project will produce both short-term GHG emissions during construction and long-term GHG emissions during operation. These emissions would not exceed the SCAQMD's recommend thresholds of significance for industrial uses. Project-related GHG emissions are not considered to be significant or adverse and will not result in an unavoidable significant adverse impact on global climate change.

Since no construction activity would occur, the NPA would not have any short-term impacts on Greenhouse Gas (GHG) emissions. No new permanent sources of GHG emissions would result from increased traffic or increased use of energy resources at the site. Overall, there would be no GHG emissions from the NPA.

Hazards and Hazardous Materials

Subsection V.9 of the Initial Study indicated the routine use, transport, or disposal of hazardous materials is primarily associated with general industrial land uses that require hazardous materials for manufacturing operations or produce hazardous wastes as by-products of production applications. During construction, there would be a minor amount of transport, use, and disposal of hazardous materials and wastes that are typical of construction projects. This would include fuels and lubricants for construction machinery, coating materials, etc. Hazardous materials commonly used in conjunction with light-industrial logistics/distribution warehouse operations include relatively limited amounts of cleaners, lubricants, and pesticides. The remnants of these items and other similar products would be disposed of as household hazardous wastes that are prohibited or discouraged from being disposed of at local landfills. In addition, the Initial Study recommended mitigation in case hazardous materials were found during grading. Regular operation and cleaning of the proposed light-industrial facility would not result in significant impacts involving the use, storage, transport or disposal of hazardous wastes and substances. Use of common household hazardous materials and their disposal does not present a substantial health risk to the community.

The Project site is surrounded on three sides by existing light industrial and commercial development within an emerging mixed-use light industrial and commercial district. The Project site development plan does not include a residential component and it does not place housing near any hazardous materials facilities. The closest residential use to the proposed Project is the existing 22-acre mobile home park located approximately 410 feet due east of the Project site at the southeast corner of Ramona Expressway and Perris Boulevard (accessed via Dawes Street).

DEIR Subsection 4.8 indicates the majority of the central and western portions of the Project site are subject to land use limitations, in terms of location and type, due to the presence of a restricted airport land use compatibility plan (ALUCP) and Air Force Safety Zone. The PVCCSP (Project site is a part) is located adjacent south of the March Air Reserve Base/Inland Port Airport (MARB/IPA). The closest runway at the MARB/IPA (Runway 14-32) is located approximately 1¾ miles to the north/northwest of the Project site. The City of Perris has amended the City's GP, Municipal Code, and PVCCSP to include an Airport Overlay Zone (AOZ), consistent with the land uses and densities outlined in the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP). Most of the Project site (11.76 acres) is located in compatibility Zone B1 (Inner Approach/Departure Zone) of the MARB/IPA LUCP. A relatively small portion (3.90 acres), at the northeast corner of the Project site, is located in compatibility Zone C1 (Primary Approach/Departure Zone).

The Project will change the land use on the site and create a potential for certain adverse impacts regarding hazards and hazardous materials issues both during construction and occupancy. There will be some adverse impacts as a result of implementing the Project. However, adherence to standard conditions and recommended mitigation measures will reduce potential impacts related to hazards and hazardous materials to less than significant levels. The Project as proposed is consistent with the ALUCP and Air Force land use restrictions on the site.

The NPA would not result in any change to the current hazards and hazardous materials of the Project site. The Project site is currently vacant so the NPA would result in no impacts related to hazards or hazardous materials, including ALUCP and Air Force Safety Zone consistency.

Hydrology and Water Quality

The Project has a potential to generate new pollutants from the proposed urban/suburban environment that can degrade water quality. However, through a combination of design measures and standard conditions, potential hydrology and water quality impacts can be reduced to less than significant levels. EIR Subsection 4.7 concludes the Project will not cause unavoidable significant hydrology or water quality impacts.

Under the NPA, the existing site would remain vacant. The current hydrology would remain the same and pollutants other than sediment are not currently being generated onsite. However, the NPA would not provide any drainage or flood control improvements, and a number of local intersections currently experience flooding that will be eliminated by Project improvements.

Therefore, hydrology/water quality resources (primarily water quality) impacts from the NPA would be greater than those of the proposed Project, however, neither would result in a significant impact to hydrology and water quality resources.

Land Use and Planning

The proposed Project would be consistent with all applicable policies from the City of Perris 2030 Comprehensive General Plan that were adopted for the purpose of avoiding or mitigation an environmental effect. Based on the data and analysis presented in EIR Subsection 4.8, implementation of the proposed Project will not cause significant land use or planning impacts in the City of Perris.

Under the NPA, the Project site would remain vacant and would not be converted to light industrial warehousing use. Therefore, there would be no land use/planning impacts from the NPA. However, neither will result in a significant impact to land use and planning resources.

Mineral Resources

As described in Subsection V.12 of the Initial Study, the Project site and surrounding area do not contain any existing mineral development or any identified potential for mineral resource development. Based on these data, the proposed Project has no potential to cause any unavoidable adverse impact to mineral resources or values in Riverside County.

Based on this finding, neither implementation of the NPA or the proposed Project has any potential to cause adverse impacts to mineral resources.

Noise

A variety of noise sources exist in the City of Perris. Mobile noise sources produce a major effect on the ambient noise environment. These sources include automobile traffic, aircraft overflights, and train movements. The primary noise source is automotive traffic along the streets and highway network. A number of stationary sources also generate noise on a regular basis. Much of this noise occurs at industrial sites that are generally located away from sensitive land uses.

In addition, the runway for MARB/IPA is located approximately 9,170 feet to the northwest of the Project site. The noise impact to properties within Zone B1 is “High” and the noise impact to properties within Zone is “Moderate to High.” Furthermore, properties within Zone B1 are within or near the 65-CNEL

contour and single-event noise sufficient to disrupt many land use activities including indoors if windows are open; and properties within Zone C1 are within or near the 60-CNEL contour and single-event noise mat be disruptive to noise-sensitive land use activities (aircraft 2,000 feet above runway elevation on arrival and generally <3,000 feet above runway elevation on departure).

EIR Subsection 4.9 concluded that Project construction will not result in a substantial temporary increase in noise levels in excess of standards established in the City's General Plan, as implemented by the City's Noise Ordinance with implementation of mitigation during grading and construction. With implementation of the PVCCSP EIR mitigation measures, construction-related noise impacts will be reduced to less than significant levels. During operation, the Project will not create significant permanent increases in noise levels at nearby existing residential uses (i.e., mobile home park to the east). As vibration levels would generally not be perceptible to the average person and would not result in cosmetic nor structural damage to buildings, vibration impacts from Project construction would be less than significant.

Since no construction activity or operations would occur, the NPA would not generate any short- or long-term construction noise impacts. The Project site is vacant, therefore, the NPA would not cause generate any noise or vibration on the site.

No unavoidable, significant adverse noise impacts will occur as a result of the Project with implementation of recommended construction mitigation. There would be no noise impacts from the NPA, and neither will result in a significant impact to noise resources.

Population and Housing

According to the US Census Bureau, the City's population as of July 2015 was 74,971 persons. The Southern California Association of Governments (SCAG) estimates that the population of Perris is expected to increase to about 116,700 by the year 2020 although this figure is significantly above current City development conditions. While the proposed Project will include some expansion of infrastructure, this new limited infrastructure will serve the proposed Project's specific requirementsand is not anticipated to contribute to additional growth as existing development contiguous to the Project site and consistent with the PVCCSP is in place. The additional employment and infrastructure requirements to support development of the overall PVCCSP were previously addressed and analyzed in the PVCCSP EIR.

The proposed Project includes a Specific Plan Amendment to change the PVCCSP land use designation of the Project site from Commercial (C) to Light Industrial (LI). This is not considered a substantial change because the new LI designation is a less intensive land use compared to the existing Commercial designation, would not result in the construction of new homes or the addition of new residents to the City. Initial Study Subsection V.14 concluded the Project would not cause significant impacts relative to the existing population and housing forecasts for the City of Perris and Riverside County.

There will be no population and housing impacts from the NPA compared to the proposed Project, but neither will result in a significant impact to population and housing resources.

Public Services

Fire. The City of Perris contracts with the Riverside County Fire Department (RCFD) for fire prevention, suppression, and paramedic services. RCFD, in turn, operates under contract with the California Department of Forestry and Fire Protection (Cal Fire). The City has fourteen firefighters assigned to two fire stations. However, the City requires new projects provide or demonstrate provision of adequate fire flow as a standard condition of approval.

Police. The City of Perris contracts with the Riverside County Sheriff's Department (RCSD) to provide police service for the City. The Riverside County Sheriff's Department – Perris Station is located at 137 N. Perris Boulevard in the City of Perris approximately 3.75 miles south of the Projectsite. Implementing development projects within the PVCCSP planning area are required to annex to the North Perris Public Safety Community Facilities District (CFD) and pay a special tax for the provisionof public Safety (i.e., police and fire) services. These special tax proceeds help finance public safetyservices, including police protection.

Schools. The Project site along with the entire PVCCSP planning area is located within the boundaries of the Val Verde Unified School District (VVUSD) which consists of twenty-two (22) schools serving 20,141 students from preschool through high school. The proposed Project will not directly create a source of school-aged children because the Project (logistics/distribution warehouse) does not include a residential component. It may indirectly affect schools by providing a source of employment that may draw new residents into the area; however, appropriate developerimpact fees, as required by state law, shall be assessed and paid to the school district. Payment ofdeveloper fees is considered to be full mitigation for potential school impacts from non-residential projects.

Parks. The Project proposes no residential uses so it will not have any direct impacts on local (City)or regional (County) parks. The only potential impact would be indirect from new employees utilizingpark facilities or services. The Project will contribute the appropriate non-residential park development impact fee (DIF) so impacts will be less than significant, and no mitigation is required.

Recreation Resources

The City and County maintain a number of local and regional parks in the area that serve the residents of the Perris Valley. The proposed Project would indirectly affect recreational facilities by adding employees who may use park facilities in the City, and the new employment may draw a limited number of new residents into the area. Indirect impacts to park facilities will be offset throughpayment of the applicable Park and Recreation Facilities developer impact fees of $0.94 per SF of industrial space. With the payment of these fees, Subsection V.16 of the Initial Study concluded anyindirect impacts to parks and other recreational facilities caused by the proposed Project will be reduced to less than significant levels.

There will be no impacts to recreation resources impacts from the NPA compared to the proposed Project. However, neither will result in a significant impact to recreation resources.

Transportation

Local congestion on local roads and streets, as measured by Level of Service (LOS) was used in thepast to identify significant traffic impacts. CEQA now uses vehicle miles traveled (VMT) as the threshold of significance for transportation impacts. The Project site is located less than 1¼ mile east of I-215 with extensive frontage along three public street rights-of-way situated along the southside of the Ramona Expressway and bounded by Perris Boulevard to the east and Indian Avenue tothe west. The PVCCSP area is primarily intended to accommodate commercial and industrial uses and as such, requires a greater need for established truck routes to serve existing and future businesses. The City has adopted specific truck routes throughout the Perris Valley Commerce Center area in an effort to separate passenger and truck traffic and move truck traffic efficiently through the project area while avoiding residential communities as much as possible. Both Perris Boulevard and Indian Avenue adjacent to the Project site are currently identified as designated Truck Routes, although the City has proposed to remove Perris Boulevard from its list of designated truck routes.

Employers, employees, and vendors utilizing the proposed Project will have the opportunity to use a variety of transportation modes including automobile, mass transit and non-vehicular travel. As set forth

in the PVCCSP, the City of Perris encourages the use of mass transit whenever possible. Bustransit is available and the extension of Metrolink facilities along the west side of the I-215 corridor with a station at I-215/Ramona Expressway/Cajalco Road has recently been completed several years ago. With respect to non-vehicular circulation, the City of Perris has designated a community trail system of existing and proposed pedestrian trails and bike paths of the PVCCSP, which is generally consistent with the City's Park and Trails with the exception of expansions to some of the bike trails. Pedestrian and bike trails are also components of the PVCCSP.

As noted in the City Guidelines, "projects that generate less than 500 average daily trips (ADT) wouldnot cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT." EIR Subsection 4.10 determined that the proposed Project was anticipated to generate 492 trip-ends per day which is below the 500 ADT threshold established by the City. Therefore, the proposed Project meets the Daily Trip Screening criteria as outlined in the City Guidelines and is presumed to have a less than significant VMT impact.

The NPA would not increase site-generated traffic or VMT above current levels and therefore, wouldnot contribute to the need for area-wide off-site road improvements or expansions of mass transit, pedestrian networks, or bicycle lanes.

There would be no transportation resources impacts from the NPA. By comparison, the proposed Project will have greater impacts than the NPA.

Tribal Cultural Resources

The City is required to determine if new development would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size andscope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), and toprovide a detailed discussion of the consultation with the four Tribes. As required by state law, the City conducted consultation with local Native American tribal representatives as outlined in SB 18 and AB 52.

The proposed Project would not have any significant impacts on identified tribal cultural resources. EIR Subsection 4.11 determined impacts on these resources would be less than significant with implementation of cultural mitigation measures.

The NPA would not disturb the site so it would not result in any change to existing tribal cultural resources relative to the Project site. Neither alternative would cause a significant impact on tribal resources, but impacts from the NPA would be substantially less than those of the proposed Project

Utilities and Service Systems

Water/Wastewater. The Project site, along with the PVCCSP planning area and the entire City of Perris, is located within the water and wastewater (sewer) service boundaries of the Eastern Municipal Water District (EMWD). The Project site is not currently connected to the EMWD water supply or wastewater collection systems given its vacant undeveloped condition. The EMWD has provided Will Serve letters indicating that they will provide water and sewer services for the Project. As set forth in the *EMWD 2020 UWMP*, the EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County.

This Alternative would leave the existing specific plan land use designation of Commercial (C) for the 16.0-acre Project site is anticipated to have a nominal impact on the overall PVCC water

supply/demand. Moreover, the water supply/demand associated with this Alternative is anticipated to be similar to the water supply/demand associated with the existing Commercial land use reflected in the PVCC water supply assessment (WSA). As documented in the PVCC WSA, the *EMWD 2020 UWMP*, and the *MWD 2020 RUMWP*, EMWD has adequate capacity to serve the PVCC's water demand and will not require facilities to be expanded.

The Perris Valley Regional Water Reclamation Facility (PVRWRF) provides wastewater treatment for a 120-square mile area surrounding Perris including the Project site. Wastewater from the Project site would be delivered through EMWD sewers to the PVRWRF. The recent PVRWRF expansion project increased the capacity of the facility to from 22 million gallons a day (22 mgd) with an ultimate capacity of 100 mgd when required by growth. Therefore, the PVRWRF could provide adequate wastewater treatment capacity for this Alternative.

Stormwater Drainage. The existing drainage system in the City of Perris is owned and operated by both the City of Perris and Riverside County. The PVCCSP is located within the Riverside County Flood Control and Water Conservation District's (RCFC's), Perris Valley Master Drainage Plan (PVMDP) and the Perris Valley Area Drainage Plan (PVADP). The PVMDP identifies a series of open concrete lined trapezoidal channels to convey runoff from the area to the Perris Valley Storm Channel (PVSC), then discharging into the San Jacinto River. An updated master drainage plan was prepared for the PVCC in order to meet the development goals of the specific plan. The PVCCSP drainage system consists of two basic components: storm drains and detention basins. The drainage system will capture surface runoff from implementing projects in the area (including the proposed Project) and convey it to proposed storm drains and detention basins before continuing to the PVSC.

Solid Waste. As set forth in the PVCCSP EIR, total construction associated with implementing projects within the PVCCSP area is anticipated to generate approximately 104,671.09 tons of construction-related solid waste over a 20-year buildout period. Based on the U.S. Environmental Protection Agency's (EPA's) construction waste generation factor for light industrial, business park/professional office, commercial, and general office projects of 3.89 pounds per square foot (PVCCSP, Table 4.11-J), the proposed Project would generate approximately 676.7 tons of construction-related solid waste [(347,919 SF x 3.89 lbs/SF) ÷ 2,000 lbs/ton)]. This represents less than one percent of the total estimated construction-related waste to be generated by development of allowed PVCCSP uses, which was determined to be able to be accommodated by the landfills serving the City. Therefore, the disposal of construction-related solid waste associated with the proposed Project would not exceed the permitted capacity of the Badlands or El Sobrante landfills and there would be a less than significant impact.

Based on the California Department of Resources, Recycling and Recovery operational solid waste disposal factor of 0.0108 ton per square foot per year for the Business Park/Professional, General Industrial, and Light Industrial PVCC land use designations applied in the PVCCSP EIR, the Project's 347,919 square feet (SF) of proposed industrial warehouse/manufacturing uses would generate approximately 3,758 tons/year of solid waste. This represents less than one percent of the estimated annual operational solid waste stream for development of allowed PVCCSP uses, which was determined to be accommodated by the landfills serving the City. Therefore, consistent with the findings of the PVCCSP EIR, the disposal of operational solid waste associated with the proposed Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills and there would be a less than significant impact.

The proposed Project (light-industrial distribution warehouse) includes a specific plan amendment to change the PVCCSP Land Use Designation of the entire site from Commercial (C) to Light Industrial (LI). However, it is noted, because the construction-related solid waste generation factor is the same for all non-residential land uses within the PCVVSP, the proposed Project implementation will not generate a substantially greater amount of solid waste during construction than evaluated in the PVCCSP EIR.

Energy. Electrical service to the Project site is provided by Southern California Edison (SCE) while natural gas is provided by the Southern California Gas Company (SCGC). The proposed Project will be connected to SCE and SCGC distribution systems via their established connection processes. Sufficient electrical and natural gas services are available from SCE and SCGC within existing rights-of-way to serve the Project. The Project will not require new or expanded electrical or natural gas facilities, the construction or relocation of which could cause significant environmental effects.

Wildfire

The Project site is in the City of Perris which is within and constitutes the eastern half of the Mead Valley Area Plan (MVAP) of the Riverside County General Plan. The Project site is not located within a County Fire Hazard Zone, or a state identified Fire Responsibility Area. It is also not located in a Wildfire Constraint Area, as depicted on Exhibit S-16, *Wildlife Constraint Areas,* of the City of Perris General Plan. The Project site is located in a relatively wide north-south urbanizing corridor within the City of Perris's, Perris Valley Commerce Center Specific Plan (PVCCSP). There are no wildland conditions in the immediate vicinity of the Project site.

Subsection V.20 of the Initial Study determined the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Based on that analysis, potential impacts related to an adopted emergency response plan or emergency evacuation plan will be less than significant.

The NPA will remain vacant and no additional exposure to wildfires would result from implementing this alternative beyond what is already occurring. There would be no wildfire resources impacts from the NPA. Neither alternative would cause a significant adverse impact to wildfire resources.

5.2.3 Summary of the NPA

With respect to the NPA, none of the Project objectives are attained because no development is included as a part of the NPA. Development of the NPA alternative would result in the following impacts:

Similar Impacts to Project

- Mineral Resources (no resources)
- Agriculture and Forest Resources (no resources)Lesser Impacts than Project
- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population and Housing
- Public Services – Fire, Police, Schools, and Parks
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems - Water, Sewer, Stormwater, Solid Waste, Electricity/Natural Gas

- Wildfire

Greater Impacts than Project

- Hydrology and Water Quality

5.3 ALTERNATIVE 1: COMMERCIAL USE

5.3.1 Overview of the Commercial Use Alternative

This is a type of "No Project" alternative that would implement the existing General Plan and PVCCSP land use designations on the site. This alternative includes development of a gas station with 4,500 square foot convenience store and 16 vehicle fueling positions, 2,200 square foot fast- food restaurant with drive-through window use in the northeast portion of the site to stay within the C1 zone. This alternative also includes the following two options for low intensity or low occupancy commercial uses on the rest of the site: **Option A** is a 1,374-unit Self-Storage Facility; while **Option B** is an 11.90-acre Nursery (see previous **Figure 5-1, *No Project - Commercial Use Alternative***).

5.3.2 Impact Analysis

Aesthetics

Development of the site under the Commercial Use Alternative No.1 would result in similar aesthetic impacts compared to the proposed Project. The proposed Project would introduce a large warehouse building onto the entire site, while the Commercial Use Alternative would place a gas station/restaurant facility in the northeast corner of the site and either a Self-Storage Facility or a commercial nursery in the central and western portions of the site. These two optional uses would be of a lower height and scale compared to the Project warehouse. All would be considered urban or suburban type uses although the nursery might appear to be more rural in appearance.

Subsection V.1 of the Initial Study concluded the proposed Project warehouse would have less than significant impacts relative to aesthetics in this urban setting, so similarly the optional self-storage facility or nursery would have similar less than significant aesthetic impacts.

Agriculture and Forest Resources

Development of the site under either the Project or Commercial Use Alternative would remove any potential for agricultural use in the future, and the site has no potential for forest uses. Subsection V.2 of the Initial Study concluded the proposed Project would have no impacts on agricultural or forest resources. Similarly, the Commercial Use Alternative would also have no impacts related to these resources.

Air Quality

EIR Subsection 4.2 indicates the proposed Project, with 347,918 square feet of industrial warehouse space, would not exceed SCAQMD thresholds and so would have less than significant impacts relative to short- and long-term air pollutant emissions as well has health risks for nearby sensitive receptors. The Commercial Use Alternative would generate equal or less air pollutant emissions during construction since the optional self-storage facility or the nursery would not require as much intensive construction activities compared to building a warehouse. The Project is expected to generate 492 total average daily trips (ADT) versus 1,402 ADT for the nursery and 1,704 ADT for the self-storage facility (see **Table 5-1**). However, this alternative would generate less truck trips and, therefore, would generate less diesel particulate health risks. Overall, the operational air quality impacts of this

alternative would be incrementally greater than the Project.

Biological Resources

The Project site contains no significant biological resources either in terms of species or habitat. EIREIR Subsection 4.3 concludes that development of the Project will result in less than significant impacts to these resources with standard conditions and the recommended mitigation. Developing the site with retail commercial uses and a self-storage facility or a nursery would have similar less than significant impacts related to biological resources. Uses developed under this alternative would require similar standard conditions and mitigation relative to grading the site.

Cultural Resources

The Project site contains no significant historical or archaeological resources although grading could reveal unknown buried artifacts or other resources. EIR Subsection 4.4 concludes that development of the Project will result in less than significant impacts on these resources with implementation of the recommended mitigation measures. Developing the site with retail commercial uses and a self-storage facility or a nursery would have similar less than significant impacts related to cultural resources since the entire site would be disturbed under either the Project or Alternative 1. Uses developed under this alternative would require similar mitigation relative to grading the site to protect unexpected resources.

Energy

The proposed Project would increase consumption of electricity and natural gas for space and water heating, air conditioning, lighting, and operation of miscellaneous equipment and appliances. It would also consume fossil fuels for car and truck trips to and from the proposed warehouse. EIR Subsection 4.5 determined the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not causeor result in the need for additional energy producing or transmission facilities. In addition, the proposed Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Any impacts would be reduced to a less than significant level with adherence to standard conditions and mitigation from the air quality section.

The Commercial Use Alternative No. 1 would also utilize energy resources, mainly in the form of electricity although some natural gas may be used by the restaurant for cooking and the offices of the self-storage facility or nursery during the winter for heating. Due to the lower intensity of overallsite use, the Commercial Use Alternative would be expected to use substantially less energy during operations compared to the proposed Project. The Alternative would also likely use less energy during construction of its less intense uses. Buildings constructed as part of this Alternative would have to comply with state energy conservation requirements similar to those for the proposed Project.

Energy impacts of the Commercial Use Alternative would be less than those of the proposed Project, but both would be less than significant with implementation of standard conditions and the recommended mitigation measures from the air quality section.

Geology and Soils

Development of the proposed Project would be subject to a number of geologic, seismic, and soil constraints. However, Section V.7 of the Initial Study indicated development of the Project would have less than significant impacts related to geology and soils with implementation of standard conditions and recommended mitigation.

Development of the site under either option of the Commercial Use Alternative would require grading of

the entire site although the nursery would have less building constraints due to its lower intensityof land use.

The Project site is mapped as a "High B" sensitivity area, denoting a high sensitivity for paleontological resources. Areas classified as high sensitivity may contain buried paleontological deposits at or below 4 feet of depth and may be impacted during construction, so mitigation was recommended. Similar mitigation would also be required to develop either option of the CommercialUse Alternative. Therefore, both the Project and the Commercial Use Alternative would have less than significant impacts to paleontological resources with implementation of mitigation.

Greenhouse Gas Emissions

EIR Subsection 4.6 indicates the Project will produce both short-term GHG emissions during construction and long-term GHG emissions during operation. However, it concluded that Project impacts would be lessthan significant. However, one option of the Commercial Use Alternative would generate significantly more traffic and thus more GHG emissions than the Project. The Project is expected to generate 492 total average daily trips (ADT) versus 1,402 ADT for the nursery or 1,704 ADT for the self-storage facility (see **Table 5-1**). Therefore, the operational GHG emissions of the Commercial Use Alternative would be incrementally higher than those of the Project.

The proposed Project as well as uses under the Commercial Use Alternative would be required to comply with the GHG reduction strategies contained in the City's CAP as well as the air quality mitigation measures which also help to reduce GHG emissions.

Hazards and Hazardous Materials

Subsection V.9 of the Initial Study indicated that construction and regular operation of the proposed light-industrial facility would not result in significant impacts involving the use, storage, transport or disposal of hazardous wastes and substances. It concluded use of common household hazardous materials and their disposal does not present a substantial health risk to the community.

Development of a gas station and restaurant plus either a Self-Storage Facility or Nursery on the site would also not result in significant impacts related to hazardous materials due to the anticipated use of the site with these facilities. Although a nursery would be expected to use commercial pesticides and other agricultural chemicals, their commercial use is closely regulated by state and federal agencies. Therefore, less than significant impacts related hazardous materials from the CommercialUse Alternative would also be expected.

EIR Subsection 4.8 stated the proposed Project was consistent with the March Inland Port Airport Land Use Compatibility Plan (ALUCP) and related Air Force Safety Zone restrictions on the site. Therefore, potential airport hazards to the Project are less than significant.

The Commercial Use Alternative was developed with lower intensity uses in the central and western portions of the site to be consistent with the ALUCP and Air Force Safety Zone land use restrictions (including either the storage or nursery options). Therefore, potential airport hazards to theCommercial Use Alternative are also less than significant.

Hydrology and Water Quality

The Project has a potential to generate new pollutants from the proposed urban/suburban environment that can degrade water quality. However, EIR Subsection 4.7 concludes the Project will result in less than significant impacts to hydrology or water quality with implementation of its planned design, standard conditions, and proposed offsite improvements to alleviate localized flooding.

The Commercial Use Alternative would also develop the entire Project site and would also be required to design its development of either a self-storage facility or commercial nursery so that offsite downstream runoff would not increase, and potential urban pollutants would not reach downstream impacted water bodies. Since the site is over a half-acre, any development would be required to comply with established regional, state, and federal water quality requirements as appropriate. With this compliance, the proposed Project and either of the options under the Commercial Use Alternative would have less than significant impacts to hydrology and water quality.

Land Use and Planning

The proposed Project would not represent a change to the City's General Plan Land Use plan and the City's Zoning Map, but it would represent a change to the PVCCSP. Based on the data and analysis presented in EIR Subsection 4.8, implementation of the proposed Project will not cause significant land use or planning impacts in the City of Perris.

The Commercial Use Alternative was developed as a "No Project" alternative in that it would be consistent with existing City General Plan Land Use plan, the City's Zoning Map, and the PVCCSP. Since this Alternative is consistent with the General Plan and zoning designations for the site, it is likely it would be consistent with the applicable General Plan goals and policies as well. Therefore, either option of this alternative would have less than significant land use or planning impacts similar to but less intense than those of the proposed Project (due to the less intense land use options).

Mineral Resources

As described in Subsection 12 of the Initial Study, the Project site and surrounding area do not contain any existing mineral development or any identified potential for mineral resource development. Therefore, the Project has no potential to cause any unavoidable adverse impact to mineral resources or values in Riverside County.

Similar to the Project, development of the site under Commercial Use Alternative No. 1 would also have no impacts on mineral resources as they are no present in the Project area.

Noise

EIR Subsection 4.9 concluded that Project construction will not result in a substantial temporary increase in noise levels in excess of standards established in the City's General Plan, as implemented by the City's Noise Ordinance with implementation of mitigation during grading and construction. With implementation of the PVCCSP EIR mitigation measures, construction-related noise impacts will be reduced to less than significant levels. During operation, the Project will not create significant permanent increases in noise levels at nearby existing residential uses (i.e., mobile home park to the east). As vibration levels would generally not be perceptible to the average person and would not result in cosmetic nor structural damage to buildings, vibration impacts from Project construction would be less than significant.

Development of the site under the Commercial Use Alternative (i.e., either a self-storage facility or a nursery) would have mixed noise impacts on nearby land uses compared to the proposed Project. Customers coming and going from the nursery option use would generate 1,402 daily vehicular trips compared to 492 trips for the Project. By comparison, customers coming and going from the self-storage option use would generate 1,704 daily trips, neither of which would significantly increase local noise levels. Therefore, the nursery or self-storage option would not result in significant operational noise. Development of this alternative may require application of construction mitigation similar to that for the proposed Project. With mitigation and given the types of low intensity uses, it is likely either option of the Commercial Use Alternative and the proposed Project and would have less than

significant noise impacts on the surrounding community.

Population and Housing

The proposed Project includes a Specific Plan Amendment to change the PVCCSP land use designation of the Project site from Commercial (C) to Light Industrial (LI). This is not considered a substantial change because the new LI designation is a less intensive land use compared to the existing Commercial designation, would not result in the construction of new homes or the addition of new residents to the City. Initial Study Subsection V.14 concluded the Project would not cause significant impacts relative to the existing population and housing forecasts for the City of Perris and Riverside County.

Since the Commercial Use Alternative also proposes non-residential uses for the site, it would also have less than significant impacts to population and housing resources.

Public Services

The Project proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). However, the proposed change in land use will not have a substantial impact on public services beyond those previously identified in the PVCCSP EIR. Subsection V.15 of the Initial Study determined that all potential impacts of the Project on public services, including fire protection, police, schools, solid waste, and other governmental services, would be less than significant with implementation of standard conditions such as payment of development impact fees and installation of adequate water system (for fire protection).

Due to the low intensity of land uses, either option of the Commercial Use Alternative would not be expected to result in significant impacts on fire protection, emergency response, police, school, or park services with standard conditions, but impacts would be incrementally less than those of the Project due to the lower intensity of uses, especially the nursery.

Recreation Resources

Subsection V.16 of the Initial Study concluded any indirect impacts to parks and other recreational facilities caused by the proposed Project will be reduced to less than significant levels with payment of applicable Park and Recreation Facilities impact fees.

Similar to the proposed Project, development of the Commercial Use Alternative would also result in no direct and only possible indirect impacts to recreation resources since it also proposes only non-residential uses (gas station/restaurant and self-storage facility or nursery).

Transportation

As noted in the City Guidelines, “projects that generate less than 500 average daily trips (ADT) would not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT.” EIR Subsection 4.10 determined that the proposed Project was anticipated to generate 492 trip-ends per day which is below the 500 ADT threshold established by the City. Therefore, the proposed Project meets the Daily Trip Screening criteria as outlined in the City Guidelines and would have a less than significant VMT impact.

The Project is expected to generate 492 total average daily trips (ADT) versus 1,402 ADT for the nursery or 1,704 ADT for the self-storage facility (see **Table 5-1**). The operational traffic and VMT impacts of either the nursery option or the self-storage facility option both exceed the City’s 500 ADT threshold and additional VMT analysis is required. However, most of the traffic from either of these

options under this Alternative result from the proposed gas station and retail use. These uses are local-serving, and such uses are considered less than significant in terms of VMT impacts. The self-storage facility and nursery options are also considered local serving uses and therefore would also have less than significant VMT impacts. Therefore, neither option of the Commercial Use Alternative would be expected to result in significant VMT traffic impacts (see **Table 5-1**).

Tribal Cultural Resources

EIR Subsection 4.11 determined the proposed Project would not have any significant impacts on identified tribal cultural resources. EIR Subsection 4.11 determined impacts on these resources would be less than significant with implementation of cultural mitigation measures.

The Commercial Use Alternative (both land use options) would develop the entire Project site and so would have the same impacts as the Project and require similar standard conditions and tribal monitoring. Neither the Project nor the alternative would cause a significant impact on tribal resources.

Utilities and Service Systems

Development of the Project will require additional water supplies, generate additional wastewater, require construction of onsite and nearby drainage improvements, and connections to existing energy systems. The EMWD has provided Will Serve letters indicating that they will provide water and sewer services for the Project and could serve this Alternative as well. Subsection 19 of the Initial Study concluded the impacts of these incrementally increased services will be less than significant with implementation of standard conditions.

Development of the site under the Commercial Use Alternative would require less consumption of water (only the self-storage facility), less generation of wastewater, less runoff under the nursery option, and less electricity and natural gas consumption than the proposed warehouse Project. However, neither the alternative nor the Project will result in significant impacts to utilities and service systems (i.e., water, sewer, stormwater, solid waste, electricity, or natural gas).

Wildfire

Subsection 20 of the Initial Study determined the Project is not in a designated high fire risk area and would not substantially impair access along the three major roadways around the Project site. Based on that analysis, potential impacts related to wildfire conditions, an adopted emergency response plan, or emergency evacuation plan will be less than significant.

The Commercial Use Alternative would develop the same site that has the same wildfire-related constraints. Therefore, there would be no wildfire resource impacts from this alternative or the proposed Project.

5.3.3 Summary of Alternative 1: Commercial Use

The Commercial Use Alternative would achieve the following PVCCSP-related objectives for non-residential development to a similar level as the proposed Project:

- Provides a development plan of superior environmental sensitivity including a high quality of visual aesthetics, suppression of noise, protection of health and safety, and the promotion of community and region.
- Considers topographic, geologic, hydrologic, and environmental opportunities and constraints to create a design that generally conforms to the character of the land by retaining and utilizing basic, existing landforms, as much as possible.

- Provides additional employment opportunities for the current and future residents of the region and surrounding communities.

However, Alternative No. 1 would not generate nearly the same number of employees or revenues to the City based on the lower intensity of uses under either land use option of this Alternative. In addition, development of the Commercial Use Alternative would result in the following impacts:

Similar Impacts to Project

- Agriculture and Forest Resources
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hydrology and Water Quality
- Mineral Resources
- Land Use and Planning
- Population and Housing
- Noise
- Tribal Cultural Resources
- Wildfire

Lesser Impacts than Project

- Aesthetics
- Energy
- Hazards and Hazardous Materials
- Public Services – Fire, Police, Schools, Parks
- Recreation
- Utilities and Service Systems - Water, Sewer, Stormwater, Solid Waste, Electricity/Natural Gas

Greater Impacts than Project

- Air Quality
- Greenhouse Gas Emissions
- Transportation-VMT

5.4 ALTERNATIVE 2: LOWER INTENSITY INDUSTRIAL

5.4.1 Overview of the Lower Intensity Industrial Alternative

This alternative would have 290,000 square feet of only high cube warehousing, not general warehousing, located in the central and western portions of the site. This alternative wouldhave 83% of the floor area compared to 347,918 square feet for the proposed Project. This alternative would also have retail commercial (a gas station and one small restaurant pad as described under Alternative 1) in the northeast portion of the site) (see previous **Figure 5-2, *Lower Intensity Industrial Alternative***).

5.4.2 Impact Analysis

Aesthetics

Development of the site under the Lower Intensity Industrial Alternative No.2 would result in similar aesthetic impacts compared to the proposed Project. The proposed Project would introduce a large

warehouse building onto the entire site, while the Lower Intensity Industrial Alternative would place a gas station/restaurant facility in the northeast corner of the site and a warehouse approximately 17 percent smaller than the proposed Project in the central and western portions of the site. These two optional uses would be of a lower height and scale compared to the Project warehouse. Either warehouse would be considered urban in appearance.

Subsection V.1 of the Initial Study concluded the proposed Project warehouse would have less than significant impacts relative to aesthetics in this urban setting, so similarly the smaller warehouse under the Lower Intensity Industrial Alternative would have similar less than significant aesthetic impacts.

Agriculture and Forest Resources

Development of the site under either the Project or Lower Intensity Industrial Alternative would remove any potential for agricultural use in the future, and the site has no potential for forest uses. Subsection V.2 of the Initial Study concluded the proposed Project would have no impacts on agricultural or forest resources. Similarly, the Lower Intensity Industrial Alternative would also have no impacts related to these resources.

Air Quality

EIR Subsection 4.2 indicates the proposed Project, with 347,918 square feet of industrial warehouse space, would not exceed SCAQMD thresholds so it would have less than significant impacts relative to long-term air pollutant emissions and health risks from diesel truck emissions. The Lower Intensity Industrial Alternative would generate a similar amount of air pollutant emissions during construction since the Project and the Alternative both fully develop the site with warehousing (and a gas station/restaurant under the Alternative).

The Lower Intensity Industrial Alternative would generate incrementally more traffic than the Project. The Project is expected to generate 492 total average daily trips (ADT) versus 1,802 ADT for the Alternative, and the Project would generate 612 PCE truck trips versus 1,912 PCE trips for the Alternative (see **Table 5-1**). Therefore, the operational air quality impacts of this Alternative would be greater than the Project. However, it would generate less diesel particulate health risks for nearby sensitive receptors since most of its trips are passenger vehicles generated by the local-serving gas station and retail use, while the warehouse, which generates truck traffic, is smaller than the Project and Section 4.2 of the EIR determined the Project would not have significanthealth risks.

Biological Resources

The Project site contains no significant biological resources either in terms of species or habitat. EIREIR Subsection 4.3 concludes that development of the Project will result in less than significant impacts to these resources with standard conditions and the recommended mitigation. Developing the site with retail commercial uses and a smaller warehouse would have similar and less than significant impacts related to biological resources. Uses developed under this alternative would likely require similar standard conditions and mitigation relative to grading the site.

Cultural Resources

The Project site contains no significant historical or archaeological resources although grading could reveal unknown buried artifacts or other resources. EIR Subsection 4.4 concludes that development of the Project will result in less than significant impacts on these resources with implementation of the recommended mitigation measures. Developing the site with retail commercial uses and a smaller warehouse would have similar less than significant impacts related to cultural resources since the entire site would be disturbed under either the Project or Alternative 2. Uses developed under this alternative

would require similar mitigation relative tograding the site to protect unexpected resources.

Energy

The proposed Project would increase consumption of electricity and natural gas for space and water heating, air conditioning, lighting, and operation of miscellaneous equipment and appliances. It would also consume fossil fuels for car and truck trips to and from the proposed warehouse. EIR Subsection 4.5 determined the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not causeor result in the need for additional energy producing or transmission facilities. In addition, the proposed Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Any impacts would be reduced to a less than significant level with adherence to standard conditions and mitigation from the air quality section.

The Lower Intensity Industrial Alternative No. 2 would also utilize energy resources, mainly in the form of electricity although some natural gas may be used by the restaurant for cooking. Due to thesimilar intensity of overall site use, the Lower Intensity Industrial Alternative would be expected to use an equivalent amount of energy during operations compared to the proposed Project. The Alternative would also likely use a similar amount of energy during construction. Buildings constructed as part of this Alternative would have to comply with state energy conservation requirements similar to those for the proposed Project.

Energy impacts of the Lower Intensity Industrial Alternative would be similar to those of the proposed Project, but both would be less than significant with implementation of standard conditions and the recommended mitigation measures from the air quality section.

Geology and Soils

Development of the proposed Project would be subject to a number of geologic, seismic, and soil constraints. However, Subsection V.7 of the Initial Study indicated development of the Project wouldhave less than significant impacts related to geology and soils with implementation of standard conditions and recommended mitigation.

Development of the Lower Intensity Industrial Alternative would require grading of the entire site aswell and its impacts would likely be less than significant similar to the proposed Project with implementation of standard conditions and recommended mitigation.

The Project site is mapped as a “High B” sensitivity area, denoting a high sensitivity for paleontological resources. Areas classified as high sensitivity may contain buried paleontological deposits at or below 4 feet of depth and may be impacted during construction, so mitigation was recommended. Similar mitigation would also be required to develop the Lower Intensity Industrial Alternative. Therefore, both the Project and the Lower Intensity Industrial Use Alternative would have less than significant impacts to paleontological resources with implementation of mitigation.

Greenhouse Gas Emissions

EIR Subsection 4.6 indicates the Project will produce both short-term GHG emissions during construction and long-term GHG emissions during operation. However, it concluded with implementation of the recommended mitigation measures, Project impacts would be reduced to lessthan significant levels.

The Lower Intensity Industrial Alternative would generate incrementally more traffic and thus slightly more GHG emissions than the Project. The Project is expected to generate 492 total average dailytrips

(ADT) versus 1,802 ADT for the Alternative (see **Table 5-1**). Therefore, the operational GHG emissions of this Alternative would be slightly higher than those of the Project.

The proposed Project as well as the Lower Intensity Industrial Alternative would be required to comply with the GHG reduction strategies contained in the City's CAP as well as the air quality mitigation measures which also help reduce GHG emissions.

Hazards and Hazardous Materials

Subsection V.9 of the Initial Study indicated that construction and regular operation of the proposed light-industrial facility would not result in significant impacts involving the use, storage, transport or disposal of hazardous wastes and substances. It concluded use of common household hazardous materials and their disposal does not present a substantial health risk to the community.

Development of a gas station and restaurant plus a smaller warehouse on the site would also not result in significant impacts related to hazardous materials due to the anticipated uses of the site with these facilities. Therefore, less than significant impacts related hazardous materials from the Lower Intensity Industrial Alternative would also be expected.

EIR Subsection 4.8 stated the proposed Project was consistent with the March Inland Port Airport Land Use Compatibility Plan (ALUCP) and related Air Force Safety Zone restrictions on the site. Therefore, potential airport hazards to the Project are less than significant.

The Lower Intensity Industrial Alternative was developed to be consistent with the ALUCP and Air Force Safety Zone land use restrictions. Therefore, potential airport hazards to the Lower Intensity Industrial Alternative are also less than significant.

Hydrology and Water Quality

The Project has a potential to generate new pollutants from the proposed urban/suburban environment that can degrade water quality. However, EIR Subsection 4.7 concludes the Project will result in less than significant impacts to hydrology or water quality with implementation of its planned design, standard conditions, and proposed offsite improvements to alleviate localized flooding.

The Lower Intensity Industrial Alternative would also develop the entire Project site and would also be required to design its development so that offsite downstream runoff would not increase, and potential urban pollutants would not reach downstream impacted water bodies. Since the site is over a half-acre, any development would be required to comply with established regional, state, and federal water quality requirements as appropriate. With this compliance, the proposed Project and the Lower Intensity Industrial Alternative would have less than significant impacts to hydrology and water quality.

Land Use and Planning

The proposed Project would not represent a change to the City's General Plan Land Use plan and the City's Zoning Map, but it would represent a change to the PVCCSP. Based on the data and analysis presented in EIR Subsection 4.8, implementation of the proposed Project will not cause significant land use or planning impacts in the City of Perris.

The Lower Intensity Industrial Alternative is also consistent with existing City General Plan Land Use plan and the City's Zoning Map but not the PVCCSP, similar to the proposed Project. Therefore, this alternative would have less than significant land use or planning impacts similar to those of the proposed Project.

Mineral Resources

As described in Subsection V.12 of the Initial Study, the Project site and surrounding area do not contain any existing mineral development or any identified potential for mineral resource development. Therefore, the Project has no potential to cause any unavoidable adverse impact to mineral resources or values in Riverside County.

Similar to the Project, development of the site under Lower Intensity Industrial Alternative No. 2 wouldalso have no impacts on mineral resources as they are no present in the Project area.

Noise

EIR Subsection 4.9 concluded that Project construction will not result in a substantial temporary increase in noise levels in excess of standards established in the City's General Plan, as implemented by the City's Noise Ordinance with implementation of mitigation during grading and construction. With implementation of the PVCCSP EIR mitigation measures, construction-related noise impacts will be reduced to less than significant levels. During operation, the Project will not create significant permanent increases in noise levels at nearby existing residential uses (i.e., mobile home park to the east). As vibration levels would generally not be perceptible to the average person and would not result in cosmetic nor structural damage to buildings, vibration impacts from Project construction would be less than significant.

Development of the site under the Lower Intensity Industrial would have noise impacts on nearby land uses similar to those of the proposed Project. Customers coming and going from the gas station/restaurant uses and the smaller warehouse would generate 1,802 daily vehicular trips compared to 492 trips for the Project. Therefore, this Alternative would result in incrementally higher but still less than significant noise impacts compared to the Project. Development of this alternative may require application of construction mitigation similar to that for the proposed Project, but any operational noise mitigation would depend on the results of a site-specific noise study if this alternative was approved. With standard conditions and mitigation, the Lower Intensity Industrial Alternative and the proposed Project and would have less than noise impacts on the surrounding community.

Population and Housing

The proposed Project includes a Specific Plan Amendment to change the PVCCSP land use designation of the Project site from Commercial (C) to Light Industrial (LI). This is not considered a substantial change because the new LI designation is a less intensive land use compared to the existing Commercial designation, would not result in the construction of new homes or the addition of new residents to the City. Initial Study Subsection V.14 concluded the Project would not cause significant impacts relative to the existing population and housing forecasts for the City of Perris and Riverside County.

Since the Lower Intensity Industrial Alternative also proposes non-residential uses for the site, it would also have less than significant impacts to population and housing resources.

Public Services

The Project proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). However, the proposed change in land use will not have a substantial impact on public services beyond those previously identified in the PVCCSP EIR. Subsection V.15 of the Initial Study determined that all potential impacts of the Project on public services, including fire protection, police, schools, solid waste, and other governmental services, would be less than significant with implementation of standard conditions such as payment of development

impact fees and installation of adequate water system (for fire protection).

Due to the similar intensity of land uses, the Lower Intensity Industrial Alternative would be expected to result in less than significant impacts on fire protection, emergency response, police, parks, or school services with standard conditions. Impacts of the Alternative would be equivalent to those of the Project due to the similar intensity of uses.

Recreation Resources

Subsection V.16 of the Initial Study concluded any indirect impacts to parks and other recreational facilities caused by the proposed Project will be reduced to less than significant levels with payment of applicable Park and Recreation Facilities impact fees.

Similar to the proposed Project, development of the Lower Intensity Industrial Alternative would also result in no direct and only possible indirect impacts to recreation resources since it also proposes only non-residential uses (gas station/restaurant and self-storage facility or nursery).

Transportation

As noted in the City Guidelines, "projects that generate less than 500 average daily trips (ADT) would not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT." EIR Subsection 4.10 determined that the proposed Project was anticipated to generate 492 trip-ends per day which is below the 500 ADT threshold established by the City. Therefore, the proposed Project meets the Daily Trip Screening criteria as outlined in the City Guidelines and would have a less than significant VMT impact.

The Project is expected to generate 492 total average daily trips (ADT) versus 1,802 ADT for the Lower Intensity Industrial Alternative (see **Table 5-1**). Since the operational traffic of the Alternative exceeds the City's 500 ADT threshold and additional VMT analysis is required. However, most of the traffic from this alterative is generated by the gas station and retail use, while the warehouse portion of this alternative has 20% less square footage than the Project (which was determined to have less than significant VMT impacts). The gas station and retail use are also considered local-serving uses and so would be considered to have less than significant VMT impacts. Therefore, this Alternative would not be expected to result in significant VMT traffic impacts (see **Table 5-1**).

Tribal Cultural Resources

EIR Subsection 4.11 determined the proposed Project would not have any significant impacts on identified tribal cultural resources. EIR Subsection 4.11 determined impacts on these resources would be less than significant with implementation of cultural mitigation measures.

The Lower Intensity Industrial Alternative would develop the entire Project site and so would have the same impacts as the Project and require similar mitigation. Neither the Project nor the alternative would cause a significant impact on tribal resources.

Utilities and Service Systems

Development of the Project will require additional water supplies, generate additional wastewater, require construction of onsite and nearby drainage improvements, and connections to existing energy systems. The EMWD has provided Will Serve letters indicating that they will provide water and sewer services for the Project and could serve this Alternative as well. Subsection V.19 of the Initial Study concluded the impacts of these incrementally increased services will be less than significant with implementation of standard conditions.

Development of the site under the Lower Intensity Industrial Alternative would require a similar consumption of water, generation of wastewater, runoff, and electricity and natural gas compared to the proposed warehouse Project. However, neither the alternative nor the Project will result in significant impacts to utilities and service systems (i.e., water, sewer, stormwater, solid waste, electricity, or natural gas).

Wildfire

Subsection V.20 of the Initial Study determined the Project is not in a designated high fire risk area and would not substantially impair access along the three major roadways around the Project site. Based on that analysis, potential impacts related to wildfire conditions, an adopted emergency response plan, or emergency evacuation plan will be less than significant.

The Lower Intensity Industrial Alternative would develop the same site that has the same wildfire-related constraints. Therefore, there would be no wildfire resource impacts from this alternative or the proposed Project.

5.4.3 Summary of Alternative 2: Lower Intensity Industrial

The Lower Intensity Industrial Alternative would achieve the following PVCCSP-related objectives for non-residential development to a similar level as the proposed Project:

- Provides a development plan of superior environmental sensitivity including a high quality of visual aesthetics, suppression of noise, protection of health and safety, and the promotion of community and region.
- Considers topographic, geologic, hydrologic, and environmental opportunities and constraints to create a design that generally conforms to the character of the land by retaining and utilizing basic, existing landforms, as much as possible.
- Provides additional employment opportunities for the current and future residents of the region and surrounding communities.

Alternative No. 2 would generate an equivalent number of employees revenues to the City based on the proposed uses under this Alternative compared to the Project. In addition, development of the Lower Intensity Industrial Alternative would result in the following impacts:

Similar Impacts to Project

- Aesthetics
- Agriculture and Forest Resources
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Land Use and Planning
- Population and Housing
- Public Services – Fire, Police, Schools, Parks
- Recreation
- Utilities and Service Systems - Water, Sewer, Stormwater, Solid Waste, Electricity/Natural Gas
- Tribal Cultural Resources

- Wildfire

Lesser Impacts than Project

- None

Greater Impacts than Project

- Air Quality
- Greenhouse Gas Emissions
- Transportation-VMT

5.4 ALTERNATIVE 3: LOW INTENSITY BUSINESS/OFFICE PARK

5.4.1 Overview of the Low Intensity Business/Office Park (LIBOP) Alternative

This alternative would have 76,920 square feet of Low Intensity Business Park/Office (LIBOP) usesin 4 buildings in the central and western portions of the site. This alternative would also have retail commercial (a gas station and one small restaurant pad as described under Alternative 1) in the northeast portion of the site)(see previous **Figure 5-3, *Business Park/Office Alternative***).

5.4.2 Impact Analysis

Aesthetics

Development of the site under the LIBOP Alternative No.3 would result in similar aesthetic impacts compared to the proposed Project. The proposed Project would introduce a large warehouse building onto the entire site, while the LIBOP Alternative would place a gas station/restaurant facility in the northeast corner of the site and four independent business park/office buildings in the central and western portions of the site. The Project warehouse and the business park/office buildings would be considered urban in appearance although the Alternative 3 buildings would be of a lower scale.

Subsection V.1 of the Initial Study concluded the proposed Project warehouse would have less than significant impacts relative to aesthetics in this urban setting, so similarly the smaller independent business park/office buildings under the LIBOP Alternative would have similar less than significant aesthetic impacts.

Agriculture and Forest Resources

Development of the site under either the Project or Lower Intensity Industrial Alternative would remove any potential for agricultural use in the future, and the site has no potential for forest uses. Subsection V.2 of the Initial Study concluded the proposed Project would have no impacts on agricultural or forest resources. Similarly, the LIBOP Alternative would also have no impacts relatedto these resources.

Air Quality

EIR Subsection 4.2 indicates the proposed Project, with 347,918 square feet of industrial warehouse space, would not exceed SCAQMD thresholds and so would have less than significant impacts relative to short- and long-term air pollutant emissions as well has health risks for nearby sensitive receptors. The LIBOP Alternative would generate a similar amount of air pollutant emissions during construction since the Project and the Alternative both fully develop the site with warehousing for theProject and a gas station/restaurant and business park/office buildings under the Alternative.

The LIBOP Alternative would generate incrementally more traffic than the Project. The Project is expected to generate 492 total average daily trips (ADT) versus 2,152 ADT for the Alternative, and the Project would generate 612 PCE truck trips versus no PCE trips for the Alternative (see **Table 5-1**). Therefore, the operational air quality impacts of this Alternative would be higher than the Project. However, this alternative would generate less truck trips and, therefore, would generate less diesel particulate health risks.

Biological Resources

The Project site contains no significant biological resources either in terms of species or habitat. EIR Subsection 4.3 concludes that development of the Project will result in less than significant impacts to these resources with standard conditions and the recommended mitigation. Developing the site with retail commercial uses and four business/office park buildings would have similar and less than significant impacts related to biological resources. Uses developed under this alternative would likely require similar standard conditions and mitigation relative to grading the site.

Cultural Resources

The Project site contains no significant historical or archaeological resources although grading could reveal unknown buried artifacts or other resources. EIR Subsection 4.4 concludes that development of the Project will result in less than significant impacts on these resources with implementation of the recommended mitigation measures. Developing the site with retail commercial uses and four business/office park buildings would have similar less than significant impacts related to cultural resources since the entire site would be disturbed under either the Project or Alternative 3. Uses developed under this alternative would require similar mitigation relative to grading the site to protect unexpected resources.

Energy

The proposed Project would increase consumption of electricity and natural gas for space and water heating, air conditioning, lighting, and operation of miscellaneous equipment and appliances. It would also consume fossil fuels for car and truck trips to and from the proposed warehouse. EIR Subsection 4.5 determined the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. In addition, the proposed Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Any impacts would be reduced to a less than significant level with adherence to standard conditions and mitigation from the air quality section.

The LIBOP Alternative No. 3 would also utilize energy resources, mainly in the form of electricity although some natural gas may be used by the restaurant for cooking. Due to the smaller square footage of proposed uses (76,920 square feet), the LIBOP Alternative would be expected to use an equal or less amount of energy during operations compared to the proposed Project. The Alternative would also likely use a similar amount of energy during construction. Buildings constructed as part of this Alternative would have to comply with state energy conservation requirements similar to those for the proposed Project.

Energy impacts of the LIBOP Alternative would be similar to those of the proposed Project but both would be less than significant with implementation of standard conditions and the recommended mitigation measures from the air quality section.

Geology and Soils

Development of the proposed Project would be subject to a number of geologic, seismic, and soil constraints. However, Subsection V.7 of the Initial Study indicated development of the Project wouldhave less than significant impacts related to geology and soils with implementation of standard conditions and recommended mitigation.

Development of the LIBOP Alternative would require grading of the entire site as well and its impacts would likely be less than significant similar to the proposed Project with implementation of standard conditions and recommended mitigation.

The Project site is mapped as a "High B" sensitivity area, denoting a high sensitivity for paleontological resources. Areas classified as high sensitivity may contain buried paleontological deposits at or below 4 feet of depth and may be impacted during construction, so mitigation was recommended. Similar mitigation would also be required to develop the LIBOP Alternative.Therefore, both the Project and the LIBOP Alternative would have less than significant impacts to paleontological resources with implementation of mitigation.

Greenhouse Gas Emissions

EIR Subsection 4.6 indicates the Project will produce both short-term GHG emissions during construction and long-term GHG emissions during operation. However, it concluded with implementation of the recommended mitigation measures, Project impacts would be reduced to lessthan significant levels.

The LIBOP Alternative would generate more traffic and thus more GHG emissions than the Project.The Project is expected to generate 492 total average daily trips (ADT) versus 2.152 ADT for the Alternative (see **Table 5-1**). Therefore, the operational GHG emissions of the low intensity businesspark alternative would be higher than those of the Project.

The proposed Project as well as the LIBOP Alternative would be required to comply with the GHG reduction strategies contained in the City's CAP as well as the air quality mitigation measures whichalso help reduce GHG emissions.

Hazards and Hazardous Materials

Subsection V.9 of the Initial Study indicated that construction and regular operation of the proposed light-industrial facility would not result in significant impacts involving the use, storage, transport or disposal of hazardous wastes and substances. It concluded use of common household hazardous materials and their disposal does not present a substantial health risk to the community.

Development of a gas station and restaurant plus four business/office park buildings on the site would also not result in significant impacts related to hazardous materials due to the anticipated usesof the site with these facilities. Therefore, less than significant impacts related hazardous materialsfrom the LIBOP Alternative would also be expected.

EIR Subsection 4.8 stated the proposed Project was consistent with the March Inland Port Airport Land Use Compatibility Plan (ALUCP) and related Air Force Safety Zone restrictions on the site. Therefore, potential airport hazards to the Project are less than significant.

The LIBOP Alternative was developed to be consistent with the ALUCP and Air Force Safety Zone land use restrictions. Therefore, potential airport hazards to the LIBOP Alternative are also less than significant.

Hydrology and Water Quality

The Project has a potential to generate new pollutants from the proposed urban/suburban environment that can degrade water quality. However, EIR Subsection 4.7 concludes the Project will result in less than significant impacts to hydrology or water quality with implementation of its planned design, standard conditions, and proposed offsite improvements to alleviate localized flooding.

The LIBOP Alternative would also develop the entire Project site and would also be required to design its development so that offsite downstream runoff would not increase, and potential urban pollutants would not reach downstream impacted water bodies. Since the site is over a half-acre, any development would be required to comply with established regional, state, and federal water quality requirements as appropriate. With this compliance, the proposed Project and the LIBOP Alternative would have less than significant impacts to hydrology and water quality.

Land Use and Planning

The proposed Project would not represent a change to the City's General Plan Land Use plan and the City's Zoning Map, but it would represent a change to the PVCCSP. Based on the data and analysis presented in EIR Subsection 4.8, implementation of the proposed Project will notcause significant land use or planning impacts in the City of Perris.

The LIBOP Alternative is also consistent with existing City General Plan Land Use plan and the City's Zoning Map but not the PVCCSP, similar to the proposed Project. Therefore, this alternative would have less than significant land use or planning impacts similar to those of the proposed Project.

Mineral Resources

As described in Subsection V.12 of the Initial Study, the Project site and surrounding area do not contain any existing mineral development or any identified potential for mineral resource development. Therefore, the Project has no potential to cause any unavoidable adverse impact to mineral resources or values in Riverside County.

Similar to the Project, development of the site under LIBOP Alternative No. 3 would also have no impacts on mineral resources as they are no present in the Project area.

Noise

EIR Subsection 4.9 concluded that Project construction will not result in a substantial temporary increase in noise levels in excess of standards established in the City's General Plan, as implemented by the City's Noise Ordinance with implementation of mitigation during grading and construction. With implementation of the PVCCSP EIR mitigation measures, construction-related noise impacts will be reduced to less than significant levels. During operation, the Project will not create significant permanent increases in noise levels at nearby existing residential uses (i.e., mobile home park to the east). As vibration levels would generally not be perceptible to the average person and would not result in cosmetic nor structural damage to buildings, vibration impacts from Project construction would be less than significant.

Development of the site under the LIBOP Alternative would have noise impacts on nearby land uses similar to those of the proposed Project. Customers coming and going from the gas station/restaurant uses and the four business/office park buildings would generate 2,152 daily vehicular trips compared to 492 trips for the Project. Therefore, this Alternative would result in incrementally higher but still less than significant noise impacts compared to the Project. Development of this alternative may require application of construction mitigation similar to that for the proposed Project, but any operational noise

mitigation would depend on the results of a site- specific noise study if this alternative was approved. With standard conditions and mitigation, the LIBOP Alternative and the proposed Project and would have less than noise impacts on the surrounding community.

Population and Housing

The proposed Project includes a Specific Plan Amendment to change the PVCCSP land use designation of the Project site from Commercial (C) to Light Industrial (LI). This is not considered a substantial change because the new LI designation is a less intensive land use compared to the existing Commercial designation, would not result in the construction of new homes or the addition of new residents to the City. Initial Study Subsection V.14 concluded the Project would not cause significant impacts relative to the existing population and housing forecasts for the City of Perris and Riverside County.

Since the LIBOP Alternative also proposes non-residential uses for the site, it would also have lessthan significant impacts to population and housing resources.

Public Services

The Project proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). However, the proposed change in land use will not have a substantial impact on public services beyond those previously identified in the PVCCSP EIR. Subsection V.15 of the Initial Study determined that all potential impacts of the Project on public services, including fire protection, police, schools, parks, and other governmental services, would beless than significant with implementation of standard conditions such as payment of development impact fees and installation of adequate water system (for fire protection).

Due to the similar intensity of land uses, the LIBOP Alternative would be expected to result in less than significant impacts on fire protection, emergency response, police, or school services with standard conditions. Impacts of the Alternative would be equivalent to those of the Project due to the similar intensity of uses.

Recreation Resources

Subsection V.16 of the Initial Study concluded any indirect impacts to parks and other recreational facilities caused by the proposed Project will be reduced to less than significant levels with paymentof applicable Park and Recreation Facilities impact fees.

Similar to the proposed Project, development of the LIBOP Alternative would also result in no directand only possible indirect impacts to recreation resources since it also proposes only non-residential uses (gas station/restaurant and self-storage facility or nursery).

Transportation

As noted in the City Guidelines, “projects that generate less than 500 average daily trips (ADT) wouldnot cause a substantial increase in the total citywide or regional VMT and are therefore presumed tohave a less than significant impact on VMT.” EIR Subsection 4.10 determined that the proposed Project was anticipated to generate 492 trip-ends per day which is below the 500 ADT threshold established by the City. Therefore, the proposed Project meets the Daily Trip Screening criteria as outlined in the City Guidelines and would have a less than significant VMT impact.

The Project is expected to generate 492 total average daily trips (ADT) versus 2,152 ADT for the LIBOP Alternative (see **Table 5-1**). Since the operational traffic of the Alternative exceeds the City’s500

ADT threshold and additional VMT analysis is required. However, the gas station and retail use generate the majority of traffic under this alternative, and these uses are considered local-serving and so do not have significant VMT impacts. Given the type and lower intensity of use and overall amount of traffic expected, this Alternative would not result in significant VMT traffic impacts.

Tribal Cultural Resources

EIR Subsection 4.11 determined the proposed Project would not have any significant impacts on identified tribal cultural resources. EIR Subsection 4.11 determined impacts on these resources would be less than significant with implementation of cultural mitigation measures.

The LIBOP Alternative would develop the entire Project site and so would have the same impacts as the Project and require similar mitigation. Neither the Project nor the alternative would cause a significant impact on tribal resources.

Utilities and Service Systems

Development of the Project will require additional water supplies, generate additional wastewater, require construction of onsite and nearby drainage improvements, and connections to existing energy systems. The EMWD has provided Will Serve letters indicating that they will provide water and sewer services for the Project and could serve this Alternative as well. Subsection V.19 of the Initial Study concluded the impacts of these incrementally increased services will be less than significant with implementation of standard conditions.

Development of the site under the LIBOP Alternative would require a similar consumption of water, generation of wastewater, runoff, and electricity and natural gas compared to the proposed warehouse Project. However, neither the alternative nor the Project will result in significant impacts to utilities and service systems (i.e., water, sewer, stormwater, solid waste, electricity, or natural gas).

Wildfire

Subsection V.20 of the Initial Study determined the Project is not in a designated high fire risk area and would not substantially impair access along the three major roadways around the Project site. Based on that analysis, potential impacts related to wildfire conditions, an adopted emergency response plan, or emergency evacuation plan will be less than significant.

The LIBOP Alternative would develop the same site that has the same wildfire-related constraints. Therefore, there would be no wildfire resource impacts from this alternative or the proposed Project.

5.4.3 Summary of Alternative 3: Low Intensity Business/Office Park

The LIBOP Alternative would achieve the following PVCCSP-related objectives for non-residential development to a similar level as the proposed Project:

- Provides a development plan of superior environmental sensitivity including a high quality of visual aesthetics, suppression of noise, protection of health and safety, and the promotion of community and region.
- Considers topographic, geologic, hydrologic, and environmental opportunities and constraints to create a design that generally conforms to the character of the land by retaining and utilizing basic, existing landforms, as much as possible.
- Provides additional employment opportunities for the current and future residents of the region and surrounding communities.

Alternative No. 3 would generate slightly fewer employees and lower revenues to the City based on the proposed square footage of uses under this Alternative. In addition, development of the Low Intensity Business/Office Park Alternative would result in the following impacts:

Similar Impacts to Project

- Agriculture and Forest Resources
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Land Use and Planning
- Population and Housing
- Public Services – Fire, Police, Schools, Parks
- Recreation
- Utilities and Service Systems - Water, Sewer, Stormwater, Solid Waste, Electricity/Natural Gas
- Tribal Cultural Resources
- Wildfire

Lesser Impacts than Project

- Aesthetics

Greater Impacts than Project

- Air Quality
- Greenhouse Gas Emissions
- Transportation-VMT

5.5 SUMMARY OF IMPACTS AND ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The summary of impacts for each alternative is presented in **Table 5-2, *Impact Comparison of Alternatives***, including the degree to which each alternative meets the Project Objectives.

The **No Project Alternative** has “no impact” for most environmental issues except aesthetics and hydrology from leaving the site undeveloped (but impacts are still less than significant).

Either optional land use of the **Commercial Use Alternative** would have impacts that are slightly greater than the Project for air quality, GHGs, and transportation-VMT (mainly due to the presence of the gas station and restaurant) but only the Self-Storage Facility Option of this alternative would have significant impacts (NOx emissions). The rest of the impacts would be equal or less than those of the Project and would also be less than significant.

The **Lower Intensity Industrial Alternative** would have impacts that are slightly greater than the Project for air quality, GHGs, and transportation-VMT, mainly due to the presence of the gas station and restaurant and would have significant air quality impacts related to NOx emissions. The rest of the impacts are similar to those of the Project (less than significant or no impact).

The **Low Intensity Business/Office Park Alternative** would have most impacts similar to those of the

Project (less than significant or no impact) except for aesthetics which is less than the Project and also less than significant. However, air quality (NOx emissions) and greenhouse gas emissions would exceed established standards and be significant.

Based on the above, the **Lower Intensity Industrial Alternative** is the **environmentally superior alternative** because its impacts are equivalent to those of the proposed Project. This alternative also meets the Project Objectives to a much greater degree than either the Commercial Use Alternative or the Low Intensity Business/Office Park Alternative but still not as well as the proposed Project.

Table 5-2
Impact Comparison Of Project Alternatives

Environmental Issue	Proposed Project	No Project Alternative (NPA)	Alternative 1 Commercial Use (Self-Storage or Nursery)	Alternative 2 Less Intense Industrial	Alternative 3 Less Intense Business Park/Office
Aesthetics	LTS	LTS+	LTS-	LTS	LTS-
Agriculture and Forest Resources	NI	NI	NI	NI	NI
Air Quality	LTS	NI	LTS+	LTS+	LTS+
Biological Resources	LTS	NI	LTS	LTS	LTS
Cultural Resources	LTS	NI	LTS	LTS	LTS
Energy	LTS	NI	LTS	LTS	LTS
Geology and Soils	LTS	NI	LTS	LTS	LTS
Greenhouse Gas Emissions	LTS	NI	LTS+	LTS+	LTS+
Hazards and Hazardous Materials	LTS	NI	LTS	LTS	LTS+
Hydrology and Water Quality	LTS	LTS+	LTS	LTS	LTS
Land Use and Planning	LTS	NI	LTS	LTS	LTS
Mineral Resources	NI	NI	NI	NI	NI
Noise	LTS	NI	LTS	LTS	LTS
Population and Housing	LTS	NI	LTS	LTS	LTS
Public Services	LTS	NI	LTS-	LTS	LTS
Recreation	LTS	NI	LTS-	LTS	LTS
Transportation	LTS	NI	LTS+	LTS+	LTS+
Tribal Cultural Resources	LTS	NI	LTS	LTS	LTS
Utilities and Service Systems	LTS	NI	LTS	LTS	LTS
Wildfire	LTS	NI	LTS	LTS	LTS
Would Meet Project Objectives?	**YES**	NO	**Yes** but not nearly to the same degree	**Yes** but not to the same degree	**Yes** but not nearly to the same degree

LTS = Less Than Significant NI = No Impact - = Less than the Project += Greater than the Project SIG = Significant Impact
SSF = Self-Storage Facility NOx = oxides of nitrogen

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CHAPTER 6 – TOPICAL ISSUES

Each environmental document contains a certain amount of duplication to ensure that information is conveyed to the decision-makers and interested members of the public in an organized fashion. Chapter 4 contains a detailed discussion of environmental effects that may result from implementing the proposed Project. This includes a discussion of project specific and cumulative environmental impacts, as well as discussion of unavoidable adverse impacts for each topic evaluated in the EIR. This chapter of the EIR combines the "topical issues" that are mandated in the State CEQA Guidelines Section 15126. Section 15126 states: "The subjects listed below shall be discussed...preferably in separate sections or paragraphs of the EIR." These sections are: (c) Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Project Should it be Implemented and (d) Growth-Inducing Impact of the Proposed Project. Section 15130 requires a discussion of Cumulative Impacts. Because of the importance of this topic, a summary of cumulative effects is included in this Chapter. The other major topics required in an EIR (Significant Environmental Effects; Unavoidable Significant Environmental Effects; and Mitigation Measures) are specifically addressed in Chapter 4 of this Draft EIR (DEIR). Alternatives to the proposed Project are evaluated in Chapter 5.

6.1 GROWTH-INDUCING IMPACTS

CEQA requires a discussion of the ways in which a project could be growth inducing. (Pub. Resources Code, §21100, subd.(b)(5); CEQA Guidelines, §§15126, subd.(d), 15126.2, subd.(d)) The CEQA Guidelines identify a project as growth-inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Under CEQA, growth inducement is not considered necessarily detrimental or beneficial. (CEQA Guidelines §15126.2, subd.(d)).

A project may indirectly induce growth by reducing or removing barriers to growth, or by creating a condition that attracts additional population or new economic activity. Projects that induce growth directly would include commercial or industrial development that hire new employees and residential development that provides housing. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in an area. Growth inducement may also occur if a project provides infrastructure or service capacity that accommodates growth beyond the levels currently permitted by local or regional land use plans. However, a project's potential to induce growth does not automatically result in growth. Growth only happens when the private or public sector responds to a change in the underlying development potential of an area with capital investment.

Typically, significant growth is induced in one of three ways. In the first instance, a project developed in an isolated area may bring sufficient urban infrastructure to cause new or additional development pressure on the intervening and surrounding land. This type of induced growth leads to conversion of adjacent acreage to higher intensity uses, either unexpectedly or through accelerated development. This conversion occurs because the adjacent land becomes more suitable for development and, hence, more valuable because of the availability of the new infrastructure. This type of growth inducement is termed "leapfrog" or "premature" development because it creates an island of higher intensity developed land within a larger area of lower intensity land use.

The second type of significant growth inducement is caused when development of a large-scale project, relative to the surrounding community or area, produces a "multiplier effect" resulting in substantial indirect community growth, although not necessarily adjacent to the development site or of the same type of use as the project itself. This type of stimulus to community growth is typified by the development of major destination facilities, such as Disney World near Orlando, Florida, or around military facilities, such as the Marine Corps Air Ground Combat Center, near Twenty-nine Palms.

A third, and subtler, type of significant growth inducement occurs when land use plans are established

that create a potential for growth, because the available land and the land uses permitted result in the attraction of new development. This type of growth inducement is also attributed to other plans developed to provide the infrastructure necessary to meet the land use objectives, or community vision, contained in the governing land use agency's general plan. In this type of growth inducement, the ultimate vision of future growth and development within a project area is established in the City or City General Plan or other comprehensive land use plan. The net effect of a General Plan's land use designations is to establish a set of expectations regarding future land use and growth that may or may not occur in the future, depending upon the actual demand and other circumstances when development is proposed. Thus, a plan may assign a particular area 100,000 square feet of commercial space, but if actual development does not ultimately generate demand for this much retail square footage, it will never be established.

New infrastructure will be built as part of this Project (reference Chapter 3, Project Description of this DEIR) which will contribute to extending improved services into the area.

At present, the Project site is vacant, undeveloped land with a 100 percent pervious earthen surface and no onsite drainage improvements. The Project site is relatively flat with an existing slope gradient estimated at less than 2%. According to *Map My County*, the Project site's average elevation is 1,460 feet above mean sea level (AMSL). In the existing undeveloped condition, on-site stormwater runoff generally sheet flows toward Ramona Expressway, Indian Street, and Perris Boulevard.

The Project applicant would construct a single 347,918-square-foot light-industrial distribution-warehouse building, access drives, walkways, parking lot, utility infrastructure, and landscaping.

The site has a gentle west to east slope with a low point at the northeast corner of the site and the proposed grading will mimic this direction of flow. With a large industrial building, the pad will be relatively flat, and the grade will slope away from the building to keep the finish floor dry. Paved areas will drain to adjacent landscape areas where water quality features, primarily vegetated swales, will be placed. Storm drain will be used to route the offsite flow from the Lowe's property (located to the west across Indian Avenue) separately through the site and into the regional storm drain. There is an existing connection to the Perris Valley Master Drainage Plan (Line E-1) at the northeast corner of the property that will be the ultimate outlet for the Project. There will be a loading bay along the south side of the building that will be set below natural grade to allow for truck loading at the finish floor elevation, and the storm drain in this area will be used to collect and store the runoff from this area in underground tanks. Runoff in those tanks will be pumped to the surface water quality facilities at the southeast corner of the site.

Access to the Project site would be provided via Indian Avenue with a full turning movement driveway near the southern edge of the Project site and aligning with the existing Lowe's property access point west of Indian Avenue. An additional right-in/right-out access will also be located on Indian Avenue to the north, closer to Ramona Expressway. Two right-in/right-out access points will be placed along Perris Boulevard. No access from Ramona Expressway is proposed. The roadway and site access improvements proposed as part of the Project include:

- **Ramona Expressway** – With recent City roadway expansion projects completed for Ramona Expressway, no changes to the existing lanes or curb location are proposed. Additional right-of-way will be dedicated, and sidewalk and right-of-way landscaping will be provided.

- **Indian Avenue** – Indian Avenue will be expanded to add a dedicated right-turn lane. The existing median will be revised to allow for southbound left turning pocket to be added for traffic entering the site. Additional right-of-way will be dedicated, and sidewalk and right-of-way landscaping will be provided.

- **Perris Boulevard** – With recent City roadway expansion projects completed for Perris Boulevard, no changes to the existing lanes, or curb location are proposed. Additional right-of-way will be dedicated, and sidewalk and right-of-way landscaping will be provided connecting the existing bus bay to the existing sidewalk to the south. The City has recently indicated a desire to restrict (i.e., preclude) additional truck traffic or access onto Perris Boulevard, including the proposed Project. Therefore, the Project includes two Access Options as described below. The City can approve the proposed site plan and select either of the Access Options at their discretion.

- **Access Option 1:** Indian Avenue. This option would have Project trucks taking access from Indian Avenue with only secondary emergency access on Perris Boulevard.

- **Access Option 2:** Perris Boulevard. This option would have Project trucks taking primary access from Perris Boulevard with secondary access from Indian Avenue.

The proposed infrastructure improvements have the potential to facilitate development of undeveloped parcels in the immediate vicinity of the site, thus the Project may indirectly induce population growth. However, this growth is anticipated in the General Plan and Specific Plan. Any impacts are considered less than significant under this evaluation criterion.

Based on this information, direct impacts from the Project will be less than significant.

As discussed in Chapter 4, Environmental Impact Evaluation, of the DEIR, the indirect effects from the Project infrastructure extensions and improvements (roadways, sewer and drainage), while anticipated under the Specific Plan, will also be considered less than significant, with the incorporation of mitigation and standard conditions.

6.2 CUMULATIVE IMPACTS

The intent of a cumulative impact evaluation is to provide the public and decision-makers with an understanding of a given project's contribution to area-wide or community environmental impacts when added to other development occurring in the region. Typically, cumulative impacts are discussed in relation to a list of past, present, and reasonably anticipated projects, or in relation to broad growth projections and related area-wide impacts identified in general (City General Plan) or regional plans (such as, SCAQMD's Air Quality Management Plan, AQMP) refer to Section 15130(b) of the State CEQA Guidelines). For the proposed Project, cumulative impacts are evaluated in the context of both types of cumulative impact forecasts. The cumulative impact projections were made using regional planning documents and site-specific technical studies. Cumulative impacts are discussed in each issue subchapter of Chapter 4 in this document. The following is a summary of cumulative impacts that are forecast to occur if the proposed Project is implemented as proposed. This information is a restatement of the cumulative impacts from Chapter 4.

Aesthetics

Development of the proposed Project will contribute to the change of the general area with an intensification of development substantially greater than that which presently occurs on the site or in the surrounding vicinity. the Project site is surrounded on three sides by existing light industrial and commercial development within an emerging mixed-use light industrial and commercial district. Due to their location and height, Project buildings will not block views from any roadways accessing residential neighborhoods including the nearby mobile home park, so there will be no impacts in this regard.

The Project site topography is generally flat and at grade with Ramona Expressway, Perris Boulevard, and Indian Avenue, adjacent properties, and the general vicinity. According to *Map My County*, the Project site's average elevation is 1,460 feet above mean sea level (AMSL); the minimum elevation is

reported at 1,460 feet AMSL and the maximum elevation is reported at 1,464feet AMSL.

The proposed Project would change the visual character of the Project site, which is currently vacant and undeveloped, by adding the distribution warehouse building and landscaping. However, the proposed Project will be consistent and compatible with existing and proposed commercial and light industrial development surrounding the Project site in terms of building height, massing, and development intensity. In addition, the proposed Specific Plan Amendment is from commercial to industrial use to the appearance and size of Project buildings will be similar to what was planned under the approved PVCCSP.

Based on the above, the proposed Project will not have a substantial adverse effect on a scenic vista from a public vantage point. Any potential impacts would be less than significant, and no mitigation is required.

As discussed in the Initial Study, the closest officially designated State Scenic Highway is Highway243, located over 20 miles east of the Project site. The Mid County Parkway project is a proposed 16-mile transportation corridor that will extend east-west along the south boundary of the PVCCSPconnecting to I-215 at the new proposed I-215/Placentia Avenue interchange (scheduled construction start Spring 2020). However, it is unknown if the Mid County Parkway project will be designated as a State Scenic Highway in the future. Construction of the proposed Project would result in modest short-term impacts to the existing visual character and quality of the area. Construction activities will require the use of equipment and storage of materials within the Project site boundaries. Construction activities are temporary and will not result in any permanent visual impact.

Implementation of the proposed Project would permanently change the visual character of the Project site by adding a distribution warehouse building structure, and landscaping, but would not change any scenic vistas or visual corridors. The proposed Project is located in an urban area andimplementation of the proposed Project would not conflict with applicable zoning and otherregulations governing scenic quality.

During Project construction, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Due to the distance between the construction area and motorists on adjacent roadways, such security lights may result in glare to motorists. However, this potential impact will be reduced to a less than significant level through the City's standard project review and approval process and with implementation of **Mitigation Measure MM-AES-1.** Implementation of the proposed Project would not introduce a substantial amount of new daytime glare to the area due to the building-type which consists of a concrete tilt-up warehouse building with relatively few windows in the limited office area.

The proposed Project would introduce new sources of nighttime light and glare into the area from additional street lighting, parking lot lighting, and building security lighting at the Project site. However, the design of all lighting at the proposed Project site will be required to comply with Chapter 19.02.110 of the City's Zoning Ordinance, which includes specifications for installation of energy-efficient lighting as well as shielding of parking lot lights to minimize spillover onto adjacentproperties and right-of-way.

The Project site is within the area covered by the Mt. Palomar Dark Sky Ordinance. The proposed Project will also be required to comply with Section 4.2.4 of the PVCC SPA9 which contains lighting standards for general, decorative, and parking lot lighting. Based on Mt. Palomar Observatory'sDark Sky Ordinance, all projects will be conditioned to use low pressure sodium.

No cumulative impacts are anticipated on these issues that were discussed in the Initial Study.

Agriculture and Forestry Resources

As stated in the Initial Study, the Project will result in a less than significant impact to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. The Project will not conflict with existing zoning for agricultural use, or a Williamson Act contract.

There is no timberland zoning on the Project site, nor is there any forest land on the Project site. Therefore the Project will not create any impacts (including cumulative impacts) to forestry resources due to a conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 122220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g)), the result in the loss of forest land or conversion of forest land to non-forest use, or involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use.

Since the proposed Project will not have any significant adverse impact to agricultural or forestry resources or resource values, it cannot make a cumulatively considerable contribution to such resources or values. The Project's cumulative agriculture/forest resources impacts are considered less than significant.

Air Quality

The Project area (as part of the SCAB) is designated as an extreme non-attainment area for ozone and a non- attainment area for PM_{10} and $PM_{2.5}$. The Project-specific evaluation of emissions presented in Subsection 4.2.4 demonstrates that the Project will not emit significant levels of criteria air pollutant or result in significant health risks to nearby sensitive receptors without Project-specific mitigation. Based on this, it can be concluded the Project would not contribute to cumulatively considerable air quality impacts on a regional basis. However, the Project will also be required to implement 17 mitigation measures from the previously certified Perris Valley Commerce Center Specific Plan (PVCCSP) EIR due to its anticipated level of NOx emissions (99.7% of the SCAQMD daily NOx standard) and the Project applicant is requesting a General Plan Amendment and Zone Change. Implementation of **PVCCSP EIR mitigation measures MM Air 2** through **MM Air 9**, **PVCCSP MM Air 13, PVCCSP MM Air 14**, and **PVCCSP MM Air 18** through **PVCCSP MM Air 20** will serve to further reduce potential Project air pollutant emissions and help assure the Project will not have cumulatively considerable impacts.

Biological Resources

Cumulative biological impacts are defined as those impacts resulting from the development within the MSHCP Plan Area as a result of build out of the Cities and County's General Plans. (MSHCP EIR/EIS). The MSHCP establishes the management of biological resources in western Riverside County (including the City of Perris) that defines cumulative biological resource values and measures the loss of biology resources that constitutes a cumulative adverse impact.

Development of the Project will contribute to the change of the general area with an intensification of development substantially greater than that which presently exists or can occur on the site or in the surrounding vicinity. The Project will not cause adverse cumulative effects related to the reduction of sensitive vegetation communities or degradation of other biology values present in western Riverside County (including the City of Perris).

With incorporation of **Mitigation Measures PVCCSP MM Bio 1** and **PVCCSP MM Bio 2,** the Project

will have a less than significant substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; and will not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

The Project will have no impacts (including cumulative impacts) as it pertains to effects on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service; or on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

There are no significant biology resources located within the Project site and the Project can be implemented consistent with the criteria identified in the MSHCP, with incorporation of **Mitigation Measures PVCCSP MM Bio 1** and **PVCCSP MM Bio 2**.

Based on incorporation of the aforementioned Mitigation Measures, and the overall lack of any habitat to support sensitive species or a substantial wildlife population, the Project will not result in adverse cumulative biology resource impacts that rise to a cumulatively considerable level. Project biology impacts are less than significant.

Cultural Resources

Perris, which is the geographical area covered by the City General Plan, including all goals and policies included therein, as well as the historic tribal area contained therein. Future development in the City could include excavation and grading that could potentially impact tribal cultural resources and human remains. The cumulative effect of the proposed Project is the continued loss of these resources. The proposed Project, in conjunction with other development in the City, has the potential to cumulatively impact cultural resources; however, it should be noted that each development proposal received by the City undergoes environmental review pursuant to CEQA. If there is a potential for significant impacts to tribal cultural resources, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures. If subsurface tribal cultural resources are assessed and/or protected as they are discovered, impacts to these resources would be less than significant.

With implementation of **Mitigation Measures MM-CR-1** and **MM-CR-2**, the contribution of the Project to the potential cumulative loss of known and unknown cultural resources throughout the City would be reduced to a less than significant level.

Energy

Energy usage is assumed to be cumulative. The proposed Project will result in an incremental use of energy during construction and operations. The energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Any impacts would be reduced to a less than significant level.

For warehousing projects in Southern California, the conversion of diesel-powered trucks to non- fossil fuels has become a major regional environmental issue. The primary state strategy for the

transportation sector for medium and heavy-duty trucks is making trucks more efficient and expediting truck turnover rather than reducing VMT from trucks. This is in contrast to the passenger vehicle component of the transportation sector where both per-capita VMT reductions and an increase in vehicle efficiency are forecasted to be needed to achieve the overall state emissions reductions goals.

Heavy-duty trucks involved in goods movements are generally controlled on the technology side and through fleet turnover of older trucks and engines to newer and cleaner trucks and engines. The first battery-electric heavy-heavy duty trucks are being tested this year and SCAQMD is looking to integrate this new technology into large-scale truck operations. The following state strategies reduce GHG emissions from the medium and heavy-duty trucks:

- CARB's Mobile Source Strategy focuses on reducing GHGs through the transition to zero and low emission vehicles and from medium-duty and heavy-duty trucks.
- CARB's Sustainable Freight Action Plan establishes a goal to improve freight efficiency by 25 percent by 2030, deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.
- CARB's Emissions Reduction Plan for Ports and Goods Movement (Goods Movement Plan) in California focuses on reducing heavy-duty truck-related emissions focus on establishment of emissions standards for trucks, fleet turnover, truck retrofits, and restriction on truck idling (CARB 2006). While the focus of Goods Movement Plan is to reduce criteria air pollutant and air toxic emissions, the strategies to reduce these pollutants would also generally have a beneficial effect in reducing GHG emissions.
- CARB's On-Road Truck and Bus Regulation (2010) requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023 nearly all trucks and buses will need to have 2010 model year engines or equivalent.
- CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation requires SmartWay tractor trailers that include idle-reduction technologies, aerodynamic technologies, and low-rolling resistant tires that would reduce fuel consumption and associated GHG emissions.

It should also be noted the SCAQMD recently instituted a new process of monitoring diesel truck use throughout the air basin in an effort to encourage conversion of diesel trucks to non-fossil fuels and improve local air quality around warehouses. On May 7, 2021, the SCAQMD adopted Rule 2305, the Warehouse Indirect Source Rule, which focuses on warehouses that are 100,000 square feet or larger and aims to slash their nitrogen oxide output using a points-based system that rewards operators for their pollution controls and charges fees depending on fleet size and rate of conversion. "About half of the air pollutants that contribute to smog come from the goods movement industry, with the largest source being heavy-duty trucks heading to warehouses across Southern California," SCAQMD Executive Officer Wayne Nastri said. "After many years of development, the adoption of this warehouse rule is a major step towards reducing air pollution and protecting the millions of people directly impacted by this type of pollution." Implementation of this rule will also help reduce future air pollutant emissions from the proposed Project, including GHGs, as well as reduce fossil fuel energy use.

In addition, the Project will implement **PVCCSP EIR Mitigation Measures MM Air 4, MM Air 11, MM Air 14**, **MM Air 19**, and **MM Air 20** to further reduce potential energy consumption related to Project construction and operation. Therefore, the Project's cumulative transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. Impacts will be less than significant.

Geology and Soils

Development of the Project will be affected by geotechnical constraints. None of the future Project-related activities are forecast to cause changes in geology or soils or the constraints affecting the Project area that cannot be fully mitigated. Geology and soil resources are inherently site specific, and the only cumulative exposure would be to a significant geological or soil constraint (onsite fault, significant ground shaking that could not be mitigated or steep slopes creating a landslide exposure).

The cumulative study area for paleontological resources is the geographical area of the City of Menifee, which is the geographical area covered by the City General Plan, including all goals and policies included therein. Future development in the City could include excavation and grading that could potentially impact paleontological resources. The cumulative effect of the proposed Project is the continued loss of these resources. The proposed Project, in conjunction with other development in the City, has the potential to cumulatively impact paleontological resources; however, it should be noted that each development proposal received by the City undergoes environmental review pursuant to CEQA. If there is a potential for significant impacts to paleontological resources, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures. If subsurface paleontological resources are assessed and/or protected as they are discovered, impacts to these resources would be less than significant. In addition, the City's General Plan policies would be implemented as appropriate to reduce the effects of additional development within the City.

According to the Initial Study, the proposed Project site is mapped in the *General Plan* as having a "High Potential" for paleontological resources (fossils). This category encompasses lands for which previous field surveys and documentation demonstrates a low potential for containing significant paleontological resources subject to adverse impacts. As such, this Project will require direct mitigation for paleontological resources. **Mitigation Measure MM-GEO-1** is required to reduce potentially significant impacts to previously undiscovered paleontological resources and/or unique geological features that may be accidentally encountered during Project implementation to a less than significant level. Cumulative impacts would also be less than significant.

Therefore, the Project has no potential to make a cumulatively considerable contribution to any significant geology or soils impact. Project soil and geology impacts are less than significant with the incorporation of **Standard Conditions SC-GEO-1, SC-GEO-2**, **SC-HYD-1**, **SC- HYD-2,** as well as **PVCCSP MM Air 3**.

Greenhouse Gas Emissions

GHG emissions are assumed to be cumulative because an individual project such as the proposed Project cannot generate enough greenhouse gas emissions to effect a discernible change in global climate. For example, statewide GHG source emissions totaled about 425.3 $MMTCO_2e$ in 2019. The proposed Project will generate less than annual equivalent emission of 9,510.65 $MTCO_2e$ (or about 0.002% of the 2019 amount).

A project may contribute to global climate change if it contributes a significant amount of greenhouse gases. However, the Project's construction and operational emissions will be below applicable significance threshold (SCAQMD Tier 3 Industrial Threshold of 10,000 $MTCO_2e$/year). Therefore, the proposed Project would not result in significant GHG impacts nor would it result in a substantial increase in the severity of GHG impacts. In addition, the Project will implement **PVCCSP EIR Mitigation Measures MM Air 2**, **MM Air 4**, **MM Air 7**, **MM Air 11**, **MM Air 13**, **MM Air 14**, **MM Air 19** and **MM Air 20** which will help further reduce potential Project GHG emissions. Therefore, Project-related GHG emissions are not considered to be cumulatively considerable and would not result in a significant impact on global climate change. Project GHG emissions are a less than significant impact.

Hazards and Hazardous Materials

The hazardous materials study area considered for cumulative impacts consists of (1) the area that could be affected by proposed activities, such as the release of hazardous materials, and (2) the areas affected by other projects whose activities could directly or indirectly affect the presence or fate of hazardous materials on site. In general, only the project site and areas adjacent to the project site are considered for cumulative impacts due to the limited potential impact area associated with release of hazardous materials into the environment.

During construction, there would be a minor amount of transport, use, and disposal of hazardous materials and wastes that are typical of construction projects. This would include fuels and lubricants for construction machinery, coating materials, etc. Routine construction control measures and best management practices for hazardous materials storage, application, waste disposal, accident prevention and clean-up, etc. would be sufficient to reduce potential impacts to a less than significant level.

Hazardous materials commonly used in conjunction with light-industrial logistics/distribution warehouse operations include relatively limited amounts of cleaners, lubricants, and pesticides. The remnants of these items and other similar products would be disposed of as household hazardous wastes that are prohibited or discouraged from being disposed of at local landfills. Regular operation and cleaning of the proposed light-industrial facility would not result in significant impacts involving the use, storage, transport or disposal of hazardous wastes and substances. Use of common household hazardous materials and their disposal does not present a substantial health risk to the community. Impacts associated with the routine transport and use of hazardous materials or wastes would be less than significant and no mitigation is required.

A limited potential exists to interfere with an emergency response or evacuation plan during construction. Construction work in the street associated with the Project will be limited to lateral utility connections (e.g., sewer) that will be limited to nominal potential traffic diversion. Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). The TCP is designed to alleviate any construction circulation impacts. The TCP is included as **PVCCSP EIR Mitigation Measure MM Air 2** and is not considered unique mitigation under CEQA. Following construction, emergency access to the Project site and area will remain as was prior to the proposed Project.

Based on historical aerial photographs, the Project site appears to have been used in conjunction with acreage to the south for agricultural purposes. Aerial photographs dated between June 2002 and June 2008 clearly show the south half of the Project site being used as part of the larger agricultural field believed to be under cultivation as a sod farm. This is consistent with information included in the PVCCSP EIR, which states, in mid-2011 a large portion of the PVCC area was undeveloped land used for agricultural purposes.

A review of the available historical aerial photographs dating back to 1994 indicate that the Project site was consistently used for agricultural purposes in the first half of the 2000's, and intermittently in the 1990's. Data prior to 1994 was not available in conjunction with this Initial Study (IS) analysis.

Agricultural activities at the Project site appear to have ceased in 2007/2008 and the site has been fallow since that time. The surface soils have been tractor bladed in recent years for weed abatement purposes. Although environmentally persistent pesticides commonly applied prior to the 1980s can linger in the soil for many years, the *Phase I ESA* evaluated the potential and did not recommend any subsequent sampling or testing. Based on the length of time that has elapsed since the agricultural usage occurred (approx. 12 years), it is unlikely the potential former usage of pesticides has significantly impaired the Project site or would require remedial actions.

Out of an abundance of caution, **Mitigation Measures MM-HAZ-1** and **MM-HAZ-2** are incorporated herein. **MM-HAZ-1** requires monitoring during ground disturbance activities and remediation if pesticides are present. **MM-HAZ-2** outlines procedures to follow should fuel tanks or other potentially hazardous materials be found during grading.

With implementation of **MM-HAZ-1** and **MM-HAZ-2**, potential impacts related to creating hazards to the public or the environment through upset and accident conditions of hazardous materials willbe reduced to less than significant levels.

There are no existing or proposed schools within a one-quarter mile distance of the Project site.

The proposed Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. There would be no impact and no mitigation is needed.

The proposed Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; as such, the proposed Project would not create a significant hazard to the public or the environment. There would be no impact and no mitigation is required.

A limited potential exists to interfere with an emergency response or evacuation plan during construction. Construction work in the street associated with the Project will be limited to lateral utility connections (i.e., sewer) that will be limited to nominal potential traffic diversion.

Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). Reference **PVCCSP EIR Mitigation Measure MM Air 2**. The TCP is designed to alleviate any construction circulation impacts. The TCP is a standard condition and is not considered unique mitigation under CEQA. Following construction, emergency access to the Project site and area will remain as was prior to the proposed Project.

Once the Project is constructed, emergency access to the Project site will be maintained via driveway curb cut aprons along both Perris Boulevard and Indian Avenue, consistent with requirements outlined in the MHFP. Additionally, the proposed Project is consistent with the industrial land use requirements outlined in the PVCCSP; therefore, the proposed Project will have a less than significant impact on implementation of the adopted emergency response plan.

All Project elements, including landscaping, will be sited with sufficient clearance from the proposed buildings so as not to interfere with emergency access to and evacuation from the site. The proposed Project is required to comply with the California Fire Code as adopted by the City of Perris Municipal Code.

The Project will comply with all applicable state, regional, and local wildfire safety regulations inclusive of the California Fire Code, the City of Perris Municipal Code, and the PVCCSP, and will not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan because no permanent public street or lane closures are proposed.

In conclusion, with the incorporation of **PVCCSP EIR Mitigation Measure MM Air 2**, implementation of the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Any potential impacts would be reduced to a less than significant level.

The Project proponent submitted a formal application to the ALUC for review and, at its July 9, 2020, meeting, the ALUC determined that the Project was consistent with the MARB / IPA (Case

ZAP1390MA19 – reference **Appendix F** of this DEIR) with a series of conditions that are incorporated into **Mitigation Measure MM- HAZ-3**. With implementation of **MM-HAZ-3**, potential impacts related to safety hazards or excessive noise for people residing or working in the project area (relative to the MARB / IPA) will be reduced to less than significant levels and no additional analysis will be required in an EIR.

The Perris Valley Airport is a privately-owned public use airport within the City. The Perris Valley Airport only has an Influence Area 1, which limits residential uses in the flight path. The proposed Project site is located approximately 4¾ miles north of the Perris Valley Airport Influence Area. Therefore, implementation of the proposed Project would not result in a safety hazard from operations at the Perris Valley Airport and no impacts would occur.

Based on adherence to **PVCCSP EIR Mitigation Measure MM Air 2** and incorporation of **Mitigation Measures MM-HAZ-1** through **MM-HAZ-3** the proposed Project will not result in adverse cumulative hazard and hazardous materials impacts that rise to a cumulatively considerable level.

Hydrology and Water Quality

The Project has been evaluated as to whether it will have a potential to cause significant flood hazards and a potential to substantially degrade water quality onsite and downstream. **Standard Conditions SC-HYD-1** through **SC-HYD-5** and design measures to control the Project's contributions to flood hazards and water quality degradation have been defined and are available to control future hydrology and water quality degradation to a less than significant impact level. With implementation of the proposed stormwater management design, as outlined in the Project Specific WQMPs, and **Standard Conditions SC-HYD-1** through **SC-HYD-5**, future stormwater runoff after development of the Project site is not forecast to make a cumulatively considerable contribution to downstream flood hazards and water quality in the Santa Ana River Watershed. This conclusion is based on the findings that the proposed **Standard Conditions SC-HYD-1** through **SC-HYD-5** and design measures will not increase runoff from the Project site and will provide adequate attenuation of water pollutants in runoff from this residential area so as not to make a cumulatively considerable contribution to the runoff volume or water pollution within the Santa Ana River Watershed. Project hydrology and water quality cumulative impacts are less than significant.

Land Use and Planning

Implementation of the proposed Project, when considered in conjunction with other existing and planned developments in the Project area, would result in developing a vacant 16-acre site into 347,918 square feet of light industrial (warehouse and office) uses. The cumulative study area analyzed for potential land use impacts is the PVCCSP within the City of Perris. The proposed change from commercial use to industrial use is generally consistent with the goals of the City General Plan and is required to be consistent with the regional ALUC restrictions. The amount of land that would be dedicated to industrial use under the proposed Project would be only an incremental amount of land already dedicated for industrial uses in the rest of the City and would generate much needed employment.

The Project would generate no new permanent residents in the City as it is assumed most of the new jobs created by the Project would be filled by local workers and/or residents. The analysis in Subsection 4.8.5 concluded that the proposed light industrial development of the Project was equivalent in terms of regional impacts compared to the existing planned commercial uses. Therefore, the Project would generally be within the growth assumptions estimated in the SCAG RTP/SCS. Project consistency with the RTP/SCS demonstrates that Project impacts are considered to be less than significant, and no mitigation is required.

The IS determined that the Project would not physically divide an established community. No impacts will occur.

Therefore, based on the analysis contained in Section 4.8, the Project will not result in significant cumulative land use or planning impacts.

Mineral Resources

As described in IS, the Project site and surrounding area do not contain any existing mineral development or any identified potential for mineral resource development. For mineral issues the amount of a mineral resource available in the region was used as the basis for cumulative impact analysis. Development of the proposed Project will not cause any adverse impacts to mineral resource or values. As a result, the proposed Project has no potential to contribute to any cumulative loss of mineral resources or values. The Project will have no cumulative adverse impact to mineralresources.

Noise

For the proposed Project, cumulative impacts are the incremental effects of the proposed Project when viewed in connection with the effects of past, current, and potential future projects within thecumulative impact area of the City of Perris. The cumulative impact area for the Project is the site and its immediate environs.

It is expected that the nearest sensitive receiver locations may also experience additional background construction noise impacts due to other project construction activities. Consistent with the cumulative impact significance thresholds outlined in the *AQ Study*, this noise analysis used thesame construction significance thresholds for project specific and cumulative impacts. Since the Project construction-noise and vibration levels satisfy the thresholds, the proposed Project construction-activities are considered less than significant on a project-specific and cumulative basis.

In addition, the Municipal Code Section 7.33.060 limits the days and hours of construction activity to avoid disturbances during the hours when persons are most to noise include recognized sleep hour for residences. Because construction activities are typically limited to weekdays, during daylight hours, this noise impact is considered a nuisance or annoying, rather than a significant impact upon surrounding land uses.

Although the *Noise Study* determined the Project would have less than significant noise impacts from Project construction, traffic, and operations, it is recommended the Project implement **Mitigation Measures PVCCSP EIR MM Noise 1** through **PVCCSP EIR MM Noise 4** to further reduce construction noiseimpacts. In addition, the *Traffic Generation Assessment* determined the Project would have less than significant direct and cumulative traffic impacts and no mitigation was required, similar to the conclusions of the *AQ Study* as well. The limited Project traffic would not make significant contributions to cumulative traffic impacts; therefore, Project traffic is not expected to make any significant contributions to cumulative noise impacts. Similarly, Project operational noise is less than significant without mitigation, so it is also not expected to make a significant contribution to
any cumulative noise impacts.

As vibration levels would generally not be perceptible to the average person and would not result in cosmetic nor structural damage to buildings, vibration impacts from Project construction would be less than significant. Since Project traffic impacts are less than significant, and there are no sensitive receptors immediately adjacent to the site, offsite vibration from Project traffic is also not expected to make a significant contribution to any cumulative vibration impacts in the surrounding region.

Based on this information, no cumulative impacts related to noise or vibration are anticipated fromthe implementation of the proposed Project.

Population and Housing

As defined in the *CEQA Guidelines,* cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for population and housing. The cumulative study area used to assess potential cumulative population and housing impacts includes the City of Perris and the County of Riverside, which is the regional context for the Project.

In order to accomplish the proposed development plan, the Project also proposes to modify the current Perris Valley Commerce Center Specific Plan (PVCCSP) land use designation for the Project site from Commercial (C) to Light Industrial (proposed PVCCSP, Amendment No. 13).

As set forth in the existing PVCCSP EIR/Initial Study, the PVCCSP included land use changes that may induce population growth relative the City's GP 2030. This conversion of land uses is reflected in the land use designations found in the Specific Plan. The PVCCSP acknowledged that it may induce population growth by providing employment opportunities, but it also noted that an overall reduction in designated residential land uses will occur as part of the PVCCSP in comparison with the GP 2030.

The PVCCSP was originally approved by the Perris City Council on January 10, 2012, as Ordinance No. 1284. There have been eleven (11) amendments to date, the most recent being Amendment No. 11, approved on October 26, 2021, as Ordinance No. 1410. There are no standards and guidelines, or mitigation measures related to population and housing resources included in the PVCCSP or associated PVCCSP EIR.

According to the US Census Bureau, the City's population as of July 2015 was 74,971 (US Census Bureau 2016). The Southern California Association of Governments (SCAG) estimates that the population of Perris is expected to increase to about 116,700 by the year 2020 although this figure is significantly above current City development conditions.

While the proposed Project will include some expansion of infrastructure, this new limited infrastructure will serve the proposed Project's specific requirements and is not anticipated to contribute to additional growth as existing development contiguous to the Project site and consistent with the PVCCSP is in place. The additional employment and infrastructure requirements to support development of the overall PVCCSP were previously addressed and analyzed in the PVCCSP EIR.

Furthermore, although the proposed Project includes a specific plan amendment to change the PVCCSP land use designation of the Project site from Commercial (C) to Light Industrial (LI), this is not considered a substantial change and the new LI designation, which is considered a less intensive land use in comparison with the existing C designation, would not attract a substantial number of people to the area.

The proposed Project does not involve construction of any new homes and will not contribute to a direct increase in the City's population. The proposed Project may indirectly contribute to population growth within the City by creating additional employment both during construction and operation. However, it is anticipated that the majority of new jobs would be filled by workers who already reside in the Project vicinity and that the Project would not attract a significant number of new residents to the City.

The IS determined that the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impact will occur.

Therefore, the direct residential population and housing growth and indirect growth from the commercial uses from the Project are not considered cumulatively considerable and significant.

Public Services

Fire Protection

The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). The proposed change in land use will not have a substantial change in the level of fire protection services needed for this property beyond those previously identified in the PVCCSP EIR.

Implementing development projects within the PVCCSP planning area will be required to annex to the North Perris Public Safety Community Facilities District (CFD) and pay a special tax for the provision of public safety (i.e., police and fire) services. These special tax proceeds help finance public safety services, including police and fire protection.

In addition, the Project site is subject to City of Perris Ordinance No. 1182 which establishes a Developer Impact Fee (DIF) to mitigate the cost of public facilities that serve new development. The Fire Department will receive a portion of the DIF to offset the impact of developing new facilities to support fire services.

It is noted that payment of DIF is a standard condition of approval by the City and is not considered mitigation under CEQA. (**Standard Condition SC-PS-1**).

An additional performance objective with respect to fire services is the provision for adequate fire flow to provide water pressures strong enough to serve the given type of construction. Without adequate fire hydrant spacing and fire flow, structures could be at undue risk and performance objectives are not met. However, the City requires new projects provide or demonstrate provision of adequate fire flow as a standard condition of approval. Therefore, impacts related to fire flow would be less than significant and no mitigation would be required under CEQA. Reference **Standard Condition SC-PS-2** (Municipal Code Section 20.01.010 (Fire Code) requires adequate hydrants (number and spacing), adequate fire flows (volume of flow per minute) and sprinklers for new structures.

With implementation of standard conditions of approval, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, any impacts related to fire protection will be less than significant and no mitigation is required.

The Project's potentially significant or cumulative considerable impacts to fire protection and emergency response services can be reduced to less than significant and payment of fees by all cumulative projects can effectively reduce the overall cumulative impacts to such services. Therefore, cumulative fire protection impacts are considered less than significant.

Police Protection

Police services were analyzed in conjunction with the PVCCSP, originally approved on January 10, 2012, as Ordinance No. 1284.

The Initial Study (IS), dated August 2009, prepared in conjunction with the PVCCSP and included as Appendix A of the PVCCSP EIR, concluded that potential impacts to Police Protection services related to the PVCCSP are Less Than Significant (no further discussion in EIR).

The Project applicant proposes to change the existing specific plan land use designation for the Project

site from Commercial (C) to Light Industrial (LI). The proposed change in land use will not have a substantial effect on anticipated police services previously identified in the PVCCSP EIR.

Implementing development projects within PVCCSP planning area will be required to annex to the North Perris Public Safety CFD and pay a special tax for the provision of public Safety (i.e., police and fire) services. These special tax proceeds help finance public safety services, including police protection.

In addition, the Project site is subject to City of Perris, Ordinance No. 1182. Ordinance No. 1182 establishes DIF to mitigate the cost of public facilities needed to serve new development. The Police Department will receive a portion of the DIF to offset the impact of developing new facilities to support police services.

It is noted that payment of DIF is required and is not considered unique mitigation under CEQA. Reference **Standard Condition SC-PS-1**.

Based on, payment of DIF (**Standard Condition SC-PS-1)** and annual taxes generated by the proposed Project, the Project's potentially significant cumulative impacts to police protection can be reduced to a less than significant level. Based on this analysis, cumulative police protection impacts are considered less than significant.

Schools

School services were analyzed in conjunction with the PVCCSP, originally approved on January 10, 2012, as Ordinance No. 1284.

The PVCCSP IS concluded that potential impacts to School services related to the PVCCSP are Less Than Significant (no further discussion in EIR).

The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). The proposed change in land use will not have a substantial impact on school services beyond that identified in the PVCCSP EIR.

Impacts to VVUSD facilities will be offset through the payment of impact fees to the VVUSD, prior to the issuance of a building permit. This fee is subject to change, and the applicable fees, at time of building permit issuance, shall apply.

Payment of these fees (**Standard Condition SC-PS-3**) is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

With the payment of these fees, cumulative impacts to school would be mitigated to a level that is considered less than significant.

Parks

Potential impacts to parks were analyzed in conjunction with the PVCCSP, originally approved on January 10, 2012, as Ordinance No. 1284.

The PVCCSP IS concluded that potential impacts to parks related to the PVCCSP are Less Than Significant (no further discussion in EIR).

The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). The proposed change in land use will not have a substantial effect on anticipated parks and recreation facilities previously identified in the PVCCSP EIR.

The Project is subject to City of Perris Ordinance No. 1182 which establishes DIF to mitigate the cost of public facilities needed to serve new development. The City's Community Services Department will receive a portion of the DIF to offset the impact of developing new facilities to support parks and recreation services. Credits may be afforded to the applicant if improvements are made to these facilities as part of the Project development.

Payment of DIF is required and is not considered unique mitigation under CEQA. Reference **Standard Condition SC-PS-1**. Project cumulative impacts to parks are less than significant.

Recreation

The cumulative study area for recreation resources is the City of Perris, which is the area used by the City when determining its park-to-population ratio goals. The City of Perris Ordinance No. 1182 incorporates park dedication procedures consistent with California Government Code Section 66477 (Quimby Act) thereby establishing a requirement for dedication of 3 acres of parkland per 1,000 population, or payment of a fee in lieu of such dedication.

The proposed Project would indirectly affect recreational facilities by providing a source of employment that may draw a limited number of new residents into the area. Appropriate developerimpact fees (DIF), as required by Ordinance No. 1182, shall be assessed and paid toward parks and recreation facilities. With the payment of these fees, the indirect impacts to parks and other recreational facilities caused by the proposed Project are considered reduced to a level that is considered less than significant.

It is noted, DIF for nonresidential development shall be paid prior to the issuance of a building permit.

Indirect impacts to park facilities will be offset through payment of the applicable Park and Recreation Facilities developer impact fees. With payment of these fees, impacts to parks and other public recreational facilities will be less than significant.

Reference **Standard Condition SC-REC-1**. It should be noted that payment of DIF's is requiredand is not considered unique mitigation under CEQA.

The cumulative impacts associated with development of the Project would be a less than significant impact to recreation resources.

Transportation

Some of the vehicle trips generated by the development on the Project site will connect to the regional CMP network. While the Project does represent an incremental increase in trips to the CMP network, this increase is not considered cumulatively considerable due to the relatively small percentage increase in regional trips it represents, and all Project-level impacts are mitigated to less than significant levels.

The proposed Project will generate an incremental amount of additional traffic on local roadways. The proposed Project is not consistent with the land use designation of the current, adopted Specific Plan (commercial), however, the use is consistent with the current ALUC land use restrictions as well as the PVCCSP Circulation Plan and the General Plan's Circulation Element. In addition, theproposed Project will install adjacent roadways to General Plan standards and will pay fair share funds to improvements on area roadways (e.g., through payment of TUMF, DIF, etc.).

The Project will be required to implement the following Mitigation Measures from the PVCCSP EIR:

PVCCSP MM Air 2 Submit a traffic control plan

PVCCSP MM Trans 1 Construct required on- and offsite roadway improvements

PVCCSP MM Trans 2 Access points must have adequate sight distance

PVCCSP MM Trans 5 Install bike racks in all parking lots

Not Required

PVCCSP MM Trans 3 Requires payment of TUMF, DIF, and NPRBBD fees (covered by **Standard Conditions SC-TR-2** through **SC-TR-4**)

PVCCSP MM Trans 4 Coordinate bus stop requirements with RTA (completed and part of site plan)

PVCCSP MM Trans 7 Prepare traffic study (Project does not generate sufficient traffic)

With implementation of **Standard Conditions SC-TR-1** through **SC-TR-4** and **PVCCSP EIR Mitigation Measures MM Trans 1**, **MM Trans 2**, and **MM Trans 5**, impacts from Project implementation will not make a significant contribution to any cumulatively considerable transportationimpacts.

Tribal Cultural Resources

The cumulative study area for tribal cultural resources is the geographical area of the City of Menifee, which is the geographical area covered by the City General Plan, including all goals and policies included therein, as well as the historic tribal area contained therein. Future development in the Citycould include excavation and grading that could potentially impact tribal cultural resources and human remains. The cumulative effect of the proposed Project is the continued loss of these resources. The proposed Project, in conjunction with other development in the City, has the potential to cumulatively impact tribal cultural resources; however, it should be noted that each developmentproposal received by the City undergoes environmental review pursuant to CEQA. If there is a potential for significant impacts to tribal cultural resources, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures. If subsurface tribal cultural resources are assessed and/or protected as they are discovered, impactsto these resources would be less than significant. In addition, the City's General Plan policies wouldbe implemented as appropriate to reduce the effects of additional development within the City.

With implementation of **Mitigation Measures MM-CR-1** and **MM-CR-2**, the contribution of the Specific Plan to thecumulative loss of known and unknown tribal cultural resources throughout the City would be reduced to a less than significant level.

Utilities and Service Systems

According to the EMWD, there is an adequate water supply and wastewater treatment capacity, respectively, to meet the demand of the Project(s). Based on the analysis and referenced documentation, water and wastewater management systems are capable of meeting the cumulative demand for these systems. The Project will have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years with adherence **Standard Conditions SC-USS-1** through **SC-USS-4** impacts to water, wastewater,and solid waste are considered less than significant. Thus, the Project will not cause cumulatively considerable significant adverse impacts on these systems. With implementation of the proposed stormwater management design, as outlined in the Project Specific WQMPs, and **Standard Conditions SC-HYD-1** through **SC-HYD-5**, future stormwater runoff after development of the Project site will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and is not forecast to make a

cumulatively considerable contribution to downstream flood hazards in the Santa Ana River Watershed.

Cumulative impacts to landfill capacity will be less than significant due to the Project construction debris and operational waste representing a less than substantial cumulative increment with adherence to **Standard Condition SC-USS-4**. Additionally, this Project implements the stormwater / drainage infrastructure requirements as laid out in the Perris Valley Commerce Center Specific Plan. Therefore, due to available capacity and implementation of **SC-USS-4**, whichprovides for recycling on site to reduce Project operational waste, cumulative impacts to the existinglandfills resulting from waste generated by Project implementation are considered less than significant.

Lastly, the Project will not require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. No cumulative impacts will result from the Project.

Wildfire

According to the IS, the Project would have a less than significant impact such that it would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan (see **PVCCSP EIR Mitigation Measure MM Air 2**). The Project site is not located within an area identified as a very high fire hazard severity according to the 2008 CalFire maps utilized by the Fire Department.

The Project will not have a cumulative effect due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities)that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes; or, expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands (see **PVCCSP EIR Mitigation Measure MM Air 2**).

Conclusion

Based on the detailed cumulative impact analysis provided in Chapter 4 for each environmental issue, and as summarized in this Chapter, cumulatively considerable environmental impacts are forecast to result to air quality and transportation from implementing the proposed Project as described in Chapter 3 of this Draft EIR.

6.3 SIGNIFICANT IRREVERSIBLE AND/OR UNAVOIDABLE ENVIRONMENTALIMPACTS

In considering the topic of “Significant Irreversible and/or Unavoidable Environmental Impacts,” it is important to define the terminology that is used in making impact forecasts. For example, an “unavoidable significant adverse environmental impact” is an effect of a proposed Project that cannotbe avoided or reduced below some specific threshold of significance by any available or feasible mitigation measure or feasible alternative to that Project. These impacts are discussed in the subchapter text for each environmental issue in Chapter 4 of this document.

An irreversible impact is an impact that once experienced, cannot be changed or modified, by any means. Irreversible impacts have more nuance than do unavoidable impacts. For example, if a project results in the death of the last individual of an endangered species, this impact cannot be reversed (at

least with technology available at this time). At least for the present, we cannot make any more individuals of the species. On the other hand, if air emissions from a project exceed established thresholds and are considered significant, it is feasible that future improvements in air emissions controls could reverse this impact and reduce (reverse) or perhaps eliminate the air emissions and reduce or reverse the significant impact. For example, if project mobile source emissions contribute to a significant air quality impact, increase availability and/or adoption of electric vehicles could reduce the air quality emissions attributable to the project. Thus, the potential for a reversal of an identified impact, be it less than significant or significant, depends on the time scale used for evaluation (forever or just next year) and the likelihood that sufficient resources (societal or individual) will be applied to reverse an impact.

Another example that illustrates this topic is the potential exposure of people to an accidental spill of an acutely hazardous or toxic substance. If the threat is significant enough, society will demand that such exposure be eliminated immediately. Thus, such a spill and the related exposure to the hazard may be a significant environmental impact but it is typically immediately reversed. Where it is not reversed the potential significant effects will remain until sufficient individual or societal resources are expended to eliminate the hazard.

6.3.1 Irreversible Environmental Impacts

The following analysis of irreversible environmental effects is presented for the reviewer's consideration.

Section 15126.2 (c) of the *Guidelines for the California Environmental Quality Act (CEQA Guidelines)* requires that the EIR consider and discuss significant irreversible changes that would be caused by implementation of the proposed Project. The CEQA Guidelines specify that the use of nonrenewable resources during the construction and operation of the project be discussed because a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary and secondary impacts (such as a highway improvement that provides access to a previously inaccessible area) should also be discussed because such changes generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with the Project and should be discussed.

Project development is an irreversible commitment of the land. After the 50- to 75-year structural lifespan of the buildings is reached, it is improbable that the site would revert to an undeveloped state. Once developed, the proposed Project would have indefinitely altered the characteristics of the Project site from vacant land to one characterized by residential, open space, and park uses.

Construction of the Project would result in a commitment of limited, slowly renewable, and nonrenewable resources. Such resources may include certain types of lumber and other forest products; raw materials such as steel; aggregate materials used in concrete and asphalt such as sand and stone; water; petrochemical construction materials such as plastic; and petroleum-based construction materials. Fossil fuels used by construction equipment would also be consumed. Project construction will also result in an increased commitment of public maintenance services such as waste disposal and sewage treatment.

Similarly, operation of the proposed Project would result in the commitment of limited, nonrenewable, and slowly renewable resources such as natural gas, electricity, petroleum-based fuels, fossil fuels, and water. Title 24 of the California Code of Regulations (CCR) requires conservation practices that will limit the amount of energy consumed by the proposed Project. Compliance with Title 24 is mandated by the State, and participation in the Leadership in Energy and Environmental Design (LEED) program is voluntary. Nevertheless, the use of such resources by the proposed Project will continue to represent a long-term commitment of essentially nonrenewable resources.

Operation of the proposed Project would also require potable water. The water supply/demand associated with Project's proposed Light Industrial use is anticipated to be less than the water supply/demand associated with the existing Commercial land use reflected in the above PVCC water supply/demand analysis. This conclusion is supported by data from the EMWD website which indicates the water consumption rate for light industrial/manufacturing uses is 120 gallons per thousand square feet compared to the rate for commercial uses at 150 gallons per thousand square feet. Therefore, since there will be less of a demand for water than the PVCC EIR anticipated, there is not a significant impact to water supplies or water demand. However, the increase in water use will continue to represent a long-term commitment of this essentially nonrenewable resource.

On-site surface water drainage in the developed condition would be different from the existing natural condition, as described in Subchapter 4.7, Hydrology and Water Quality. Project hydrology would meet drainage system standards, and pollutants of concern would be controlled through implementation of structural and nonstructural best management practices (BMPs) during Project construction and operation.

Burrowing owls and their nests and eggs are protected from "take" (meaning destruction, pursuit possession, etc.) under the Migratory Bird Treaty Act (MBTA) of 1918 and under Sections 3503, 3503.5, and 3800 of the California Fish and Game Code. Activities that cause destruction of active nests, or that cause nest abandonment and subsequent death of eggs or young, may constitute violations of one or both of these laws. The MSHCP identifies the project site as being located within the designated survey area for burrowing owl, requiring a burrowing owl suitability assessment to be conducted. No burrowing owls or recent signs (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. Based on the results of the field investigation, it was determined that the project site is vegetated with a variety of low- growing plant species that allow for the line-of-sight observation opportunities favored by burrowing owl. However, no small mammal burrows that have the potential to provide suitable burrowing owl nesting habitat (>4 inches in diameter) were observed within the boundaries of the site. In addition, the site is surrounded by an assortment of tall poles, signs, walls, and structures that provide perching opportunities for large raptors (i.e., red-tailed hawk [*Buteo jamaicensis*]) that can prey on burrowing owl. Based on this information, it was determined that the potential for burrowing owl to occur on-site is negligible.

However, **Mitigation Measure PVCCSP MM Bio 2** from the Perris Valley Commerce Center Specific Plan shall be implemented by the project. This condition of approval requires a development project to conduct focused surveys for the Borrowing Owl within 30-days of commencement of grading and construction activities.

Although the burrowing owl was no longer present on site during the burrowing owl portion of the survey, suitable habitat is present, and the site could eventually be reoccupied. The potential reoccupation of the suitable habitat would represent a significant impact. Implementation of **Mitigation Measures PVCCSP MM Bio 1** and **PVCCSP MM Bio 2**, as outlined below in Subsection 4.3.5, will ensure that potential impacts to burrowing owls are reduced to less than significant levels by requiring that a preconstruction survey for burrowing owl is prepared no more than 30 days prior to ground disturbance and requiring that if grading is to occur during the nesting season (February 15 – August 31), a nesting bird survey shall be conducted within ten (10) days prior to grading permit issuance, in accordance with MSHCP survey requirements.

With incorporation of **Mitigation Measures PVCCSP MM Bio 1** and **PVCCSP MM Bio 2**, Project impacts would be reduced to less than significant level such that the Project would not conflict with the MSHCP (the adopted Habitat Conservation Plan).

As stated earlier, payment of the MSHCP Mitigation Fee (**Standard Condition SC-BIO-1**), and the Stephens' Kangaroo Rat Fee (**Standard Condition SC-BIO-2**) are mandatory and require the Project

applicant to pay these fees prior to the issuance of a grading permit and building permit, respectively. Payment of this fee is not considered unique mitigation under CEQA.

In addition, site topography would be modified per the conceptual grading plan for the site, and on-site topography would be substantially different after Project implementation.

The commitment of limited, slowly renewable, and nonrenewable resources required for construction and operation of the proposed Project would limit the availability of these resources for future generations or for other uses during the life of the Project.

6.3.2 Significant Unavoidable Environmental Impacts

The analysis provided in the Initial Study prepared as part of the NOP for the Project, as well as analysis provided in Subchapters 4.2 through 4.12 of this DEIR, determined that the Project would not have a Significant Irreversible and/or Unavoidable Environmental Impacts after implementation of any recommended mitigation measure.

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CHAPTER 7 – PREPARATION RESOURCES

7.1 REPORT PREPARATION

7.1.1 Lead Agency

City of Perris
Chantal Power, AICP,
Contract Planner101
North D Street
Perris, CA 92570
909.754.1653
cpower@interwestgrp.com

7.1.2 EIR Consultant

Matthew Fagan Consulting Services, Inc., Matthew Fagan,
Owner42011 Avenida Vista Ladera
Temecula, CA 92951
951.265.5428
matthewfagan@roadrunner.com

7.1.3 EIR Technical Consultants

- Air Quality, Greenhouse Gases, Energy, Health Risk Assessment, Noise,Traffic/VMT – Urban Crossroads
- Biology – ELMT Consulting
- Cultural – Jean A. Keller, Ph.D.
- Geotechnical – Geocon West
- Paleontological – CRM Tech
- Phase 1 ESA – Krazan & Associates, Inc.
- Hydrology, Water Quality – United Engineering Group, Inc., CA

7.2 SOURCES/REFERENCES

- CalRecycle, SWIS Facility Detail, El Sobrante Landfill (33-AA-0217) https://www2.calrecycle.ca.gov/swfacilities/Directory/33-AA-0217

- City of Perris General Plan https://www.cityofperris.org/departments/development-services/general-plan

- City of Perris General Plan - Final Environmental Impact Report http://www.cityofperris.org/city-hall/general-plan/General_Plan_2030.pdf

- City of Perris – Municipal Code, Title 19, Zoning, Chapter 19.68, Fees, Section 19.68.020 Development Impact Fees https://www.cityofperris.org/departments/development-services/municipal-code

- City of Perris Ordinance No. 1352 “Western Riverside County Transportation Uniform

Mitigation Fee Program Ordinance of 2017"
https://www.cityofperris.org/home/showpublisheddocument/2823/637250455869830000

- City of Perris, Perris Trail Master Plan, adopted February 26, 2013, Resolution No. 4562; https://www.cityofperris.org/home/showdocument?id=467

- Final Environmental Impact Report Perris Valley Commerce Center Specific Plan https://www.cityofperris.org/home/showpublisheddocument/13874/637455522381730000

- Eastern Municipal Water District Comprehensive Annual Financial Report for the Fiscal Year Ended June 30, 2020 https://www.emwd.org/sites/main/files/file-attachments/2020_cafr_-_final_for_web.pdf?1608140100

- Eastern Municipal Water District, 2020 Urban Water Management Plan, prepared by EMWD (EMWD 2020 UWMP), 7-1-2021 https://www.emwd.org/post/urban-water-management-plan

- Eastern Municipal Water District 2020 Urban Water Management Plan (EMWD 2020 UWMP); Metropolitan Water District 2020 Urban Water Management Plan (2020 RUWMP) https://www.emwd.org/post/urban-water-management-plan

- EMWD Charges and Deposits https://www.emwd.org/post/charges-and-deposits

- EMWD Consolidated Schedule of Rates, Fees and Charges (proposed for June 16, 2021 Board Approval) https://www.emwd.org/sites/main/files/file-attachments/ratebook.pdf?1609791522

- El Sobrante Landfill Annual Monitoring Report, Jan 1, 2020 through Dec 31, 2020, by USA Waste of CA, Inc., dated August 2021 (Final) http://www.rcwaste.org/Portals/0/Files/ElSobrante/2021/Final%202020%20Annual%20Report-%20El%20Sobrante%20Landfill.pdf

- El Sobrante Landfill Fact Sheet, issued by Waste Management of California, accessed May 2019 https://www.wmsolutions.com/pdf/factsheet/El_Sobrante_Landfill.pdf

- Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map (FIRM), Panel 06065C1430H in the City of Perris. FEMA website https://msc.fema.gov/portal/home

- Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017) https://www.ite.org/technical-resources/topics/trip-and-parking-generation/trip- generation-10th-edition-formats/

- Metropolitan Water District (MWD), 2020 Urban Water Management Plan prepared by MWD (MWD 2020 UWMP), 3-2021

https://www.mwdh2o.com/media/18118/draft_metropolitan_2020_uwmp_march_2021.pdf

- North Perris Road and Bridge Benefit District Analysis Report, Albert A. Webb and Associates, June 2008; https://www.cityofperris.org/home/showpublisheddocument/6063/637250732251000000

- Ordinance No. 458 (An Ordinance of the County of Riverside Regulating Special Flood Hazard Areas and Implementing the National Flood Insurance Program, adopted by the City of Perris as Municipal Code Title 15, Floodplain Regulations) https://library.municode.com/ca/perris/codes/code_of_ordinances?nodeId=COOR_TIT15FLRE

- Ordinance No. 2009-62 "Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance of 2009" http://riversidecounty-ca.elaws.us/code/coor_title4_ch4.58_sec4.58.060

- Perris Valley Regional Water Reclamation Facility – Fact Sheet, issued by EMWD, dated January 2021 https://www.emwd.org/sites/main/files/file-attachments/pvrwrffactsheet.pdf

- 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf

- 2020-2045 RTP/SCS Final Program EIR (SCH#2019011061) – Section 3.11 Land Use and Planning http://scagrtpscs.net/Documents/2020/peir/draft/2020PEIR_3_11_LandUseandPlanning.pdf

- SCAG Sustainability Planning Grant website http://sustain.scag.ca.gov/Pages/Grants%20and%20Local%20Assistance/GrantsLocalAssistance.aspx

- Southern California Association of Governments website http://www.scag.ca.gov/about/Pages/Home.aspx

- State of California Code of Regulations § 15064.3. https://regulations.justia.com/states/california/title-14/division-6/chapter-3/article-5/section-15064-3/

- U.S. Environmental Protection Agency (USEPA), 2012. National Pollutant Discharge Elimination System (NPDES), Integrated Planning for Municipal Stormwater and Wastewater. USEPA website https://www.epa.gov/npdes/integrated-planning-municipal-stormwater-and-wastewater

- Water Efficient Guidelines for New Development, July 19, 2013 http://www.emwd.org/home/showdocument?id=6987

- Western Riverside Council of Governments website
  http://www.wrcog.cog.ca.us

- Western Riverside County Multiple Species Habitat Conservation Plan
  http://rctlma.org/Portals/0/mshcp/volume1/sec6.html

- WRCOG Regional System of Highways and Arterials, Transportation Uniform Mitigation Fee Program – Figure 4.4
  https://wrcog.us/DocumentCenter/View/280/2011-Regional-System-of-Highways-and-Arterials-RSHA-Map-PDF?bidId=

- WRCOG Transportation Uniform Mitigation Fee Calculation Handbook, PB 10-7-2015
  https://wrcog.us/DocumentCenter/View/268/TUMF-Fee-Calculation-Handbook-PDF?bidId=

CHAPTER 8 – APPENDICES

8.1 NOTICE OF PREPARATION (NOP) / NOP DISTRIBUTION LIST

8.2 NOP COMMENT LETTERS AND SCOPING MEETING COMMENTS

8.3 INITIAL STUDY

8.4 TECHNICAL APPENDICES/MATERIALS USED TO PREPARE THE DEIR

APPENDIX 8.1

NOTICE OF PREPARATION / NOP DISTRIBUTION LIST

NOTICE OF PREPARATION
DRAFT ENVIRONMENTAL IMPACT REPORT

To:

(Potential Responsible, Trustee, Federal and Local Agencies and nearby property owners)

From:

City of Perris
Planning Division
135 North "D" Street
Perris CA, 92570

CEQA LEAD AGENCY:

City of Perris
Planning Division
135 North "D" Street
Perris, California 92570
Phone (909) 754-1653, FAX (951) 943-8379
Staff Contact: Chantal Power, AICP, Contract Planner
Email: cpower@interwestgrp.com

SUBJECT: Perris Valley Commerce Center Specific Plan, Amendment No. 10 (SPA 10) & Development Plan Review 19-00012 Environmental Impact Report

The City of Perris (City) will be the Lead Agency and is commencing preparation of a Draft Environmental Impact Report (EIR) for the warehouse Project described herein. The City wants to know the views of your agency as to the scope and content of the environmental information germane to your agency's statutory responsibilities. As a responsible or trustee agency, your agency may need to use the EIR prepared by the City when considering issuance of a permit or other approval for the project. The City also wants to know the issues of concerns to the nearby property owners. Information gathered during the NOP comment period will be used to shape and focus future analyses of environmental impacts.

Project Site Location and Setting:

The Project site is located in the City of Perris, County of Riverside, State of California. The Project site is bounded as follows: Ramona Expressway to the immediate north and commercial and light industrial uses to the north of Ramona Expressway; light industrial uses to the south; Perris Boulevard to the immediate east and commercial uses east of Perris Boulevard; and Indian Avenue to the immediate west and light industrial uses to the west of Indian Avenue. The Project site totals approximately 16 acres on Assessor's Parcel Number 303-060-020, USGS 7.5 minute series Perris Quadrangle map Section 7, Township 4 south, Range 3 west.

The existing and proposed General Plan Land Use Designation for the Project site is Perris Valley Commerce Center Specific Plan (PVCCSP). The existing Zoning Classification is Perris Valley Commerce Center Specific Plan (commercial).

Project Description:

The Applicant for PVCC SPA No. 10 proposes to modify the current Specific Plan Land Use Designation of the Project site as follows:

> Current Land Use - Commercial (C): This zoning designation provides for retail, professional office, and service-oriented business activities which serve the entire City, as well as the surrounding neighborhoods. This zone combines the General Plan Land Use designation of Community Commercial and Commercial Neighborhood.
>
> Proposed Land Use - Light Industrial (LI): This zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. This zone correlates with the 'Light Industrial' General Plan Land Use designation.

The Applicant believes that LI designation is better suited to the restrictions in place for the Project site by the March Air Reserve Base/Inland Port Airport Influence Area.

The Project would involve development of the 16-acre site with an approximate 347,918-square-foot (sq. ft.) light industrial building; the building will be divided into 339,918 sq. ft. of non-refrigerated warehouse space and 8,000 sq. ft. of office space. The Project has been designed in compliance with the industrial design standards and guidelines contained within the PVCCSP. The proposed building would be located in the central portion of the Project site, with parking to the east, west, and south. The plan provides designated, outdoor employee break areas on both the east and west sides of the proposed building. The proposed building would be a maximum of 45 feet tall and would include aesthetic treatments such as varying building height and rust colored metal awnings and has an overall grey color scheme with white accents.

Potential Environmental Effects:

Based on the Initial Study prepared for the proposed project, the City will address the following potentially significant impacts in the Draft EIR: Air Quality, Biological Resources, Cultural Resources, Energy, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities and Service Systems.

Agency/Public Comments:

This transmittal constitutes the official Notice of Preparation (NOP) for the proposed Project Draft EIR and serves as a request for environmental information that you or your organization believe should be included or addressed in the proposed Draft EIR document. Please be sure to address the scope and content of environmental information or issues that may relate to your agency's statutory responsibilities in connection with the proposed Project.

Draft EIR Public Scoping Meeting:

Notice is hereby given that the City of Perris will hold a Draft EIR scoping meeting for the general public and any interested agencies. The Scoping meeting will be held during the regularly scheduled Planning Commission meeting on **May 19, 2021, at 6:00 p.m.** The scoping meeting will be held **in the City Council Chambers of the City of Perris, 101 North "D" Street**. At the meeting, the City will provide background information on environmental impact reports, provide a brief overview of the Project and will solicit public input on environmental issues to be addressed in the Draft EIR and on items of public concern. Issues identified during the scoping meeting will be addressed in the Draft EIR (as appropriate).

Purpose of the Notice of Preparation:

The purpose of this NOP is to fulfill legal notification requirements and inform the public, and CEQA Responsible and Trustee Agencies, that an EIR is being prepared for the proposed Project by the City. This NOP solicits agency and interested party concerns regarding the potential environmental effects of implementing the proposed Project at the Project location. CEQA encourages early consultation with private persons and organizations that may have information or may be concerned with any potential adverse environmental effects related to physical changes in the environment that may be caused by implementing the project. Responses to the NOP that specifically focus on potentially significant environmental issues are of particular interest to the City of Perris. All written responses to this NOP will be included in the appendices to the EIR. The content of the responses will help guide the focus and scope of the EIR in accordance with State CEQA Guidelines.

NOP COMMENT PERIOD:

The City invites you to submit written comments describing your specific environmental concerns. If you are representing a public agency, please identify your specific areas of statutory responsibility if applicable. Written comments are desired at the earliest possible date, but due to the time limits mandated by State law, your response must be sent no later than 30 days after receipt of this notice. **The NOP public comment period begins on May 5, 2021 and ends on June 4, 2021.** Comments must be submitted in writing, or via email, to the City staff contact identified above, and please include your name, address, and contact information in your correspondence.

The Initial Study for the Project may be viewed in person at City Hall or downloaded from the City's website:

Initial Study and Technical Appendices
https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review

City of Perris General Plan and EIR
https://www.cityofperris.org/departments/development-services/general-plan

Perris Valley Commerce Center Specific Plan and EIR
https://www.cityofperris.org/departments/development-services/specific-plans

Initial Study and Technical appendices will also be available on the CEQANET website:
https://ceqanet.opr.ca.gov/

The City of Perris appreciates your conscientious attention to this Notice of Preparation.

Project Title: PVCCC SPA 10 and DPR 19-00012

Project Applicant: PR Partners, LLC
C/O Pacific Development Partners
30220 Rancho Viejo Road, Suite B
San Juan Capistrano, CA 92675
Point of Contact: Lars Andersen
lars@pdpsjc.net

Date: April 28, 2021

Signature: _____
Chantal Power, AICP, Contract Planner

City of Moreno Valley
Planning Department – CEQA Review
14177 Frederick Street
Moreno Valley, CA 92552
(DPR 19-00012)

Southern California Association of Governments - CEQA Review
3403 10th Street, Suite 805
Riverside, CA 92501
(DPR 19-00012)

City of Menifee
Planning Department - CEQA Review
29844 Haun Rd
Menifee, CA 92586
(DPR 19-00012)

California Department of Transportation
Division of Aeronautics, MS #40 (CEQA Review)
P.O. Box 942874
Sacramento, CA 94274-0001
(DPR 19-00012)

South Coast Air Quality Management District
CEQA Review
21865 Copley Drive
Diamond Bar, CA 91765
(DPR 19-00012)

Western Riverside Council of Governments
CEQA Review
4080 Lemon Street, 3rd Floor MS1032
Riverside, CA 92501-3609
(DPR 19-00012)

Riverside County Transportation Commission
CEQA Review
P.O. Box 12008
Riverside, CA 92502
(DPR 19-00012)

Santa Ana Regional Water Quality Control Board - CEQA Review
3737 Main Street, Suite 500
Riverside, CA 92501
(DPR 19-00012)

Rincon Band of Luiseno Indians
Attn: Jim McPherson - CEQA
One Government Center Lane
Valley Center, CA 92082
(DPR 19-00012)

Native American Heritage Commission
CEQA Review
1556 Harbor Blvd.
West Sacramento, CA 95691
(DPR 19-00012)

UCR Archaeological Research Unit
Watkins Hall #1306A
CEQA Review
Riverside, CA 92521
(DPR 19-00012)

California Integrated Waste Management Board - CEQA Review
P.O. Box 4025
Sacramento, CA 95812-4025
(DPR 19-00012)

Riverside County Flood Control & Water Conservation District
CEQA Review
1995 Market Street
Riverside, CA 92501
(DPR 19-00012)

California Department of Transportation – District 8 - CEQA Review
464 West 4th Street
San Bernardino, CA 92401
(DPR 19-00012)

Riverside Co Airport Land Use Commission
County Administration Center - CEQA
4080 Lemon St., 14th Floor
Riverside, CA 92501
(DPR 19-00012)

Regional Conservation Authority Western Riverside County
CEQA Review
3403 10th St #320
Riverside, CA 92501
(DPR 19-00012)

CAL Fire
CEQA Review
2524 Mulberry St
Riverside, CA 92501
(DPR 19-00012)

Pechanga Band of Luiseno Indians
CEQA Review
P.O. Box 1477
Temecula, CA 92593
(DPR 19-00012)

Soboba Band of Luiseño Indians
Attn: Joseph Ontiveros - CEQA
P.O. Box 487
San Jacinto, CA 92581
(DPR 19-00012)

Riverside Co. Dept. of Environmental Health
CEQA Review
800 S. Sanderson Avenue
Hemet, CA 92545
(DPR 19-00012)

Eastern Municipal Water District
Attn: CEQA Review
P.O. Box 8300
Perris, CA 92572-8300
(DPR 19-00012)

U.S. Fish & Wildlife Service
Carlsbad Fish & Wildlife Office - CEQA Review
2177 Salk Ave #250
Carlsbad, CA 92008
(DPR 19-00012)

Riverside County Planning Department
Attn: CEQA Review
4080 Lemon Street, 12th FL
Riverside, CA 92501-3634
(DPR 19-00012)

March Air Reserve Base
452SPTG/CE
Brian Shaw, Base Civil Engineer (CEQA)
610 Meyer Drive
March ARB, CA 92518-2166
(DPR 19-00012)

March Air Reserve Base
452SPTG/CE
Brian Pacino, AICP (CEQA)
2145 Graeber Street
March ARB, CA 92518-2166
(DPR 19-00012)

Riverside Transit Agency
CEQA Review
P.O. Box 59968
Riverside, CA 92517-1968
(DPR 19-00012)

March Joint Powers Authority
CEQA Review
14205 Meridian Pkwy, Suite 140
Riverside, CA 92518-3045
(DPR 19-00012)

Riverside County Fire Department
CEQA Review
2300 Market Street, Suite 140
Riverside, CA 92501
(DPR 19-00012)

Agua Caliente Band of Cahuilla Indians
CEQA Review
Tribal Historic Preservation Office
5401 Dinah Shore Drive
Palm Springs, CA 92264
(DPR 19-00012)

Desert Cahuilla Indians Torres Martinez
CEQA Review
P.O. Box 1160
Thermal, CA 92274
(DPR 19-00012)

Southern California Edison
CEQA - Third Party Environmental Review
2244 Walnut Grove Ave. Quad 4C 472A
Rosemead, CA 91770
(DPR 19-00012)

Southern California Edison
CEQA Review - Local Public Affairs
26100 Menifee Road
Romoland, CA 92585
(DPR 19-00012)

CR&R Incorporated
CEQA Review
P.O. Box 1208
Perris, CA 92572
(DPR 19-00012)

Perris Police and Sheriff's Department
CEQA Review
137 N. Perris Blvd.
Perris, CA 92570
(DPR 19-00012)

Time Warner Cable
CEQA Review
425 Corona Freeway
Corona, CA 92879
(DPR 19-00012)

The Gas Company
CEQA Review
527 N. San Jacinto Street
Hemet, CA 92548
(DPR 19-00012)

Verizon California, CA 310 IL
CEQA Review
2849 Ficus Street
Pomona, CA 91766
(DPR 19-00012)

Val Verde Unified School District
CEQA Review
975 W. Morgan Street
Perris, CA 92571
(DPR 19-00012)

California Department of Fish & Game
CEQA Review
3602 Inland Empire Blvd., Suite C-220
Ontario, CA 91764
(DPR 19-00012)

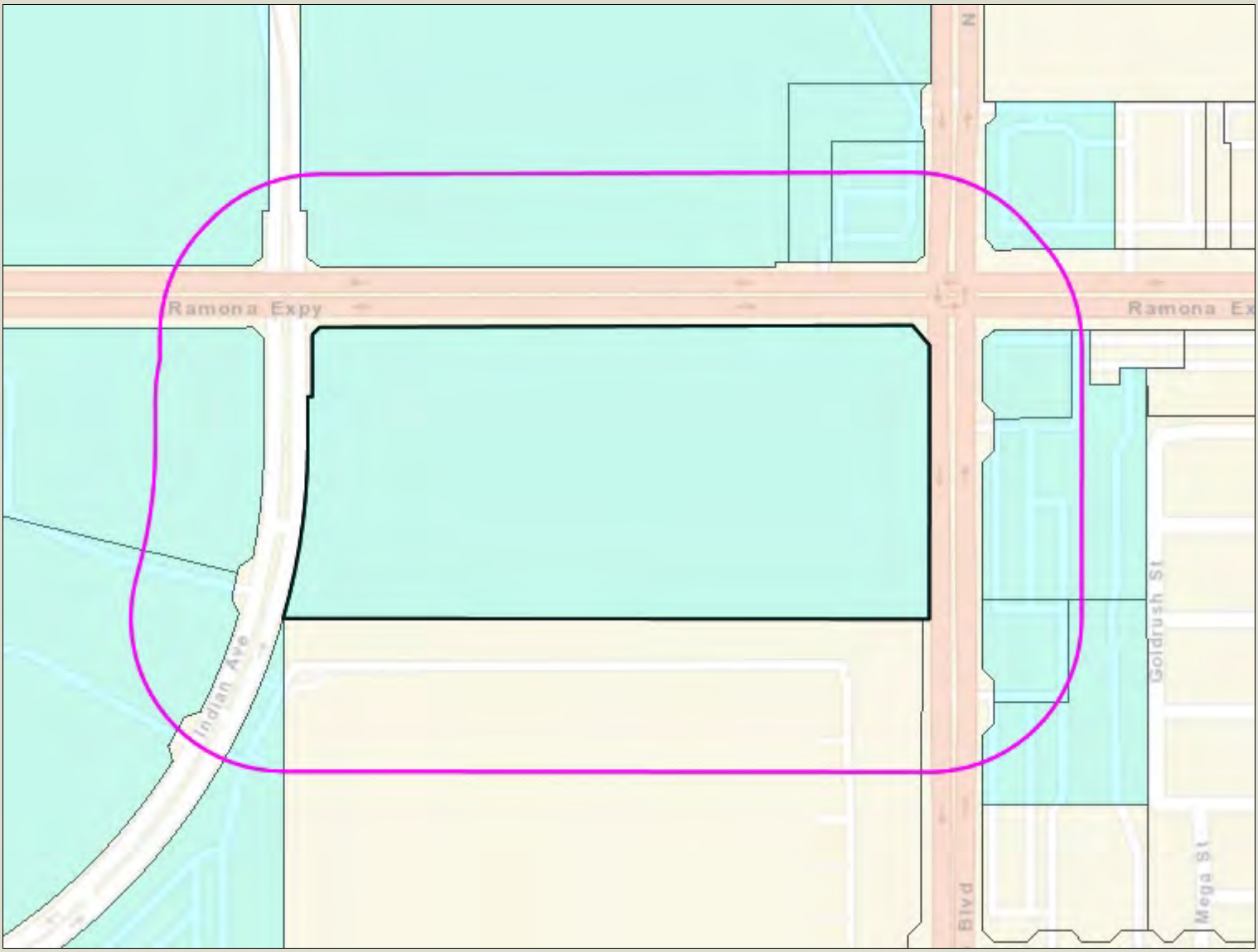
Mitchell M. Tsai, Attorney at Law
155 South El Molino Avenue, Suite 104
Pasadena, CA 91101
(DPR 19-00012)

Lozeau | Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
(DPR 19-00012)

Richard Drury, Theresa Rettinghouse, Komalpreet Toor, Hannah Hughes
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
(DPR 19-00012)

Riverside County GIS Mailing Labels

APN: 303-060-020 (300 feet buffer)



Legend

- County Boundary
- Cities
- Parcels
- World Street Map

Notes

0 376 752 Feet

IMPORTANT Maps and data are to be used for reference purposes only. Map features are approximate, and are not necessarily accurate to surveying or engineering standards. The County of Riverside makes no warranty or guarantee as to the content (the source is often third party), accuracy, timeliness, or completeness of any of the data provided, and assumes no legal responsibility for the information contained on this map. Any use of this product with respect to accuracy and precision shall be the sole responsibility of the user.

REPORT PRINTED ON... 4/27/2021 8:19:27 AM

© Riverside County RCIT

PROPERTY OWNERS CERTIFICATION FORM

I, VINNIE NGUYEN certify that on April 27, 2021,

The attached property owners list was prepared by Riverside County GIS,

APN (s) or case numbers 303-060-020 for

Company or Individual's Name RCIT - GIS,

Distance buffered 300'

Pursuant to application requirements furnished by the Riverside County Planning Department. Said list is a complete and true compilation of the owners of the subject property and all other property owners within 300 feet of the property involved.

I further certify that the information filed is true and correct to the best of my knowledge. I understand that incorrect or incomplete information may be grounds for rejection or denial of the application.

TITLE: GIS Analyst

ADDRESS: 4080 Lemon Street 9TH Floor

Riverside, Ca. 92502

TELEPHONE NUMBER (8 a.m. – 5 p.m.): (951) 955-8158

302060038
IDIL RAMONA
1197 PEACHTREE ST STE 600
ATLANTA, GA 30361
(DPR 19-00012)

302060041
BOMBAY PARTNERS V ONTARIO
3535 INLAND EMPIRE BLVD
ONTARIO, CA 91764
(DPR 19-00012)

302060040
PERRIS EXPRESS WASH INC
19510 VAN BUREN BLVD # F-484
RIVERSIDE, CA 92508
(DPR 19-00012)

302130038
ELZA HANCZ
1001 LEXINGTON RD
BEVERLY HILLS, CA 90210
(DPR 19-00012)

303060010
LOWES H I W INC
PO BOX 1000
MOORESVILLE, NC 28115
(DPR 19-00012)

303060021
3900 INDIAN AVENUE
601 S FIGUEROA ST NO 3400
LOS ANGELES, CA 90017
(DPR 19-00012)

303100033
PERRIS EXPRESSWAY CENTER, LP
25401 CABOT RD STE 208
LAGUNA HILLS, CA 92653
(DPR 19-00012)

303060016
LOWES H I W INC
1000 LOWES BLVD
MOORESVILLE, NC 28117

303100037
TWO LLC REPI
25401 CABOT RD # 208
LAGUNA HILLS, CA 92653

303100032
O'REILLY AUTO ENTERPRISES
PO BOX 9167
SPRINGFIELD, MO 65801
(DPR 19-00012)

303100017
CIRCLE K STORES INC
PO BOX 52085
PHOENIX, AZ 85072
(DPR 19-00012)

302060039
SAFAR & SAFAR BROTHERS INC
14453 SALINE DR
CORONA, CA 92880
(DPR 19-00012)

303060020
PR PARTNERS - OWNER
11601 WILSHIRE BLVD 2110
LOS ANGELES, CA 90025
(DPR 19-00012)

LARS ANDERSEN – APPLICANT
30220 RANCHO VIEJO ROAD STE B
SAN JUAN CAPISTRANO, CA 92675
(DPR 19-00012)

MIKE NAGGAR – PROJ MANAGER
445 S. D ST.
PERRIS, CA 92570
(DPR 19-00012)

APPENDIX 8.2

NOP COMMENT LETTERS AND SCOPING MEETING COMMENTS

AGUA CALIENTE DAND *OF* CAHUILLA INDIANS-

THIBAL HISTORIC PR-SERVATION

03-041-2021-006

May 06, 2021

[VIA EMAIL TO:cpower@inte rwestgrp.com]
Interwest Consulting Group
Ms. Chantal Power

Re: DPR 19-00012

Dear Ms. Chantal Power,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the DPR 19-00012 project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. For this reason, the ACBCI THPO requests the following:

*Formal government to government consultion under California Senate Bill 18

*Formal government to government consultion under California Assembly Bill No. 52 (AB-52).

*A cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area.

*A copy of the records search with associated survey reports and site records from the information center.

*Copies of any cultural resource documentation (report and site records) generated in connection with this project.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760)699-6956. You may also email me at ACBCI-THPO @aguacaliente.net.

Cordially,

Lacy Padilla
Archaeologist
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

5401 DINAH SHOR □RIV , PAIf 5Ff"IING, CA922
T 760/599/6801) I 7C,0 U99/ '12•1 WWW./I • UΛCA /C• TC.NS1I• G V

From: Zerda, Daniel <DZerda@Rivco.org>
Sent: Thursday, May 6, 2021 4:36 PM
To: Chantal Power <cpower@interwestgrp.com>
Subject: DPR 19-00012 and Amendment No.10 for Perris Valley Commerce Center Specific Plan ALUC Comments

Hi Chantal,
Thank you for providing the transmittal for the above referenced project. Please note that the project was found consistent under ZAP1390MA19. It is my understanding that their are no proposed changes to what was previously reviewed by the ALUC, so a new submittal will not be necessary at this time. Thank you again, and please let me know if you have any questions.

-Best Regards,

Daniel Zerda
Student Intern
Transportation and Land Management Agency
County of Riverside
(951)955-0982

Confidentiality Disclaimer
This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure.
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County of Riverside California

Ph: (626) 381-9248
Fx: (626) 389-5414
Em: info@mitchtsailaw.com

Mitchell M. Tsai
Attorney At Law

155 South El Molino Avenue
Suite 104
Pasadena, California 91101

VIA ELECTRONIC & U.S. MAIL

May 17, 2021

Nancy Salazar
City Clerk
City of Perris
135 North D Street
Perris, CA 92570
Em: cityclerk@cityofperris.org

Chantal Power
Contract Planner
City of Perris
135 North D Street
Perris, CA 92570
Em: cpower@interwestgrp.com

RE: Public Records Act and Mailing List Request Regarding Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012.

Dear Ms. Salazar and Ms. Power,

On behalf of Southwest Regional Council of Carpenters **("SWRCC")** and its members, this Office requests that the City of Perris **("City")** provide any and all information referring or related to the Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012 **("Project")** pursuant to the California Public Records Act **("PRA"),** Cal. Government **("Gov't")** Code§§ 6250-6270 (collectively **"PRA Request").**

Moreover, the SWRCC requests that City provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act **("CEQA"),** Cal Public Resources Code **("PRC")** § 21000 *et seq,* and the California Planning and Zoning Law **("Planning and Zoning Law"),** Cal. Gov't Code§§ 65000-65010. California Public Resources Code Sections 21092.2, and 21167(£) and

Government Code Section 65092 require 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.

The Southwest Regional Council of Carpenter s is a labor union representing 50,000 union carpenters in six states, including in southern California, and has a strong interest in well-ordered land use planning and addressing the environmental impacts of development projects, such as the Project.

I. PUBLIC RECORDS ACT REQUEST.

SWRCC is requesting any and all information referring or related to the Project.

The Public Records Act defines the term "public record" broadly as " any writing containing information relating to the conduct of the public's business . . . regardless of physical form and characteristics." Gov't Code § 6252(d). "Records" includes all communications relating to public business regardless of physical form or characteristics, including but not limited to any writing, picture, sound, or symbol, whether paper, magnetic, electronic, text, other media, or written verification of any oral communication. Included in this request are any references in any appointment calendars and applications, phone records, or text records. These "records" are to include, but are not limited to correspondences, e-mails, reports, letters, memorandums, and communications by any employee or elected official of City concerning the Project.

Please include in your response to this request the following examples of "records," as well as any similar physical or electronic forms of communication: any form of writing such as correspondence, electronic mail records ("email"), legal and factual memoranda, facsimiles, photographs, maps, videotapes, film, data, reports, notes, audiotapes, or drawings. Cal. Government Code§ 6252(g) (defining a writing to including "any record thereby created, regardless of the manner in which the record has been stored"). Responsive correspondence should include, inter alia, emails, text messages, or any other form of communication regardless of whether they were sent or received on public or privately-owned electronic devices "relating to the conduct of the public's business." Cal. Government Code § 6252(e); *Citizens for Ceres v. Super. Ct . ("Ceres")* (2013) 217 Cal. App. 4th 889,909; *Citizens for Open Gov't v. City of Lodi ("Lodi")* (2012) 205 Cal.App.4th 296, 307, 311; *City of San Jose v. Superior Court* (2017) 2Cal. 5th 608, 625 (finding that a public employee or officer's "writings about public

business are not excluded" from the California Public Records Act " simply because they have been sent, received, or stored in a personal account.") .

This Office requests any and all information referring or related to the Project, including but not limited to:

(1) All Project application materials;

(2) All staff reports and related documents prepared by the City with respectto its compliance with the substantive and procedural requirements of the California Environmental Quality Act, Public Resources Code § 21000 et seq., and the CEQA Guidelines, title 14, California Code of Regulations, § 15000 et seq. (collectively **"CEQA")** and with respect to the action on the Project;

(3) All staff reports and related documents prepared by the City and written testimony or documents submitted by any person relevant to any findings or statement of overriding considerations adopted by the agencypursuant to CEQA;

(4) Any transcript or minutes of the proceedings at which the decisionmaking body of the City heard testimony on, or considered any environmental document on, the Project, and any transcript or minutesof proceedings before any advisory body to the public agency that were presented to the decisionmaking body prior to action on the environmental documents or on the Project;

(5) All notices issued by the City to com ply with CEQA or with any other law governing the processing and approval of the Project;

(6) All written comments received in response to, or in connection with, environmental documents prepared for the Project, including responsesto the notice of preparation;

(7) All written evidence or correspondence submitted to, or transferred from, the City with respect to compliance with CEQA or with respect tothe Project;

(8) An y proposed decisions or findings submitted to the decisionmaking

body of the City by its staff, or the Project proponent, Project opponents, or other persons;

(9) The documentation of the final City decision and approvals, including the final environmental impact report, mitigated negative declaration, negative declaration, or notice of exemption, and all documents, in addition to those referenced in paragraph (3), cited or relied on in the findings or in a statement of overriding considerations adopted pursuantto CEQA;

(10) Any other written materials relevant to the public agency's compliance with CEQA or to its decision on the merits of the Project, including the initial study, any drafts of any environmental document, or portions thereof, that have been released for public review, and copies of studies or other documents relied upon in any environmental document prepared for the Project and either made available to the public during the public review period or included in the City's files on the Project, and all internal agency communications, including staff notes and memoranda related to the Project or to compliance with CEQA; and

(11) The full written record before any inferior administrative decisionmaking body whose decision was appealed to a superior administrative decisionmaking body prior to the filing of any litigation.

Please respond within 10 days from the date you receive this request as to whether this request specifies identifiable records not exempt from disclosure under the PRAor otherwise privileged or confidential, and are therefore subject to disclosure. This Office understands that this time may be extended up to 14 days for unusual circumstances as provided by Cal. Government Code§ 6253(c), and that we will be notified of any extension and the reasons justifying it.

We request that you provide all documents in electronic format and waive any and all fees associated with this Request. SWRCC is a community-based organization. Please notify and obtain express approval from this Office before incurring any duplication costs.

If any of the above requested documents are available online, please provide us with the URL web address at which the documents may be downloaded. If any of the

requested documents are retained by the City in electronic computer-readable format such as PDF (portable document format), please provide us with pdf copies of the documents via email, or inform us of the location at which we can copy these documents electronically.

In preparing your response, please bear in mind that you have an obligation under Government Code section 6253.1 to (1) identify all records and information responsive to our request or the purpose of our request; (2) describe the informationtechnology and physical location in which the records exist; and (3) provide suggestions for overcoming any practical basis for denying access to the records or information sought.

In responding to this request, please bear in mind that any exemptions from disclosure you may believe to be applicable are to be narrowly construed. *Marken v. Santa Monica-Malibu Unif. Sch. Dist.* (2012) 202 Cal. App. 4th 1250,1262; and may be further narrowed or eliminated by the adoption of Proposition 59, which amended article I, section 3(6)(2) of the California Constitution to direct that any "statute ... or other authority ... [that] limits the right of access" to "information concerning the conduct of the people's business" must be "narrowly construed."

As for any records that you nonetheless decline to produce on the grounds of an exemption, please bear in mind that the case law under the Public Records Act imposes a duty on you to distinguish between the exempt and the non-exempt portionof any such records, and to attempt in good faith to redact the exempt portion and to disclose the balance of such documents.

Please bear in mind further that should you choose to withhold any document from disclosure, you have a du ty under Government Code section 6255, subd. (a) to " justify withholding any record by demonstrating that the record in question is exempt under express provisions" of the Public Records Act or that "the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record."

Finally, please note that you must retain and not destroy any and all records, notwithstanding any local record retention or document destruction policies. As the Court noted in *Golden Door Properties)* LL C *v. Superior Court of San Diego County* (2020) 53 Cal.App.5th 733 that a public agency "must retain '[a]ll written evidence or

correspondence submitted to, or transferred from' ... with respect to" CEQA compliance or "with respect to the project."

II. NOTICE LIST REQUEST.

We also ask that you put this Office on its notice list for any and all notices issued under the CEQA and the Planning and Zoning Law.

In particular, we request that City send by mail or electronic mail notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivision for the Project, or supported, in whole or in part, through permits, contracts, grants, subsidies, loans, or other forms of approvals, actions or assistance, including but not limited to the following:

- Notices of any public hearing held in connection with the Project; as well as
- Any and all notices prepared pursuant to CEQA, including but not limited to:
- Notices of determination that an Environmental Impact Report ("EIR") or supplemental EIR is required for a project, prepared pursuant to Public Resources Code Section 21080.4;
- Notices of availability of an EIR or a negative declaration for a project prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations;
- Notices of approval or determination to carry out a project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law;
- Notice of approval or certification of any EIR or negative declaration prepared pursuant to Public Resources Code Section 21152 or any other provision of law;
- Notice of exemption from CEQA prepared pursuant to Public Resources Code section 21152 or any other provision of law; and
- Notice of any Final EIR prepared pursuant to CEQA.

This Office is requesting notices of any approvals or public hearings under CEQA and the California Planning and Zoning Law. This request is filed pursuant to California Public Resources Code Sections 21092.2, and 21167(£) and Government Code Section 65092 requiring 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.

Please send notice by regular and electronic mail to:

Mitchell M. Tsai, Attorney At Law
155 South El Molino Avenue Suite
104
Pasadena, California 91101
Em: mitch@mitchtsailaw.com
Em: greg@mitchtsailaw.com
Em: leon@mitchtsailaw.com

We look forward to working with you. If you have any questions or concerns, please do not hesitate to contact our Office.

Sincerely,

Mitchell M. Tsai
Attorneys for Southwest Regional Council
of Carpenters

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
cpower@interwestgrp.com
Chantal Power, AICP, Contract Planner
City of Perris, Planning Division
135 North D Street
Perris, California 92570

June 1, 2021

Notice of Preparation of a Draft Environmental Impact Report for the Perris Valley Commerce Center Specific Plan, Amendment No. 10 (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website[1] as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod[2] land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds[3] and localized significance thresholds (LSTs)[4] to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of

[1] South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.
[3] South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment[5].

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*[6] is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory[7].

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES IV), completed in May 2015, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions[8]. According to the MATES IV Carcinogenic Risk interactive Map, the area surrounding the Proposed Project has an estimated cancer risk over 500 in one million[9]. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include

[5] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.
[6] CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: http://www.arb.ca.gov/ch/handbook.pdf.
[7] CARB's technical advisory can be found at: https://www.arb.ca.gov/ch/landuse.htm.
[8] South Coast AQMD. May 2015. *Multiple Air Toxics Exposure Study in the South Coast Air Basin*. Available at: http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf.
[9] South Coast AQMD. MATES INV Estimated Risk. Accessed at: https://scaqmd-online.maps.arcgis.com/apps/webappviewer/index.html?id=470c30bc6daf4ef6a43f0082973ff45f.

South Coast AQMD's CEQA Air Quality Handbook[1], South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan[10], and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy[11].

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule[12] and the Heavy-Duty Low NOx Omnibus Regulation[13], ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year[14] that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

[10] South Coast AQMD's 2016 Air Quality Management Plan can be found at: http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf (starting on page 86).
[11] Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.
[12] CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.
[13] CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox.
[14] CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

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Attorney At Law

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VIA U.S. MAIL & E-MAIL

June 3, 2021

Chantal Power
City of Perris
135 North D Street
Perris, CA 91709
cpower@interwestgrp.com

RE: Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012

Dear Ms. Power,

On behalf of the Southwest Regional Council of Carpenters ("**Carpenters**" or "**SWRCC**"), my Office is submitting these comments on the City of Perris's ("**City**" or "**Lead Agency**") Notice of Preparation of an Environmental Impact Report ("**NOP**") (SCH No. 2021050021) for the Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012 Project ("**Project**").

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states, including California, and has a strong interest in well-ordered land use planning, addressing the environmental impacts of development projects and equitable economic development.

Individual members of the Southwest live, work and recreate in the City and surrounding communities and would be directly affected by the Project's environmental impacts.

Commenter expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenter incorporates by reference all comments raising issues regarding the environmental impact report ("**EIR**") submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected to the Project's environmental documentation may assert any issue timely raised by other parties).

Moreover, Commenter requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act ("**CEQA**"), Cal Public Resources Code ("**PRC**") § 21000 *et seq*, and the California Planning and Zoning Law ("**Planning and Zoning Law**"), Cal. Gov't Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require 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.

The City should require the Applicant to provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

> . . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the "[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component" can result in air pollutant reductions.[2]

I. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

A. Background Concerning the California Environmental Quality Act

CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 California Code of Regulations ("**CCR**" or "**CEQA Guidelines**") § 15002(a)(1).[3] "Its

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[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10

[3] The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 150000 et seq, are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. (Cal. Pub. Res. Code § 21083.) The CEQA Guidelines are given "great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous." *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal. 4th 204, 217.

purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR 'protects not only the environment but also informed self-government.' [Citation.]" *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal. App. 4th 1344, 1354 ("*Berkeley Jets"*); *County of Inyo v. Yorty* (1973) 32 Cal. App. 3d 795, 810.

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. CEQA Guidelines § 15002(a)(2) and (3). *See also, Berkeley Jets,* 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553; *Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal. 3d 376, 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines § 15002(a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in CEQA section 21081. CEQA Guidelines § 15092(b)(2)(A–B).

While the courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position.' A 'clearly inadequate or unsupported study is entitled to no judicial deference.'" *Berkeley Jets*, 91 Cal. App. 4th 1344, 1355 (emphasis added) (quoting *Laurel Heights,* 47 Cal. 3d at 391, 409 fn. 12). Drawing this line and determining whether the EIR complies with CEQA's information disclosure requirements presents a question of law subject to independent review by the courts. (*Sierra Club v. Cnty. of Fresno* (2018) 6 Cal. 5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102, 131.) As the court stated in *Berkeley Jets*, 91 Cal. App. 4th at 1355:

> A prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Communities for a Better Environment v. Richmond* (2010) 184 Cal. App. 4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449–450).

B. The EIR Should Review Local Hire and Local Skilled and Trained Workforce Requirements, As Well as Other Regional and Project-Specific Mitigation Measures as a Means to Mitigate the Project's Significant Greenhouse Gas and Transportation Impacts.

A fundamental purpose of an EIR is to identify ways in which a proposed project's significant environmental impacts can be mitigated or avoided. PRC §§ 21002.1(a), 21061. To implement this statutory purpose, an EIR must describe any feasible mitigation measures that can minimize the project's significant environmental effects. PRC §§ 21002.1(a), 21100(b)(3); CEQA Guidelines §§ 15121(a), 15126.4(a).

If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible"[4] and find that "specific overriding economic, legal, social, technology or other benefits of the project outweigh the significant effects on the environment." PRC § 21081(b). "A gloomy forecast of environmental degradation is of little or no value without pragmatic, concrete means to minimize the impacts and restore ecological equilibrium." *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1039.

[4] CEQA Guidelines § 15092(b)(2)(A).

The Project's NOP and Initial Study conclude that the Project may result in significant greenhouse gas and transportation impacts. As noted earlier, local hire and local skilled and trained workforce requirements can result in demonstrable reductions in VMT as well as associated greenhouse gas emissions.[5]

Locating jobs closer to residential areas can have significant environmental benefits. . As the California Planning Roundtable noted in 2008:

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[6]

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near hocking stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.[7] Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing." The

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[5] March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling; California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf; South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=8

[6] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf

[7] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at* http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

> city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider the use of local hire and local skilled and trained workforce requirements within the Project's environmental impact report as a mitigation measure for the Project's significant transportation impacts.

If the City has any questions or concerns, feel free to contact my Office.

Sincerely,

Mitchell M. Tsai
Attorneys for Southwest Regional
Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Paul E. Rosenfeld, PhD
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March 8, 2021

Mitchell M. Tsai
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise ("SWAPE") is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas ("GHG") emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model ("CalEEMod") is a "statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects."[1] CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.[2]

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[3]

[1] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[2] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[3] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled ("VMT") associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.[4]

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

> "$VMT_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$
>
> Where:
>
> n = Number of land uses being modeled."[5]

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

> "$\text{Emissions}_{pollutant} = VMT * EF_{running,pollutant}$
>
> Where:
>
> $\text{Emissions}_{pollutant}$ = emissions from vehicle running for each pollutant
>
> VMT = vehicle miles traveled
>
> $EF_{running,pollutant}$ = emission factor for running emissions."[6]

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[7] In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence.[8] The default number of construction-related worker trips is calculated by multiplying the

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[4] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.
[5] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.
[6] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[7] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[8] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.[9] Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively."[10] Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.[11] The operational home-to-work vehicle trip lengths are:

> "[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings" (emphasis added).[12]

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).[13]

Worker Trip Length by Air Basin		
Air Basin	**Rural (miles)**	**Urban (miles)**
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Minimum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

[9] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[10] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[11] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.
[12] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.
[13] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8-miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7-miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan ("Project") located in the City of Claremont ("City"). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.[14] In an effort to evaluate the potential for a local hire provision to reduce the Project's construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO_2e)	3,623
Amortized Construction GHG Emissions (MT CO_2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized Construction GHG Emissions (MT CO_2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project's urbanization level and location.

[14] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

EXHIBIT B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

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Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs,* vs. United States Metals Refining Company et. al. *Defendant.*
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs,* vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant.*
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs,* vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al.,, et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas

Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio

John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division

Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland

Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

EXHIBIT C

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Santa Monica, California 90401
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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

JASON E. UHLEY
General Manager-Chief Engineer

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RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

238500

June 3, 2021

City of Perris
Planning Department
135 North D Street
Perris, CA 92570

Attention: Chantal Power

Re: DPR 19-00012 and SPA 10
APN 303-060-020

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 4, 2021. 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:

D This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.

IZI This project involves District proposed Master Drainage Plan facilities, namely, Perris Valley MDP Lateral E-2. The District will accept ownership of such facilities on written request of the City. 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.

☐ This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted _____ Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. 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.

IZI This project is located within the limits of the District's IZ!Perris Valley ☐San Jacinto River ☐Homeland/Romoland Line A ☐Homeland/Romoland Line B Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, 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 or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.

IZI An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Perris Valley MDP Lateral E and E-1. For further information, contact the District's Encroachment Permit Section at 951.955.1266.

D The District's previous comments are still valid.

GENERAL INFORMATION

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 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.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,

Deborah de Chambeau

DEBORAH DE CHAMBEAU
Engineering Project Manager

ec: Riverside County Planning Department
Attn: Phayvanh Nanthavongdouangsy

SLJ:blm

June 4, 2021

Chantal Power, AICP, Contract Planner
City of Perris
135 North "D" Street
Perris, CA 92570

Submitted via email

Re: Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012 Notice of Preparation (SCH #2021050021)

Dear Chantal,

This letter is in response to the Notice of Preparation (SCH #2021050021) that has been prepared for the Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012 ("Project") to provide comments and recommendations for areas of study during the environmental impact report.

Though the census tract where this Project would be located is not a top five percent statewide, it is located in one that has some higher factors on certain metrics which are worsened by warehouses and we are concerned with the continued onslaught of warehouse construction in the region, including in Perris. We would like to see the study ensure that the measures necessary to allow the Project to be served 100% by zero-emissions vehicles be included and analyzed.

Finally, the documents indicate that there would be a change of zone from the current Commercial, but it notes that it is a catchall for several different Commercial types from the City, including some which include housing. Therefore, we would note that it raises the potential to also need an upzone site for this Project to comply with the requirements of SB 330 of maintaining the zoning capacity for the same amount of homes.

We believe that these concerns must be addressed as part of the CEQA process to ensure that the Perris community is not subjected to an increase in the many negative impacts of warehousing to surrounding communities. These include air quality concerns, water quality concerns, and labor concerns, particularly of the resulting projects after construction is completed.

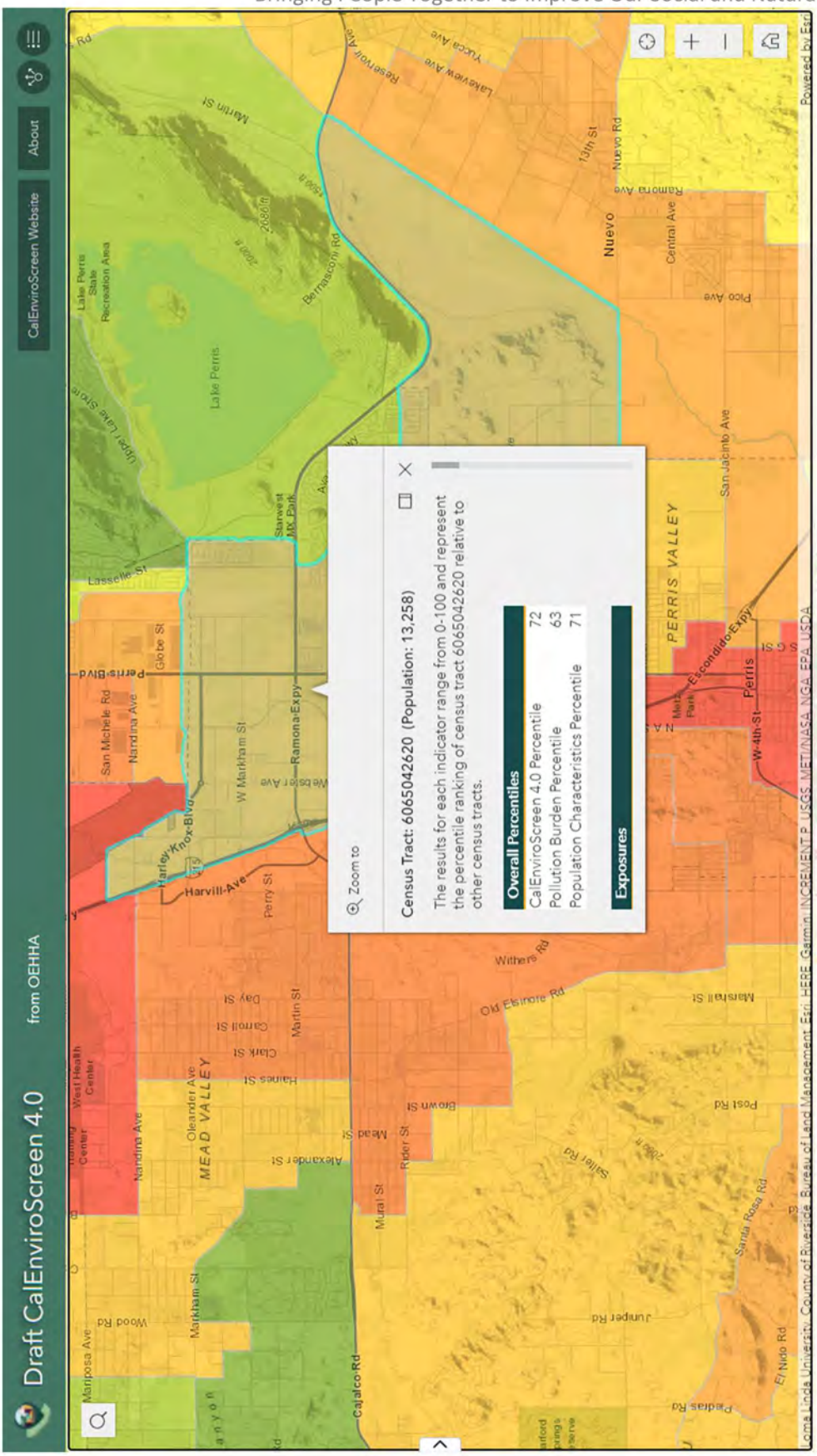
We thank you for your time and invite you to reach out if there are any additional questions.

Sincerely,

Alma Marquez

Alma Marquez
Executive Director

CCAEJ 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, CCAEJ'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. ***CCAEJ*** prioritizes community voices as we continue our grassroots efforts to bring lasting environmental justice to the Inland Valley Region.



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CALIFORNIA
AIR RESOURCES BOARD

Gavin Newsom, Governor
Jared Blumenfeld, CalEPA Secretary
Liane M. Randolph, Chair

June 4, 2021

Chantal Power
Contract Planner
City of Perris Planning Division
135 North "D" Street
Perris, California 92570
cpower@interwestgrp.com

Dear Chantal Power:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Notice of Preparation (NOP) for the Perris Valley Commerce Center Specific Plan (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2021050021. The Project would allow for the construction and operation of a 347,918 square foot light industrial building on a 16 acre site. The Project-site is located within the City of Perris (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

Industrial development, such as those proposed under the Project, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.[1] CARB has reviewed the NOP and is concerned about the air pollution and health risk impacts that would result should the City approve the Project.

The Project Would Increase Exposure to Air Pollution in Disadvantaged Communities

The Project, if approved, will expose nearby communities to elevated levels of air pollution. Residences are located within 500 feet of the Project's eastern boundary. In addition to residences, Val Verde High School, Rancho Verde High School, Triple Crown Elementary School, and Val Verde Elementary School are all located within two miles of the Project-site. The community is near existing toxic diesel particulate matter (diesel PM) emission sources, which include existing industrial uses, vehicular traffic along Interstate 215 (I-215) and aircraft operations from the march Air Reserve Base. Due to the Project's proximity to residences and schools already burdened by multiple sources of air pollution, CARB is concerned with the potential cumulative health impacts associated with the construction and operation of the Project.

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1. With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel PM emissions generated during the construction and operation of the Project would negatively impact the community, which is already impacted by air pollution from existing industrial uses, vehicular traffic along I-215 and aircraft operations from the march Air Reserve Base.

The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Operation

Since the Project is near residences and schools that are already burdened by multiple air pollution sources, CARB urges the City and applicant to prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy-duty trucks. The HRA should also determine if the operation of the Project in conjunction with past, present, and reasonably foreseeable future projects or activities would result in a cumulative cancer risk impact on nearby residences. To reduce diesel PM exposure and associated cancer risks, CARB urges the City and applicant to include all the air pollution reduction measures listed in Attachment A of this comment letter in the HRA and DEIR.

Since the Project description provided in the NOP does not explicitly state that the proposed industrial land uses would not be used for cold storage, there is a possibility that trucks and trailers visiting the Project-site would be equipped with transport refrigeration units (TRU).[2] TRUs on trucks and trailers can emit large quantities of diesel exhaust while operating within the Project-site. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near where these TRUs could be operating, would be exposed to diesel exhaust emissions that would result in a significant cancer risk impact to the nearby community. If the Project would be used for cold storage, CARB urges the City to model air pollutant emissions from on-site TRUs in the DEIR, as well as include potential cancer risks from on-site TRUs in the Project's HRA. If the Project will not be used for cold storage, CARB urges the City to include one of the following design measures in the DEIR:

- A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project-site; or
- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

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2 TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

The HRA prepared in support of the Project should be based on the latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments),[3] CARB's Hot Spots Analysis and Reporting Program (HARP2 model), and the South Coast Air Quality Management District's (SCAQMD) CEQA Air Quality Handbook.[4] The Project's mobile diesel PM emissions used to estimate the Project's cancer risk impacts should be based on CARB's latest 2021 Emission Factors model (EMFAC2021). Mobile emission factors can be easily obtained by running the EMFAC2021 Web Database: *https://arb.ca.gov/emfac/emissionsinventory.*

The HRA should evaluate and present the existing baseline (current conditions), future baseline (full build-out year, without the Project), and future year with the Project. The health risks modeled under both the existing and the future baselines should reflect all applicable federal, state, and local rules and regulations. By evaluating health risks using both baselines, the public and planners will have a complete understanding of the potential health impacts that would result from the Project.

The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Construction

In addition to the health risks associated with operational diesel PM emissions, health risks associated with construction diesel PM emissions should also be included in the air quality section of the DEIR and the Project's HRA. Construction of the Project would result in short-term diesel PM emissions from the use of both on-road and off-road diesel equipment. The OEHHA guidance recommends assessing cancer risks for construction projects lasting longer than two months. Since construction would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project-site during construction.

The HRA should account for all diesel PM emission sources related to Project construction, including, but not limited to, off-road mobile equipment, diesel generators, and on-road heavy-duty trucks. As previously stated in Section II of this letter, the cancer risks evaluated in the construction HRA should be based on the latest OEHHA guidance, CARB's HARP2 model, and SCAQMD's CEQA guidance. The cancer risks reported in the HRA should be calculated using the latest emission factors obtained from CARB's latest EMFAC (currently EMFAC 2021) and Off-road models

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3. Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: *https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.*

4. SCAQMD's 1993 Handbook can be found at: *http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.*

Conclusion

To reduce the exposure of toxic diesel PM emissions in disadvantaged communities already impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel PM and NO_x emissions, as well as the greenhouse gases that contribute to climate change. CARB encourages the City and applicant to implement the measures listed in Attachment A of this comment letter to reduce the Project's construction and operational air pollution emissions.

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

CARB appreciates the opportunity to comment on the NOP for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at *stanley.armstrong@arb.ca.gov*.

Sincerely,

Robert Krieger, Branch Chief, Risk Reduction Branch

Attachment

cc: See next page.

cc: State Clearinghouse
state.clearinghouse@opr.ca.gov

Carlo De La Cruz, Senior Campaign Representative, Sierra Club
carlo.delacruz@sierraclub.org

Lijin Sun, Program Supervisor, CEQA Intergovernmental Review, South Coast Air Quality Management District
lsun@aqmd.gov

Morgan Capilla, NEPA Reviewer, U.S. Environmental Protection Agency, Air Division, Region 9
capilla.morgan@epa.gov

Taylor Thomas, Research and Policy Analyst, East Yard Communities for Environmental Justice
tbthomas@eycej.org

Torres Ivette, Policy Analyst, Center for Community Action and Environmental Justice
ivette.t@ccaej.org

Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

Attachment A

ATTACHMENT A

Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

The California Air Resources Board (CARB) recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommended by CARB, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.

2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.

3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved equal to or exceed that of a Tier 4 engine.

4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.

5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NO_x) standard starting in the year 2022.[1]

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1. In 2013, CARB adopted optional low-NO_x emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NO_x emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NO_x emission standard is available at: *https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards*.

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation.

Recommended Operation Measures

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.

2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.[2]

3. Include contractual language in tenant lease agreements that requires all TRUs entering the project-site be plug-in capable.

4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.

5. Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the project site be zero-emission.

6. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.

7. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.
8. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks

2. CARB's technology assessment for transport refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: *https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf.*

including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,[3] Periodic Smoke Inspection Program (PSIP),[4] and the Statewide Truck and Bus Regulation.[5]

9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site.

10. Include contractual language in tenant lease agreements that limits on-site TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted, and the health impacts fully mitigated.

11. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

12. Including language in tenant lease agreements, requiring the installing of vegetative walls[6] or other effective barriers that separate loading docks and people living or working nearby.

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3. In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: *https://ww2.arb.ca.gov/our-work/programs/ttghg*.
4. The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: *https://www.arb.ca.gov/enf/hdvip/hdvip.htm*.
5. The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model-year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: *https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm*.
6. Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: *https://ww2.arb.ca.gov/sites/default/files/classic//research/apr/past/13-306.pdf*.

Rincon Band of Luiseño Indians
CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1051 | Fax: (760) 749-8901 | rincon-nsn.gov

May 14, 2021

Sent via email: cpower@interwestgrp.com
City of Perris
Planning Division
Chantal Power
135 North "D" Street
Perris, CA 92570

Re: Response to NOP DEIR for the Perris Valley Commerce Center Specific Plan, Amendment No. 10 (SPA 10) & Development Plan Review 19-00012 Environmental Impact Report

Dear Ms. Power,

This letter is written on behalf of the Rincon Band of Luiseño Indians ("Rincon Band" or "Band"), a federally recognized Indian Tribe and sovereign government. We have received your Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the above-mentioned project. The identified location is within the Traditional Use Area (TUA) of the Luiseño people and within the Band's specific Area of Historic Interest (AHI). As such, Rincon is traditionally and culturally affiliated to the project area.

We do not have any questions at this time. However, we ask to be notified and involved in the entire CEQA environmental review process for the entirety of the project's duration. Please also include the Band on all distribution lists for environmental document reviews, consultations, circulation of public documents, and notices for public hearings and scheduled approvals. The Band asks to be provided with copies of documents pertaining to the project such as the cultural survey including the archaeological site records, shape files, archaeological record search results, and the grading plans.

If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 749 1092 or via electronic mail at cmadrigal@rincon-nsn.gov. Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resources Manager

Bo Mazzetti, Chairman | Tishmall Turner, Vice Chair | Laurie E. Gonzalez, Council Member | John Constantino, Council Member | Joseph Linton, Council Member

STATE OF CALIFORNIA Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

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EXECUTIVE SECRETARY
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Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

May 5, 2021

Chantal Power, AICP, Contract Planner
City of Perris
135 North "D" Street
Perris, CA 92570

Re: 2021050021, Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Project, Riverside County

Dear Ms. Power:

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.

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)).

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

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

CITY OF PERRIS
Planning Commission Meeting - May 19, 2021
Fri, 5/21 · 11:20 AM1:12:21

CH
Com Hernandez
0:03
Commissioner Hernandez present

CJ
Com Jimenez
0:09
Commissioner Jimenez present

S
Shively
0:11
Vice Chair Hammond. Yeah, Chair Shively here we can have a moment of silence followed by the Pledge of Allegiance from Commissioner her notice.

CH
Com Hernandez
0:32
Everybody please stand and join me in the Pledge of Allegiance. I pledge allegiance to the flag of the United States of America and to the republic for which it stands, one nation, under God, indivisible, with liberty and justice for all.

S
Shively
0:57
item five presentations say none we'll go ahead and move to item six consent calendar. Any member of the public wishing to speak on this matter may do so at this time. See none. We're going to close public comment for the consent calendar. Bring it to commissioners for discussions. Anybody see any errors or omissions in the meeting minutes for May 5?

CJ
Com Jimenez
1:24
No, Mr. Commissioner, same here, nothing human this evening.

S
Shively
1:34
Commissioner Hernandez, I didn't hear what you're saying. Yes, no edits or comments on my part. Okay. Thank you if we can have a motion for approval.

CJ
Com Jimenez
1:47
Commissioner humanise motion. Committee Chairman. Commissioner Hernandez Yes. Commissioner Jimenez Yes. Vice Chair Hammond. Yes, Chair Shively. Yes, but the vote of four yes this motion passes.

S
Shively

2:19
Item seven a Public Hearing scoping meeting for environmental impact report associated with development plan review 19 dash 00012 and specific plan amendment 19 dash 05287. A request to amend the Perris Valley Commerce Center Specific Plan to change zoning definition to a 16 acres site of a 16 acre site APN 303 dash 060 dash 0.20 located at the southwest corner of Ramona expressway in Paris Boulevard from commercial to light industrial to facilitate the construction of a 347,918 square foot high cube warehouse building that because Mike Naggar and Associates Do we have any ex parte communications

CJ

Com Jimenez

3:13

Commissioner humanness I drive down Ramona Paris all the time.

H

Hammond

3:20

I drove by the site around the site today just drove by.

S

Shively

3:24

I am familiar with the site as well.

CH

Com Hernandez

3:26

and there's nothing on my part.

S

Shively

3:33

To get a presentation, please.

KP

Kenneth Phung

3:44

This would be presented our buyer contract planner Chantelle Powers. Thank you.

CP

Chantelle Powers

3:53

Hello, commissioners. Good evening, and nice to see all of you here tonight. I'm going to go ahead and start with the the project here. Unfortunately, I think that there's an issue with my slideshows seems to be cutting off. So I'm just going to leave it like this. Is everybody able to see the full slide that way? Yeah. Okay, great. Then we'll just continue on that way. I'm here to introduce the this is a scoping meeting for a notice in preparation of an environmental impact report for a project proposing a specific plan amendment and development of a site on the south, southeast, sorry, southwest corner of Ramona expressway and Perris Boulevard. Specifically, the project is amending the specific plan zoning designation from commercial to light industrial to accommodate the construction of a 347,918 square foot high q warehouse building. Again located on the southwest corner of Ramona Expressway and Perris Boulevard. Currently the project site is is zoned commercially, as are the adjacent or the opposing corners of Ramona and

Perris Boulevard. But just south of the site and Western site, our industrially zoned properties mostly developed with industrial uses. One thing that I did want to point out here is that the Perris Valley Commerce Center Specific Plan does envision this area as a commercial corridor due to the proximity of the I 215 freeway to the west, and the residential subdivisions to the east. However, the property is also located within

6:20
a
CP
Chantelle Powers
6:23
a few of the accident accident potential zones for the march Air Reserve base. Those those zones are c one and B1- APZ 2. We'll get into that a little bit more later. But I wanted to go back to the site again and just analyze some of the uses around the site here. We do have service stations on the north side North corners of Ramona Expressway and PWERRIS Boulevard. There's a few fast, fast casual restaurants and a drive thru restaurant on the west side. Sorry, east side and also on the east side. wrapping around an existing mobile home park is a strip retail center with some small retail shops and personal service commercial uses as well as a few additional eateries. And then again south and west of the project site are industrially zoned and developed sites. This product in particular is proposing to construct a 347,918 square foot high Cube warehouse that will also entail 109,000 square feet 600 sorry 109,644 square feet, which totals 16.2% of the site would be landscaped. All of the on site improvements required of a light industrial zone would be implemented on site the project proposes 135 parking spaces, two points of access from Indian Avenue one of which would be dedicated to passenger vehicles with limited right and right out access only and one full access driveway dedicated to truck traffic. The site also proposes two points of access along Paris Boulevard one driveway dedicated to passenger vehicle vehicles with right in right out access only there as well. And one right out only driveway dedicated to truck access. So again, I wouldn't get back to these the accident potential zones that the the project site falls in, you have I believe it's about three and a half to four acres are located in the C1 zone, which does limit some of the the uses that can potentially be constructed on the site that would be eliminated or prohibited uses would be schools, daycare centers, hospitals, congregate care facilities, noise sensitive, non residential uses, hazards to flight which are any tall towers or infrastructure, telecommunication towers, things of that nature, and uses that exceed an average of 100 100 people per acre and the rest of the site is within a much more recent corrective accident potential zone, which limits all of those uses that are limited in the prohibited in the C1 accident potential zone but also prohibits the construction of hotels, motels, restaurants, buildings with more than two floors, hazardous material materials manner, manufacturer and storage, critical community infrastructure and uses that exceed an average of 50 people per acre. So this is the site plan for the proposed project, you can see that the high cube warehouse will encompass the majority of the site. And then the rest will be dedicated to those on site improvements that would be required, including 135 parking spaces, and the truck court at the rear of the property. This is the proposed elevations and color board. And we just wanted

to briefly explain that the EIR process and where we're at at this point. We're essentially at the beginning stage of this point, although an initial study was already conducted

CP

Chantelle Powers

11:28

previously, and so now we're we're getting to the point where we're ready to start to start preparing the environmental impact report. And as part of that process, a scoping meeting is is required by CEQA. In order to gain any public comments or concern agencies, anyone that would have a concern with the project at this point has has the opportunity to weigh in. And then during the drafting of the EIR. We would consider any of those comments that were given here today during during this scoping meeting. But the public and concerned agencies again will have another chance to weigh in after the draft EIR is completed. And of course, all of those comments and concerns will be addressed in the final EIR, which then would go to before the Planning Commission for a recommendation to the city council. As stated the the initial study has been prepared as as kind of a lead up to to the EIR process. And during the preparation of the initial study, it was found that certain of the the checklist requirements for CEQA some of the environmental concerns that are that are required to be to be analyzed wouldn't have a significant effect based on on project details. And those environmental issues are aesthetics, agriculture and forestry resources, geology and soils, Hazard hazards and hazardous materials, mineral resources, population and housing, public services, recreation, utility and service systems and wildfire. And so that leaves the remaining checklist items that will be further analyzed in the e ir and mitigated to the extent that they can be and those those environmental issues are air quality biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water control, land use planning, noise, transportation, tribal cultural resources, and then the mandatory findings of significance. At this point, staff recommends that the Planning Commission conduct this this meeting and allow concerned citizens and public agencies to have the opportunity to review and discuss and provide any direction and feedback for integration into the enter into the EIR for this specific plan amendment, which will also be accompanied by a development plan review. That concludes my presentation. So I can open this up to to the Planning Commission to take any comments.

S

Shively

14:53

Any comments or questions for Staff? Go ahead and get started. are you connected? commission commissioners? Hwrnandez?

CH

Com Hernandez

15:13

Yeah, if you just clarify exactly. My understanding, this is public scoping, are we actually getting requested for approval of something,

CP

Chantelle Powers

15:24

you're not taking any action today, other than to discuss, and any concerns that the Commission might have any concerns that the public might have, or potentially any concern public agencies that might have a representative here tonight. At this point, we're just taking feedback and public

comment in order to fold those those concerns into the EIR, which is is going to be prepared, along with these any comments taken tonight, but no action will be taken.

S

Shively

16:08

Commissioner Hernandez, do you have any follow up questions?

CH

Com Hernandez

16:15

I guess I mean, my my general question is, it's kind of, you know, it's currently zoned as commercial. And I'm curious why, you know, the city would have interest in I guess, rezoning it to, light industrial?

CP

Chantelle Powers

16:41

I can answer that a little bit. And then I may actually allow the applicant to weigh in a little bit as well. But basically, what the situation is because you have the property located within these accident potential zones of the March, Air Reserve base, the amount, or the types of commercial uses that you can actually build there are really limited, you can't really have any public assembly types of uses. You know, you can have some commercial uses, but but they would be limited in in their kind of scope and in the amount of people that are actually allowed per acre. So for a developer trying to develop the site that limits the scope of what they're actually able to construct there. But I think I'm gonna go ahead and let Mike Naggar who is the project applicant, maybe weigh in on on his thoughts here.

S

Shively

17:52

He can when we give him an opportunity, he can definitely cut in on that. Commissioner.

H

Hammond

18:04

Sure. Okay. It's Commissioner here. And as you remember to say the name not, assume who I am . Okay. Obviously, this is probably, I'm in the triple digits in terms of how many EIRs I've heard over the years. One thing about scoping me but obviously not going to get into the building size and all the other things, but some key points that I want to get consideration and you may need to take down a lot of issues, the zoning changes you but we're not gonna I'm not gonna say anything at this point. This is just for staff. points of access is one of the things I saw on this and I don't think there's been it's just kind of pointed out as two accesses on one street on Perris, and two on Indian, Indian, Indian Avenue. Obviously, there's a lot of traffic on both streets. I believe Perris Boulevard. I know Indiana is Indian is a truck route. I think we know that Perris Boulevard is trucker to maybe by mistake with the truck route as well. Am I correct?

KP

Kenneth Phung

19:09

Yes. Currently, a is currently a truck route, okay, on the PVC specific plan, but from staffs opinions, it might have been in an error. All the developers who kind of develop along first

bolivares recognize it. They typically they don't put truck route on Perris Boulevard. So just want to put that into record.

H

Hammond

19:29

Okay, thanks. Those one of the things that would be had to be looked at as the entrance points, if you look at the map, the site plan, talking Indian Avenue, the the southwest corner, that's an entrance point. And I'm assuming they come out of Perris Boulevard, because obviously there's no circulation pattern throughout the entire site. So that's kind of one of those real negatives to me and needs to be studied more. If there's private parking or employee parking. That's on the west corner that that means the trucks have to go straight through and go to Paris Boulevard, which forces them to turn right and go down to Morgan Street. And because I did today, Morgan Street to Indian back up to Ramona Expressway, which quote unquote, is also not an unoffcia is an unofficial, just say unofficial, because every single truck goes on back to Harley Knox. So that route needs to be relooked at in terms of egress, Perris, Boulevard, anything on Perris Boulevard coming out, other than passenger vehicles needs to be steady, because that's the problem, you're not gonna come out of the truck, you're gonna you're gonna get bang, that's just no way. If you live in Perris, you know, that's not gonna happen. So something has to be looked at in terms of that, because it's only right out that you're showing, you can make a tough turn out of there. So that really means they're going to go down to Morgan street Morgan Street all way around, do they really want to do that? So there's a circulation around or through the site is one of those considerations? I think also, I'm still only access just north of where the trucks is on the southwest to the north, west corner, I think you're talking Well, not quite the corner. But that's what you're talking about employees coming in there. So the employees would have to come down Indiana, and turn into a left turn into there, just as there would have to be a left turn into the Indian. So both the left turns and that's a coming North. So I'm looking at that circulation issue. Is there any question in right there? That's one. Number two. Generally, with a EIRS, you have alternatives, effective mandatory alternatives. So we're going to have to have alternatives in an alternative, one alternative thw alternative two this particular process, we need to be looked at in terms of commercial zone or the Northwest east corner. What is that? Is that one alternative? What are the alternatives that you have a strip mall across the street that doesn't have a lot of people, but you have 135 spaces here. So that exceeds 100? Just by the parking spaces? Explain that one. Okay, so that is one of those things where in the commercial zone, they have parking on that side. And there's an ample amounts of spaces on that side. So that is in the commercial area? is there other alternatives, there's not been looked at what needs to be looked at and need be brought forward? as well. And I think I'll go within that saying when we are but there has to be alternatives to any EIR. So it can't just be we're gonna put a warehouse here. What are the alternatives since we're talking about zone change? It's not it's not traditionally was never and I was there 2005. This is a commercial zone for a reason the city wanted that corridor to be commercial. They wanted to be commercial for a reason. That's why you have an ARCO across the street, you have a Shell on the other side, you have a Del Taco NASA at, you have a Del Taco on the east side. And then another thing is designed for the understanding that you were in the airports zone, but still there's limited. There's a limited things that you can do under that car dealerships, storage facilities, things like that, these are some alternatives that need to be looked at in an EIRreport alternative. So this is mandatory for us is not an option. There has to be alternatives like that in any EIR. So that's one of those things where alternative, one alternative

two gennerally is one of the things is brought into would at least give some idea other than just the warehouse, you know, 347,000 square foot warehouse or EQ or whatever it's called. The one question I do have a staff, the commercial zoning, what is the acreage on the commercial side is 1.6 acres.

CP

Chantelle Powers

23:45

Now it's 16 acres on the commercial. Yes, the while the entire site is zoned commercially right now. Yeah. And it's a 16 acres.

H

Hammond

23:55

What I should say is that that portion with the office buildings where you have the slant and looking at the site plan. We're sorry. You just had the picture. I just Yeah. Just before, just before that. It was on the site plan. Oh, this Yeah. Wherever shows the percentage, I think of that. Yeah, I think you know what I'm talking about that northeast corner. This? Yeah, that percent that's in that airport zones? BC2?

S

Shively

24:24

Yeah, that was like three, three, little over three acres. Okay.

H

Hammond

24:29

Yeah. Okay, that was gonna carry on. And that means Yeah, that was 13 or 14, whatever it is to the west, approximate . Okay. Okay. Wasn't sure. So that's like three acres, just in that corridor. Okay. Okay. Okay, I'll stop there, cuz that's okay. But those are some things I think in terms of the scope of meeting that needs to be addressed, in my opinion, be looked at historically need to be looked at. I would say this 10 years ago, say it now. Those are all It is just like many image changing zone, I tend to be a little bit more difficult, because I want to know what alternatives are there are? What are the kinds of things that had to be looked at and presented, whether it's one way or whether it's the other issues, I think you need to be presented those. And I don't know if that's something that's there should be a consideration before you finalize, setting up this significance when you talk about a total change. It was zoned for commercial. So I think looking at those different options, I think it's one of those alternatives, as we did up north on Perris, there's different alternatives that they present it not saying we have to go with it just an alternative. That's a consideration for me. We obviously we have the idea of permitted uses. You know, they mentioned the things that can't be done restaurants, obviously hotels, motels, not in the flight Pattern, there are other things that are permitted uses in this this area that don't have large amounts of people, maybe 100 people per acre. And they're smaller businesses, there are other things that are considerations. Even across the street, I don't know if you have 100 people, at any one time, you may have people coming in buying things, but to say 100 employees, not normally the case. So I'm just bringing up points of things that could be that should be considerations, at least something to be studied and looked at. Okay. Commissioner,

CJ

Com Jimenez

26:20
I also would like to have a presentation on I know you said for retail, there was a lot of limitations. I want to know what those limitations are, what the options are for, can it be a small grocery store, especially, we're getting new houses built on the corner of Evans and Ramona. And I know in the past, one of the reasons that we couldn't get a lot of retail in that zone was because they were looking at what is it house per acre, whatever ratio they use, but now that we're getting more houses in that area, does it impact this? Does it make it more viable for commercial use for retail use? I know we can use it for restaurants, which you know, would have been great. But there are other uses. I know just thinking about our population. Just rezoning something into from commercial to light industrial might trigger a lot of response, especially if it's zoned for commercial and that was intended original use. I am really concerned just you know, we just had our last meeting and we were talking about the environmental impacts. We were talking about how we want to build more affordable housing, more housing, apartments, condos, that would also require more retail opportunities, and other types of uses. Also, I know I brought up before that our city shouldn't just focus on warehouses, but maybe also it can be used for small business, what was the three uses, I wrote them down? It was it allows retail professional office serve and service oriented businesses. So there are other options that, you know, we don't necessarily just need to do that. So I would like to also learn about potential other uses for that area. And just I'm really concerned also really think about the pollution in the area. We talked about the water quality, and I'm glad you wrote that in there. The greenhouse emissions, the air quality, and we have you know, the retail location across the street and we just approved they're going to build what was it an O'Reilly right across the street. So we do have some commercial coming to the area and developing there too. What was it a month ago, we approved the O'Reilly's for across the street. So just other options instead of just lite industrial, are there other things we can do there to still maintain within the specific plan still support that just in thinking I feel like our community that is going to be their big concerns for them.

S

Shively

29:02

Definitely on the bandwagon for the issues with the zone change. Potential ideas is a business professional park or light in small warehouse business for owners to have to store stuff like mechanical equipment or electrical or plumbing warehouses just small enough to have a front office and warehouse in the back or something as a potential idea that something could occur in there. One of the items I did run into in the Planning Commission's there have been seen issues with is the mixing of of pedestrian parking or passenger parking in truck, drive and stuff. So that needs to be separated and kept kept away from each other as long as it is agreement with Commissioner Hammonds issue of truck parking or truck driving on Perris Boulevard is an issue. And then not as part of the ER but is as a look of the building, the color scheme is flat and too gray tones, I think it needs a different pickup a color change a little bit to be more appealing. Those are the items that I have that jumping on the bandwagon between Hammond and Jimenez on those items. So those items need to be addressed and really thought of before we do change this from commercial to light industrial. Go ahead,

CJ

Com Jimenez

31:09

I would just like to add to I mean, this is the main entry into our city, it leads right into like Perris, we see a lot of trucks on there already. That shouldn't be. I feel like this is just super easy for truck drivers to get off on Ramana and to 15. And we already see a lot of that. But this is really like the first impression people get of our city as they're coming in. I just wanted to be just very cognizant of that, that that's what people are seeing. I mean, I met someone at a car dealership this weekend, who comes to like Perris for fishing. And I was like, Oh my god, how did you get there? Did you come to Moreno Valley, or did you come down Ramona, because if it came down Ramona, it's nothing but warehouses. So just that is the face that people get to know as parents when they come to do something like fishing or going to like Paris. So that is just the first impression you know how it is with first impressions

S

Shively

32:04

are good. Any powers or any other items you want to discuss before we turn it over to Mr. Naggar?

CP

Chantelle Powers

32:14

Oh, I just wanted to clarify a little bit, it sounds like the issue came up a couple of times of separating passenger vehicles and truck access. And so I just wanted to point out that the truck access and truck court are completely on the south side of the project. And then employee parking is proposed on both sides with separate entrances for those so so that has been considered and will be kept separate. And of course, as part of the EIR process, a traffic impact analysis will also be prepared. So it did want to let everyone know that those considerations are both are going to be part of the e ir, as well as project alternatives, which are required by CEQA.

S

Shively

33:08

I think the the issue with the mixing of vehicles is that there's an inlet between the truck axis and the pedestrian parking or passenger vehicle parking at both sides of the building is what we're looking at. I see one, one additional thing that I did catch is that employees coming down southbound on Indian will have to do a U turn to get into the pedestrian or the employee parking area that needs to be reviewed as well.

CJ

Com Jimenez

33:48

And also, I don't know if you talked to the city engineer but driving that area a lot driving down Ramona, people drive super fast when they make that right turn, and somebody is waiting to turn into Park into the employee parking. I think that would be a very high risk. Also people coming down Perris Boulevard going southbound that people travel pretty fast. I know what the limit is, but I've seen a lot of people drive really fast run red lights to try to beat it. So I feel like that entrance and exit is too close to the corner. And I don't know how I feel about it going further down because then it's too close to the truck one so I think that one is, you know, a little bit tricky. Same thing with the Indian entrance making a U turn on Indian. I mean there is a lot of traffic going down that way too. So accessibility is a big issue for me, looking at this

S

Shively
34:48
Commissioner, Hernandez Do you have any follow ups? issues?
CH
Com Hernandez
34:58
No, I think the same thing. Kind of everybody else has mentioned, concerns about traffic, you know, the change in zoning. And we have, you know, the warehouses and kind of even areas zoned for warehouse when when we approve the warehouses, we still get feedback from the public on that sudden changes, I know that be a major concern as well. And like other staff said to this is kind of the entry point is the city, high traffic area. So, I guess my preference kind of, you know, if we are going to, you know, to keep it as is or kind of, I guess, make it justify, we'll ask why we're doing this. And then kind of come up with those old other options that are available, you know, mentioned earlier, that was limited, I guess, options for commercial use. So kind of what are those options? And, and seeking, like I said, either mitigated or kind of alternatives to those so that we have a solution for commercial use? Yeah. And then I'm just curious to, you know, you did mention the limited commercial options. Would that include a gas station? I like to get gas stations, all four corners right there.
H
Hammond
36:29
I think a gas station would be allowed. Okay, I wouldn't go there. Oh, well, you finish? We can't see him. Yes, that's it. Yeah, that brought up a point two, I'm really focusing which, which is where you're going to have to go with the scoping is to be the engineering question to correct me if I'm wrong, because you know, I'm human being here. If you get on Perris Boulevard, to the wayfair. If you go to the Westinghouse, I was there when those with the more the mogan st, the entrances are not on parents Boulevard. So if you're going away for you go down Morgan Street to go Indiana. If you go to the Westinghouse, I actually went on the roof of that building. I won't do that again. scary, but the entrance is on another Street. I don't believe the entrances correctly, are off of perris Boulevard. So I don't know of any over on this particular one that where the interest is apparently let's say we can't be. But just in terms of egress and Ingress. I'm not sure that has really been studied as to the traffic flow that would come out of Perris Boulevard. So if you're talking warehouse and you talk to email, larger trucks, when you're talking about turning right off of Paris, this is under consideration, down to Morgan Street, which I just did today. I wanted to do it today to get the most up to date. And then turning right on Morgan. And getting on Indiana, I was gonna run over on Indiana. And Indiana is a truck route. And you can see the other ones turning into from Indiana, but I don't see it. And I could be wrong guys. Tell me right now, but I don't know of any interest is off of Perris Boulevard for the warehouses. Indian Avenue. Yes, of course. So I'm just not sure that's really been studied or wouldn't have to be looked at in terms of the the circulation things if you're gonna come out with all the trucks going right? It hasn't really been steady. We don't know the amount of trucks you don't know who's actually going in there. You don't know that kind of other flow that would have to be steady. But that's a consideration too. I just adding to the list. But stop and think about it. I don't know of any that really have that. For this size. Now we're talking about business parks. I think about this actual mate wayfair is not on Paris that I know of. And maybe you may have just a little security

entrace is something but generally speaking, it's a mortgage, or it's on Indian Avenue. That's it for me.

CJ

Com Jimenez

39:02

Right and looking at when they're exiting. I mean big rigs exit a lot slower than regular vehicles, how much are they going to impact? The traffic flow coming south on Perris? How wide would they cover both lanes? Or would they be able to make it just into the one lane. And there was something else I wanted to add. And you know what, also I remember a while ago is maybe a year ago, some of those streets are not meant for Big Rigs I saw a truck get stuck on I think is placencia next to that restaurant, because there's a dip and it elevates right towards the middle. So the front tires made it over. But the back didn't because it got stuck in the evening. I don't remember how they got it out but he blocked traffic for quite some time. So just you know thinking about that too, just with the traffic flow and all the impacts from it.

S

Shively

40:00

As far as we have any other items you want to add before we move to Mr. Naggar. Now, no, I,

CP

Chantelle Powers

40:11

I have completed my presentation. And I do believe that many of the issues that planning commissioners have raised will be considered in the EIR are had already been contemplated for consideration in the e ir. But But now that they've been laid out so succinctly, we will definitely include analysis on those issues.

S

Shively

40:38

Thank you. Mr. Naggar, would you wish to do a presentation for us?

MN

Mike Naggar

40:44

Yes, thank you. I don't think I can improve on what Chatellel brought up. But I do have a few things I want to mention first, good evening to you planning commissioners and staff. It's a pleasure to be back in front of you albeit via video. I want to thank you for all of your comments on many of you know me, and many of you know that I've done a quite a bit of development in this corridor. And I want you to know all the things that you brought up I'm aware of and highly sensitive to. And while this may be a formal scoping meeting, I wanted to ensure you as shantelle just reference that many of those comments that you mentioned, we had the foresight to make sure that we included them in our consultants studies, I'm going to ask for a few things to be studied in the EIR, and why I do so I think we buy may actually shed light on some of your comments. I I know this is a scoping session. So I'll try not to get in in any sort of narrative unless you ask me questions. But there are some things that absolutely, I think need to be included for your benefit and the benefit of the citizens. The first one I want to make sure that the eir covers is flood control and flooding, for the infra for the intersection of Paris Boulevard and the Ramona Expressway. During the winter months, the whole interchange is subject to

inundation. And that definitely needs to be looked at and mitigated and come up with mitigation measures through the e ir. And we'll certainly do that. But I definitely want that on the record and one that part of the scoping. Back in 2019, on December the fourth, the Planning Commission and the city council had a joint workshop in which a consultant turned in a study that addressed zoning changes and economic development in this corridor. And it was quite exhaustive. This property was talked about extensively as well as another property across the street. And its limitations because of the highly restricted airport zones. The results of that meeting was not necessarily to approve a zone change here. The results or the conclusion was that no more zone changes in this corridor will be considered. With the exception of this property in question and another one across the street, the key word is considered. I don't want to misrepresent but but at the time the joint session, understood the constraints and was willing to entertain zone changes on this property. While while creating i don't i don't know if you would call it policy coming to the conclusion that it did not want to entertain any more zone changes in the corridor, I'm going to ask the EIR consultant to include that consultants report, which I've sent to staff just so they had it. And I'll send it to the EIR consultant or chantel can. And also I've conducted a audio and written transcript of that meeting for their convenience as well. And I'll make sure the e ir consultant has that. So there's no ambiguities. The third thing I'd like to make sure that the e ir studies in depth is the highly restrict high restrictions that a ALUC has put on this property. This is very important because their restrictions are governing our uses and the uses are extremely limited. And then I think that it's essential that that be looked at in the e ir to the degree that it can to the degree that the joint meeting for over into economic development that was had

MN

Mike Naggar

45:05

the economic aspect of this project should also address that construction of commercial on this property is not insurable. Nor is it lendable under commercial under the commercial zoning. In other words, no lender will lend for construction, nor will any insurance company insure. And that pretty much eliminates the the population restrictions that ALUC has put on this or rather it It supports. You get my point. It's hard to do commercial with the restrictions. And then of course, not being able to find funding or insurance. shentel was very good at mentioning it straddles two airport zones. And it not only straddles them, but it also straddles them at a very weird angle. That if we were to bifurcate that literally would make that three acres, not three acres developable but really more like one and a half acres developable it really would cause a triangle and really constrain it. So I'd like that looked into the land use aspect of the EIR as well, which See, in relation to the ALUC, I think the ER should also address that via the conditions ALUC put on, we had to shift all the offices of this project in to the less restrictive zone, which is on the southeast corner of the project. Because we could not locate them on the more restricted zones. So that was implemented. We will be doing a traffic study. And I wanted to just mention a few things that came up in some of the comments, all the traffic that will be coming in and out of this area, possibly with the exception of commuter vehicle traffic, not the trucks are going to be directed toward the new interchange on Placentia. That interchange is fully funded. And I'm not certain of its status. If its construction hasn't started, it will start imminently it's funded. And I believe RCTC has already given up the contract for construction. And that's very key. Because the way traffic is going to move even if you make a right turn out on Paris Boulevard, the goal will be to get you over to the placenta interchange away from the Ramona Expressway. We are

sensitive to that we know about that. We know that that the Commission and the council want restrictions on trucks on the Ramon Expressway. In addition, I want to point out the traffic study that was scoped by the city also includes a full turning movement ingress and egress on Indian Avenue. And exactly to the west is the entrance for the for the e commerce center for Lowe's. So that'll be a full function interchange. You can go left you can go right. And so can lows and it will be signalized. We of course will be conditioned not to take trucks to make a right on Indian down of the remote Expressway. Again, the goal and probably the preferred route for the trucks wouldn't be make a left out on Indian and to get to the placencia Interchange. Do and then the one last comment I want to ensure the commission there were some comments and good comments too. About how do you make the right turn movement off of Paris Boulevard heading north into the site. And I wanted to say that Paris Boulevard will be fully widened to its full general plan with and I don't want to misspeak, but I'm pretty confident that there'll be a deceleration lane and an acceleration lane for ingress and egress on the Paris Boulevard. But in all of these things they need to be studied and in every one of your comments will fully be evaluated. And I can assure you we will not bring something to you that's a pig in a poke or runs counter to everything that I know is important to the city. With that, I yield

S

Shively

49:53

Thank you sir. He comments.

CA

City Attorney

49:57

One of the things I would like to clarify Economic Development, information economics is not part of a consideration for an e ir, in any EIR because we're focusing on physical impacts to the environment. So that wouldn't be something that would necessarily be included in any EIR. However, if the developer wants to prevent present, which it sounds like he does, and that's, that's fair enough analysis on economics and some past history, we'd be, you know, that's perfectly appropriate. So I, but I did want to clarify that it would not be in the environmental impact report, and I'm sure his consultant will work with him on that, to make sure that the information is put into the proper place. Thank you.

H

Hammond

50:51

Thank you. You're good. I'm gonna go. I tend to be long minutes, you

CJ

Com Jimenez

51:05

no, I just thank you for the comments. I appreciate that you will take all our comments and research them further and include them. I really appreciate that you take that serious. That's all I gotta say. I mean, I appreciate it. Uh, do you know, are you going to research beforehand? Also, when the dates are for that placencia Interchange actually happened? Is it in process or the egress lanes? If you would include this?

MN

Mike Naggar

51:41

If you're addressing me? I'm sure staff has it? And if not, I will make sure we obtain it. Thank you. I

S

Shively

51:50

believe that was a question for the city engineer.

CE

City Engineer

51:54

Chairman Shively, planning commissioners to placencia interchange the phase one is under construction. So but that's the initial phase to Indian Avenue. and thereafter that's a city project widening placencia. Further further west. Further east, I'm sorry.

CJ

Com Jimenez

52:16

So that would be part of the second phase phase one includes

CE

City Engineer

52:20

phase one of the interchange is which is a full full interchange. However, with the overall mid county Parkway project, that interchange will be How can I say expanded? Okay.

CJ

Com Jimenez

52:37

So when they talk about potentially if something like this gets built, it wouldn't be developed at that point yet for the trucks to be able to take that exit and go down and take the placencia Interchange possibly for some time.

CE

City Engineer

52:51

Correct. Actually, right now, we are evaluating all applications, industrial applications like warehouses to analyze access to that interchange also. And we analyzing all the impacts. So this project will have to follow suit. So not only we would require him to go north on Indian avenue to Holly Knox, we also want them to analyze it to Placentia interchange, correct. Perfect, thank you, but only a segment of it. Not placencia all the way easterly.

CJ

Com Jimenez

53:22

Oh, perfect. Okay. Thank you.

KP

Kenneth Phung

53:24

Yeah, I can elaborate real quickly. I think the current timeline for the interchange, the Caltrans project is all the way to Indian Avenue. And the kind of data thing is the summer 2023 right now. And then the city engineer's office will take the remaining portion from Indian all the way

Paris Boulevard. My previous conversation with the city engineer is that it will be done the same time around 2023. Summer.

CJ

Com Jimenez

53:52

Thank you, and then the expansion of Paris, would that Ingress egress? Is that also something that we have a timeframe for?

CE

City Engineer

54:03

I'm sorry, what do you mean the acceleration deceleration lane is what you were referring to talking about widening

CJ

Com Jimenez

54:09

widening because Mr. Nygaard mentioned that it was in the works to expand it to its full potential.

CE

City Engineer

54:18

That would be a condition of the project. They have to dedicate the required right away per general plan and widen for general plan requirements. That would be a standard condition of approval. That's that won't be a city project. That would be a condition for the project for this application.

CJ

Com Jimenez

54:35

Okay, thank you for clarifying.

S

Shively

54:38

Commissioner Hernandez, do you have items over discretion? No questions or items discussed for me. Thank you.

H

Hammond

54:49

Okay. Yeah, is mister naggar before? Long time I've been working with you mister naggar. So I've aged we both age. What can I say? Right? Yeah, you brought us important key points. I think I need to clarify some things too. For control, obviously, is one of the questions where I wasn't sure that maybe more of a silly question, we brought up flood control, not just at the intersection, but I wasn't sure that right away, and that's in front of this project was part of the neighbors across the street, it was the state can now have B but not on this side. Because that was always in line that will say that we can build a grocery store because of the five foot I don't buy that at all ever bought that in 2019 years. But there was always said we couldn't do it, you didn't want to do it. The other thing, I was at a disseminating meeting today, I said right across to the mayor. And we brought up some issues, and I don't need to record it. One of the things he

brought up, there were things that could be done, but I'm very adamant about obviously the airport zone, things of that nature. But one of things you did bring up, there were some ideas, but we but those was part of the permitted uses in that area. Even things like car dealerships, things like that would that would didn't have high impact if people can be both they're always saying in the in the scope of services, because I'm not gonna discuss the project in the scope of services to look at as alternatives. They have to be done anyways, mandatory. But you have to look at alternatives. They have to be put in there, whether you accept them. And I actually took the training years ago, and it was eight hours of pure hell doing CEQA training. But I took it and I sat through it and I somehow survived it. But that's one of the things is you have to have alternatives will never get past here if we don't see them. But those that's what we're more looking at as opposed to this project that what are some alternatives that need to be looked at on any winning EIR report? What are some alternatives? He talks about circulation there has to be reviewed in terms of the width, because I don't see any width on him have is 26 meters to 30 feet, but these trucks are gonna drive all the way through the other side. We weren't talking about the future placencia we're talking about going to Paris Boulevard, which is a speed trap. Okay, anybody believes that does not live in Paris? Okay. Ramon expressways, the speed trap? They don't 55 is a joke. Okay. In turn, right. And you go Paris Boulevard, and you just maybe go five miles slower. But going out in that area is a major consideration and the next level council levels got a question. Okay. So if you're turning right, with a big rig, as she mentioned, onto the street, you have a problem. Second thing circulation, passenger vehicles, we'll have to make a U turn. that's a that's a real safety issue, to go into a U turn or go all the way around to Morgan all the way up in turn, right? Is that a plan that we really want to look at in terms of safety and security? So she's absolutely right on, you're gonna if you're coming down in the area to make a left turn? Is that something that a circulation element needs to be looked at? You know, is there a change that's going to change what the parking structure the interests of all that? So these are all scope questions. These are all things need to be looked at, because it's not here is basically you have a medium area to turn around and go there. I don't think you want to put that into the city, because the city is going to be the ones gonna get it. Okay. So that's a consideration. But anyway, those are just some points. I appreciate the points that he made and understanding. And that's what we have I say, okay, so hopefully we addressed it as much as we could think of here without discussing the issue. Thank you.

S

Shively

58:23

Thank you. I have my fellow commissioners to address some of the issues I had, so I don't need to elaborate on further. At this time. There's any member of public wishing to speak on this matter.

S

Shively

58:47

Watching No, thank you. Go ahead and close public comment this time.

0:42:341:12:21

APPENDIX 8.3

INITIAL STUDY

INITIAL STUDY

for

Perris Valley Commerce Center Specific Plan, Amendment No. 10
&
Development Plan Review 19-00012

Lead Agency:

City of Perris
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Perris, CA 92570
951.943.5003
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April 2021

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Appendix C2 *Geotechnical Investigation,* prepared by Geocon West, 8-30-2006

Appendix D *Paleontological Resources Assessment Report, Assessor's Parcel Number 303-060-020*, prepared by CRMTech, 4-1-2020

Appendix E *Phase I Environmental Site Assessment*, Krazan & Associates, Inc., 3-26-2020

Appendix F *Airport Land Use Commission (ALUC) Development Review - ZAP1390MA19*, prepared by Riverside County Airport Land Use Commission, 7-16-2020

Appendix G *SAN 53 – Will Serve – APN: 303-060-020*, prepared by Eastern Municipal Water District, 8-26-2020

Appendix H *Project Plans,* 3-2021

Appendix I *Perris Valley Commerce Center Specific Plan Amendment Number 10 - Draft*, prepared by Matthew Fagan Consulting Services, Inc., 12-2020

CITY OF PERRIS

I. INTRODUCTION

1. **Project Title:** Perris Valley Commerce Center (PVCC) Specific Plan, Amendment No. 10 (SPA 10) and Development Plan Review 19-00012 (DPR 19-00012)

2. **Lead Agency Name and Address:** City of Perris, Planning Division 101 North D Street, Perris, CA 92570

3. **Contact Person and Phone Number:** Chantal Power, AICP Contract Planner, 951.943.5003

4. **Purpose and Scope**

Pursuant to the California Environmental Quality Act (CEQA, California Public Resources Code, Sections 21000, et seq.) and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines, California Code of Regulations, Title 14, Sections 15000 et seq.), this Initial Study (IS) has been prepared in order to determine whether implementation of the proposed light industrial building (herein referred to as "Project") could result in potentially significant environmental impacts that would require the preparation of an Environmental Impact Report (EIR). This IS has evaluated each of the issue areas contained in the checklist provided in Appendix G of the State CEQA Guidelines. The objective of this environmental document is to inform City of Perris decision makers, representatives of other affected/responsible agencies, and other interested parties of the potential environmental effects that may be associated with the proposed Project.

If an Initial Study prepared for a proposed project determines that no or less than significant effects on the environment would occur or that potentially significant impacts can be reduced to less than significant levels with implementation of specified mitigation measures, the Lead Agency can prepare a Negative Declaration (ND) or a Mitigated Negative Declaration (MND) pursuant to the State CEQA Guidelines (California Code of Regulations, Sections 15070–15075). An ND or MND is a statement by the Lead Agency attesting that a project would produce less than significant impacts or that potentially significant impacts can be reduced to less than significant levels with mitigation. If an Initial Study prepared for a proposed project determines it may produce one or more significant effects on the environment, an EIR shall be prepared. This further environmental review is required to address the potentially significant environmental effects of the project and to provide mitigation where necessary and feasible.

The proposed Project site is within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area of the City of Perris. The PVCCSP was adopted by the City of Perris on January 12, 2012 (Ordinance No. 1284). Environmental impacts resulting from implementation of allowed development under the PVCCSP have been evaluated in the Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR) (State Clearinghouse No. 2009081086), which was certified by the City of Perris in January 2012. The PVCCSP EIR is a program EIR and project-specific evaluations in later-tier environmental documents for individual development projects within the Specific Plan planning area was anticipated. As stated in Section 15168(d)(3) of the State CEQA Guidelines, "The program EIR can focus an EIR on a subsequent project to permit discussion solely of new effects which had not been considered before". As such, the environmental analysis for the proposed Project presented in this IS is based on, or

"tiered" from, the analysis presented in the PVCCSP EIR, when applicable, and the PVCCSP EIR is incorporated by reference.

The PVCCSP EIR analyzes the direct and indirect impacts resulting from implementation of the allowed development under the PVCCSP. Measures to mitigate, to the extent feasible, the significant adverse project and cumulative impacts resulting from that development are identified in the PVCCSP EIR. In conjunction with certification of the PVCCSP EIR, the City of Perris also adopted a Mitigation Monitoring and Reporting Program (MMRP). Additionally, the PVCCSP includes Standards and Guidelines to be applied to future development projects within the Specific Plan area. The City of Perris requires that future development projects in the Specific Plan area comply with the required PVCCSP Standards and Guidelines and applicable PVCCSP EIR mitigation measures as outlined in the MMRP and that these requirements are implemented in a timely manner.

Pursuant to the provisions of CEQA and the State CEQA Guidelines, the City of Perris is the Lead Agency and is charged with the responsibility of deciding whether or not to approve the Project.

5. Findings of this Initial Study

This IS is based on an Environmental Checklist Form (Form), as suggested in Section 15063(d)(3) of the State CEQA Guidelines and presented as Appendix G to the State CEQA Guidelines. The Form is found in Section V. Environmental Issues Assessment, of this IS. It contains a series of questions about the Project for each of the listed environmental topics. The Form is used to evaluate whether or not any significant environmental effects are associated with implementation of the Project, after implementation of mitigation measures that would require the preparation of an EIR. The explanation for each answer is included in Section V.

The Form is used to review the potential environmental effects of the Project for each of the following areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

As identified through the analysis presented in this IS, the Project would have no impacts or less than significant impacts (either with or without mitigation) for Aesthetics, Agriculture and Forestry Resources, Air Quality (odors), Biological Resources (state or federally protected wetlands, and local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance), Geology and Soils, Hazards and Hazardous Materials, Land Use and Planning (physically divide an established community), Mineral Resources, Population and Housing, Public Services, Recreation, Transportation (substantially increase hazards due to a geometric design feature or incompatible uses, inadequate emergency access), Utilities and Service

Systems (sufficient water supplies, adequate capacity for wastewater, generate excessive solid waste, Comply with solid waste regulations), and Wildfire.

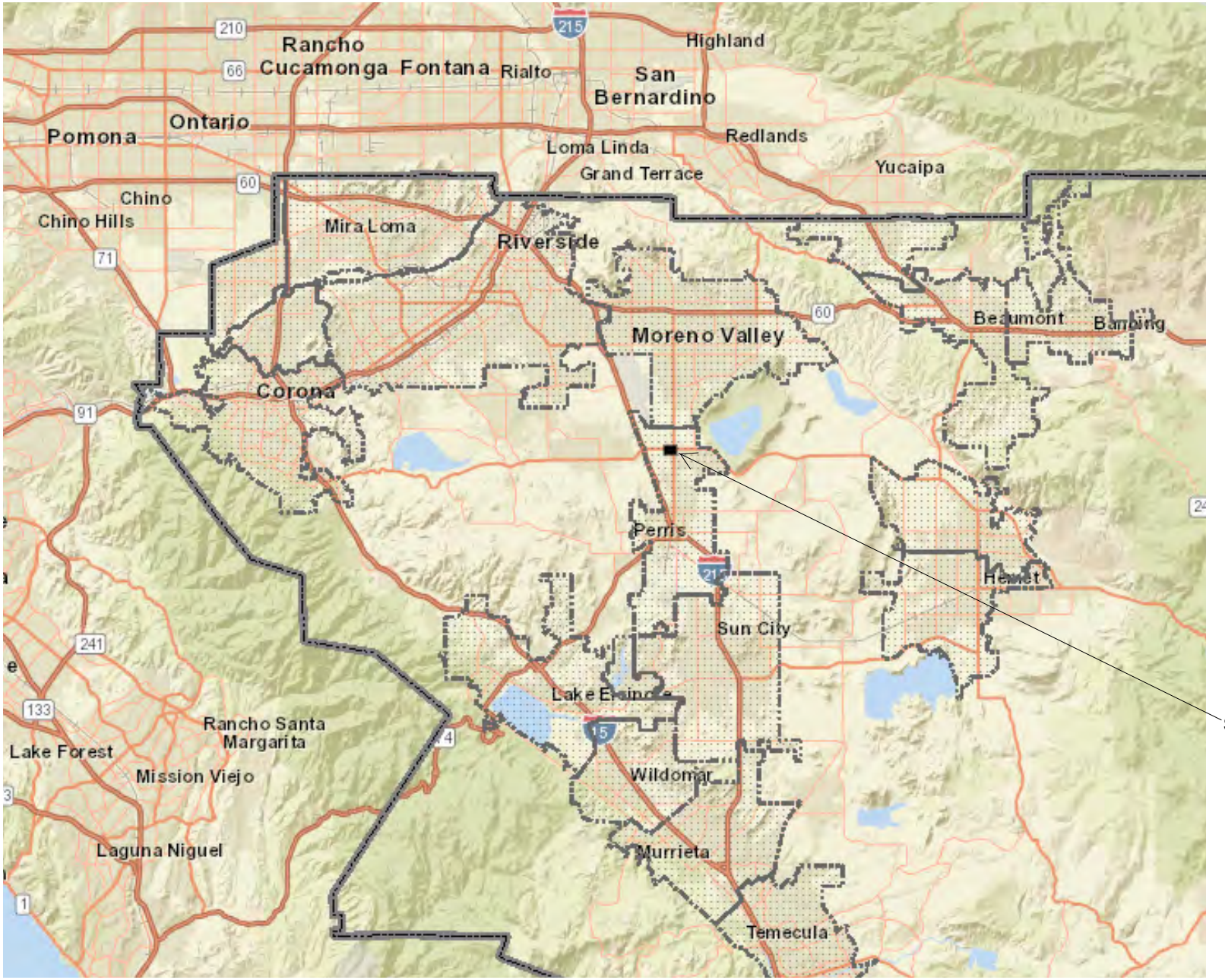
The analysis for the remainder of the environmental topics not listed indicates the potential for significant impacts and requires further analysis in an EIR, which shall be prepared.

6. Project Site Location and Setting

The Project site is bounded as follows: Ramona Expressway to the immediate north and commercial and light industrial uses to the north of Ramona Expressway; light industrial uses to the south; Perris Boulevard to the immediate east and commercial uses east of Perris Boulevard; and Indian Avenue to the immediate west and light industrial uses to the west of Indian Avenue. The Project site is located in the City of Perris, County of Riverside, State of California. Reference **Figure 1, *Regional Location Map***, and **Figure 2, *Vicinity Map.***

The Project totals approximately 16 acres on Assessor's Parcel Number 303-060-020, USGS 7.5 minute series Perris Quadrangle map Section 7, Township 4 south, Range 3 west.

Figure 1
Regional Location Map



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

Figure 2
Vicinity Map

Source: Project Plans (Appendix L)

The existing and proposed General Plan Land Use Designation for the Project site is Perris Valley Commerce Center Specific Plan (PVCCSP). Reference **Figure 3, *Existing and Proposed General Plan Land Use Designations***. The existing Zoning Classification is Perris Valley Commerce Center Specific Plan (commercial). The proposed Zoning Classification is Perris Valley Commerce Center Specific Plan (light industrial). Reference **Figure 4, *Existing and Proposed Zoning Classifications***.

As shown on **Figure 5, *Aerial Photo***, the Project site is currently unoccupied and undeveloped, with no observed or reported on-site operations. Land uses adjacent to the Project site include undeveloped land and commercial uses to the north; light industrial Fallas Distribution Center to the south; commercial uses and a mobile home park to the east; and light industrial Lowes Distribution Center to the west. **Table 1, *Surrounding Land Uses***, lists the different uses that are located immediately adjacent to the proposed Project site. Also, please reference **Figure 3, *Existing and Proposed General Plan Land Use Designations***, **Figure 4, *Existing and Proposed Zoning Classifications***, *and* ***Figure 5, Aerial Photo***.

Table 1
Surrounding Land Uses

Direction	General Plan Land Use Designation	Zoning Classification	Existing Land Use
Project Site	Perris Valley Commerce Center (PVCC) Specific Plan	Existing: PVCC Specific Plan (Commercial) Proposed: PVCC Specific Plan (Light Industrial)	Vacant
North	PVCC Specific Plan	PVCC Specific Plan (Commercial and Light Industrial)	Ramona Expressway, vacant land and some commercial uses
South	PVCC Specific Plan	PVCC Specific Plan (Light Industrial)	Light Industrial distribution center
East	PVCC Specific Plan	PVCC Specific Plan (Commercial and Residential)	Perris Boulevard, commercial uses, and mobile home park
West	PVCC Specific Plan	PVCC Specific Plan (Light Industrial)	Indian Avenue and light Industrial distribution center

Sources: City of Perris Zoning Map, Land Use Map, and Google Maps

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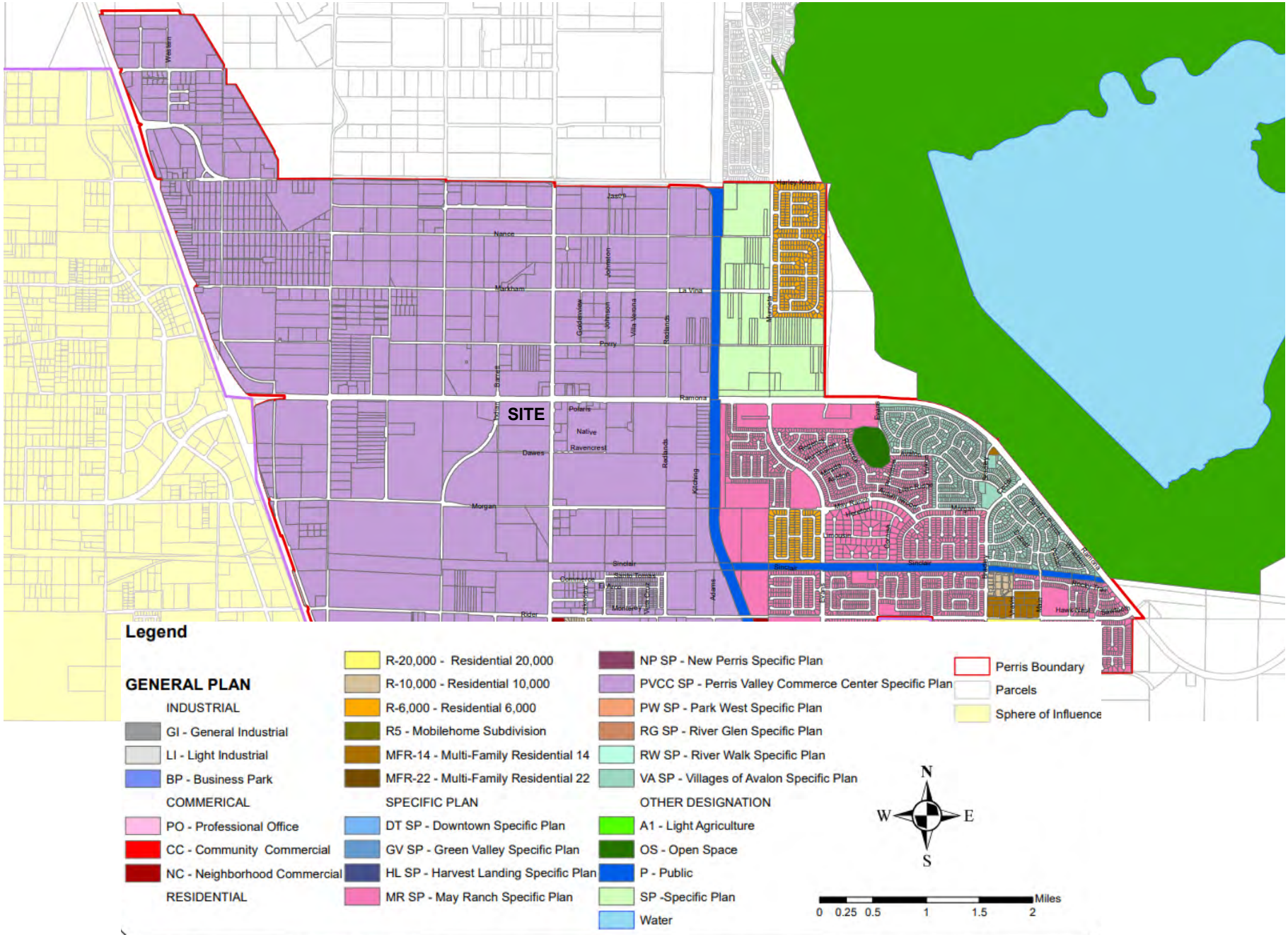
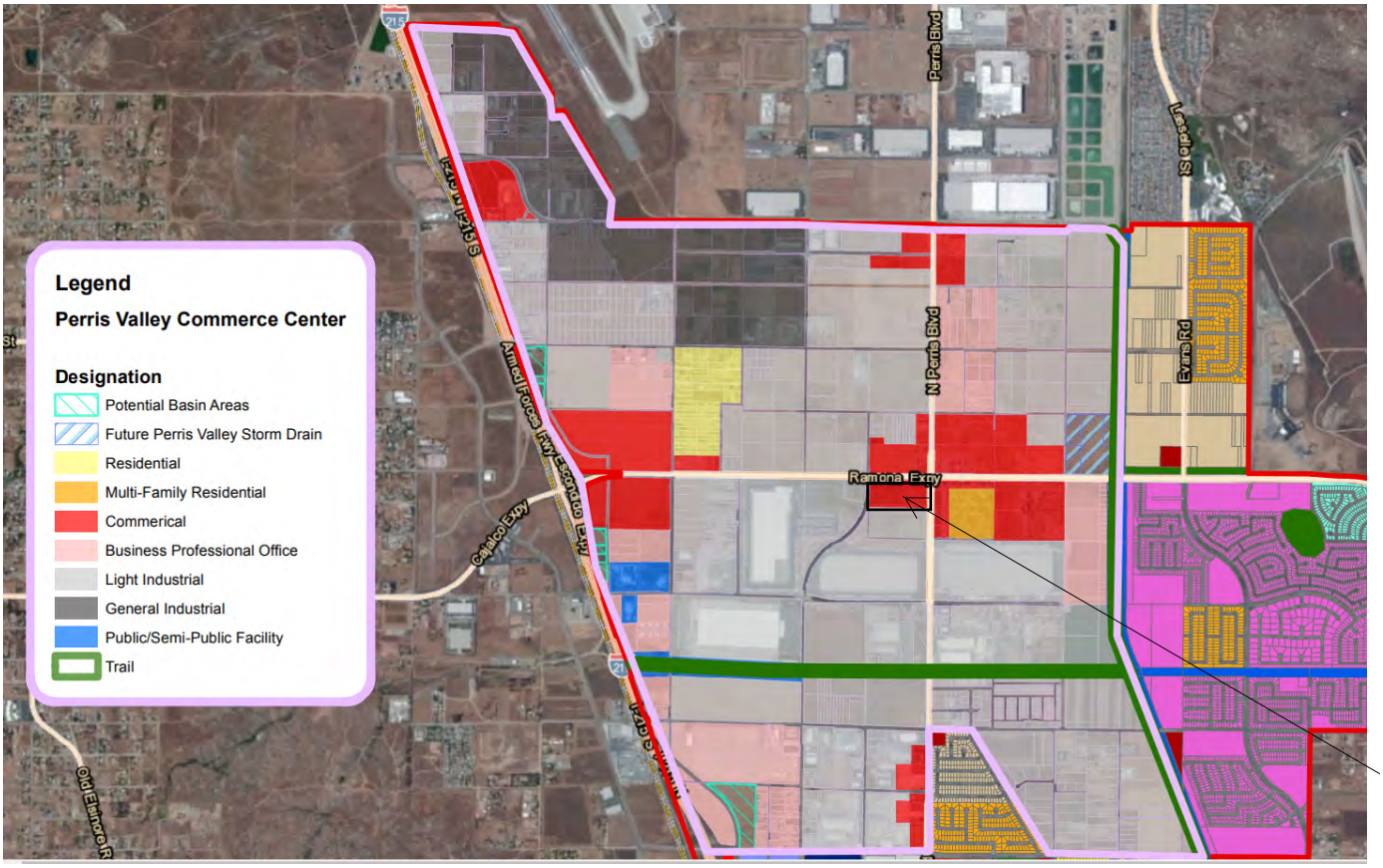
Figure 3
Existing and Proposed General Plan Land Use Designations



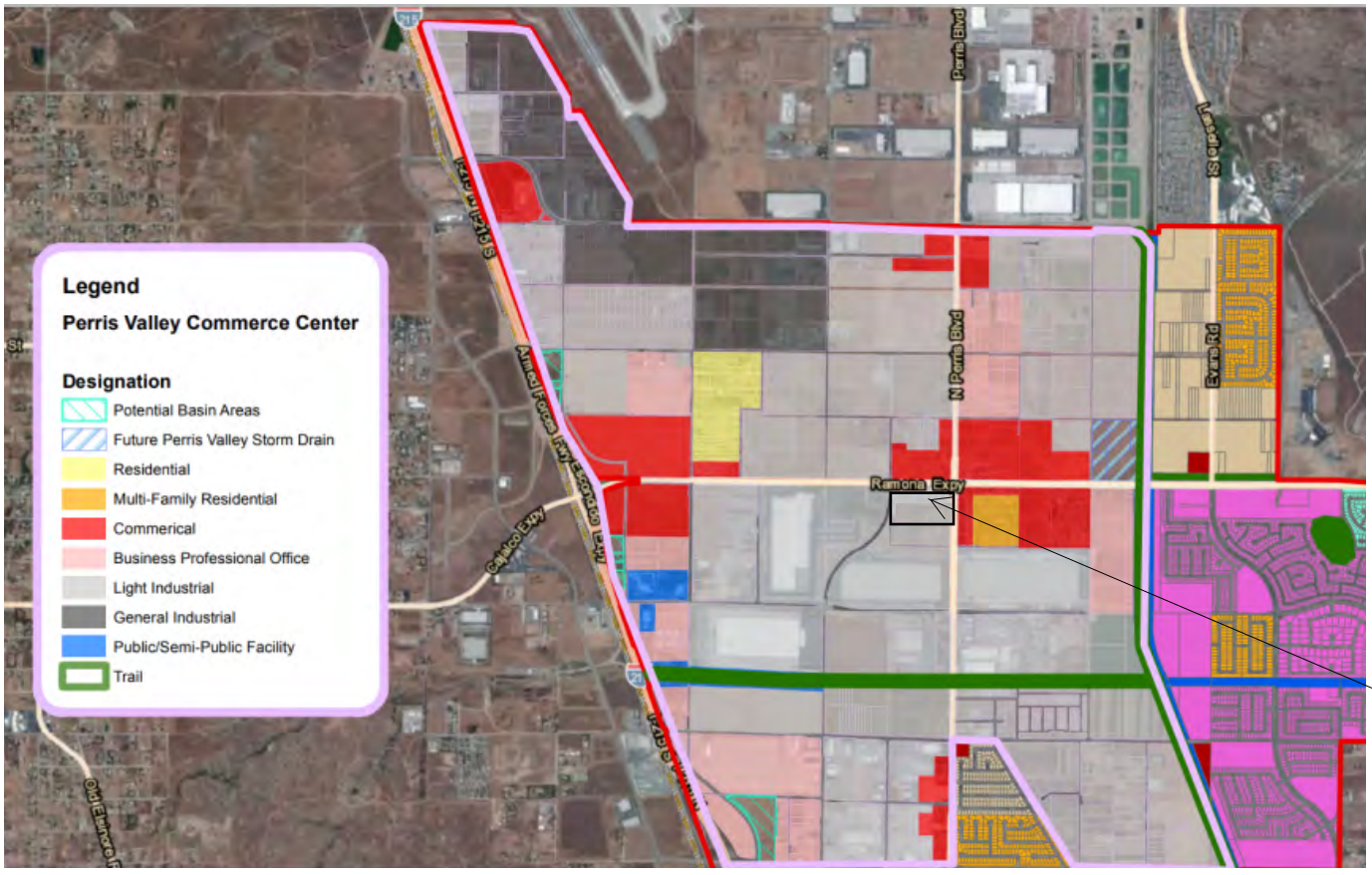
Source: City of Perris http://www.cityofperris.org/city-hall/general-plan/Land_Use_Map.pdf

Figure 4
Existing and Proposed Zoning Classifications

EXISTING

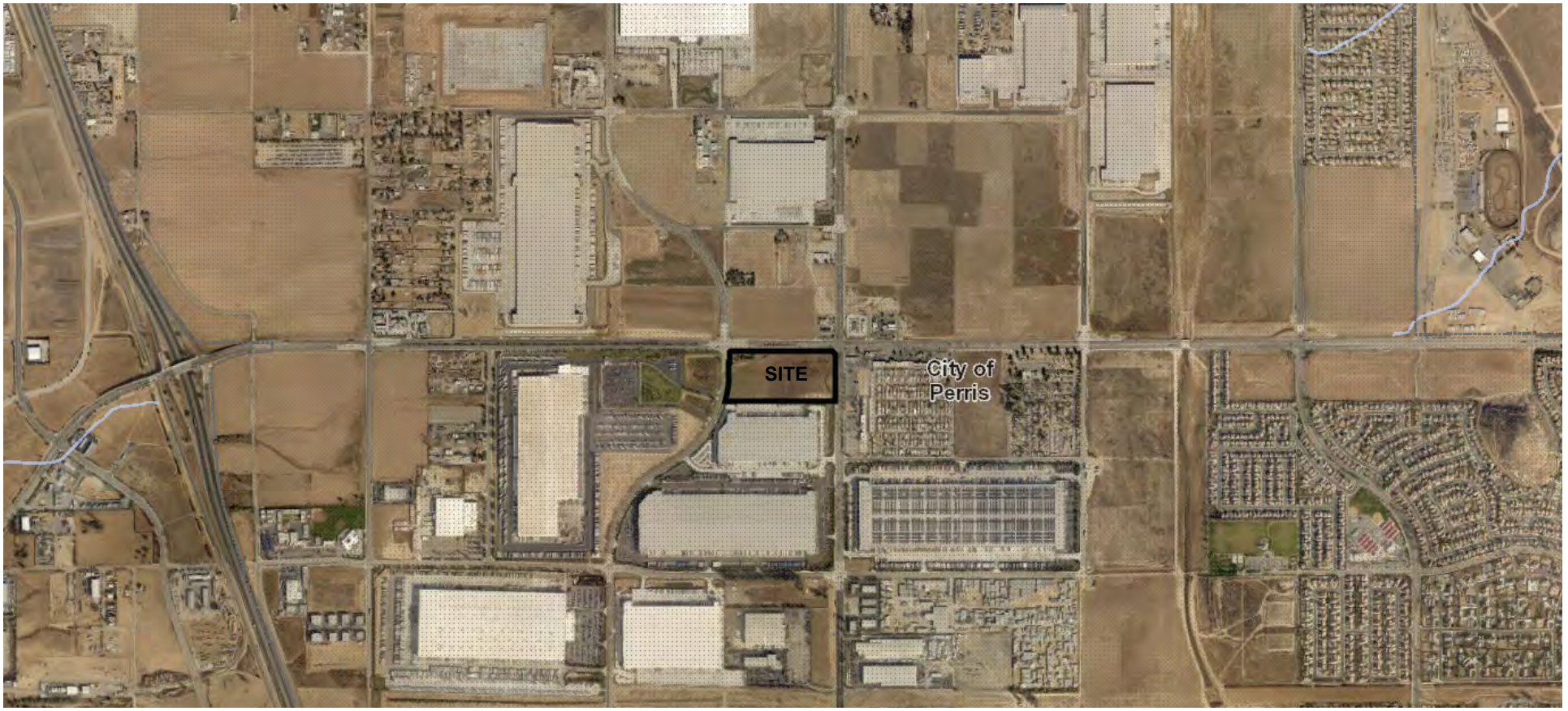


PROPOSED



Source: City of Perris http://www.cityofperris.org/city-hall/zoning/2016-zone-map.pdf

Figure 5
Aerial Photo



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

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The Project site is relatively flat with no areas of significant topographic relief. On-site elevations range from approximately 1,452 to 1,465 feet above sea level and generally slopes from southwest to northeast. The Project site primarily consists of vacant, undeveloped land that has been subject to a variety of anthropogenic disturbances that was historically used for agricultural land uses. The Project site no longer is used for agricultural activities but has been subject to on-going weed abatement activities and disturbance associated with surrounding development. These disturbances have eliminated the natural plant communities that once occurred at and surrounding the Project site. As further discussed in the Biological Resources section of this IS, the vegetation on site can be characterized as a heavily disturbed land cover type that is vegetated with a variety of non-native and early successional/ruderal plant species (according to the Western Riverside County Multiple Species Habitat Conservation Plan [MSHCP], developed or disturbed lands consist of areas that have been disced, cleared, or otherwise altered).

The Project site is located approximately 5.0 miles southeast of the March Air Reserve Base/Inland Port (MARB/IP) Airport, within the Airport Influence Area, and subject to the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IP ALUCP). The MARB/IP ALUCP divides the area close to the airport into zones based on proximity to the airport and perceived risks. An Accident Potential Zone (APZ) effectively restricts the types and intensities of land uses on some properties within the APZs to mostly nonresidential or low-occupancy industrial uses. The Project site has 11.60 acres located within Zone B1, APZ II and 3.90 acres located within Zone C1. Zone B1, APZ II allows 50 people per acre and prohibited uses include children's schools, day care centers, libraries, hospitals, congregate care facilities, hotels/ motels, restaurants, and places of assembly. Zone C1 allows 100 people per acre and prohibited uses include children's schools, day care centers, libraries, hospitals, congregate care facilities, and places of assembly. Reference **Figure 6, *March Air Reserve Base / Inland Port Airport Influence Area***.

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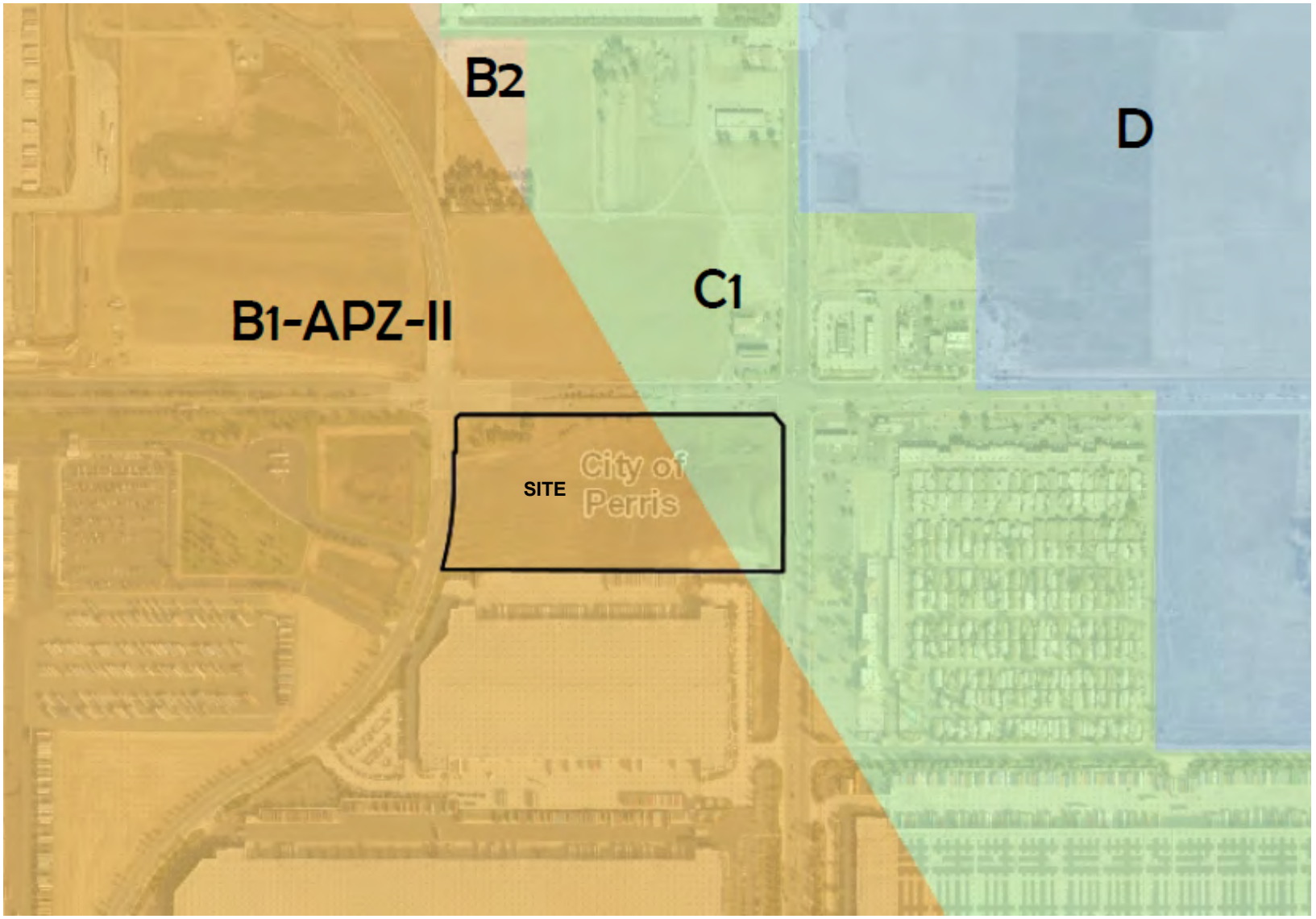
Figure 6
March Air Reserve Base Airport Influence Area



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

Zone B1, APZ II allows 50 people per acre and prohibited uses include children's schools, day care centers, libraries, hospitals, congregate care facilities, hotels/ motels, restaurants, and places of assembly.

Zone C1 allows 100 people per acre and prohibited uses include children's schools, day care centers, libraries, hospitals, congregate care facilities, and places of assembly.

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7. Project Description

The applicant for PVCC SPA No. 10 proposes to modify the current Specific Plan Land Use Designation of the Project site as follows:

Current Land Use - Commercial (C): This zoning designation provides for retail, professional office, and service-oriented business activities which serve the entire City, as well as the surrounding neighborhoods. This zone combines the General Plan Land Use designation of Community Commercial and Commercial Neighborhood.

Proposed Land Use - Light Industrial (LI): This zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. This zone correlates with the 'Light Industrial' General Plan Land Use designation. Reference **Table 2, *SPA 10 Land Use Summary***.

Table 2
SPA 10 Land Use Summary

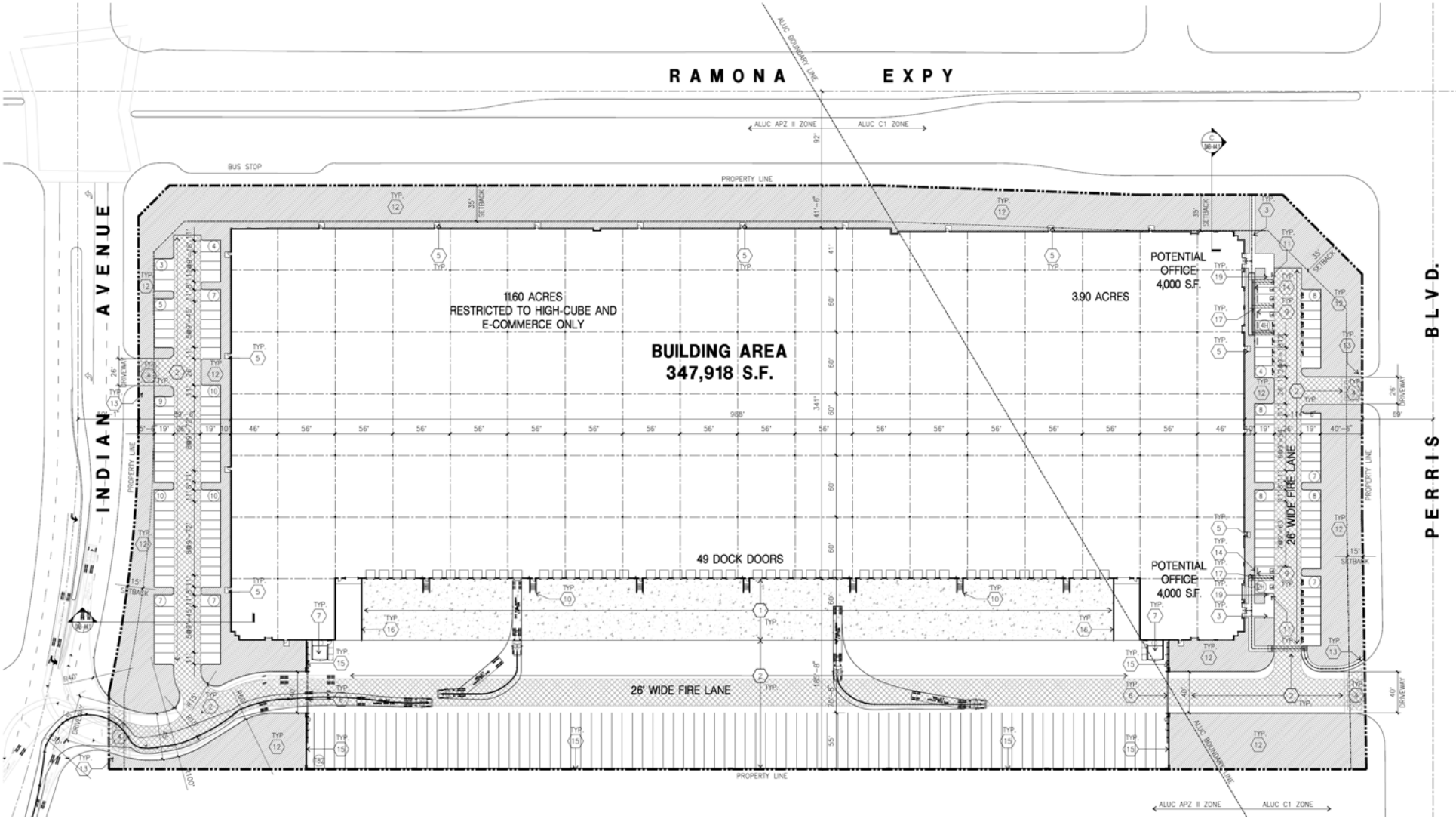
General Plan Land Use	Existing Acres Prior to PVCC SP	Acres Adopted by 2012 PVCCSP	Proposed Acres (SPA1-SPA10)
Business Park/Professional Office (BPO) Professional Office (PO) Business Park (BP)	317	343	272
Commercial (C) Community Commercial (CC) Neighborhood Commercial (NC)	462	349	253
General Industrial (GI)	423	408	392
Light Industrial (LI)	1,620	1,866	2,049
Multi-Family Residential Residential (Multi-Family) (MFR-14)	22	22	22
Public (P) Public/Semi-Public/Utilities Park, Recreational and Natural Open Space (OS)	120	194	194
Residential (R) Residential (Single-Family) (R-6,000)	59	0	0
Residential (R) Residential (Single-Family) (R-20,000)	63	60	60
Specific Plan (SP)	190	0	0
Other (ROW, Basin, etc.)	307	341	341
Total Acres	**3,583**	**3,583**	**3,583**

Source: PVCC SPA10 (**Appendix I**)

The project applicant believes that LI designation is better suited to the restrictions in place for the Project site by the MARB/IP Airport Influence Area.

The Project would involve development of the 16-acre site with an approximate 347,918-square-foot (sq. ft.) light industrial building; the building will be divided into 339,918 sq. ft. of non-refrigerated warehouse space and 8,000 sq. ft. of office space. The Project has been designed in compliance with the industrial design standards and guidelines contained within the PVCCSP. Reference **Figure 7, *Conceptual Site Plan*** and **Figure 8, *Conceptual Elevations***. As shown on **Figure 7**, the proposed building would be located in the central portion of the Project site, with parking to the east, west, and south. The plan provides designated, outdoor employee break areas on both the east and west sides of the proposed building. As shown on **Figure 8**, the proposed building would be a maximum of 45 feet tall. The proposed building would include aesthetic treatments such as varying building height and rust colored metal awnings and has an overall grey color scheme with white accents.

Figure 7
Conceptual Site Plan



Source: Project Plans (Appendix H)

Figure 8
Conceptual Elevations

Source: Project Plans (Appendix H)

8. Circulation and Parking

Vehicular Circulation

Access to the Project site would be provided via Indian Avenue with a full turning movement location near the southern edge of the Project site and aligning with the existing Lowe's property access point west of Indian Avenue. An additional right in right out access will also be located on Indian Avenue to the north, closer to Ramona Expressway. Two right in right out access points will be placed along Perris Boulevard. No access from Ramona Expressway is proposed. Refer to **Figure 7*, Conceptual Site Plan***. The roadway and site access improvements proposed as part of the Project include:

- **Ramona Expressway** – With recent City roadway expansion projects completed for Ramona Expressway, no changes to the existing lanes, or curb location are proposed. Additional right of way will be dedicated and sidewalk and right of way landscaping will be provided.

- **Indian Avenue** – Indian Avenue will be expanded to add a dedicated right turn lane. The existing median will be revised to allow for southbound left turning pocket to be added for traffic entering the site. Additional right of way will be dedicated and sidewalk and right of way landscaping will be provided.

- **Perris Boulevard** – With recent City roadway expansion projects completed for Perris Boulevard, no changes to the existing lanes, or curb location are proposed. Additional right of way will be dedicated and sidewalk and right of way landscaping will be provided connecting the existing bus bay to the existing sidewalk to the south.

Non-Vehicular Circulation

As part of the Project, six-foot sidewalks would be constructed along the Project frontages (Ramona Expressway, Perris Boulevard, and Indian Avenue). In addition, bicycle lanes will be added on Ramona Expressway (Class IV), Perris Boulevard (Class IID), and Indian Avenue (Class II). Americans with Disabilities Act (ADA) travel is provided from the street to the site via Indian Avenue, near the southern-most driveway, and also from Ramona Expressway at the northeastern corner of the site. ADA access is also provided on-site, as required. Bicycle racks are provided on both the east and west sides of the proposed building.

Parking

As shown in **Figure 7**, automobile parking would be provided along the eastern and western boundaries of the site. A total of 145 automobile parking stalls (92 stalls are required), including three standard ADA-compliant stalls, and three van ADA-compliant stalls. Pursuant to Section 5.106.5.2 of the 2019 California Green Building Standards Code (CCR, Title 24, Part 11 – CalGreen), 17 of the parking spaces will be designated for low-emitting, fuel efficient, and carpool/vanpool vehicles. Pursuant to Section 5.106.5.3.2 of the CalGreen Code, 7 parking spaces will provide conduits for the charging of electric vehicles. Additionally, 82 10' x 55' trailer parking stalls would be provided along the southern boundary of the site.

9. Landscaping, Walls/Fences and Signage, and Lighting

Landscaping

According to the Conceptual Site Plan, the landscape area would encompass approximately 16 percent of the site, exceeding the 12 percent of landscape required by City of Perris Municipal Code Section 19.070.060(6)9. As required by Section 19.70.030, Water Conservation Requirements for New or Rehabilitated Landscapes, of the City of Perris Municipal Code, the landscaping for the Project has been designed to meet the irrigation requirements of the *California Water Conservation in Landscaping Act 2006* and the *California Code of Regulations (CCR) Title 23, Division 2, Chapter 2.7* and would include, but not be limited to: plants with low water usage; an automatic irrigation controller system, and use of minimal overhead spray sprinklers.

Walls/Fences and Signage

An 8-foot-high concrete, tilt-up screen wall exists currently along the southern boundary of the site. The screen wall will be extended onto the Project site from both the east and west ends of the existing wall; 8-foot-high metal gates are proposed at both the east and west entries to the Project where the screen wall ends. These gates are each 40 feet in length and will be located after the access to the east and west parking and building entry areas. This area will serve to separate the site from the existing property to the south and to secure the trailer parking stalls.

Business signage will be provided on site in accordance with the PVCCSP and the City of Perris Municipal Code.

Lighting

The Project would include installation of lighting within the perimeter of the site, parking area, and on the building for safety and security. A uniform site lighting design would be provided throughout the site. The lighting design would consist of building wall-mounted light fixtures as well as pole-mounted lights, all designed to provide the required light level to provide adequate security pursuant to lighting requirements contained in the City of Perris Municipal Code Section 19.02.110, which includes requirements for installation of energy-efficient lighting as well as shielding of parking lot lights to minimize spillover onto adjacent properties and right-of-way.

10. Grading

The site has a gentle west to east slope with a low point at the northeast corner of the site. The proposed grading will mimic this direction of flow. With a large industrial building, the pad will be relatively flat, and the grade will slope away from the building to keep the finish floor dry. Paved areas will drain to adjacent landscape areas, where water quality features will be placed. The features will primarily be vegetated swales. Storm drain will be used to route the offsite flow from the Lowe's property (located to the west across Indian Avenue), through the site, and into the regional storm drain. There is an existing connection to the Perris Valley Master Drainage Plan (Line E-1) at the northeast corner of the property that will be the ultimate outlet for the Project. There will be a loading bay along the south side of the building that will be set below natural grade to allow for truck loading at the finish floor elevation. As such, storm drain in this area will be used to collect and store the runoff from this area in underground tanks. Runoff in those tanks will be pumped to the surface Best Management Practices at the southeast corner of the site.

Sidewalk and parking areas will be designed and graded to allow for the required ADA access as shown on the Project design drawings.

11. Proposed Utilities Infrastructure

Municipal and private utility services necessary to serve the Project are currently available within adjacent roadways. On-site utility infrastructure necessary to serve the Project, including water, sanitary sewer, drainage, and runoff treatment would be installed within the Project site and would connect to the existing utilities. The final sizing and design of on-site facilities would occur during final Project design. Utility and Service System providers are as follows:

Electricity:	Southern California Edison
Water:	Eastern Municipal Water District
Sewer:	Eastern Municipal Water District
Cable:	Frontier Communications or Time Warner
Gas:	Southern California Gas
Telephone:	Verizon
School:	Val Verde Unified School District
Police:	Riverside County Sheriff's Department
Fire:	Riverside County Fire Department

Following is a description of existing and proposed utility infrastructure:

Water

The Project site, along with the PVCCSP planning area and the entire City of Perris, is located within the water service boundary of the Eastern Municipal Water District (EMWD).

The Project's proposed specific plan land use designation change from Commercial (C) to Light Industrial (LI) for the 16-acre Project site is anticipated to have a nominal impact on the overall PVCC water supply/demand. Moreover, the water supply/demand associated with Project's proposed Light Industrial use is anticipated to be less than the water supply/demand associated with the existing Commercial land use reflected in the PVCC water supply/demand analysis.

Connections to the local EMWD water system will involve temporary construction impacts that will occur in conjunction with other on-site Project improvements.

Sewer Lines

The Project site, along with the PVCC Specific Plan area and the entire City of Perris, is located within the wastewater (sewer) service boundary of EMWD.

As set forth in the PVCCSP EIR, the EMWD has sufficient capacity to provide wastewater services to the PVCC planning area and its implementing development projects would be subject to conditions imposed by the City and the EMWD associated with the installation of additional pipelines within the specific plan area to serve individual implementing projects within the PVCC.

The EMWD owns and maintains the sanitary sewer system within the PVCC planning area. Wastewater generated by the implementing development projects within the PVCC, inclusive of

the proposed Project (logistics/distribution warehouse), will be treated at the Perris Valley Regional Water Reclamation Facility.

Storm Drainage and Water Quality Features

All new development in the City of Perris is required to comply with provisions of the National Pollutant Discharge Elimination System (NPDES) program, including Waste Discharge Requirements (WDR), and the 2010 Santa Ana Municipal Separate Sewer Permit (MS4) Permit, as enforced by the Santa Ana Regional Water Quality Board (SARWQCB).

At present, the Project site is vacant, undeveloped land with a 100 percent pervious earthen surface. The Project site is relatively flat with an existing slope gradient estimated at less than 2%. According to *Map My County*, the Project site's average elevation is 1,460 feet above mean sea level (AMSL); the minimum elevation is 1,460 AMSL and the maximum elevation is 1,464 AMSL. There are no on-site drainage improvements.

Dry Utilities

The electrical service provider for the Project site, the PVCCSP planning area, and the greater City of Perris is Southern California Edison (SCE). Based on a review of the PVCCSP, Figure 3.0-13 (Existing Electric), Google Earth aerial photographs, and a site inspection, undergrounded electrical service lines are currently in place within the public street right-of-way contiguous to the Project site (Ramona Expressway, Perris Boulevard, and Indian Avenue) serving existing commercial and light industrial uses adjacent south, east and west of the Project site.

The proposed Project will be connected to The Gas Company's natural gas distribution system. Based on a review of PVCCSP, Figure 3.0-12 (Existing Natural Gas), natural gas lines are in place contiguous to the Project site within the Ramona Expressway and Perris Boulevard public rights-of-way.

12. Construction Activities

It is anticipated that construction of the Project would occur in a single phase. For purposes of analysis in this Initial Study, it is assumed that construction would last for approximately 12-18 months. The following construction activities would occur at the Project site (with the estimated duration for purposes of analysis shown parenthetically): site preparation (approximately 10 days), grading (approximately 30 days), building construction (approximately 300 days), paving (approximately 20 days), and architectural coatings (approximately 20 days). Construction is anticipated to begin in December 2022 and be complete in November 2023.

Should construction occur any time after the respective construction dates identified, the impacts presented in this Initial Study relative to air quality and greenhouse gas emission that are based on these construction dates would be reduced. This is because emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.

13. Project Approvals

The proposed light industrial use is not consistent with the City's existing Zoning Map Classification (commercial) or the existing PVCCSP Land Use designation (commercial). The

proposed light industrial use is consistent with the existing General Plan Land Use designation for the Project site (Perris Valley Commerce Center Specific Plan); no General Plan Amendment is required. Therefore, the following approvals and permits are required from the City of Perris to implement the Project:

- Specific Plan Amendment (under Development Plan Review DPR 19-00012);
- Development Plan Review (DPR 19-00012) to allow the development of the 16-acre site with a 347,918 sq. ft. warehouse distribution facility;
- Certification of the Initial Study (IS) with the determination that the IS has been prepared in compliance with the requirements of CEQA; and
- Certification of an Environmental Impact Report (EIR) with the determination that the EIR has been prepared in compliance with the requirements of CEQA.

Other non-discretionary actions anticipated to be taken by the City at the staff level as part of the Project include:

- Review and approval of off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval;
- Review of on-site plans, including grading, on-site and off-site landscaping, and on-site utilities; and
- Approval of the Final Water Quality Management Plan (WQMP) to address post- construction runoff flows.

Approvals and permits that may be required by other agencies include:

- A National Pollutant Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board (RWQCB); and
- Approval of water and sewer improvement plans by the Eastern Municipal Water District.

14. Required City of Perris approvals, and Other Public Agencies Whose Approval is Required

Required approvals from the City of Perris shall include, but not be limited to:

- Specific Plan Amendment
- Entitlements
- Statewide General Construction Permit
- Grading Permit
- Encroachment Permit
- Building Permits

Other public agencies whose approval may be required:

- South Coast Air Quality Management District
- Riverside County Airport Land Use Commission
- Riverside County Flood Control and Water Conservation District
- Riverside County Transportation Department
- Eastern Municipal Water District
- Riverside County Department of Environmental Health

- Regional Water Quality Control Board, Santa Ana Region
- Caltrans

15. Documents Incorporated by Reference

The following reports and/or studies are applicable to development of the Project site and are hereby incorporated by reference.

- *Perris Comprehensive General Plan 2030*, City of Perris, originally approved on April 26, 2005. (Available at http://www.cityofperris.org/city-hall/general-plan.html)
- *Perris General Plan 2030 Final Environmental Impact Report*, SCH No. 2004031135, certified April 26, 2005. (Available at http://www.cityofperris.org/city-hall/general-plan/General_Plan_2030.pdf)
- *Perris Valley Commerce Center Specific Plan, FINAL ENVIRONMENTAL IMPACT REPORT,* SCH No. 2009081086, prepared by Albert A. Webb Associates, certified January 10, 2012. (Available at https://www.cityofperris.org/Home/ShowDocument?id=2645)
- Perris Valley Commerce Center Amendment No. 9, City of Perris, California, May 2018, prepared by Albert A. Webb Associates. (Available at https://www.cityofperris.org/Home/ShowDocument?id=2647)

These reports/studies are available for review at:

Public Service Counter
City of Perris Planning Division 135 North “D” Street
Perris, California 92570
(951) 943-5003

Hours: Monday–Friday: 8:00 AM to 6:00 PM.

II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (x) would be potentially affected by this Project, involving at least one impact that is a "**Potentially Significant Impact**" to the issue area as indicated by the checklist on the following pages.

☐ Aesthetics	☒ Greenhouse Gas Emissions	☐ Population/Housing
☐ Agriculture and Forestry Resources	☐ Hazards & Hazardous Materials	☐ Public Services
☒ Air Quality	☒ Hydrology/Water Quality	☐ Recreation
☒ Biological Resources	☒ Land Use/Planning	☒ Transportation
☒ Cultural Resources	☐ Mineral Resources	☒ Tribal Cultural Resources
☒ Energy	☒ Noise	☐ Utilities/Service Systems
☐ Geology/Soils		☐ Wildfire
		☒ Mandatory Findings of Significance

III. DETERMINATION

On the basis of this initial evaluation:

☒ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required.

Signature

4-27-2021

Date

Chantal Power, AICP, Contract Planner
Printed Name

IV. EVALUATION OF ENVIRONMENTAL IMPACTS

1) The purpose of this Initial Study is to identify all, or portions of, 19 issue areas that will be either be:
   a) Dismissed at the Initial Study stage of analysis; or
   b) Further analyzed is required in an Environmental Impact Report (EIR).

2) Answers in this IS shall take into account the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts. For those issues that will be analyzed in the EIR, this analysis will be contained in an EIR.

3) The checklist answers shall indicate whether the impact is potentially significant, less than significant with mitigation, less than significant or have no impact. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion will identify the following:
   a) Earlier Analysis Used: Identify and state where they are available for review.
   b) Impacts Adequately Addressed: Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures: For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

5) The explanation of each issue identifies:
   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.
   c) Whether the issue requires additional information/analysis in an EIR.

V. ENVIRONMENTAL ISSUES ASSESSMENT

1. AESTHETICS.

Source(s): *Map My County,* (**Appendix A**); *Project Plans* (**Appendix H**); City of Perris General Plan 2030 – Draft Environmental Impact Report (GP 2030 - DEIR), October 2004, Chapter 4.2, *Aesthetics;* Perris Valley Commerce Center Specific Plan – Draft Environmental Impact Report (PVCCSP-DEIR), July 2011, Appendix A, Initial Study, Section 13, *Aesthetics*; Perris Valley Commerce Center Specific Plan Amendment No. 9 (PVCC SPA9), May 2018, Section 4.2.4, *Lighting*; County of Riverside General Plan Circulation Element, Revised December 12, 2017, Figure C-8, *Scenic Highways*; **Figure 3, *Existing and Proposed General Plan Land Use Plan Designations***, **Figure 4*, Existing and Proposed Zoning Classifications*,** **Figure 5, *Aerial Photo*,** and **Table 1*, Surrounding Land Uses*** in Section I. of this Initial Study.

Analysis of Project Effect and Determination of Significance:

Except as provided in Public Resources Code Section 21099, would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	

Less Than Significant Impact

Aesthetics generally refer to the identification of visual resources, the quality of public views in an area, and/or the overall visual perception of the environment. The issue of light and glare is related to both the creation of daytime glare due to the reflection of the sun (such as from glass surfaces) and/or an increase in nighttime ambient lighting levels (such as from building lights, streetlights, and vehicle headlights).

The Project is not a specified project on an infill site within a transit priority area so Public Resources Code Section 21099 does not apply (i.e., aesthetic impacts must be addressed).

Scenic vistas can be impacted by development in two ways, 1) a structure may be constructed that blocks the view of a vista, and 2) the vista itself may be altered (e.g., development on a scenic hillside).

The natural setting of the City of Perris, the Perris Valley, and the larger northwest Riverside County region is one of rolling hills separated by relatively flat valleys. There are distant mountain and hillside views that are significant to the area's visual character and which provide scenic vistas from various locations within the local community.

The City of Perris encompasses approximately forty (40) square miles within the Perris Valley and is situated midway between the San Jacinto and Santa Ana Mountains. The Perris Valley is a north-northwest trending alluvial basin, and the terrain is generally flat.

Surrounding views from the City include the Lake Perris dam to the northeast, the Bernasconi Hills, and the Lakeview Mountains to the east, Gavilan Hills and the Motte-Rimrock Reserve to the west, and to a lesser extent March Air Reserve Base / Inland Port Airport to the north.

The Project site is located in the central portion of the Perris Valley Commerce Center Specific Plan (PVCCSP), a 3,583-acre master plan approved by the City of Perris on January 10, 2012 (Ordinance No. 1284). There have been nine (9) amendments to date, the most recent being Amendment No. 9 (SPA9), approved on August 28, 2018 (Ordinance No. 1371).

The Project applicant is requesting approval of a Specific Plan Amendment to accommodate the development of a 347,918 square foot light-industrial distribution warehouse building with 8,000 square feet of office area on a 16-acre site.

The Project applicant is requesting approval to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI) as proposed PVCC Specific Plan, Amendment No. 10. Reference **Figure 3, *Existing and Proposed General Plan Land Use Plan Designations***, and **Figure 4*, Existing and Proposed Zoning Classifications*** in Section I. of this Initial Study.

As set forth in the Initial Study (IS) for the PVCCSP:

- The PVCCSP is surrounded by existing development;
- The PVCCSP is not located within a scenic vista, nor will development of the PVCCSP, including the change in land uses, have an adverse effect on a scenic vista;
- The PVCCSP restricts building heights and includes architectural design and landscape guidelines that will meet the City's development standards, further reducing the potential for visual impacts.

At the time the PVCCSP was adopted in 2012 the area was largely undeveloped land used for agricultural purposes (sod farming, other) with smaller elements of development consisting of some warehousing/distribution facilities, neighborhood and community commercial, small scale industrial facilities, a rural residential neighborhood, and a mobile home park.

Over the past nine (9) years since its adoption, a substantial amount of new development activity (primarily logistics/distribution warehouses) and infrastructure (i.e., road improvements, dry and wet utilities, etc.) has been built within the PVCCSP boundary, including the 579,708-square-foot distribution warehouse contiguous south of the Project site (3900 Indian Ave) completed in 2014.

The Project site is located less than 1¼ mile east of I-215 with extensive frontage along three public street rights-of-way situated along the south side of the Ramona Expressway and bounded by Perris Boulevard to the east and Indian Avenue to the west.

The Project site is not located along a Scenic Highway; Ramona Expressway is a designated by the City as an Expressway, while Perris Boulevard is designated as a Primary Arterial and Indian Avenue is designated as a Secondary Arterial.

The closest Scenic Highway located approximately 1¼ mile south of the Project site is identified as the Mid County Parkway project extending east-west along the south boundary of the PVCCSP connecting to I-215 at the new proposed I-215/Placentia Avenue interchange (scheduled construction start Spring 2020).

The Project site is surrounded by lands within the PVCC Specific Plan (PVCCSP) designated for Commercial use to the north and east; and by lands designated for Light Industrial use to the south and west. Reference **Table 1, *Surrounding Land Uses***, and **Figure 5, *Aerial Photo***, in Section I. of this Initial Study.

- There is an existing 579,708-square-foot distribution warehouse contiguous south of the Project site (3900 Indian Ave; built 2014); and the 1.25-million-square-foot Lowe's Regional Distribution Center is located adjacent west of the Project site across Indian Avenue (3984 Indian Ave; built 2000/2001).
- Existing local serving commercial development is located adjacent east across Perris Boulevard and extending east along Ramona Expressway. Gas station/convenience store facilities are located adjacent to the Project site at the northwest and southeast corners of Ramona Expressway and Perris Boulevard. The commercial land adjacent north across Ramona Expressway is currently vacant.

As described above, the Project site is surrounded on three sides by existing light industrial and commercial development within an emerging mixed-use light industrial and commercial district. Due to their location and height, Project buildings will not block views from any roadways accessing residential neighborhoods including the nearby mobile home park, so there will be no impacts in this regard.

The Project site topography is generally flat and at grade with Ramona Expressway, Perris Boulevard, and Indian Avenue, adjacent properties, and the general vicinity. According to *Map My County*, the Project site's average elevation is 1,460 feet above mean sea level (AMSL); the minimum elevation is reported at 1,460 feet AMSL and the maximum elevation is reported at 1,464 feet AMSL.

The proposed Project would change the visual character of the Project site, which is currently vacant and undeveloped, by adding the distribution warehouse building and landscaping. However, the proposed Project will be consistent and compatible with existing and proposed commercial and light industrial development surrounding the Project site in terms of building height, massing, and development intensity. In addition, the proposed Specific Plan Amendment is from commercial to industrial use to the appearance and size of Project buildings will be similar to what was planned under the approved PVCCSP.

Based on the above, the proposed Project will not have a substantial adverse effect on a scenic vista from a public vantage point. Any potential impacts would be less than significant, and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Except as provided in Public Resources Code Section 21099, would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				**X**

No Impact

Please reference the discussion in Threshold 1.a, as it pertains to Public Resources Code Section 21099(d)(1) and the visual character of the Project site environs.

The bulk of developable land within the City of Perris is located in a flat, broad basin. Rolling foothills lie to the east and west of this basin. Given the flatness of the basin, the view corridors extend for miles along current and planned roadways which helps protect public scenic vistas from the broad basin to the surrounding foothills. The San Jacinto River traverses the area in a northeast-southwest direction. Large rocks scattered among undeveloped, rolling topography in the west-central area of the City of Perris also contribute to the visual landscape. However, no one rock or collection of rocks in this landscape is notable by virtue of their unique formation, size, or character. These landforms represent pleasing features that offer variation to the landscape. The planning area's hillsides and rock outcroppings have been incorporated into the City's development plan. The Project site contains no significant rock or rock outcroppings.

The Project site is not located along a State Scenic Highway; Ramona Expressway is a designated by the City as an Expressway, while Perris Boulevard is designated as a Primary Arterial and Indian Avenue is designated as a Secondary Arterial.

The closest officially designated State Scenic Highway is Highway 243, located over 20 miles east of the Project site. The Mid County Parkway project is a proposed 16-mile transportation corridor that will extend east-west along the south boundary of the PVCCSP connecting to I-215 at the new proposed I-215/Placentia Avenue interchange (scheduled construction start Spring 2020). However, it is unknown if the Mid County Parkway project will be designated as a State Scenic Highway in the future.

Disturbances to the vacant Project site are modest, and represent cumulative impacts resulting from past agricultural activities, weed abatement efforts, and the removal of a rural residence near the northwest corner of the site.

There are no scenic trees, rock outcroppings, or historic buildings on the Project site and the Project site is not located within or adjacent to a state scenic highway corridor. Implementation of the proposed Project will have no impact on scenic resources and no mitigation is required.

Based on the above, no additional analysis will be required in an EIR.

Except as provided in Public Resources Code Section 21099, would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			**X**	

Less Than Significant Impact

Please reference the discussion in Threshold 1.a as it pertains to Public Resources Code Section 21099(d)(1) and the visual character of the Project site environs.

The Project site is located in the central portion of the PVCCSP planning area. The PVCCSP is located in what is considered an urban and urbanizing area that is more fully discussed in Threshold 1.a.

As set forth in the Initial Study (IS) for the PVCCSP:

- The PVCCSP is surrounded by existing development;
- The PVCCSP is not located within a scenic vista, nor will development of the PVCCSP, including the change in land uses, have an adverse effect on a scenic vista;
- The PVCCSP restricts building heights and includes architectural design and landscape guidelines that will meet the City's development standards, further reducing the potential for visual impacts.

Construction of the proposed Project would result in modest short-term impacts to the existing visual character and quality of the area. Construction activities will require the use of equipment and storage of materials within the Project site boundaries. Construction activities are temporary and will not result in any permanent visual impact.

Implementation of the proposed Project would permanently change the visual character of the Project site by adding a distribution warehouse building structure, and landscaping, but would not change any scenic vistas or visual corridors.

The proposed Project is located in an urban area and implementation of the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. Any potential impacts would be less than significant, and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Except as provided in Public Resources Code Section 21099, would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		**X**		

Less Than Significant Impact

Please reference the discussion in Threshold 1.a as it pertains to Public Resources Code Section 21099(d)(1) and the Project site environs.

Construction

During Project construction, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Due to the distance between the construction area and motorists on adjacent roadways, such security lights may result in glare to motorists. However, this potential impact will be reduced to a less than significant level through the City's standard project review and approval process and with implementation of **Mitigation Measure MM-AES-1**.

Operations

Excessive or inappropriately directed lighting can adversely impact nighttime views by reducing the ability to see the night sky and stars. Glare can be caused from unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal, glass windows, other) can also cause glare. Impacts associated with glare range from simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists).

There are existing lighting sources adjacent to the Project site including traffic lights, streetlights, exterior mounted building light fixtures, free-standing parking light standards, and vehicle headlights. The proposed Project will include outdoor lighting associated with operation of a distribution warehouse facility.

Implementation of the proposed Project would not introduce a substantial amount of new daytime glare to the area due to the building-type which consists of a concrete tilt-up warehouse building with relatively few windows in the limited office area.

The proposed Project would introduce new sources of nighttime light and glare into the area from additional street lighting, parking lot lighting, and building security lighting at the Project site. However, the design of all lighting at the proposed Project site will be required to comply with Chapter 19.02.110 of the City's Zoning Ordinance, which includes specifications for installation of energy-efficient lighting as well as shielding of parking lot lights to minimize spillover onto adjacent properties and right-of-way.

The Project site is within the area covered by the Mt. Palomar Dark Sky Ordinance. The proposed Project will also be required to comply with Section 4.2.4 of the PVCC SPA9 which contains lighting standards for general, decorative, and parking lot lighting. Based on Mt. Palomar Observatory's Dark Sky Ordinance, all projects will be conditioned to use low pressure sodium.

Through standard City procedures, compliance with City regulations regarding light, and implementation of **Mitigation Measure MM-AES-1**, impacts with regard to the creation of new light and glare at the Project site will be less than significant.

As a result of this analysis, no additional analysis will be required in an EIR.

Standard Conditions and Requirements

None are required.

Mitigation Measures

MM-AES-1 Prior to issuance of grading permits, the Project developer shall provide evidence to the City that any temporary nighttime lighting installed for security purposes shall be downward facing and hooded or shielded to prevent security light spillage outside of the staging area or direct broadcast of security light into the sky.

2. AGRICULTURE AND FORESTRY RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Source(s): *Map My County,* (**Appendix A**); *Project Plans* (**Appendix H**); City of Perris General Plan Draft Environmental Impact Report (GP-DEIR), Appendix A, Initial Study, Section II, *Agricultural Resources*, Appendices; Perris Valley Commerce Center Specific Plan Draft Environmental Impact Report (PVCCSP-DEIR), Appendix A, Initial Study, Section 16, *Agricultural Resources*; State of California Public Resources Code Section 12220(g); City of Perris Municipal Code, Chapter 19.20. - A-1 Zone (Light Agricultural/Interim Designation).

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				**X**

No Impact

The California Department of Conservation's (CDC) Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of Important Farmland. It divides the state's land into eight categories based on soil quality and existing agricultural uses to produce maps and statistical data. These are used to help preserve productive farmland and to analyze impacts on farmland. Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are all Important Farmland and are collectively referred to as Important Farmland herein. The highest rated Important Farmland is Prime Farmland. Farmland maps are updated and released every two years.

The Project site has the following designations, per *Map My County*:

- Farmland of Local Importance; and
- Urban-Built Up Land.

Based on this information, the proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use. No impact would occur.

Therefore, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X

No Impact

The Project site's existing General Plan land use designation and Zoning classification are both Specific Plan (SP). As set forth on Figure 2.0-1 of the Perris Valley Commerce Center Specific Plan (PVCCSP) - Land Use Plan, the Project site is currently designated Commercial (C).

The PVCCSP Commercial (C) designation allows retail, professional office, and service-oriented business activities which serve the entire City, as well as the surrounding neighborhoods. This zone combines the General Plan Land Use designations of Community Commercial and Commercial Neighborhood.

The Project proposes to amend the existing PVCCSP by changing the existing zoning classification for the Project site from Commercial to Light Industrial:

- Proposed PVCCSP zoning classification for Project Site: Light Industrial (LI)

The PVCCSP Light Industrial (LI) designation provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. This zone correlates with the 'Light Industrial' General Plan Land Use designation.

The City is focusing on developing land in an economically productive manner that will serve the growing population. Thus, the City of Perris's future development emphasizes mixed-use, commercial, industrial, and residential projects rather than supporting the continuation of agricultural uses, which are becoming less economically viable.

As stated in the City of Perris General Plan 2030 DEIR, Appendix A, Initial Study, Section II, Agricultural Resources:

> "The 1991 General Plan Land Use Element eliminated the "agricultural" land use designation. Accordingly, the Environmental Impact Report prepared in conjunction with the 1991 General Plan identified conversion of agricultural land as a significant cumulative impact. The EIR Findings indicated that certain social and economic factors outweighed the cumulative impacts associated with conversion of agricultural land to non-agricultural use and a Statement of Overriding Considerations were thereby adopted. Accordingly, adoption and implementation of the project General Plan will have no impact."

Furthermore, the City's 2030 GP-DEIR states:

> "The 1991 General Plan Land Use Element redesignated all agricultural lands for uses other than agriculture. Remaining land zoned for agricultural use is subject to a Williamson Act contract for which a notice of non-renewal has been filed indicating that the land will

be taken out of agricultural production. Adoption and implementation of the project General Plan will have no impact on the non-renewal."

The Perris Valley Commerce Center Specific Plan is designed to encourage a thoughtful mix of land uses that provide interrelated opportunities. The commerce center land use designations include: General Industrial (GI), Light Industrial (LI), Business/Professional Office (BPO) and Commercial (C). There are two areas of residential designations that are intended to recognize two existing communities: (1) Residential (R) for the community located south of Markham, east of Webster, and north of Ramona Expressway; and (2) Multi-Family Residential (MFR-14) for the mobile home community located north of Dawes and easterly of Perris Boulevard (one block east of the Project site).

The proposed Project's light industrial use will not conflict with existing zoning. For agricultural use and no impact will occur.

The Project site is located in Planning Area 3 (Agriculture Conversion Area) of the City of Perris, General Plan 2030 (GP 2030), Land Use Element. As of the 2005 adoption date of the GP 2030, Planning Area 3 consisted of large tracts of land used for agriculture, much of which has since been converted to urban use in conjunction with the PVCCSP. GP 2030 acknowledges that "proximity to the Interstate 215 corridor suggests conversion of agricultural land, over the long term, to uses that are compatible with surrounding commercial and industrial uses. Conversion could enhance the economy of the City by attracting new uses that complement the existing Lowe's and Ross distribution centers and provide jobs for local residents".

According to Riverside County's *Map My County*, the Project site is located within an Agricultural Preserve identified as Perris Valley No. 1 Map No. 56; however, it is not identified as being subject to an existing Williamson Act contract. In addition, the Project site is vacant land and there have been no recent agricultural activities on site. Therefore, the Project will not conflict with a Williamson Act contract. No impact will occur.

Therefore, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined in Government Code section 51104(g))?				**X**

No Impact

Public Resources Code Section 12220(g) identifies forest land as *land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.* The Project site and surrounding properties do not support a significant number of trees and are not currently being managed or used for forest land as identified in Public Resources Code Section 12220(g).

Based on these conditions, development of the Project will have no impact to any timberland zoning and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?				**X**

No Impact

There is no forest land on the Project site so there will be no loss of forest land or conversion of forest land to non-forest use as a result of the Project. No impacts will occur, and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				**X**

No Impact

As discussed in Threshold 2.a, the proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use.

As shown on **Table 1, *Surrounding Land Uses***, in Section I. of this Initial Study, there are no agricultural uses adjacent to the Project site. Furthermore:

- As shown on **Figure 3, *Existing and Proposed General Plan Land Use Designations***, in Section I. of this Initial Study, there are no agriculturally designated properties in proximity of the Project site.
- As shown on **Figure 4, *Existing and Proposed* Zoning *Classifications***, in Section I. of this Initial Study, the properties abutting the Project site to the northeast are designated Light Agricultural (A-1).

Currently the Project site is vacant land with existing logistics/distribution warehouse development contiguous to the south and west, and in the immediate vicinity north of Ramona Expressway. Additionally, there is a mobile home community zoned Multi-Family Residential (MFR-14) located north of Dawes and easterly of Perris Boulevard (one block east of the Project site). There is no agricultural use adjacent to or in the immediate vicinity of the Project site. The closest agricultural use is located on the north side of Ramona Expressway between E. Oleander Avenue and Evans Road, approximately three-quarters (¾) of a mile east/northeast from the Project site. Given the

distance to this interim dry farming agricultural use, the proposed Project would not involve changes to the environment that would result in the conversion of this property to a non-agricultural use.

No additional analysis will be required in an EIR as it pertains to the conversion of Farmland to a non-agricultural use.

There is no forest land on the Project site. Therefore, the Project will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use. No impact will occur, and no mitigation is required.

Therefore, no additional analysis will be required in an EIR as it pertains to forest land.

Standard Conditions and Requirements

None are required.

Mitigation Measures

No mitigation measures are required.

3. AIR QUALITY.

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Source(s): *Project Plans* (**Appendix H**); City of Perris General Plan - Draft Environmental Impact Report (GP-DEIR), Chapter 4.3, *Air Quality*; Perris Valley Commerce Center Specific Plan - Draft Environmental Impact Report (PVCCSP-DEIR), Section 4.2, *Air Quality*; Final *2016 Air Quality Management Plan*, issued by the South Coast Air Quality Management District, March 2017, Resolution No. 17-2.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	X			

Potentially Significant Impact

CEQA requires a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans (CEQA Guidelines Section 15125, as amended 2019).

The Project site along with the entire City of Perris and much of the County of Riverside is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The regional plan that applies to the City of Peris and the proposed Project is the SCAQMD's Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies between the proposed Project and the referenced AQMP.

The Project applicant proposes a Specific Plan Amendment to accommodate the development of a 347,918-square-foot light-industrial warehouse building with 8,000 square feet of office area on a 16-acre site.

The Project site is located in the ±3,500-acre PVCCSP planning area, in the City of Perris. The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI) as proposed PVCCSP, Amendment No. 10.

The SCAQMD is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the basin is in nonattainment (i.e., ozone [O_3], coarse particulate matter [PM_{10}], and fine particulate matter [$PM_{2.5}$]). These are considered criteria pollutants, because they are three of several prevalent air pollutants known to be hazardous to human health (an area designated as nonattainment for an air pollutant is an area that does not achieve national and/or state ambient air quality standards for that pollutant).

The SCAQMD has prepared the AQMP to establish a comprehensive program to lead the Basin into compliance with all federal and state air quality standards. The 2016 Final AQMP issued by

the SCAQMD in March 2017 is the most recent air quality plan released and is the current air quality plan in effect.

The control measures and related emission reduction estimates included in the 2016 AQMP are based upon emissions projections for a future development scenario derived from land use, population, and employment estimates included in the regional transportation plan (RTP), area-wide general plans, and approved specific plans, and in consultation with local governments. Accordingly, if a project demonstrates compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed, and the project would not conflict with implementation of such a plan.

As the proposed Project includes a specific plan amendment to rezone approximately 16 acres from Commercial (C) to Light Industrial (LI), Threshold 3.a will need be analyzed in a forthcoming EIR. The analysis will include, but not be limited to, a review of the Project's consistency with the SCAQMD's 2016 Air Quality Management Plan, and the Southern California Association of Governments pending Connect SoCal 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (2020-2045 RTP/SCS).

It is noted, the Connect SoCal 2020-2045 RTP/SCS Draft PEIR was released December 2019 (adoption is currently pending).

In order to ensure a comprehensive discussion as to whether the Project would conflict with or obstruct implementation of the applicable air quality plan (based on these changes), this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	**X**			

Potentially Significant Impact

The Basin is classified as in attainment for all criteria pollutants except for ozone, PM_{10}, and $PM_{2.5}$. The Basin is designated as a nonattainment area for federal ambient air quality standard (AAQS) for the 8-hour ozone, $PM_{2.5}$ standards and as partial nonattainment for lead (Pb) and is in nonattainment area under state 1- and 8-hour ozone, $PM_{2.5}$, and PM_{10} standards. Ozone is not emitted directly but is a result of atmospheric activity on precursors. NO_X and Reactive Organic Gases (ROG) are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone.

The City evaluates project air quality emissions based on the quantitative emission thresholds originally established in the SCAQMD's CEQA Air Quality Handbook. The SCAQMD's significance thresholds for impacts to regional air quality are shown in **Table 3-1, *SCAQMD Air Quality Significance Thresholds – Mass Daily Thresholds***.

Table 3-1
SCAQMD Air Quality Significance Thresholds – Mass Daily Thresholds

Pollutant	Emissions (pounds)	
	Construction	Operational
Oxides of Nitrogen (NO_X)	100	55
Volatile Organic Compounds (VOC)	75	55
Coarse Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55
Oxides of Sulfur (SO_X)	150	150
Carbon Monoxide (CO)	550	550
Lead (Pb)*	3	3

Source: SCAQMD Air Quality Significance Thresholds (SCAQMD 2015)

The Project has the potential to result in result in emissions of NO_X, VOC, PM_{10}, $PM_{2.5}$, SO_X, and CO, during construction and operations. The Project is required to comply with the PVCCSP EIR mitigation measures that have been adopted to address the construction-related and operational air quality impacts associated with new development projects within the PVCCSP planning area.

In order to ensure a comprehensive discussion as to whether the Project would result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state AAQS (including releasing emissions, which exceed quantitative thresholds for ozone precursors), this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	X			

Potentially Significant Impact

A sensitive receptor is a person in the population who is more susceptible to health effects due to exposure to an air contaminant than is the population at large. Examples of sensitive receptor locations in the community include residences, schools, playgrounds, childcare centers, churches, athletic facilities, retirement homes, and long-term health care facilities.

The nearest sensitive receptor is the existing multi-family residential mobile home park located approximately 410 feet due east of the Project site at the southeast quadrant of Ramona Expressway and Perris Boulevard (accessed via Dawes Street).

A health risk assessment will be required to evaluate exposure of sensitive receptors to substantial pollutant concentrations resulting from diesel exhaust from trucks serving the proposed Project. Other emissions generated at the Project site will be compared to the SCAQMD's Localized Significance Thresholds (LSTs).

To ensure a comprehensive discussion as to whether the Project would expose sensitive receptors to substantial pollutant concentrations, this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?			X	

Less Than Significant Impact

According to the CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. None of these are associated with the Project site's proposed logistics/distribution-warehouse use.

The potential for an odor impact is dependent on a number of variables including the nature of the odor source, distance between the receptor and odor source, and local meteorological conditions. During construction, potential odor sources associated with the Project include diesel exhaust associated with construction equipment. Diesel exhaust may be noticeable; however, construction activities would be temporary. Heavy-duty equipment in the Project area during construction will emit odors; however, the construction activity would cease to occur after individual construction is completed.

The Project is required to comply with SCAQMD Rule 402 (Rule 402) during construction, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. Rule 402 shall be implemented as **Standard Condition SC-AQ-1**. Compliance with Rule 402 is a standard condition and is not considered unique mitigation under CEQA. Construction odors will be less than significant.

Potential odor sources associated with the operation of the Project are anticipated to be those that would be typical of similar distribution-warehouse development. Light industrial distribution warehouse developments typically do not result in odor impacts. Operational odors will be less than significant.

No additional analysis will be required in an EIR.

Standard Conditions and Requirements

SC-AQ-1 The Project is required to comply with Rule 402 during construction, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Mitigation Measures

The proposed Project is required to comply with the following PVCCSP EIR mitigation measures. Additional mitigation to be determined if necessary, in an EIR.

PVCCSP MM Air 1: To identify potential implementing development project-specific impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined in conjunction with the SCAQMD. The results of the construction-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis or other appropriate analyses as determined in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

PVCCSP MM Air 2: Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

PVCCSP MM Air 3: To reduce fugitive dust emissions, the development of each individual implementing development project shall comply with SCAQMD Rule 403. The developer of each implementing project shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance. Dust control measures shall include, but are not limited to:

- Requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain);
- Keeping disturbed/loose soil moist at all times;
- Requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered;
- Installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip;
- Posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved portions of the project site;
- Suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour;
- Appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation;
- Sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers

or roadway washing trucks when sweeping streets to remove visible soil materials; and/or,
- Replacement of ground cover in disturbed areas as quickly as possible.

PVCCSP MM Air 4: Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.

PVCCSP MM Air 5: Electricity from power poles shall be used instead of temporary diesel or gasoline-powered generators to reduce the associated emissions. Approval will be required by the city the City of Perris Building Division prior to issuance of grading permits.

PVCCSP MM Air 6: The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled off-road construction equipment, the use of construction equipment that demonstrates early compliance with off-road equipment with the CARB in-use off-road diesel vehicle regulation (SCAQMD Rule 2449) and/or meets or exceeds Tier 3 standards with available CARB verified or USEPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNOx unless it is unavailable in Riverside County at the time of project construction activities. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris Building Division prior to issuance of a grading permit.

PVCCSP MM Air 7: During construction, ozone precursor emissions from mobile construction equipment shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers' specifications to the satisfaction of the City of Perris Building Division. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction. Compliance with this measure shall be subject to periodic inspections by the City of Perris Building Division.

PVCCSP MM Air 8: Each individual implementing development project shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.

PVCCSP MM Air 9: To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g., bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in SCAQMD's Rule 1113. Construction specifications shall be included in building specifications that assure these requirements are implemented. The specifications for each implementing development project shall be reviewed by the City of Perris Building Division for compliance with this mitigation measure prior to issuance of a building permit for that project.

PVCCSP MM Air 10: To identify potential implementing development project-specific impacts resulting from operational activities, proposed development projects that are subject to CEQA shall have long-term operational-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined by the City of Perris as lead agency in conjunction with the SCAQMD. The results of the operational-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis, CO Hot Spot analysis, or other appropriate analyses as determined by the City of Perris in conjunction with SCAQMD. If such analyses identify potentially significant

regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

PVCCSP MM Air 11: Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.

PVCCSP MM Air 12: Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.

PVCCSP MM Air 13: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other state programs that restrict operations to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero- Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NOx] funding programs, as identified on SCAQMD's website (http: //www.aqmd.gov). Tenants would be required to use those funds, if awarded.

PVCCSP MM Air 14: Each implementing development project shall designate parking spaces for high-occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.

PVCCSP MM Air 15: To identify potential implementing development project-specific impacts resulting from the use of diesel trucks, proposed implementing development projects that include an excess of 10 dock doors for a single building, a minimum of 100 truck trips per day, 40 truck trips with TRUs per day, or TRU operations exceeding 300 hours per week, and that are subject to CEQA and are located adjacent to sensitive land uses; shall have a facility-specific Health Risk Assessment performed to assess the diesel particulate matter impacts from mobile-source traffic generated by that implementing development project. The results of the Health Risk Assessment shall be included in the CEQA documentation for each implementing development project.

This Initial Study analysis includes early consultation with RTA so the Project has complied with the pre-approval portion of the following applicable PVCCSP EIR mitigation measure (specific input regarding local bus stops from the RTA will be presented in an EIR):

PVCCSP MM Air 18: Prior to the approval of each implementing development project, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the implementing development project that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the implementing development project, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalks and

curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.

PVCCSP MM Air 19: In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris Building Division) prior to conveyance of applicable streets.

PVCCSP MM Air 20: Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All reductions will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.

4. BIOLOGICAL RESOURCES.

Source(s): *Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis*, prepared by ELMT Consulting, Inc. 3-2020 (*MSHCP Compliance Document*, **Appendix B**); Multiple Species Habitat Conservation Plan (MSHCP) Information Map of the Western Riverside County Regional Conservation Authority; Chapter 19.71 of the Perris Municipal Code, "Urban Forestry Establishment and Care"; and Chapter 19.70.040 of the Perris Municipal Code, "Landscape Design Guidelines and Technical Manual".

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	**X**			

Potentially Significant Impact

According to the *MSHCP Compliance Document*, the Project site is located within the Mead Valley Area Plan of the MSHCP but is not within any Criteria Cells or MSHCP Conservation Areas and does not contain any Core Habitat or Wildlife Movement Corridors under the MSHCP. The Project site contains no Critical Habitat for any listed species but is within the designated survey area for burrowing owl (*Athene cuincularia*). It was determined the Project site had a low potential as suitable habitat for burrowing owl, and no focused surveys were recommended. In addition, the MSHCP Compliance Document indicates the site contains no drainage features that would fall under the jurisdiction of the Regional Water Quality Control Board (RQWCB), U.S Army Corps of Engineers (ACOE), or the California Department of Fish and Wildlife (CDFW). The Project site is located within the Mitigation Fee Area of the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) so the applicant will be required to pay the SKR HCP Mitigation Fee prior to development of the site. Several special-status plant and wildlife species identified by the CDFW's California Natural Diversity Database and other electronic databases as potentially occurring in the vicinity of the Project site. These include the smooth tarplant, California horned lark, several raptors, and possibly local bat species. The Project site consists of vacant, undeveloped land that was historically used for agriculture. It no longer supports agricultural activities but has been subject to on-going weed abatement and disturbance by surrounding development. However, it is possible the Project may have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations of the CDFW or the USFWS.

Therefore, potential impacts to these resources will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	**X**			

Potentially Significant Impact

According to the *MSHCP Compliance Document*, the Project site does not appear to contain any drainage features, vernal pools, wetlands, etc. that would fall under the jurisdiction of the RQWCB, ACOE, or the CDFW. The site also does not support any drainage features that would qualify as riparian/riverine habitat under the MSHCP. However, the site does contain drainage features that once served the agricultural uses onsite, so it is possible the Project could have a substantial adverse effect on other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or the United States Fish and Wildlife Service (USFWS).

Therefore, potential impacts to these resources will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				**X**

No Impact

According to the *MSHCP Compliance Document*, no Vernal Pool and/or Fairy Shrimp habitat was detected at the Project site and the property did not support depression areas, and no evidence of long-lasting ponds (i.e., cracked mud, crusty soil, etc.) was detected. Saline-alkali or clay soils, a common component of vernal pools, were also absent. Plants typically associated with vernal pools, or remnants thereof, such as alkaline popcorn flower (*Plagiobothrys leptocladus*), western marsh cudweed (*Gnaphalium palustre*), Parish's glasswort (*Arthrocnemum subterminale*), and swamp pickle grass (*Crypsis schoenoides*) were also not detected on the Project site, and no suitable habitat for fairy shrimp was detected at the Project site.

Similar to the vernal pool assessment, no areas that would be classified as federally protected wetlands were detected at the Project site that contained evidence of supporting long-lasting pools, and depression areas were absent from the Project site. Lastly, road ruts that contained evidence of ponding, and stock ponds were also not detected at the Project site.

Therefore, the Project will not have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. No impacts will occur.

No additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	**X**			

Potentially Significant Impact

According to the *MSHCP Compliance Document*, the Project site does not contain any Criteria Cells, Conservation Areas, or Wildlife Movement Corridors under the MSHCP. In addition, it does not contain any drainage features which could contribute to wildlife movement through the area. The site does contain bushes and trees which may provide potential roosting, foraging, and nesting habitat for migratory birds and raptors, such as hawks and owls. Nesting bird species are protected by California Fish and Game Code Sections 3503 and 3503.5 and by the MBTA of 1918 (16 USC 703-711), which make it unlawful to take, possess, or needlessly destroy the nest or eggs of any migratory bird or bird of prey. Impacts to nesting bird species must be avoided at all times. The period from approximately 1 February to 31 August is the expected breeding season for bird and raptor species occurring in the Project area. If Project activity or vegetation removal must be initiated during the breeding season, a qualified biologist should check for nesting birds within three days prior to such activity. If active bird nests are found, avoidance buffers of 1,000 feet for large birds of prey, 500 feet for small birds of prey, and 250 feet for songbirds, decided by CDFW on a case-by-case basis, will need to be observed and implemented.

Due to potential impacts to these resources, this issue will be examined in detail in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				**X**

No Impact

The Project site currently contains bushes and trees that may be regulated by local policies and ordinances. The proposed Project will install landscaping including trees on the site. The Project, through the City's development review process, will be required to comply with two local

ordinances regarding biological resources, namely the planting and maintenance of trees within the City.

First, Chapter 19.71 of the Perris Municipal Code, Urban Forestry Establishment and Care, outlines how the City will require and maintain the planting of trees throughout the City to establish Perris as a local "urban forest". Section 19.71.010 of the Code states the following purpose of the Urban Forest Ordinance…

"An urban forest is the assemblage of trees in a community that line streets, enhance parks, public spaces and grow wild or are planted in open spaces that this ordinance seeks to protect and enhance. The urban forest includes trees in commercial centers, schools, industrial parks and residential areas, for which property owners provide care and protection. As a City grows, a well-maintained urban forest grows with it providing a sense of permanence, a source of civic pride, and enhancing the quality of life for its citizens and visitors. Urban forests are also a cost effective means of addressing critical community and regional issues ranging from improving local air quality to combating global climate change."

In addition, the "Landscape Design Guidelines and Technical Manual" is Section 19.70.040 of the Perris Municipal Code, which describes landscaping requirements by development type and location. The separate Technical Manual is an appendix that includes irrigation, landscape and planting detail sheets, Water Use Classifications of Landscape Species, and the Approved Tree List as adopted by the City. The Project will be required to comply with this ordinance as a standard condition of approval through the City's development review process.

The City requires new development to comply with these ordinances, so the proposed Project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impacts will occur.

No additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	**X**			

Potentially Significant Impact

The proposed Project site is located within the Mead Valley Area Plan of the MSHCP for western Riverside County. It is not located within a Criteria Area or adjacent to a Criteria Area or Conservation Area of the MSHCP. As discussed in 4.a, above, it is possible the Project may have an adverse effect on one or more resources protected under or covered by the County's MSHCP.

Therefore, potential impacts to these resources will be analyzed in an EIR.

Standard Conditions and Requirements

To be determined if necessary in an EIR.

Mitigation Measures

The proposed Project is required to comply with the following PVCCSP EIR mitigation measures. Additional mitigation to be determined if necessary, in an EIR.

PVCCSP MM Bio 1: In order to avoid violation of the MBTA and the California Fish and Game Code, site-preparation activities (removal of trees and vegetation) for all PVCCSP implementing development and infrastructure projects shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.

If site-preparation activities for an implementing project are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for such project, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the implementing project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre- activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.

PVCCSP MM Bio 2: Project-specific habitat assessments and focused surveys for burrowing owls would be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre-construction survey for resident burrowing owls would also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity would be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.

If active nests are identified on an implementing project site during the pre- construction survey, the nests shall be avoided, or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.

If burrowing owls occupy any implementing project site and cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the City of Perris Planning Department and the CDFG. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to

exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The implementing project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation. If avoidance is infeasible, then a DBESP would be required, including associated relocation of burrowing owls. If conservation is not required, then owl relocation would still be required following accepted protocols. Take of active nests would be avoided, so it is strongly recommended that any relocation occur outside of the nesting season.

5. CULTURAL RESOURCES.

Source(s): *Map My County,* (**Appendix A**); Assembly Bill 52 (AB 52); and Senate Bill 18 (SB 18); and California Health and Safety Code Section 7050.5; Public Resources Code (PRC) Section 5020.1(j); California Code of Regulations (CCR) Section 15064.5(a)(1)-(3).

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?	**X**			

Potentially Significant Impact

According to Public Resources Code (PRC) Section 5020.1(j), "'historical resource' includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California."

More specifically, CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 California Code of Regulations (CCR) Section 15064.5(a)(1)-(3)). Regarding the proper criteria for the evaluation of historical significance, CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

The Project site has not been surveyed for historical resources. To further assess the potential for impacts to cultural resources, a Phase I Cultural Resources Assessment of the site will be prepared as part of the EIR documentation. Without more information, impacts to historical resources are considered potentially significant.

Therefore, this issue will be studied in more detail in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	X			

Potentially Significant Impact

The Perris Valley is considered sensitive for archaeological prehistoric (Native American) resources and artifacts. Although much of the Project area has been disturbed by past agriculture and other human activity, grading could lead to the discovery of buried cultural resources. Several local Native American Tribes have also expressed concern and interest in development activities in the Perris Valley pursuant to SB 18 and AB 52. These tribes regularly consult with local governments on impacts to tribal resources. To further assess the potential for impacts to cultural resources, a Phase I Cultural Resources Assessment of the site will be prepared, and Native American Consultation will be conducted as part of the EIR documentation. Without more information, impacts to archaeological resources are considered potentially significant.

Therefore, this issue will be studied in more detail in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of formal cemeteries?	X			

Potentially Significant Impact

Because the Project site has been previously disturbed by agricultural uses, no human remains, or cemeteries, are anticipated to be disturbed by the proposed Project. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface which may be encountered during construction excavations associated with the proposed Project. It is also possible to encounter buried human remains during construction given the proven prehistoric occupation of the region, the presence of surface and subsurface archaeological resources throughout the Perris Valley, and the favorable natural conditions that would have attracted prehistoric inhabitants to the area.

Several local Native American Tribes have expressed concern and interest in development activities in the Perris Valley pursuant to SB 18 and AB 52. These tribes regularly consult with local governments on impacts to tribal resources, including the discovery of human remains that may be related to their tribes.

California Health and Safety Code Section 7050.5 requires that, in the event that human remains are uncovered, work must be halted in the immediate area of the find and the County Coroner must be notified. If the remains are determined to be of Native American origin, the appropriate tribal representatives are contacted.

To further assess the potential for impacts to cultural resources, including human remains, a Phase I Cultural Resources Assessment of the site will be prepared, and Native American Consultation will be conducted as part of the EIR documentation. Without more information, impacts to potential discovery of human remains are considered potentially significant.

Therefore, this issue will be studied in more detail in an EIR.

Standard Conditions and Requirements

To be determined if necessary, in an EIR.

Mitigation Measures

The proposed Project is required to comply with the following PVCCSP EIR mitigation measure:

PVCCSP MM Cultural 1: Prior to the consideration by the City of Perris of implementing development or infrastructure projects for properties that are vacant, undeveloped, or considered to be sensitive for cultural resources by the City of Perris Planning Division, a Phase I Cultural Resources Study of the subject property prepared in accordance with the protocol of the City of Perris by a professional archeologist shall be submitted to the City of Perris Planning Division for review and approval. The Phase I Cultural Resources Study shall determine whether the subject implementing development would potentially cause a substantial adverse change to any significant paleontological, archaeological, or historic resources. The Phase I Cultural Resources Study shall be prepared to meet the standards established by Riverside County and shall, at a minimum, include the results of the following:

1. Records searches at the Eastern Information Center (EIC), the National or State Registry of Historic Places and any appropriate public, private, and tribal archives.
2. Sacred Lands File record search with the NAHC followed by project scoping with tribes recommended by the NAHC.
3. Field survey of the implementing development or infrastructure project site.

The proponents of the subject implementing development projects and the professional archaeologists are also encouraged to contact the local Native American tribes (as identified by the California Native Heritage Commission and the City of Perris) to obtain input regarding the potential for Native American resources to occur at the project site.

Measures shall be identified to mitigate the known and potential significant effects of the implementing development or infrastructure project, if any. Mitigation for historic resources shall be considered in the following order of preference:

1. Avoidance.
2. Changes to the structure provided pursuant to the Secretary of Interior's Standards.
3. Relocation of the structure.
4. Recordation of the structure to Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER) standard if demolition is allowed. Avoidance is the preferred treatment for known significant prehistoric and historical archaeological sites, and sites containing Native American human remains. Where feasible, plans for implementing projects shall be developed to avoid known significant archaeological resources and sites containing human remains. Where avoidance of construction impacts is possible, the implementing projects shall be designed and landscaped in a manner,

which would ensure that indirect impacts from increased public availability to these sites are avoided. Where avoidance is selected, archaeological resource sites and sites containing Native American human remains shall be placed within permanent conservation easements or dedicated open space areas.

The Phase I Cultural Resources Study submitted for each implementing development or infrastructure project shall have been completed no more than three (3) years prior to the submittal of the application for the subject implementing development project or the start of construction of an implementing infrastructure project.

In addition, the Project is required to comply with the following mitigation measure that replaces PVCCSP EIR mitigation measures MM Cultural 2, MM Cultural 3, and MM Cultural 4:

MM-CR-1 Prior to the issuance of grading permits, the Project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at both the subject site and any off-site Project-related improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur at the site or within the off-site Project improvement areas until the archaeologist has been approved by the City.

The archaeologist shall be responsible for monitoring ground-disturbing activities, maintaining daily field notes and a photographic record, and for reporting all finds to the developer and the City of Perris in a timely manner. The archaeologist shall be prepared and equipped to record and salvage cultural resources that may be unearthed during ground-disturbing activities and shall be empowered to temporarily halt or divert ground-disturbing equipment to allow time for the recording and removal of the resources.

In the event that archaeological resources are discovered at the Project site or within the off-site Project improvement areas, the handling of the discovered resource(s) will differ, depending on the nature of the find. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for Native American/tribal cultural/archaeological resources. However, it is understood that all artifacts, with the exception of human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner will commit to the relinquishing and curation of all artifacts identified as being of Native American origin. All artifacts, Native American or otherwise, discovered during the monitoring program shall be recorded and inventoried by the consulting archaeologist.

If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop and the Project proponent and Project archaeologist shall notify the City of Perris Planning Division and the Soboba Band of Luiseño Indians and the Pechanga Band of Luiseño Indians. A designated Native American representative from either the

Soboba Band of Luiseño Indians or the Pechanga Band of Luiseño Indians shall be retained to assist the Project archaeologist in the significance determination of the Native American as deemed possible. The designated Luiseño tribal representative will be given ample time to examine the find. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribe. If the find is determined to be of sacred or religious value, the Luiseño tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaking in a manner that avoids destruction or other adverse impacts.

In the event that human remains are discovered at the Project site or within the off-site Project improvement areas, mitigation measure **MM-CR-2** shall immediately apply and all items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling.

Native American artifacts that are relocated/reburied at the Project site would be subject to a fully executed relocation/reburial agreement with the assisting Luiseño tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied on-site and in an area of permanent protection, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist.

Native American artifacts that are relocated/reburied at the Project site would be subject to a fully executed relocation/reburial agreement with the assisting Luiseño tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied on-site and in an area of permanent protection, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist.

Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. Subsequent to analysis and reporting, these artifacts will be subjected to curation, as deemed appropriate, or returned to the property owner.

Once grading activities have ceased and/or the archaeologist, in consultation with the designated Luiseño representative, determines that monitoring is no longer warranted, monitoring activities can be discontinued following notification to the City of Perris Planning Division.

A report of findings, including an itemized inventory of artifacts, shall be prepared upon completion of the tasks outlined above. The report shall include all data outlined by the Office of Historic Preservation guidelines, including a conclusion of the significance of all recovered, relocated, and reburied artifacts. A copy of the report shall also be filed with the City of Perris Planning Division, the University of California, Riverside, Eastern Information Center (EIC) and the Luiseño tribe(s) involved with the Project.

In addition, the Project is required to comply with the following mitigation measure that replaces PVCCSP EIR mitigation measure MM Cultural 6:

MM-CR-2 In the event that human remains (or remains that may be human) are discovered at the Project site or within the off-site Project improvement areas during ground-disturbing activities, the construction contractors, Project archaeologist, and/or designated Luiseño tribal representative shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the Project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the Project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and the median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98I and 5097.94(k)).

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the EIC.

Additional mitigation to be determined if necessary, in an EIR.

6. ENERGY.

Source(s): *Project Plans* (**Appendix H**); City of Perris General Plan - Draft Environmental Impact Report (GP-DEIR), Chapter 4.10.4, *Energy*; Perris Valley Commerce Center Specific Plan - Draft Environmental Impact Report (PVCCSP-DEIR), Section 4.11, *Utilities and Service Systems*, and Section 5.0, Other CEQA Topics, *Irreversible Commitment of Resources*; and Title 24 Building Efficiency Standards.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	**X**			

Potentially Significant Impact

The Project applicant proposes a Specific Plan Amendment to accommodate the development of a 347,918-square-foot light-industrial warehouse building with 8,000 square feet of office area on a 16-acre site.

The Project site is located in the ±3,500-acre PVCCSP planning area, in the City of Perris. The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI) as proposed PVCC Specific Plan, Amendment No. 10.

Reference **Figure 4, *Existing and Proposed Zoning Classifications***, provided in Section I. of this Initial Study.

A Project-specific Energy Study for the proposed Project (logistics/distribution warehouse) has not been conducted to date; however, an Energy Study for the Project will be required prior to the issuance of the pending Project EIR.

Implementation of the proposed Project would commit approximately 16 acres to development of a logistics/distribution-warehouse use. In addition to a commitment of land to this light industrial use, the Project would result in a long-term change in the visual character of the Project site. The change in the visual environment would be consistent with existing light industrial distribution warehouse use development contiguous south and west of the Project site, and existing development within the PVCCSP boundary. Construction and operation of the proposed Project would contribute to the incremental depletion of renewable and non-renewable resources.

Electricity consumption during construction and operation phases would incrementally increase the consumption of coal, and natural gas used at power plants located outside the City of Perris. Accordingly, this represents a long-term commitment to the continued consumption of these resources.

To ensure a comprehensive discussion as to whether the Project would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	X			

Potentially Significant Impact

The Project would increase the site's demand for energy compared to its existing undeveloped state. Specifically, the proposed Project would increase consumption of energy for space and water heating, air conditioning, lighting, and operation of miscellaneous equipment and appliances.

Pursuant to PVCCSP EIR mitigation measure MM Air 20, the Project will be required to exceed Title 24 energy conservation requirements by at least 15 percent. The Title 24 Building Energy Efficiency Standards were developed by the California Energy Commission and apply to energy consumed for heating, cooling, ventilation, water heating, and lighting in new residential and non-residential buildings.

Adherence to these efficiency standards would result in a "maximum feasible" reduction in unnecessary energy consumption.

It is not anticipated that the Project would conflict with any adopted energy conservation plans. However, in order to provide a comprehensive discussion as to whether the Project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency, this issue will be analyzed in an EIR.

Standard Conditions and Requirements

To be determined if necessary in an EIR.

Mitigation Measures

The proposed Project is required to comply with the following PVCCSP EIR mitigation measures. Additional mitigation to be determined if necessary, in an EIR.

PVCCSP MM Air 14: Each implementing development project shall designate parking spaces for high-occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.

PVCCSP MM Air 18: Prior to the approval of each implementing development project, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the implementing development project that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the implementing development project, road

improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalks and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.

PVCCSP MM Air 19: In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris Building Division) prior to conveyance of applicable streets.

PVCCSP MM Air 20: Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All reductions will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.

7. GEOLOGY AND SOILS.

Source(s): *Map My County* (**Appendix A**); *Geotechnical Update and Percolation Test Report,* prepared by Geocon West 4-28-2020 (*Geo Update*, **Appendix C1**); *Geotechnical Investigation*, prepared by Geocon Inland Empire, Inc., 8-30-2006 (*Geo Investigation*, **Appendix C2**); *Paleontological Resources Assessment Report, Assessor's Parcel Number 303-060-020*, prepared by Harry M. Quinn, Geologist/Paleontologist, 4-1-2020 (*PRAP*, **Appendix D**); Perris Valley Commerce Center Specific Plan - Draft Environmental Impact Report (PVCCSP-DEIR), July 2011, Section 3.0, *Project Description*, and Section 4.5 *Geology and Soils*; **Figure 7-1, *Surrounding Topography***; and Google Earth.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.i) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			**X**	

Less Than Significant Impact

Although the Project site is located in the seismically active region of Southern California, it is not located within an Alquist-Priolo Earthquake Fault Zone. Furthermore, there are no known active or potentially active faults trending towards or through the Project site.

According to the *Geo Investigation*, the closest known active fault is the San Jacinto Valley segment of the San Jacinto Fault located approximately eight (8) miles northeast of the Project site.

Based on the above, implementation of the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Therefore, impacts associated with rupture of a fault are considered less than significant and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.ii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?		-	X	

Less Than Significant Impact

The Project site is subject to strong seismic ground shaking as are virtually all properties in the Southern California region. As such, the proposed Project would be subject to ground shaking impacts if a major earthquake were to occur in the area. Potential impacts include injury or loss of life, and property damage.

A list of the closest known active and potentially active faults to the Project site is included below in **Table 7-1, *Closest Known Active/Potentially Active Faults to the Project Site***.

Table 7-1
Closest Known Active/Potentially Active Faults to the Project Site

Fault Name	Approximate Distance From Project Site	Est. Maximum Earthquake Magnitude (M_w)	Est. Peak Site Acceleration (g)
San Jacinto – San Jacinto Valley	8	6.9	0.27
San Jacinto – San Bernardino	12	6.7	0.18
Elsinore – Glen Ivy	15	6.8	0.16
Elsinore – Temecula	16	6.8	0.15
San Jacinto – Anza	19	7.2	0.16
Chino – Central Avenue (Elsinore)	20	6.7	0.15
San Andreas – Southern	20	7.4	0.17
San Andreas – San Bernardino	20	7.3	0.16
Whittier	24	6.8	0.10

Source: *Geo Investigation*

As shown in **Table 7-1,** the closest active/potentially active fault to the Project site is the San Jacinto Valley Section of the San Jacinto Fault located approximately eight (8) miles northeast of the site.

According to the *Geo Investigation*, the Project site could be subjected to moderate to severe ground shaking in the event of an earthquake on any of the above-referenced faults or other faults within the Southern California and northern Baja California regions.

The Probabilistic Seismic Hazards Analysis set forth in the *Geo Investigation* indicates that there is a ten percent (10%) probability of exceeding a mean site acceleration rate of 0.34g within 50 years (475-year return period) and a ten percent (10%) probability of exceeding a mean site acceleration of 0.40 within 100 years (949-year return period).

The 2019 California Building Code (CBC; California Code of Regulations, Title 24, Volume 2) contains seismic safety provisions with the aim of preventing building collapse during a design earthquake, so that occupants would be able to evacuate after the earthquake.

A design earthquake is one with a two percent (2%) chance of exceedance in 50 years, or an average return period of 2,475 years. Adherence to these requirements would reduce the potential of the structure from collapsing during an earthquake, thereby minimizing injury and loss of life.

The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. Although structures may be damaged during earthquakes, adherence to seismic design requirements would minimize damage to property within the structure because the structure is designed not to collapse.

Table 6.3, Section 6.3 of the *Geo Investigation* identifies relevant CBC seismic design parameters for the Project site.

Standard Condition SC-GEO-1 is required to reduce potentially significant impacts that could expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking during Project implementation to a less than significant level.

Standard Condition SC-GEO-2 requires the Project to comply with recommendations listed in the *Geo Investigation* to address strong seismic ground shaking and how it will reduce exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

The proposed Project's adherence to **SC-GEO-1** and **SC-GEO-2** would reduce the impacts related to strong ground shaking, including the risk of loss, injury, and death, to a level that is less than significant, and no mitigation is required.

Based on this analysis, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.iii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?			**X**	

Less Than Significant Impact

As described in the *Geo Investigation*, liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, subsurface soil characteristics, and depth to groundwater.

The Project site is located in the Perris Valley which is bounded by the Box Springs Mountains on the north, a relatively undefined area of the Menifee Valley on the south, several granitic hills and mountains (including the Lakeview Mountains) on the east, and the Perris Erosion Surface on the west. The Perris Valley is a north-northwest trending alluvial basin which has been filled with sediments that have eroded out of the surrounding bedrock highlands. Drainage in the valley is to the south and west.

The Geocon field investigation was performed in August of 2006 and included site reconnaissance and excavating eighteen (18) exploratory hallow-stem auger borings. Surficial soil encountered during the field investigation consists of very old alluvium:

- **Alluvium.** Pleistocene-age alluvium underlies the entire Project site to depths in excess of fifty feet (50'). The alluvium generally consists of moist, brown, loose to dense sand, with varying amounts of silt and clay. Discontinuous layers of silt and clay were also encountered. The upper portion of the alluvium is not considered suitable for the support of site improvements and/or structural fill and will require remedial grading.
- **Groundwater.** Groundwater was not encountered in the geotechnical borings extended to a maximum depth of fifty-one feet (51'). Groundwater in the vicinity of the Project site has historically been in excess of one-hundred feet (100') below surface.

Due to the depth of groundwater (over 50'), the liquefaction potential at the site is considered very low.

The findings set forth in the *Geo Investigation* are consistent with *Map My County* which states that the Project site's liquefaction potential is "low."

In conclusion, potential liquefaction impacts at the Project site are considered less than significant and no mitigation is required.

As a result of the above analysis, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.iv) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?				**X**

No Impact

The Project site topography is generally flat and at grade with Ramona Expressway, Perris Boulevard, and Indian Avenue, adjacent properties, and the general vicinity.

Furthermore, the Project site's location in the central portion of the ±3,500-acre Perris Valley Commerce Center Specific Plan (PVCCSP) is surrounded by similar relatively flat lands. The terrain within the PVCCSP is relatively level with elevations ranging from a low point of 1,435 feet above mean sea level (AMSL) at the southeast corner near the Perris Valley Storm Channel (PVSC) to a high point of 1,522 feet AMSL at the northwest corner adjacent to the March Air Reserve Base / Inland Port Airport (an 87-foot difference in elevation over a distance of 3½ miles; or an approx. 0.5% average gradient).

According to *Map My County*, the Project site's average elevation is 1,460 feet above mean sea level (AMSL); the minimum elevation is reported at 1,460' AMSL and the maximum elevation is reported at 1,464' AMSL. This is consistent with the *Geo Investigation* which reports an approximate elevation between 1,450' and 1,460' AMSL.

As shown on the following page, **Figure 7-1, *Surrounding Topography***, there are no steep slopes within a one-quarter mile radius of the Project site:

- The closest steep slope is located over 1¼ mile southwest of the Project site at the northeast extent of the Gavilan Hills, southwest of Interstate 215 and Rider Street;
- The Project site is roughly two (2) miles from an outcropping of basement rocks that form part of Mount Russell near the Perris Reservoir to the northeast.

There are no upsloping hill sides proximate to the Project site. Consequently, potential for seismically-induced landslides or debris flows does not exist for the Project site.

Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impacts will occur.

As a result of this analysis, no additional analysis will be required in an EIR.

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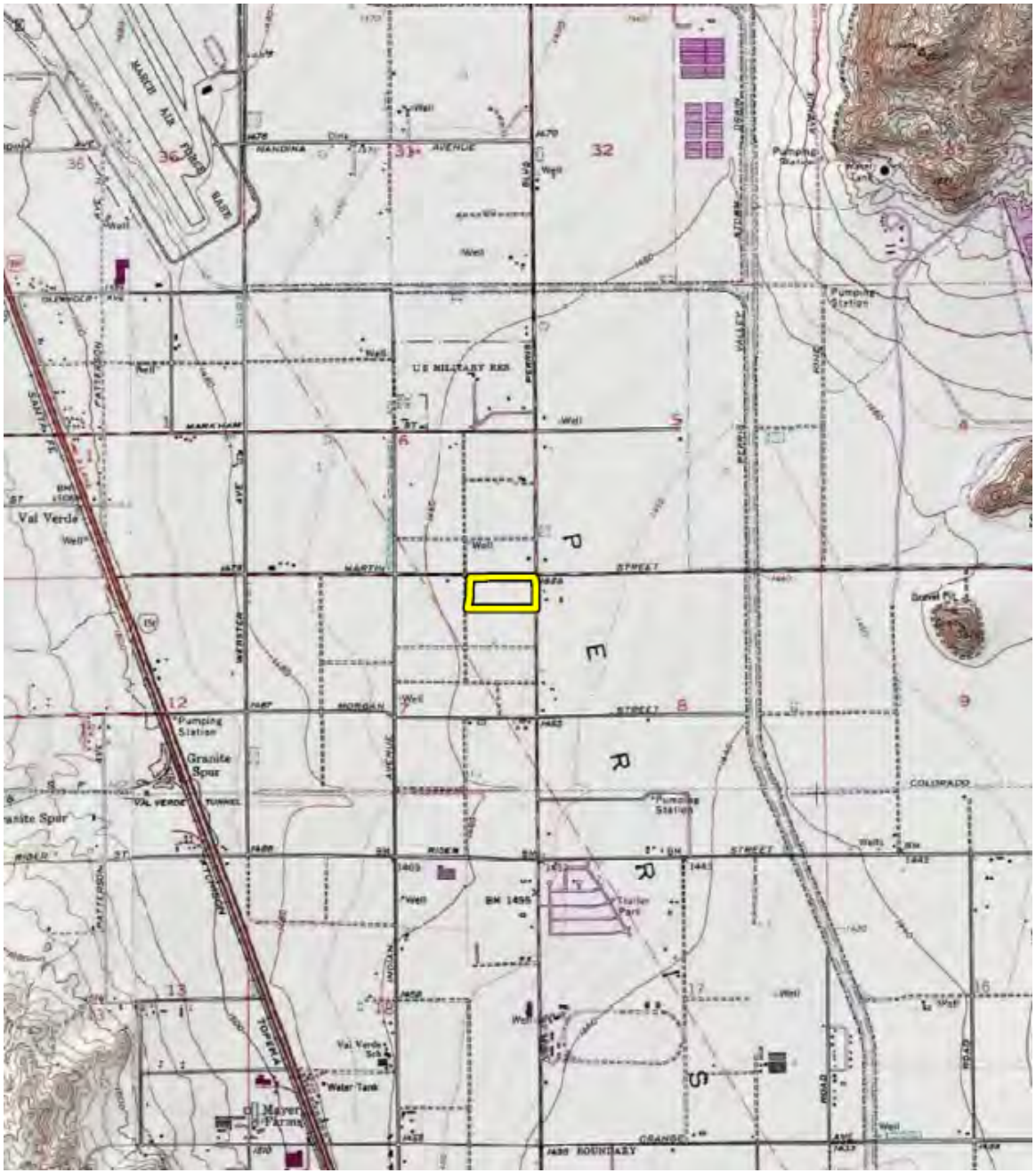
Figure 7-1
Surrounding Topography



Source: MSHCP Report (Appendix B)

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Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?			X	

Less Than Significant Impact

Based on historical aerial photographs, it is evident the Project site was used for agricultural purposes in conjunction with acreage to the south. Aerial photographs dated between June 2002 and June 2008 clearly show the south half of the Project site being used as part of the larger agricultural field believed to be under cultivation as a sod farm. This is consistent with information included in the PVCCSP-EIR, which states, in mid-2011 a large portion of the PVCC area was undeveloped land used for agricultural purposes.

A review of the available historical aerial photographs dating back to 1994 indicate that the Project site was consistently used for agricultural purposes in the first half of the 2000's, and intermittently in the 1990's. Data prior to 1994 was not available in conjunction with this Initial Study (IS) analysis.

Agricultural activities at the Project site appear to have ceased in 2007/2008 and the site has been fallow since that time. The surface soils have been tractor bladed in recent years for weed abatement purposes.

Implementation of the proposed Project has the potential to expose surficial soils to wind and water erosion during site grading and construction activities:

- Wind erosion would be minimized through mandated soil stabilization measures by South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust), such as daily watering (see **PVCCSP MM Air 3**).
- Water erosion would be prevented through the City's standard, mandated, erosion control practices required pursuant to the California Building Code (CBC) (see **Standard Condition SC-GEO-1**) and the National Pollution Discharge Elimination System (NPDES), such as silt fencing, fiber rolls, or sandbags (see **Standard Condition SC-HYD-1**).
- Following construction of the proposed Project, the site would be covered completely by paving, structures, and landscaping (see **Standard Condition SC-HYD-2**).

With the incorporation of **PVCCSP MM Air 3**, **SC-GEO-1**, **SC-HYD-1** and **SC-HYD-2**, any potential impacts related to substantial soil erosion or the loss of topsoil associated with implementation of the proposed Project would be reduced to a less than significant level and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			**X**	

Less Than Significant Impact

Impacts related to liquefaction and landslides are discussed in Thresholds 7.a.iii, and 7.a.iv.

Seismically induced lateral spreading involves primarily lateral movement of earth materials due to ground shaking. It differs from slope failure in that complete ground failure involving large movement does not occur due to the relatively smaller gradient of the initial ground surface.

Lateral spreading is demonstrated by near-vertical cracks with predominantly horizontal movement of the soil mass involved. In soils, this movement is generally due to failure along a weak plane and may often be associated with liquefaction. Lateral spreading typically damages pipelines, utilities, bridges, and structures.

The topography of the Project site and surroundings is fairly flat and subsurface geologic profile is not susceptible to liquefaction. Under these circumstances, the potential for lateral spreading at the subject site is considered very low.

As discussed in Threshold 6.a.ii, the proposed Project will be required to comply with **SC-GEO-1** and **SC-GEO-2**. These are standard conditions and are not considered unique mitigation under CEQA.

Therefore, the implementation of the proposed Project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Impacts would be less than significant.

Adherence to **SC-GEO-1** and **SC-GEO-2** would reduce any potential impact from lateral spreading, subsidence, liquefaction or collapse to a less than significant level and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial direct or indirect risks to life or property?			**X**	

Less Than Significant Impact

The Project site is not located in an area underlain by expansive soils. The Project site and surrounding Perris Valley Commerce Center Specific Plan (PVCCSP) is situated in the western portion of the Perris Valley, a north-northwest trending alluvial basin which has been filled with sediments that have eroded out of the surrounding bedrock highlands.

The near-surface on-site soil at the Project site consists predominantly of sand with varying amounts of clay and silt and sandy clay which generally possess a *very low* expansion potential (EI<20) as defined by the Uniform Building Code (UBC) Table No. 18-I-B and exhibit moderate shear strength characteristics.

As set forth in Appendix B, Table B-II (Summary of Laboratory Expansion Index Test Results, ASTM D4829-03), of the *Geo Investigation*, Boring B1-1 and Boring B8-1 had expansion Indexes of 18 and 3:

- Boring B1-1 Expansion Index: 18
- Boring B8-1 Expansion Index: 3

The CBC requires special design considerations for foundations of structures built on soils with expansion indices greater than 20.

As discussed in Threshold 7.a.ii, the proposed Project will be required to comply with **SC-GEO-1** and **SC-GEO-2**. These are standard conditions and are not considered unique mitigation under CEQA.

In conclusion, the proposed Project will not be located on expansive soil creating substantial risks to life or property. Any direct or indirect impacts related to expansive soils would be less than significant and no mitigation is required.

Based on the above, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				**X**

No Impact

The Project proposes to connect to the existing Eastern Municipal Water District sewer system and will not require the use of septic tanks. This threshold is not applicable to the proposed Project; therefore, no impact will occur.

Based on the above, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

Less Than Significant with Mitigation Incorporated

According to *Map My County*, the Project site is mapped within a "High B" sensitivity area, denoting a high sensitivity for paleontological resources.

This is consistent with the *PRAP*, which states: "The results of these research procedures indicate that the proposed Project's potential to impact significant non-renewable paleontological resources appears to be high, especially in the early Holocene to Pleistocene soils present subsurface at varying depths."

Areas classified as high sensitivity may contain buried paleontological deposits at or below 4 feet of depth and may be impacted during construction. It is possible that potentially significant prehistoric remains could be found, since buried fossils often go undetected during a walkover survey. Prehistoric remains may have been buried by erosional sediments accumulating in this area and masked by existing pavement.

Since the Project site is mapped in the County's General Plan as having a high potential for paleontological resources (fossils), the proposed Project site grading/earthmoving activities should be monitored for potential impacts to this resource and, therefore, the Project is required to comply with the City's standard mitigation measure to prepare a Paleontological Resource Impact Mitigation Program (PRIMP) prior to grading permit issuance and a monitoring program prior to issuance of the final grading permit.

Mitigation Measure MM-GEO-1 is required to reduce potentially significant impacts to previously undiscovered paleontological resources and/or unique geological features that may be accidentally encountered during Project implementation to a less than significant level.

With implementation of **MM-GEO-1**, impacts to paleontological resources will be less than significant. Upon implementation of **MM-GEO-1**, the likelihood that the Project will directly or indirectly destroy unique paleontological resources on site, or a unique geologic feature will be less than significant, and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Standard Conditions and Requirements

SC-GEO-1 Project design shall be subject to the seismic design criteria of the 2019 edition of the California Building Code (CBC), adopted December 10, 2019 by the City of Perris as Ordinance No. 1387.

SC-GEO-2 The Project shall comply with the recommendations listed in the *Geo Investigation* as it pertains to impacts arising from unstable soils (seismic ground shaking, on-

or off-site landslide, lateral spreading, subsidence, liquefaction or collapse), and/or expansive soils.

SC-HYD-1 During all phases of construction, the Project shall control stormwater runoff so as to prevent any deterioration of water quality that will impair subsequent or competing uses of the water. The Director of Public Works will review and approve Best Management Practices (BMPs) contained in the Project applicants submitted Stormwater Pollution Prevention Plan (SWPPP) to be implemented to reduce the discharge of pollutants during construction. The Project applicant's SWPPP shall identify erosion control BMPs to minimize pollutant discharges during construction activities. These identified BMPs will include stabilized construction entrances, sand bagging, designated concrete washout, tire wash racks, silt fencing, and curb cut/inlet protection.

SC-HYD-2 The Project proponent shall submit a Water Quality Management Plan (WQMP) for review and approval. The WQMP identifies post-construction BMPs in addressing increases in impervious surfaces, methods to decrease incremental increases in off-site stormwater flows, and methods for decreasing pollutant loading in off-site discharges as required by the applicable NPDES requirements.

Mitigation Measures

By preparing this Initial Study analysis, which includes the Geotechnical Investigation and the Geotechnical Update and Percolation Test Report, the Project has complied with the following applicable PVCCSP EIR mitigation measure:

PVCCSP MM Geo 1: Concurrent with the City of Perris' review of implementing development projects, the project proponent of the implementing development project shall submit a geotechnical report prepared by a registered geotechnical engineer and a qualified engineering geologist to the City of Perris Public Works/Engineering Administration Division for its review and approval. The geotechnical report shall assess the soil stability within the implementing development project affecting individual lots and building pads, and shall describe the methodology (e.g., over excavated, backfilled, compaction) being used to implement the project's design.

The proposed Project is required to comply with the following PVCCSP EIR mitigation measure:

PVCCSP MM Air 3: To reduce fugitive dust emissions, the development of each individual implementing development project shall comply with SCAQMD Rule 403. The developer of each implementing project shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance. Dust control measures shall include, but are not limited to:

- Requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain);
- Keeping disturbed/loose soil moist at all times;
- Requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered;

- Installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip;
- Posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved portions of the project site;
- Suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour;
- Appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation;
- Sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials; and/or,
- Replacement of ground cover in disturbed areas as quickly as possible.

In addition, the Project is required to comply with the following mitigation measure that replaces PVCCSP EIR mitigation measure MM Cultural 5:

MM-GEO-1 Prior to the issuance of grading permits, the Project proponent/developer shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision for a qualified professional paleontologist (or his or her trained paleontological representative) to be on-site for any Project-related excavations that exceed three (3) feet below the pre-grade surface. Selection of the paleontologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the Project site or within the off-site Project improvement areas until the paleontologist has been approved by the City.

Monitoring shall be restricted to undisturbed subsurface areas of older Quaternary alluvium. The approved paleontologist shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The paleontologist shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontologist shall have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens.

Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved. Specimens shall be identified and curated and placed into an accredited repository (such as the Western Science Center or the Riverside Metropolitan Museum) with permanent curation and retrievable storage.

A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.

8. GREENHOUSE GAS EMISSIONS.

Source(s): *Project Plans* (**Appendix H**); City of Perris General Plan - Draft Environmental Impact Report (GP-DEIR), Chapter 4.3, *Air Quality*; Perris Valley Commerce Center Specific Plan - Draft Environmental Impact Report (PVCCSP-DEIR), Section 4.2, *Air Quality*; City of Perris *Climate Action Plan*, City Council, February 23, 2016.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X			

Potentially Significant Impact

The Project applicant proposes a Specific Plan Amendment to accommodate the development of a 347,918-square-foot light-industrial warehouse building with 8,000 square feet of office area on a 16-acre site.

The Project site is located in the ±3,500-acre PVCCSP planning area, in the City of Perris. The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI) as proposed PVCC Specific Plan, Amendment No. 10.

A project-specific Air Quality and Greenhouse Gas (AQ/GHG) Report for the proposed Project (logistics/distribution warehouse) has not been conducted to date; however, an AQ/GHG Report for the Project will be required prior to the issuance of the pending Project EIR.

The proposed Project's greenhouse gas emissions will be quantified in the pending AQ/GHG Report. Furthermore, the results of this study will be discussed and analyzed in the forthcoming EIR. It is noted, given the Project site's proposed logistics/distribution-warehouse use, the potential to generate a substantial amount of greenhouse gas emissions is recognized.

GHG emissions for the Project will be analyzed in the AQ/GHG Report to determine if the project could have a cumulatively considerable impact related to greenhouse gas emissions. Operational emissions associated with the proposed Project would include GHG emissions from mobile sources (transportation), energy, water use and treatment, waste disposal, and area sources. GHG emissions from electricity use are indirect GHG emissions from the energy (purchased energy) that is produced off-site. Area sources are owned or controlled by the Project (e.g., natural gas combustion, boilers, and furnaces) and produced on-site. Construction activities are short term and cease to emit greenhouse gases upon completion, unlike operational emissions that are continuous year after year until operation of the use ceases. Because of this difference, the SCAQMD recommends amortizing construction emissions over a 30-year operational lifetime. This normalizes construction emissions so that they can be grouped with operational emissions to generate a precise Project-based GHG inventory.

Upon Project completion, the proposed Project will result in operational GHG emissions of greenhouse gases.

To ensure a comprehensive discussion as to whether the Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Therefore, this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	X			

Potentially Significant Impact

Significance under this threshold can be determined by showing compliance with applicable air quality plans.

As discussed in this Initial Study Threshold 3.a, Air Quality, the proposed Project includes an amendment to the PVCCSP. The City of Perris 2016 Climate Action Plan (CAP) utilizes Western Riverside County Council of Government's (WRCOG's) analysis of existing greenhouse gas reduction programs and policies that have already been implemented in the sub-region and of applicable best practices from other regions to assist in meeting the 2020 subregional reduction target.

Project compliance with the GHG reduction strategies contained in the City's CAP as well as mitigation measures to mitigate potentially significant impacts will be discussed in the forthcoming EIR.

The City of Perris is cognizant of its ability as a local government to contribute to the achievement of subregional, regional, and state greenhouse gas reduction targets. The City's CAP has been developed to address global climate change through the reduction of harmful GHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals (AB 32) and Executive Order S-03-05.

Furthermore, the City has adopted the 2019 edition of the California Building Code (Title 24), including the California Green Building Standards Code (pursuant to Perris Municipal Code Sec. 16.08.050). The Project will be subject to the California Green Building Standards Code, which requires new buildings to reduce water consumption, employ building commissioning to increase building system efficiencies for large buildings, divert construction waste from landfills, and install low pollutant-emitting finish materials.

Upon Project completion, the proposed Project will result in operational GHG emissions of greenhouse gasses.

CEQA requires a comprehensive discussion as to whether the Project would conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

Therefore, this issue will be analyzed in an EIR.

Standard Conditions and Requirements

To be determined if necessary in an EIR.

Mitigation Measures

The proposed Project is required to comply with the following PVCCSP EIR mitigation measures. Additional mitigation to be determined if necessary, in an EIR.

PVCCSP MM Air 2: Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

PVCCSP MM Air 4: Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.

PVCCSP MM Air 7: During construction, ozone precursor emissions from mobile construction equipment shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers' specifications to the satisfaction of the City of Perris Building Division. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction. Compliance with this measure shall be subject to periodic inspections by the City of Perris Building Division.

PVCCSP MM Air 11: Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.

PVCCSP MM Air 12: Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.

PVCCSP MM Air 13: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other state programs that restrict operations to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future

tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero- Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NOx] funding programs, as identified on SCAQMD's website (http: //www.aqmd.gov). Tenants would be required to use those funds, if awarded.

PVCCSP MM Air 14: Each implementing development project shall designate parking spaces for high-occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.

PVCCSP MM Air 18: Prior to the approval of each implementing development project, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the implementing development project that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the implementing development project, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalks and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.

PVCCSP MM Air 19: In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris Building Division) prior to conveyance of applicable streets.

PVCCSP MM Air 20: Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All reductions will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.

9. HAZARDS AND HAZARDOUS MATERIALS.

Source(s): *Map My County* (**Appendix A**); *Project Plans* (**Appendix H**); *Phase I Environmental Site Assessment*, prepared by Krazan & Associates, Inc., 3-26-2020 (*Phase I ESA* **Appendix E**); *Airport Land Use Commission (ALUC) Development Review - ZAP1390MA19*, prepared by Riverside County Airport Land Use Commission, 7-16-2020 (**Appendix F**); City of Perris General Plan 2030 – Draft Environmental Impact Report (GP - DEIR), July 2004, Appendix A, Initial Study, Section VII, *Hazards and Hazardous Materials*; Perris Valley Commerce Center Specific Plan, Amendment No. 9, May 2018, Chapter 2, Land Use Plan, Section 2.2, Summary of Perris Valley Commerce Center Land Use Comparison, Table 2.0-1, Land Use Comparison; Perris Valley Commerce Center Specific Plan – Draft Environmental Impact Report (PVCCSP-DEIR), July, 2011, Section 4.6, *Hazards and Hazardous Materials*; Val Verde Union School District website; 2014 March Air Reserve Base Land Use Compatibility Plan; **Figure 9-1, Geotracker** and **Figure 9-2, Envirostor**; and Google Earth.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			**X**	

Less Than Significant Impact

The proposed Project could result in a significant hazard to the public if it includes the routine transport, use, or disposal of hazardous materials or places housing near a facility which routinely transports, uses, or disposes of hazardous materials.

The Project site is located in the central portion of the PVCCSP planning area, a 3,583-acre masterplan approved by the City of Perris on January 10, 2012 (Ordinance No. 1284). There have been nine (9) amendments to date, the most recent being Amendment No. 9 (SPA9), approved on August 28, 2018 (Ordinance No. 1371).

Situated adjacent south of the March Air Reserve Base/Inland Port Airport (MARB/IPA) and the City of Moreno Valley, and located contiguous east of Interstate 215 (I-215), the PVCC SPA9 land use plan is dominated by lands designated Light Industrial (2,033 acres; 56.7%) and General Industrial (392 acres; 10.9%), followed by Business Park/Professional Office (272 acres; 7.6%), Commercial (269 acres; 7.5%), and Public land use designations (194 acres; 5.4%). The specific plan also includes areas with a residential designation to recognize existing neighborhoods (no new residential use is proposed).

The limited residential component within the PVCC SPA9 consists of 82 acres (2.3%) comprised of two separate areas including 1) an existing mobile home park, and 2) a rural-residential neighborhood of single-family residences on half-acre lots:

- Multi-Family Residential (MFR-14) – The MFR-14 land use designation applies to the existing 22-acre mobile home park at the southeast quadrant of Ramona Expressway and Perris Boulevard (accessed via Dawes Ave), located one block east of the Project site, separated by strip retail development fronting along Indian Avenue.
- Residential/Single Family (R-20,000) - The R-20,000 designation applies to the 60-acre rural residential neighborhood (20,000 SF Min. Lot Size) located on the east side of Webster Avenue, extending from Markham Street south approaching Ramona Expressway. It is noted, the north half of this neighborhood lies within the Accident Potential Zone 1 of the March Air Reserve Base, and the entire neighborhood is surrounded by Light Industrial (east and west), General Industrial (north), and Commercial (south) designated land. It is further noted, the neighborhood is now bounded by newer high-cube logistics/distribution warehouses on the east (4120 Indian Ave; built 2015) and west (4160 Webster Ave; built 2018).

The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI) to accommodate the development of a 347,918-square-foot light-industrial distribution warehouse building including 8,000 square feet of office area., via Specific Plan Amendment No. 10.

- The Project site is surrounded by lands within the PVCCSP designated for Commercial use to the north and east; and by lands designated for Light Industrial use to the south and west. There is an existing 579,708-square foot distribution warehouse contiguous south of the Project site (3900 Indian Ave; built 2014); and the 1.25-million square foot Lowe's Regional Distribution Center is located adjacent west of the Project site across Indian Avenue (3984 Indian Ave; built 2000/2001). Existing local serving commercial development is located adjacent east across Perris Boulevard and extending east along Ramona Expressway. Gas station/convenience store facilities are located adjacent to the Project site at the northwest and southeast corners of Ramona Expressway and Perris Boulevard. The commercial land adjacent north across Ramona Expressway is currently vacant.

As described above, the Project site is surrounded on three sides by existing light industrial and commercial development within an emerging mixed-use light industrial and commercial district. The Project site development plan does not include a residential component and it does not place housing near any hazardous materials facilities.

The closest residential use to the proposed Project is the existing 22-acre mobile home park located approximately 410 feet due east of the Project site at the southeast corner of Ramona Expressway and Perris Boulevard (accessed via Dawes Street).

The routine use, transport, or disposal of hazardous materials is primarily associated with general industrial land uses that require hazardous materials for manufacturing operations or produce hazardous wastes as by-products of production applications. The proposed Project's light-industrial logistics/distribution warehouse use does not include or facilitate any activity involving the significant use, routine transport, or disposal of hazardous substances.

Construction Impacts

During construction, there would be a minor amount of transport, use, and disposal of hazardous materials and wastes that are typical of construction projects. This would include fuels and lubricants for construction machinery, coating materials, etc. Routine construction control measures and best management practices for hazardous materials storage, application, waste

disposal, accident prevention and clean-up, etc. would be sufficient to reduce potential impacts to a less than significant level.

Operational Impacts

Hazardous materials commonly used in conjunction with light-industrial logistics/distribution warehouse operations include relatively limited amounts of cleaners, lubricants, and pesticides. The remnants of these items and other similar products would be disposed of as household hazardous wastes that are prohibited or discouraged from being disposed of at local landfills. Regular operation and cleaning of the proposed light-industrial facility would not result in significant impacts involving the use, storage, transport or disposal of hazardous wastes and substances. Use of common household hazardous materials and their disposal does not present a substantial health risk to the community. Impacts associated with the routine transport and use of hazardous materials or wastes would be less than significant and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		

Less Than Significant with Mitigation Incorporated

The Project site is not included on the state's Cortese List, a compilation of various sites throughout California that have been compromised due to soil or groundwater contamination from past uses.

The Project site is vacant, undeveloped land; therefore, potential impacts related to the demolition of structures with asbestos containing materials or lead-based paint are not applicable.

Based on the above, the potential for the proposed Project to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment is considered relatively low.

A Phase I Environmental Site Assessment (*Phase 1 ESA*) for the Project site was prepared that concluded there were no recognized environmental conditions (RECs) but one Potential Area of Concern (PAOC) – there may be fuel storage tanks due to the site's historical agricultural farm setting.

The following information is from the City of Perris General Plan 2030 – Draft Environmental Impact Report (GP-DEIR; October 2004), and the Perris Valley Commerce Center - Draft Environmental Impact Report (PVCCSP-DEIR, July 2011), and a review of historical aerial photographs published by Google Earth as appropriate.

Based on historical aerial photographs, the Project site appears to have been used in conjunction

with acreage to the south for agricultural purposes. Aerial photographs dated between June 2002 and June 2008 clearly show the south half of the Project site being used as part of the larger agricultural field believed to be under cultivation as a sod farm. This is consistent with information included in the PVCCSP-DEIR, which states, in mid-2011 a large portion of the PVCC area was undeveloped land used for agricultural purposes.

A review of the available historical aerial photographs dating back to 1994 indicate that the Project site was consistently used for agricultural purposes in the first half of the 2000's, and intermittently in the 1990's. Data prior to 1994 was not available in conjunction with this Initial Study (IS) analysis.

Agricultural activities at the Project site appear to have ceased in 2007/2008 and the site has been fallow since that time. The surface soils have been tractor bladed in recent years for weed abatement purposes. Although environmentally persistent pesticides commonly applied prior to the 1980s can linger in the soil for many years, the *Phase I ESA* evaluated the potential and did not recommend any subsequent sampling or testing. Based on the length of time that has elapsed since the agricultural usage occurred (approx. 12 years), it is unlikely the potential former usage of pesticides has significantly impaired the Project site or would require remedial actions.

Out of an abundance of caution, **Mitigation Measures MM-HAZ-1** and **MM-HAZ-2** are incorporated herein. **MM-HAZ-1** requires monitoring during ground disturbance activities and remediation if pesticides are present. **MM-HAZ-2** outlines procedures to follow should fuel tanks or other potentially hazardous materials be found during grading.

With implementation of **MM-HAZ-1** and **MM-HAZ-2**, potential impacts related to creating hazards to the public or the environment through upset and accident conditions of hazardous materials will be reduced to less than significant levels and no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				**X**

No Impact

The Project site, along with the entire PVCCSP, is located within the Val Verde Unified School District (VVUSD). The VVUSD consists of twenty-two (22) schools serving 20,141 students from preschool through high school. There are 4 high schools, 4 middle schools, 12 elementary schools, 1 preschool, 1 virtual/SSA, and 1 adult school. The district boundary is bisected by Interstate-215 and generally extends from Van Buren Boulevard on the north to Orange Avenue on the south, and Gavilan Road on the west to Lake Perris on the east. The district serves students from the Cities of Perris and Moreno Valley, as well as the unincorporated area of Mead Valley.

The closest existing schools to the Project site are shown in **Table 9-1**, ***Existing Schools Closest to Project Site***.

Table 9-1
Existing Schools Closest to Project Site

School Facility	District	Proximity to Project Site
Val Verde High School	VVUSD	±1.0 mile west/southwest
May Ranch Elementary School	VVUSD	±1¼ miles east/southeast
Val Verde Elementary School	VVUSD	±1½ miles south/southwest
Rancho Verde High School	VVUSD	±1½ miles northeast
Triple Crown Elementary School	VVUSD	±2.0 miles south/southeast
Mary McLeod Bethune Elementary School	VVUSD	±2½ miles north/northeast
Orange Vista High School	VVUSD	±2½ miles southeast
Thomas Rivera Middle School	VVUSD	±3.0 miles west
Lakeside Middle School	VVUSD	±3.0 miles east/southeast
Vista Verde Middle School	VVUSD	±2½ miles north/northeast
March Middle School	VVUSD	±3.0 miles north

Source: Google Earth

As shown above, VVUSD's Val Verde High School, located approximately 1 mile west/southwest of the Project site, is the closest existing public school facility to the Project site, followed by VVUSD's May Ranch Elementary School located approximately 1¼ miles to the east/southeast, Val Verde Elementary School located approximately 1½ miles to the south/southwest, and Rancho Verde High School approximately 1½ miles to the northeast.

VVUSD's newest school is Orange Vista High School (opened 2016) located approximately 2½ miles southeast of the Project site. Rancho Verde High School (1½ mi NE of Project site) is currently being renovated and modernized; however, VVUSD does not have any new schools under construction or planned at this time.

No charter or private schools were found within the PVCC boundary. The closest charter school found is located at 1461 N. A Street (SWQ I-215 & Nuevo Rd) approximately 3.0 miles south of the Project site.

Based on the above, there are no existing or proposed schools within a one-quarter mile distance of the Project site.

The proposed Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. There would be no impact and no mitigation is needed.

As a result of this analysis, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				**X**

No Impact

Pursuant to Government Code Section 65962.5, the State of California Department of Toxic Substances Control is required to maintain a list of hazardous materials sites (Cortese List).

- EnviroStor is the Department of Toxic Substances Control's data management system for tracking cleanup, permitting, enforcement and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further.
- GeoTracker is the Water Boards' data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater. GeoTracker contains records for sites that require cleanup, such as Leaking Underground Storage Tank (LUST) Sites, Department of Defense Sites, and Cleanup Program Sites. GeoTracker also contains records for various unregulated projects as well as permitted facilities including: Irrigated Lands, Oil and Gas production, operating Permitted USTs, and Land Disposal Sites.

The Project site is not included on the state's Cortese List, a compilation of various sites throughout California that have been compromised due to soil or groundwater contamination from past uses.

The Project site is not:

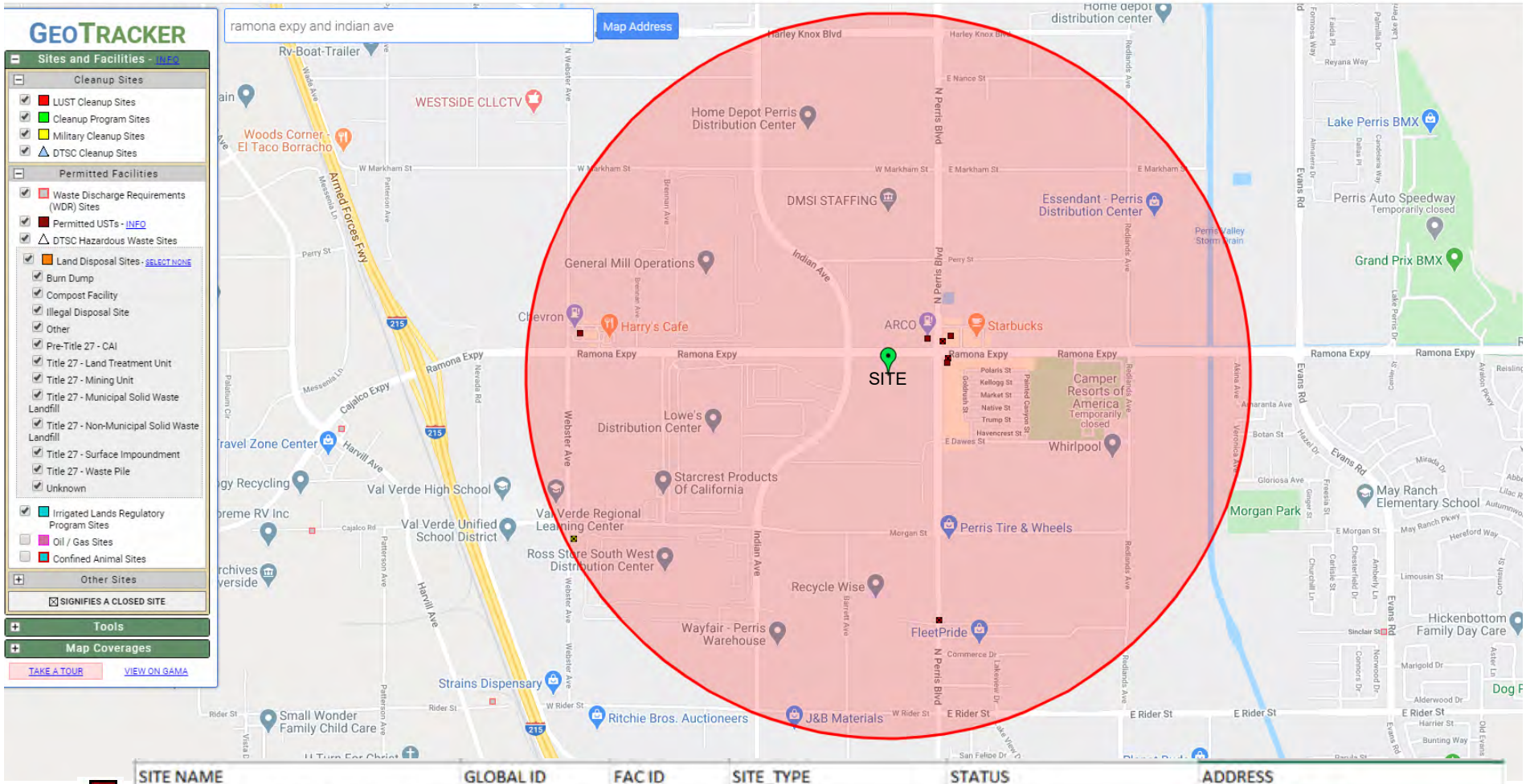
- Listed as a hazardous waste and substance site by the Department of Toxic Substances Control (DTSC);
- Listed as a leaking underground storage tank (LUST) site by the State Water Resources Control Board (SWRCB);
- Listed as a hazardous solid waste disposal site by the SWRCB;
- Currently subject to a Cease and Desist Order (CDO) or a Cleanup and Abatement Order (CAO) as issued by the SWRCB; or
- Developed with a hazardous waste facility subject to corrective action by the DTSC.

Reference **Figure 9-1, *GeoTracker*** and **Figure 9-2, *EnviroStor***, included on the following pages.

Based on the above, the proposed Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; as such, the proposed Project would not create a significant hazard to the public or the environment. There would be no impact and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

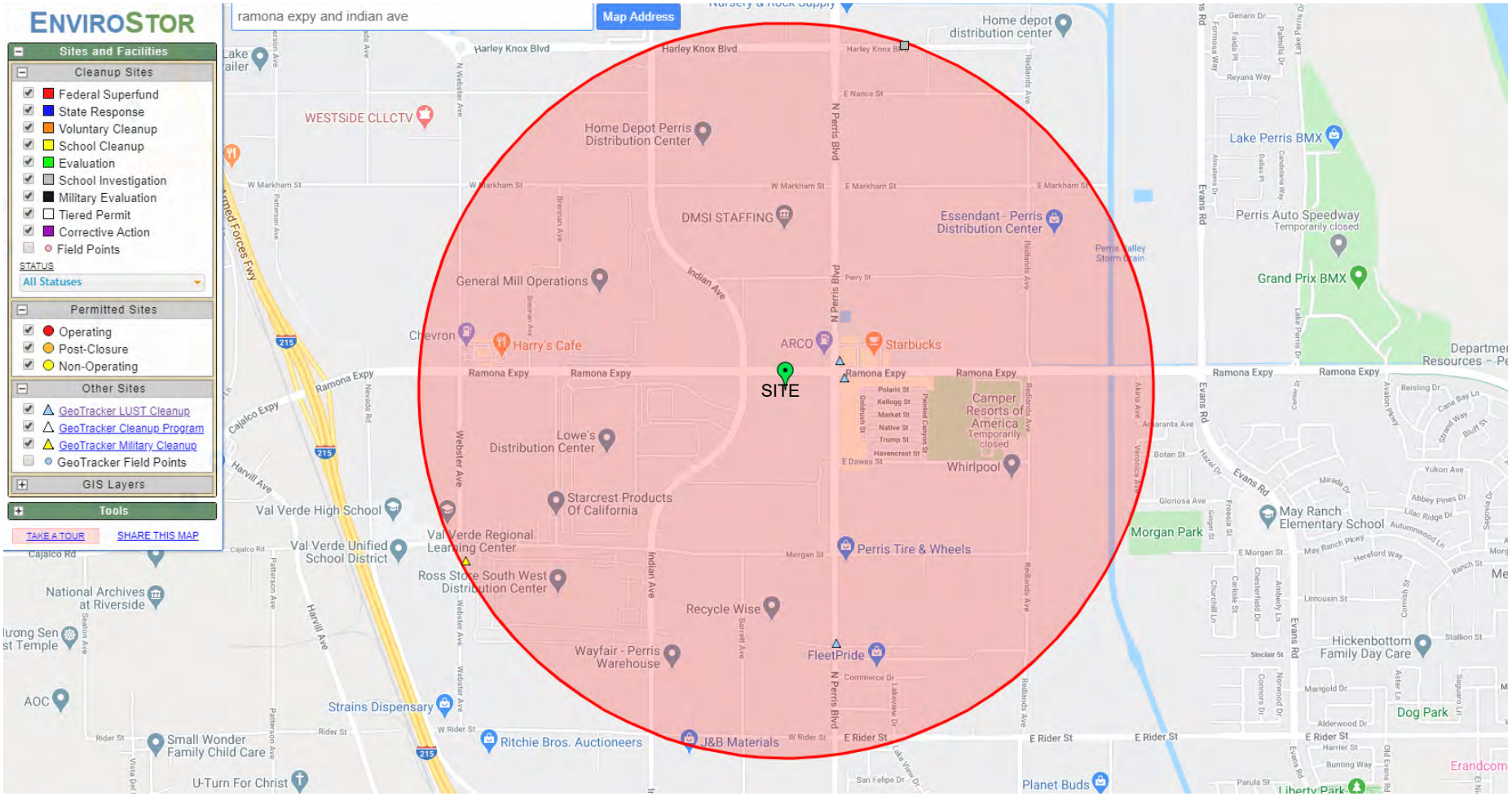
Figure 9-1
GEOTRACKER Site



	SITE NAME	GLOBAL ID	FAC ID	SITE_TYPE	STATUS	ADDRESS
	CIRCLE K STORES INC. SITE #2709429		FA0036723			3995 N PERRIS BLVD
	LAKE CHEVRON		FA0025793			796 W RAMONA EXPRESSWY
	MARCH AIR FORCE BASE - US AIR FORCE, FORMER MARCH AFB - OU-4 - SITE 21					
	CONDURE'S EFFLUENT POND	DOD100280300		MILITARY CLEANUP SITE	COMPLETED - CASE CLOSED	WEBSTER AVENUE AND MORGAN ST.
	MOBIL #18-BLN	T0606505176		LUST CLEANUP SITE	COMPLETED - CASE CLOSED	3995 N PERRIS BLVD.
	NATIONAL RV	T0606592251		LUST CLEANUP SITE	COMPLETED - CASE CLOSED	3411 PERRIS BLVD.
	SAFAR & SAFAR BROTHERS', INC					4040 N PERRIS BLVD
	SHELL PERRIS #121222	T0606524504		LUST CLEANUP SITE	COMPLETED - CASE CLOSED	4039 N PERRIS BLVD
	TESORO (SHELL) 68585 (WRR 6367)		FA0019645			4039 N PERRIS BLVD

Source: GEOTRACKER https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=ramona+expy+and+indian+ave

Figure 9-2
ENVIROSTOR Site



PROJECT NAME	STATUS	PROJECT TYPE	ADDRESS
MEADE VALLEY ELEMENTARY SCHOOL ADDITION	NO ACTION REQUIRED	SCHOOL INVESTIGATION	21-100 OLEANDER AVENUE
NATIONAL RV	CASE CLOSED	LUST CLEAN UP	3411 PERRIS BLVD.
MOBIL #18-BLN	CASE CLOSED	LUST CLEAN UP	3995 N PERRIS BLVD.
SHELL PERRIS #121222	CASE CLOSED	LUST CLEAN UP	4039 N PERRIS BLVD.
MARCH AIR FORCE BASE - US AIR FORCE, FORMER MARCH AFB - OU-4 - SITE 21 CONDURE'S EFFLUENT POND	CASE CLOSED	MILITARY CLEAN UP SITE	WEBSTER AVENUE AND MORGAN ST.

Source: ENVIROSTOR https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=ramona+expy+and+indian+ave

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?		X		

Less Than Significant with Mitigation Incorporated

March Air Reserve Base / Inland Port Airport

The PVCCSP planning area (Project site is a part) is located adjacent south of the March Air Reserve Base / Inland Port Airport (MARB/IPA). The closest runway at the MARB/IPA (Runway 14-32) is located approximately 1¾ miles to the north/northwest of the Project site.

The City of Perris has amended the City's GP, Municipal Code, and the PVCCSP to include an Airport Overlay Zone (AOZ), consistent with the land uses and densities outlined in the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP).

Most of the Project site (11.60 acres) is located in compatibility Zone B1 (Inner Approach/Departure Zone) of the MARB/IPA LUCP. A relatively small portion (3.90 acres), at the northeast corner of the Project site, is located in compatibility Zone C1 (Primary Approach/Departure Zone). Reference **Figure 6, *March Air Reserve Base / Inland Port Airport Influence Area***, in Section I. of this Initial Study.

The MARB/IPA LUCP identifies prohibited and discouraged uses within each land use compatibility zone as well as density/intensity standards, and open land requirements as summarized in **Table 9-2, *MARB / IPA Basic Compatibility Criteria***, included on the following page. Consistency with the LUCP is determined by compliance with each criterion of the applicable compatibility zone.

Table 9-2
MARB / IPA Basic Compatibility Criteria

Zone	Locations	Density/Intensity Standards			Required Open Land	Additional Criteria	
		Residential (du/ac)[1]	Other Uses (people/ac)[2]				
			Avg[5]	Single[6]		Prohibited Uses[3]	Other Development Conditions[4]
B1	Inner Approach/DepartureZone	No new dwellings allowed	25 (APZ I)[10] 50 (APZ II And Outside APZs)[11]	100 100	Max. 50% lot cover-age within APZs[12]	• Children's schools, day care centers, libraries • Hospitals, congregate care facilities, hotels/motels, restaurants, places of assembly • Bldgs with >1 aboveground habitable floor in APZ I or >2 floors in APZ II and outside of APZs[13] • Hazardous materials manufact-ure/storage[14] • Noise sensitive outdoor nonresidential uses[15] • Critical community infrastructure facilities[16] • Hazards to flight[8] • Uses listed in AICUZ as not compatible in APZ I or APZ II[17]	• Locate structures maximum distance from extended runway centerline • Sound attenuation as necessary to meet interior noise level criteria[18] • Zoned fire sprinkler systems required • = Airspace review req'd for objects >35 ft. tall[19] • Electromagnetic radiation notification[9] • Avigation easement dedication and disclosure[4]
C1	Primary Approach/Departure Zone	≤3.0	100	250	No Requirement	• Children's schools, day care centers, libraries • Hospitals, congregate care facilities, places of assembly • Noise-sensitive outdoor nonresidential uses[15] • Hazards to flight[8]	• Critical community infrastructure facilities discouraged[16] [20] • Aboveground bulk storage of hazardous materials discouraged[14] [20] • Sound attenuation as necessary to meet interior noise level criteria[18] • Airspace review req'd for objects >70 ft. tall[19] • Electromagnetic radiation notification[9] • Deed notice and disclosure[4]

Notes:

1. Residential development must not contain more than the indicated number of dwelling units (excluding secondary units) per gross acre. Clustering of units is encouraged provided that the density is limited to no more than 4.0 times the allowable average density for the zone in which the development is proposed. Gross acreage includes the property at issue plus a share of adjacent roads and any adjacent, permanently dedicated, open lands. Mixed-use development in which residential uses are proposed to be located in conjunction with nonresidential uses in the same or adjoining buildings on the same site shall be treated as nonresidential development for the purposes of usage intensity calculations; that is, the occupants of the residential component must be included in calculating the overall number of occupants on the site. A residential component shall not be permitted as part of a mixed use development in zones where residential uses are indicated as incompatible. See Countywide Policy 3.1.3(d). All existing residential development, regardless of densities, is not subject to ALUC authority.
2. Usage intensity calculations shall include all people (e.g., employees, customers/visitors, etc.) who may be on the property at a single point in time, whether indoors or outside.
3. The uses listed here are ones that are explicitly prohibited regardless of whether they meet the intensity criteria. In addition to these explicitly prohibited uses, other uses will normally not be permitted in the respective compatibility zones because they do not meet the usage intensity criteria. See Riverside County Airport Land Use Compatibility Plan, Volume 1, Appendix D for a full list of compatibility designations for specific land uses.
4. As part of certain real estate transactions involving residential property within any compatibility zone (that is, anywhere within an airport influence area), information regarding airport proximity and the existence of aircraft overflights must be disclosed. This requirement is set by state law. See Countywide Policy 4.4.2 for details. Easement dedication and deed notice requirements indicated for specific compatibility zones apply only to new development and to reuse if discretionary approval is required. Except within Zone A (Clear Zone), avigation easements are to be dedicated to the March Inland Port Airport Authority. See sample language in www.marchjpa.com/docs_forms/avigationeasement.pdf. Any avigation easements required within Zone A shall be dedicated to the United States of America.
5. The total number of people permitted on a project site at any time, except rare special events, must not exceed the indicated usage intensity times the gross acreage of the site. Rare special events are ones (such as an air show at the airport) for which a facility is not designed and normally not used and for which extra safety precautions can be taken as appropriate.
6. Clustering of nonresidential development is permitted. However, no single acre of a project site shall exceed the indicated number of people per acre. See Countywide Policy 4.2.5 for details.
7. Clear zone (equivalent to runway protection zone at civilian airports) limits that delineate Zone A are derived from locations indicated in the March Air Reserve Base AICUZ study. See Note 4 for avigation easement dedication requirements in this zone.
8. Hazards to flight include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Land use development that may cause the attraction of birds to increase is also prohibited. Man-made features must be designed to avoid heightened attraction of birds. In Zones A, B1, and B2, flood control facilities should be designed to hold water for no more than 48 hours following a storm and be completely dry between storms (see FAA Advisory Circular 150/5200-33B). Additionally, certain farm crops and farming practices that tend to attract birds are strongly discouraged. These include: certain crops (e.g., rice, barley, oats, wheat – particularly durum – corn, sunflower, clover, berries, cherries, grapes, and apples); farming activities (e.g., tilling and harvesting); confined livestock operations (i.e., feedlots, dairy operations, hog or chicken production facilities, or egg-laying operations); and various farming practices (e.g., livestock feed, water, and manure). Fish production (i.e., catfish, trout) conducted outside of fully enclosed buildings may require mitigation measures (e.g., netting of outdoor ponds, providing covered structures) to prevent bird attraction. Also see Countywide Policy 4.3.7.
9. March ARB must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include microwave transmission in conjunction with a cellular tower, radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers and other similar EMR emissions.
10. Other than in Zone A, construction of a single-family home, including a second unit as defined by state law, on a legal lot of record is exempted from this restriction where such use is permitted by local land use regulations. Interior noise level standards and avigation easement requirements for the compatibility zone in which the dwelling is to be located are to be applied.
11. Non-residential uses are limited to 25 people per gross acre in Accident Potential Zone (APZ) I and 50 people per acre in APZ II and elsewhere in Zone B1. Single-acre intensity

limits are 100 people/acre throughout Zone B1.
12. In APZ I, any proposed development having more than 20% lot coverage must not provide on-site services to the public. Zoned fire sprinklers are required. Also, in APZ I, site design of proposed development should to the extent possible avoid placement of buildings within 100 feet of the extended runway centerline; this center strip should be devoted to parking, landscaping, and outdoor storage. Maximum lot coverage is not limited outside the APZs.
13. Within APZ II and outside APZs, two-story buildings are allowed.
14. Storage of aviation fuel and other aviation-related flammable materials on the airport is exempted from this criterion. In APZ I, manufacture or bulk storage of hazardous materials (toxic, explosive, corrosive) is prohibited unless storage is underground; small quantities of materials may be stored for use on site. In APZ II and elsewhere within Zone B1, aboveground storage of more than 6,000 gallons of nonaviation flammable materials per tank is prohibited. In Zones B2 and C1, aboveground storage of more than 6,000 gallons of hazardous or flammable materials per tank is discouraged.
15. Examples of noise-sensitive outdoor nonresidential uses that should be prohibited include major spectator-oriented sports stadiums, amphitheaters, concert halls and drive-in theaters. Caution should be exercised with respect to uses such as poultry farms and nature preserves.
16. Critical community facilities include power plants, electrical substations, and public communications facilities. See Countywide Policy 4.2.3(d).
17. For properties in either APZ I or II, any use listed as "N – not compatible" for that particular APZ in Table 3-1 of the 2005 Air Installation Compatible Use Zone Study for March Air Reserve Base. Beyond the boundaries of the APZs in Zone B1, such uses are discouraged, but not necessarily prohibited unless otherwise specified herein.
18. All new residences, schools, libraries, museums, hotels and motels, hospitals and nursing homes, places of worship, and other noise-sensitive uses must have sound attenuation features incorporated into the structures sufficient to reduce interior noise levels from exterior aviation-related sources to no more than CNEL 40 dB. This requirement is intended to reduce the disruptiveness of loud individual aircraft noise events upon uses in this zone and represents a higher standard than the CNEL 45 dB standard set by state and local regulations and countywide ALUC policy. Office space must have sound attenuation features sufficient to reduce the exterior aviation-related noise level to no more than CNEL 45 dB. To ensure compliance with these criteria, an acoustical study shall be required to be completed for any development proposed to be situated where the aviation-related noise exposure is more than 20 dB above the interior standard (e.g., within the CNEL 60 dB contour where the interior standard is CNEL 40 dB). Standard building construction is presumed to provide adequate sound attenuation where the difference between the exterior noise exposure and the interior standard is 20 dB or less.
19. This height criterion is for general guidance. Airspace review requirements are determined on a site-specific basis in accordance with Part 77 of the Federal Aviation Regulations. Shorter objects normally will not be airspace obstructions unless situated at a ground elevation well above that of the airport. Taller objects may be acceptable if determined not to be obstructions. The Federal Aviation Administration or California Department of Transportation Division of Aeronautics may require marking and/or lighting of certain objects. See Countywide Policies 4.3.4 and 4.3.6 for additional information.
20. Discouraged uses should generally not be permitted unless no feasible alternative is available.
21. Although no explicit upper limit on usage intensity is defined for Zone D and E, land uses of the types listed—uses that attract very high concentrations of people in confined areas—are discouraged in locations below or near the principal arrival and departure flight tracks.

Given the proposed Project's location within compatibility Zone B1, it is required to be reviewed by the Riverside County Airport Land Use Commission (ALUC) before being considered for approval by the City. If the ALUC determines that a development plan is inconsistent with the Airport Land Use Plan, ALUC requires the local agency to reconsider its approval regarding land use compatibility.

The Project proponent submitted a formal application to the ALUC for review and, at its July 9, 2020 meeting, the ALUC determined that the Project was consistent with the MARB / IPA (Case ZAP1390MA19) with a series of conditions that are incorporated into **Mitigation Measure MM-HAZ-3**. With implementation of **MM-HAZ-3**, potential impacts related to safety hazards or excessive noise for people residing or working in the project area (relative to the MARB / IPA) will be reduced to less than significant levels and no additional analysis will be required in an EIR.

Perris Valley Airport

The Perris Valley Airport is a privately-owned public use airport within the City. The Perris Valley Airport only has an Influence Area 1, which limits residential uses in the flight path. The proposed Project site is located approximately 4¾ miles north of the Perris Valley Airport Influence Area. Therefore, implementation of the proposed Project would not result in a safety hazard from operations at the Perris Valley Airport and no impacts would occur.

As a result of this analysis, no additional analysis with respect to the Perris Valley Airport will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	

Less Than Significant Impact

The proposed Project will replace vacant land with light-industrial development (logistics/distribution warehouse). Access to the Project site would be provided via Indian Avenue with a full turning movement location near the southern edge of the Project and aligning with the existing Lowe's property access point west of Indian Avenue. An additional right in right out access will also be located on Indian Avenue closer to Ramona Expressway. Two right in right out access points will be placed along Perris Boulevard. No access from Ramona is proposed.

A limited potential exists to interfere with an emergency response or evacuation plan during construction. Construction work in the street associated with the Project would be limited to street frontage improvements and lateral utility connections (i.e., water, sewer) that will be limited to nominal potential traffic diversion. Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (**PVCCSP EIR mitigation measure MM Air 2**).

The traffic control plan (TCP) is designed to mitigate any construction circulation impacts. The TCP is a standard condition and is not considered unique mitigation under CEQA. Following construction, emergency access to the Project site and area will remain as was prior to the proposed Project.

All Project elements, including landscaping, will be sited with sufficient clearance from the proposed buildings so as not to interfere with emergency access to and evacuation from the site. The proposed Project is required to comply with the California Fire Code as adopted by the Perris Municipal Code.

The Project will not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan, because no permanent public street or lane closures are proposed.

Based on the above, and with the incorporation of **PVCCSP EIR mitigation measure MM Air 2**, any related impacts associated with implementation of the proposed Project would be reduced to a less than significant level.

As a result of this analysis, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

Less Than Significant Impact

The City of Perris is located within and largely constitutes the eastern half of the Mead Valley Area Plan (MVAP) of the Riverside County General Plan. In general, the west half of the Mead Valley land use plan, west/southwest of Interstate 215 (I-215), provides for a predominantly rural community with an equestrian focus.

As set forth in *Map My County*, the Project site is not located within a County Fire Hazard Zone, nor is it located in a state identified Fire Responsibility Area.

Furthermore, the Project site is not located within a Wildfire Constraint Area, as depicted on Exhibit S-16, *Wildlife Constraint Areas,* of the City of Perris General Plan.

The Project site is located in a relatively wide north-south urbanizing corridor within the City's PVCCSP. There are no wildland conditions in the immediate vicinity of the Project site. The closest Wildfire Constraint Area is located approximately 1¼ miles southwest of the Project site, consisting of the rural Gavilan Hills community portion of the MVAP southwest of I-215 and Rider Way.

The California Department of Forestry and Fire Protection, under contract with the County of Riverside and operating as the Riverside County Fire Department (RCFD), provides fire prevention, suppression, and paramedic services to the City of Perris. Station No. 1 serves the City of Perris and serves as the Riverside County Fire Department Headquarters. Station No. 1 is located at 210 W. San Jacinto Avenue.

The City of Perris participates in the Riverside County Multi-Agency Multi-Hazard Functional Plan (MHFP) which outlines requirements for emergency access and standards for emergency responses. The PVCCSP Initial Study (IS; PVCCSP DEIR, Appendix A) determined that because emergency access will be maintained and improved throughout the Specific Plan area in accordance with the MHFP, development within the PVCCSP will not interfere with adopted emergency response plans.

A limited potential exists to interfere with an emergency response or evacuation plan during construction. Construction work in the street associated with the Project will be limited to lateral utility connections (i.e., sewer) that will be limited to nominal potential traffic diversion.

Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). Reference **PVCCSP EIR mitigation measure MM Air 2**. The TCP is designed to mitigate any construction circulation impacts. The TCP is a standard condition and is not considered unique mitigation under CEQA. Following construction, emergency access to the Project site and area will remain as was prior to the proposed Project.

Once the Project is constructed, emergency access to the Project site will be maintained via driveway curb cut aprons along both Perris Boulevard and Indian Avenue, consistent with requirements outlined in the MHFP. Additionally, the proposed Project is consistent with the industrial land use requirements outlined in the PVCCSP; therefore, the proposed Project will have a less than significant impact on implementation of the adopted emergency response plan.

All Project elements, including landscaping, will be sited with sufficient clearance from the proposed buildings so as not to interfere with emergency access to and evacuation from the site. The proposed Project is required to comply with the California Fire Code as adopted by the City of Perris Municipal Code.

The Project will comply with all applicable state, regional, and local wildfire safety regulations inclusive of the California Fire Code, the City of Perris Municipal Code, and the PVCCSP, and will not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan because no permanent public street or lane closures are proposed.

In conclusion, with the incorporation of **PVCCSP EIR mitigation measure MM Air 2**, implementation of the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Any potential impacts would be reduced to a less than significant level.

As a result of this analysis, no additional analysis will be required in an EIR.

Standard Conditions and Requirements

None are required.

Mitigation Measures

MM-HAZ-1 **Pesticide Presence.** Prior to any ground disturbance activities, the Project applicant shall coordinate the sampling and laboratory testing of onsite soils for contamination by past agricultural chemicals (e.g., pesticides, herbicides, rodenticides, heavy metals, etc.) with the County Department of Environmental Health Services (DEH). If requested, the applicant shall submit a workplan to DEH for review and approval prior to the completion of grading. If any past agricultural chemicals are found in levels that exceed applicable health standards, a qualified contractor shall be retained to remove and properly dispose of such materials. Any work conducted shall be in compliance with DEH guidelines as the appropriate oversight agency. If sampling and laboratory testing are performed, a final report shall be prepared and submitted to DEH for review and approval prior to issuance of a certificate of occupancy.

MM-HAZ-2 **Buried Hazards.** If any former fuel tanks or other potentially hazardous materials are found during grading or any ground disturbing activities, work in that area shall be halted within 100 feet of the find and a qualified environmental contractor shall be retained. The contractor shall assess the risk or hazard level of the material(s) and identify the most appropriate method of remediation. This work shall occur in coordination with and to the satisfaction of the County Department of Environmental Health Services (DEH).

MM-HAZ-3 **ALUC Consistency.** Prior to issuance of a certificate of occupancy, the applicant shall demonstrate the Project has complied with the following conditions issued by the Riverside County Airport Land Use Commission (ALUC) at its July 9, 2020 meeting relative to the March Air Reserve Base / Inland Port Airport (MARB/IPA):

1. Any outdoor lighting installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.

2. The following uses/activities are not included in the proposed project and shall be prohibited at this site:

   (a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.
   (b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
   (c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, composting operations, trash transfer stations that are open on one or more sides, recyding enters containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.)
   (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
   (e) Children's schools, day care centers, libraries, hospitals, skilled nursing and care facilities, congregate care facilities, hotels/motels, restaurants, places of assembly (including churches and theaters), buildings with more than 3 aboveground habitable floors, noise sensitive outdoor nonresidential uses, critical community infrastructure facilities and hazards to flight.
   (f) Any other uses not permitted in Accident Potential Zone II pursuant to DoDI 4165.57.

3. Prior to issuance of any building permits, the landowner shall convey and have recorded an avigation easement to the March Inland Port Airport Authority. Contact March Joint Powers Authority at (951) 656-7000 for additional information.
4. The attached notice [from the July 9, 2020 ALUC Staff Report] shall be given to all prospective purchasers of the property and tenants of the buildings.

5. Any proposed detention basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm and remain totally dry between rainfalls. Vegetation in and around the

detention basins that would provide food or cover for birds would be incompatible with airport operations and shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature. Landscaping in and around the detention basin(s) shall not include trees or shrubs that produce seeds, fruits, or berries.

Landscaping in the detention basin, if not rip-rap, should be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS, WILDLIFE AND STORMWATER MANAGEMENT" brochure available at RCALUC.ORG which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a qualified wildlife hazard biologist.

A notice sign, in a form similar to that attached hereto, shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes". The sign will also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin.

6. March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.

7. Noise attenuation measures shall be incorporated into the design of the office areas of the structure, to the extent such measures are necessary to ensure that interior noise levels from aircraft operations are at or below 45 CNEL.

8. The project does not propose rooftop solar panels at this time. However, if the project were to propose solar rooftop panels in the future, the applicant/developer shall prepare a solar glare study that analyzes glare impacts, and this study shall be reviewed by the Airport Land Use Commission and March Air Reserve Base.

9. This project has been evaluated as a proposal for 260,076 square feet of e-commerce area, 79,843 square feet of warehouse area, and 8,000 square feet of office floor area. Any increase in building area or change in use will require review by the Airport Land Use Commission. In addition, this project shall not store, process or manufacture hazardous materials without review and approval by the Airport Land Use Commission.
   Supporting documentation was provided to the Airport Land Use Commission and is available online at www.rcaluc.org, click Agendas, 07-09-20 Agenda, Bookmark Agenda Item No. 3.1.

Written proof of compliance shall be provided to County Planning and ALUC prior to issuance of the certificate of occupancy.

For this proposed Project, Mitigation Measure MM-HAZ-3 replaces PVCCSP EIR mitigation measures MM Haz 2 through MM Haz 6.

In addition, the proposed Project is required to comply with the following PVCCSP EIR mitigation measure.

PVCCSP MM Air 2 Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

10. HYDROLOGY AND WATER QUALITY.

Source(s): *Map My County*, **(Appendix A)**; *Project Plans* (**Appendix H**); *Geotechnical Update and Percolation Test Report,* prepared by Geocon West, 4-28-2020 (*Geo Update*, **Appendix C1**)*; Geotechnical Investigation,* prepared by Geocon West, 8-30-2006 (*Geo Investigation,* **Appendix C2**)*;* City of Perris General Plan 2030 – Draft Environmental Impact Report (GP - DEIR), July 2004, Chapter 4.5, *Hydrology and Water Quality, Exhibit 4.5-12, Dam Inundation Map;* Perris Valley Commerce Center Specific Plan – Draft Environmental Impact Report (PVCCSP-DEIR), July 2011, Chapter 4.7, *Hydrology and Water Quality*; Google Earth; and **Figure 10-1, *FEMA FIRM Map***.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	X			

Potentially Significant Impact

A project normally would have an impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Water Code Section 13050, or that cause regulatory standards to be violated as defined in the applicable National Pollutant Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for a receiving water body.

For the purpose of this specific issue, a significant impact could occur if the Project would discharge water that does not meet the quality standards of the agencies which regulate surface water quality and water discharge into stormwater drainage systems.

Significant impacts could also occur if the Project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include preparation of a Storm Water Pollution Prevention Plan (SWPPP) to reduce potential construction-related water quality impacts and a Water Quality Management Plan (WQMP) to reduce potential post-construction water quality impacts. Reference **Standard Condition SC-HYD-1** (SWPPP), and **Standard Condition SC-HYD-2** (WQMP).

It is noted, the Project is in the initial preliminary planning stages at present. Project plans and project-specific studies are limited to the Site Plan, as of the date this Initial Study.

A Project-specific Water Quality Management Plan (WQMP) and a Preliminary Hydrology Report for the Project site are pending.

Construction Impacts

Three general sources of potential short-term, construction-related stormwater pollution associated with the proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Operational Impacts

Construction of the proposed Project (distribution warehouse) would increase the impervious area at the Project site by replacing vacant property with associated paving and the rooftop. Landscaping is proposed as part of Project design in the form of landscaped planters containing various trees, shrubs, and ground covers. The Project proponent is required to submit a WQMP to the City for review and approval. The pending WQMP will identify post-construction Best Management Practices (BMPs) in addressing increases in impervious surfaces, methods to decrease incremental increases in off-site stormwater flows, and methods for decreasing pollutant loading in off-site discharges as required by the applicable NPDES requirements.

All wastewater associated with the Project's interior plumbing systems will be discharged into the local sewer system for treatment at the regional wastewater treatment plant. Reference **Standard Condition SC-USS-1** (Sewer Connection Fees) and **Standard Condition SC-HYD-3** (Wastewater).

In order to ensure a comprehensive discussion as to whether the Project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	**X**			

Potentially Significant Impact

A potentially significant impact could occur if a project removes an existing groundwater recharge area or substantially alters drainage that results in a reduction in groundwater recharge such that existing wells in the vicinity would no longer be able to operate.

As set forth in the *Geo Investigation*, 1) groundwater was not encountered at the Project site in the geotechnical borings extended to a maximum depth of fifty-one feet (51'), and 2) groundwater in the vicinity of the Project site has historically been in excess of one-hundred feet (100') below surface. Project-related grading will not reach these depths and no direct disturbance of groundwater is anticipated.

The Project site's proposed industrial/distribution-warehouse building footprint, access drives, parking areas, and other hardscape improvements would significantly increase the on-site impervious surface area thereby reducing the total amount of on-site infiltration. With the incorporation of the Project's pending WQMP and implementation of project-specific BMP's, these Project impacts are expected to be reduced to a level that would be less than significant.

However, in order to ensure a comprehensive discussion as to whether the Project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin, this issue will be analyzed further in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.i) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site**?**	**X**			

Potentially Significant Impact

Potentially significant impacts to the existing drainage pattern of the site or area could occur if development of the Project results in substantial on- or off-site erosion or siltation.

A site drainage plan is required by the City of Perris and will be reviewed by the City Engineering Department. The final grading and drainage plan will be approved by the City Engineering Department during plan check review.

Erosion and siltation reduction measure BMPs contained in the required SWPPP will be implemented during construction.

At the completion of construction, the Project will consist of impervious surfaces, landscaped planters, and post-construction BMPs.

Reference **Standard Conditions SC-HYD-1** (SWPPP), **SC-HYD-2** (WQMP), **SC-HYD-4** (Site Drainage Plan), and **SC-HYD-5** (Storm Drainage Facilities).

In order to ensure a comprehensive discussion as to whether the Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would result in substantial erosion or siltation on- or off-site, this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.ii) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	X			

Potentially Significant Impact

Consistent with the discussion in Threshold 10.a, potentially significant impacts to the existing drainage pattern of the site or area could occur if development of the Project would also result in an increase in the rate or amount of surface runoff.

In order to ensure a comprehensive discussion as to whether the Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial increase in the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.iii) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	X			

Potentially Significant Impact

Consistent with the discussion in Threshold 10.a, potentially significant impacts to the existing drainage pattern of the site or area could occur if development of the Project would also result in an increase in the rate or amount of surface runoff.

In order to ensure a comprehensive discussion as to whether the Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.iv) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?	**X**			

Potentially Significant Impact

Consistent with the discussion in Threshold 10.a, potentially significant impacts to the existing drainage pattern of the site or area could occur if development of the Project would also result in an increase in the rate or amount of surface runoff.

In order to ensure a comprehensive discussion as to whether the Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows, this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?				**X**

No Impact

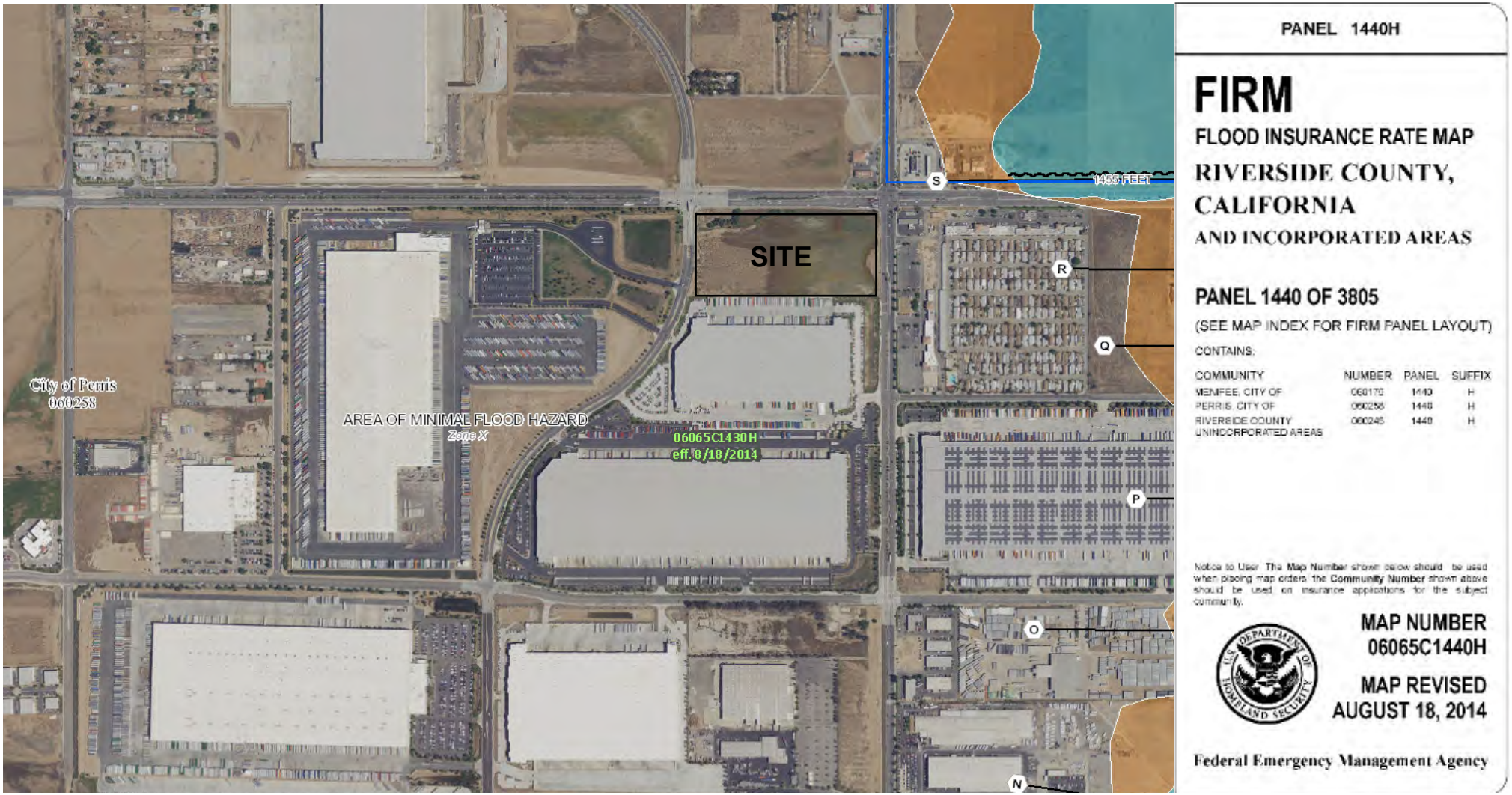
According to **Figure 10-1, *FEMA FIRM Map***, the Project site is proximate to, but is not located within a FEMA designated flood hazard area. The referenced FEMA Map indicates the entire Project site is located in Zone X which corresponds to areas outside the 100-year floodplain (FEMA Flood Hazard Areas are shown on the referenced FEMA Map extending south and west to a point approximately one-quarter mile northeast of the Project site). This is consistent with the *Map My County* which states the Project site is located outside of the floodplain and floodplain review is not required.

The Project site is located approximately two (2) miles southwest of Lake Perris (Perris Reservoir). Based on a review of Exhibit 4.5-12, Dam Inundation Map, City of Perris General Plan, with the exception of a small area at the very northeast corner of the Project site, the east boundary of the Project site along N. Perris Boulevard coincides with western extent of the maximum Dam Inundation Area. Therefore, there is no risk associated with seiche or inundation.

The Project site is located approximately 37 miles from the nearest coastline; therefore, there is no risk associated with tsunamis.

As a result of this analysis, no additional analysis will be required in an EIR.

Figure 10-1
FEMA FIRM Map



Source: FEMA https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-117.39449821289038,33.71106270929909,-117.06216178710959,33.85373990254864

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Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	X			

Potentially Significant Impact

Please reference the discussion previously set forth in Thresholds 10.a and 10.b.

In order to ensure a comprehensive discussion as to whether the Project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, this issue will be analyzed in an EIR.

Standard Conditions and Requirements

SC-HYD-1 SWPPP. Erosion and siltation reduction measure BMPs contained in the required SWPPP will be implemented during construction. At the completion of construction, the Project will consist of impervious surfaces, landscaped planters, and post-construction BMPs.

SC-HYD-2 WQMP. The Project proponent is required to submit a Water Quality Management Plan (WQMP) for review and approval. The WQMP identifies post-construction BMPs in addressing increases in impervious surfaces, methods to decrease incremental increases in off-site stormwater flows, and methods for decreasing pollutant loading in off-site discharges as required by the applicable NPDES requirements.

SC-HYD-3 Wastewater. All wastewater associated with the Project's interior plumbing systems will be discharged into the local sewer system for treatment at the regional wastewater treatment plant.

SC-HYD-4 Site Drainage Plan. A site drainage plan is required by the City of Perris and will be reviewed by the City Engineering Department. The final grading and drainage plan will be approved by the City Engineering Department during plan check review.

SC-HYD-5 Storm Drainage Facilities. The Project applicant shall pay Development Impact Fees (DIF) for nonresidential development prior to the issuance of a building permit.

SC-USS-1 Sewer Connection Fees. Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable sewer connection fees to EMWD.

Mitigation Measures

To be determined if necessary, in an EIR.

11. LAND USE AND PLANNING.

Source(s): *Map My County*, (**Appendix A**); **Figure 3, *Existing and Proposed General Plan Land Use Designations*** and **Figure 4, *Existing and Proposed* Zoning *Classifications***, in Section I. of this Initial Study; City of Perris General Plan 2030, Circulation Element, adopted June 14, 2005, as amended August 26, 2008, Exhibit CE-9, *Existing Designated Truck Routes*.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?			X	

Less Than Significant Impact

The Project site is located in the City of Perris, County of Riverside, State of California. Reference **Figure 1, *Regional Location Map***, and **Figure 2, *Vicinity Map*** in Section I. of this Initial Study.

The Project applicant proposes a Specific Plan Amendment to accommodate the development of a 347,918-square-foot light-industrial distribution warehouse building with 8,000 square feet of office area on a 16-acre site.

The Project site is located in the ±3,500-acre Perris Valley Commerce Center Specific Plan (PVCCSP), in the City of Perris. The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI) as proposed PVCC Specific Plan, Amendment No. 10.

The ±3,500-acre PVCCSP was originally approved by the Perris City Council on January 10, 2012, as Ordinance No. 1284. There have been nine (9) amendments to date, the most recent being Amendment No. 9, approved on August 28, 2018 as Ordinance No. 1371.

The PVCCSP planning area is located in the North Perris area of western Riverside County, generally bordered by Interstate-215 (I-215) to the west, March Air Reserve Base and Oleander Avenue to the north, the Perris Valley Storm Channel (PVSC) to the east, and Placentia Avenue to the south.

The PVCCSP location contiguous to the I-215 freeway is key to the rapidly expanding distribution warehouse development taking place within the specific plan boundaries.

At the time the PVCCSP was adopted in 2012 the area was largely undeveloped land used for agricultural purposes (sod farming, other) with smaller elements of development consisting of some warehousing/distribution facilities, neighborhood and community commercial, small scale industrial facilities, a rural residential neighborhood and a mobile home park.

Over the past nine (9) years since its adoption, a substantial amount of new development activity (primarily logistics/distribution warehouses) and infrastructure (i.e., road improvements, dry and wet utilities, other) has been built within the PVCCSP boundary, including the 579,708-square-

foot distribution warehouse contiguous south of the Project site (3900 Indian Avenue) completed in 2014.

The Project site is located less than 1¼ mile east of I-215 with extensive frontage along Ramona Expressway, a six-lane "expressway" (184' ultimate design width) with a raised center median as it extends east/west through the PVCCSP planning area and continuing as a divided four-lane arterial east past Lake Perris (Perris Reservoir) towards the unincorporated agricultural community of Lakeview, then onto the City of Hemet and the City of San Jacinto. The Project site's Ramona Expressway frontage extends from Indian Avenue on the west to Perris Boulevard on the east; both are full service signalized intersections with pocket turn lanes.

Based on a review of **Figure 3, *Existing and Proposed General Plan Land Use Designations*** and **Figure 4, *Existing and Proposed* Zoning *Classifications***, in Section I. of this Initial Study, the Project site is surrounded by lands within the PVCCSP designated for Commercial use to the north and east; and by lands designated for Light Industrial use to the south and west:

Commercial

North (across Ramona Expressway): Most of the acreage on the north side of Ramona Expressway, with the exception of the northwest corner (NWC) of the Ramona Expressway and Perris Boulevard, is vacant, unimproved land with an underlying PVCCSP land use designation of Commercial (APN 302-060-041; 17.71 acres). The NWC of Ramona Expressway and Perris Boulevard is improved with an Arco gas station and convenience store (APN 302-060-39).

East (across Perris Boulevard): Improved local serving commercial retail development with an underlying PVCCSP land use designation of Commercial (multiple APNs including 303-100-017, 021, 032, 033 & 037). The southeast corner of Ramona Expressway and Perris Boulevard is improved with a Mobil gas station and Circle K convenience store (APN 303-100-017).

Light Industrial

South: Improved 579,708-square foot distribution warehouse on a 28.80-acre site, completed in 2014 (3900 Indian Avenue; APNs 303-060-021 &022).

West: (across Indian Avenue) Improved 1.25-million square foot Lowe's Regional Distribution Center on an approximate 100-acre site at 3984 Indian Avenue (APNs 303-030-019+).

The Project site is located along the Ramona Expressway corridor, a primary east-west arterial and designated truck route extending through the light industrial and commercial dominated PVCC Specific Plan in North Perris.

The proposed Project will be consistent and compatible with existing and proposed commercial and light industrial development surrounding the Project site in terms of building height, massing, and development intensity.

Based on the above, the proposed Project will not divide an established community. Any related impacts will be less than significant, and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction adopted for the purpose of avoiding or mitigating an environmental effect?	**X**			

Potentially Significant Impact

The Project site is located in the ±3,500-acre PVCCSP planning area, in the City of Perris. The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI) as proposed PVCC Specific Plan, Amendment No. 10.

To ensure a comprehensive discussion as to whether the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction adopted for the purpose of avoiding or mitigating an environmental effect, this issue will be analyzed in an EIR.

Standard Conditions and Requirements

To be determined if necessary, in an EIR.

Mitigation Measures

To be determined if necessary, in an EIR.

12. MINERAL RESOURCES.

Source(s): *Map My County*, (**Appendix A**); City of Perris General Plan Draft Environmental Impact Report (GP-DEIR), Appendix A, Initial Study, Section X, *Mineral Resources*, Appendices; Perris Valley Commerce Center Specific Plan Draft Environmental Impact Report (PVCCSP-DEIR), Appendix A, Initial Study, Section 8, *Mineral Resources*; mindat.org website; and Project Site Visit – April 13, 2020 by Matthew Fagan.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				**X**

No Impact

The California Geological Survey Mineral Resources Project provides information about California's non-fuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources, as mandated by the Surface Mining and Reclamation Act (SMARA) of 1975. Non-fuel mineral resources include metals such as gold, silver, iron, and copper; industrial metals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt and dimension stone, and construction aggregate, including sand, gravel, and crushed stone. Development generally results in a demand for minerals, especially construction aggregate. Urban preemption of prime deposits and conflicts between mining and other uses throughout California led to passage of the SMARA, which requires all cities and counties to incorporate in their general plans the mapped designations approved by the State Mining and Geology Board.

The classification process involves the determination of Production-Consumption (P-C) Region boundaries, based on identification of active aggregate operations (Production) and the market area served (Consumption). The P-C regional boundaries are modified to include only those portions of the region that are urbanized or urbanizing and are classified for their aggregate content. An aggregate appraisal further evaluates the presence or absence of significant sand, gravel, or stone deposits that are suitable sources of aggregate. The classification of these mineral resources is a joint effort of the state and the local governments. It is based on geologic factors and requires that the State Geologist classify the mineral resources area as one of the four Mineral Resource Zones (MRZs), Scientific Resource Zones (SRZ), or Identified Resource Areas (IRAs), described below:

- **MRZ-1:** A Mineral Resource Zone where adequate information indicates that no significant mineral deposits are present or likely to be present.
- **MRZ-2:** A Mineral Resource Zone where adequate information indicates that significant mineral deposits are present, or a likelihood of their presence and development should be controlled.
- **MRZ-3:** A Mineral Resource Zone where the significance of mineral deposits cannot be determined from the available data.

- **MRZ-4:** A Mineral Resource Zone where there is insufficient data to assign any other MRZ designation.
- **SZ Areas:** Containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance shall be classified in this zone.
- **IRA Areas:** County or State Division of Mines and Geology Identified Areas where adequate production and information indicates that significant minerals are present.

As part of the classification process, an analysis of site-specific conditions is utilized to calculate the total volume of aggregates within individually identified Resource Sectors. Resource Sectors are those MRZ-2 areas identified as having regional or statewide significance. Anticipated aggregate demand in the P-C Regions for the next 50 years is then estimated and compared to the total volume of aggregate reserves identified within the P-C Region.

The City of Perris is located within the San Bernardino P-C Region.

As set forth in the City of Perris GPDEIR IS (Section X, Mineral Resources), the California Department of Conservation is primarily interested in preservation of access to significant resources areas included in MRZ-2. Lands within the City of Perris and its Sphere of Influence are designated MRZ-3 and MRZ-4 which are not defined as significant resource areas.

The Project site is located within the MRZ-3 zone boundaries and no known significant mineral resources have been identified in the vicinity of the Project site by the city or the state.

It is further noted that the Project site is located within the PVCCSP planning area with existing logistics/distribution warehouse development contiguous to the south and west, and in the immediate vicinity north of Ramona Expressway. There are no standards and guidelines, or mitigation measures related to mineral resources included in the PVCCSP or associated PVCCSP EIR.

In conclusion, there are no mineral extraction or process facilities on or near the Project site, and no mineral resources are known to exist in the vicinity. Therefore, the Project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impacts will occur, and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				**X**

No Impact

Please reference the discussion in Threshold 12.a.

There are no mineral extraction or process facilities on or near the Project site. Furthermore, no mineral resources are known to exist within the vicinity.

Therefore, the proposed development of the Project site will not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. No impacts will occur, and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Standard Conditions and Requirements

None are required.

Mitigation Measures

No mitigation measures are required.

13. NOISE.

Source(s): *Map My County*, (**Appendix A**); **Table 1** ***Surrounding Land Uses***, **Figure 5,** ***Aerial Photo***, and **Figure 6,** ***March Air Reserve Base / Inland Port Airport Influence Area*** in Section I. of this Initial Study; City of Perris General Plan - Draft Environmental Impact Report (GP-DEIR), Section 4.7, *Noise*; Perris Valley Commerce Center Specific Plan Draft Environmental Impact Report (PVCCSP-DEIR), Section 4.9, *Noise*; City of Perris – Municipal Code, Title 7, Health and Welfare, Chapter 7.34, *Noise Control*, and Title 16, Buildings and Construction, Chapter 16.22, *Construction Located Near Arterials, Railroads and Airports*; Map MA-1, *Compatibility Map* and Table MA-1, *Compatibility Zone Factors*, March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB Comp. Plan), adopted November 13, 2014; Perris Valley Airport Land Use Compatibility Plan, Map PV-1, Compatibility Map – Perris Valley Airport and Map PV-3, Ultimate Noise Impacts – Perris Valley Airport; and Google Earth.

City of Perris - Municipal Code

According to Section 7.34.010 of the Perris Municipal Code (PMC), excessive noise levels are detrimental to the health and safety of individuals. Noise is considered a public nuisance, and the City discourages unnecessary, excessive or annoying noises from all sources.

Chapter 16.22 of the PMC regulates new development including “sensitive receptors” located near arterials, railroads and the airport. “Sensitive receptors” refers to types of land uses that are adversely affected by various noise sources. Such land uses are defined in Section 16.22.020 of the Municipal Code to include: residences, schools, libraries, hospitals, churches, offices, hotels, motels, and outdoor recreational areas. Factors used to define sensitive receptors include the potential for interference with speech communication, the need for freedom from noise intrusion, the potential for sleep interference, and subjective judgment.

“Noise impacted projects” are defined as residential projects, or portions thereof, which are exposed to an exterior noise level of 60 dBA CNEL or greater. Such projects must include noise insulation design and construction assemblies that achieve an exterior-to-interior noise reduction sufficient to keep interior noise levels to a maximum of 45 dBA CNEL. This standard applies to any habitable room furnished for normal use with doors and windows closed. Specific construction techniques and materials that will achieve various levels of noise reduction are defined. Specifications for preparation of an acceptable acoustical report are also defined.

Section 7.34.060 of the PMC provides that “It is unlawful for any person between the hours of seven p.m. of any day and seven a.m. of the following day, or a legal holiday, with the exception of Columbus Day and Washington’s birthday, or on Sundays, to erect, construct, demolish, excavate, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise. Construction activity shall not exceed eighty dBA L_{max} in residential zones in the city."

Fundamentals of Sound and Environmental Noise

Noise can be defined as unwanted sound. Sound (and therefore noise) consists of energy waves that people receive and interpret. Sound pressure levels are described in logarithmic units of ratios of sound pressures to a reference pressure, squared. These units are called bels.

In order to provide a finer description of sound, a bel is subdivided into ten decibels, abbreviated dB. To account for the range of sound that human hearing perceives, a modified scale is utilized known as the A-weighted decibel (dBA).

Since decibels are logarithmic units, sound pressure levels cannot be added or subtracted by ordinary arithmetic means. For example, if one automobile produces a sound pressure level of 70 dBA when it passes an observer, two cars passing simultaneously would not produce 140 dBA. In fact, they would combine to produce 73 dBA.

This same principle can be applied to other traffic quantities as well. In other words, doubling the traffic volume on a street or the speed of the traffic will increase the traffic noise level by 3 dBA. Conversely, halving the traffic volume or speed will reduce the traffic noise level by 3 dBA. A 3 dBA change in sound is the beginning at which humans generally notice a barely perceptible change in sound and a 5 dBA change is generally readily perceptible.

Noise consists of pitch, loudness, and duration; therefore, a variety of methods for measuring noise have been developed. According to the California General Plan Guidelines for Noise Elements, the following are common metrics for measuring noise:

- **L_{eq} (Equivalent Energy Noise Level):** The sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over given sample periods. LEQ is typically computed over 1-, 8-, and 24-hour sample periods.

- **L_{mx} (Maximum Noise Level):** The maximum sound level over given sample period.

- **CNEL (Community Noise Equivalent Level):** The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five decibels to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and after addition of ten decibels to sound levels in the night from 10:00 p.m. to 7:00 a.m.

- **L_{DN} (Day-Night Average Level):** The average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of ten decibels to sound levels in the night after 10:00pm and before 7:00 a.m.

CNEL and L_{DN} are utilized for describing ambient noise levels because they account for all noise sources over an extended period of time and account for the heightened sensitivity of people to noise during the night. L_{eq} is better utilized for describing specific and consistent sources because of the shorter reference period. L_{max} noise levels are used for the evaluation of compliance with the PMC.

Thresholds of Significance:

According to the PVCCSP EIR, the City of Perris has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G to the State *CEQA Guidelines*. Based on Appendix G to the State *CEQA Guidelines*, impacts related to noise may be considered potentially significant if the project would result in:

- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;

- Exposure of persons to or generation of excessive groundborne vibration of groundborne noise levels; for a project located within an airport land use plan or, where such a plan has not been adapted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels; or
- Exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

There is no official "industry standard" of determining significance for noise impacts. However, a jurisdiction will typically identify either a 3 dBA or 5dBA increase as being the threshold because these levels represent varying levels of perceived noise increases. The City of Perris Noise Element of the General Plan states that a change in 5 dBA is "readily discernable to most people in an exterior environment." Accordingly, an increase in 5 dBA is considered significant for all sensitive receptors along road segments that do not exceed 60 dBA. Additionally, per the City of Perris, for sensitive receptors, if the noise increase would meet or exceed the City's 60 dBA CNEL standard, then an increase of 3 dBA would also be considered significant.

Analysis of Project Effect and Determination of Significance:

Would the Project result in?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	**X**			

Potentially Significant Impact

The City of Perris General Plan – Draft Environmental Impact Report (GP-DEIR) states that a variety of noise sources exist in the City of Perris. Mobile noise sources produce a major effect on the ambient noise environnent. These sources include automobile traffic, aircraft overflights, and train movements. The primary noise source is automotive traffic along the streets and highway network.

Traffic noise is generated by the friction of tires on pavement, together with the sounds of engines and exhausts. Generally, higher traffic volumes and speeds equal higher noise levels along the roadway. Accordingly, the highest traffic noise levels are typically found along freeway and highway corridors.

The mix of vehicles also directly affects noise levels e.g., noise along a truck route would typically be higher than noise levels along a comparable route that did not allow trucks. Street grades can also make a difference since vehicles, and trucks in particular, make more noise when climbing grades, compared to travel along a relatively flat road surface, as the engines work harder (and louder) to propel the vehicle uphill.

A number of stationary sources also generate noise on a regular basis. Much of this noise occurs at industrial sites that are generally located away from sensitive land uses. Other notable stationary sources include auto racing events at the Perris Auto Speedway located adjacent to

the City at the Lake Perris State Recreational Area, and motorcycle racing events at the Starwest Motocross Park, just south of the Speedway.

Figure 4.9-2, *Land Use Compatibility for Community Noise Exposure*, of the PVCC-DEIR references Exhibit N-1 of the City's General Plan, which describes the nature of the noise environment broken down into four (4) categories where the CNEL or Ldn level is:

- Below 55 dB — Relatively quiet suburban or urban areas, no arterial streets within 1 block, no freeways within one-quarter (¼) mile;
- 55-65 dB — Most somewhat noisy urban areas, near but not directly adjacent to high volumes of traffic;
- 65-75 dB — Very noisy urban areas near arterials, freeways or airports;
- 75+ dB — Extremely noisy urban areas adjacent to freeways or under airport traffic patterns. Hearing damage with constant exposure outdoors.

Furthermore, Figure 4.9-2 indicates normally acceptable, conditionally acceptable, and normally unacceptable exterior noise levels for various uses including the following:

- Residential — (SFR, MFR, Mobile Homes) exterior noise levels *normally acceptable* up to 60 dBA CNEL, *conditionally acceptable* up to 65 dBA CNEL, and *normally unacceptable* between 65 and 75 dBA CNEL;
- Commercial 1 — (Motels/Hotels, Transient Lodging) exterior noise levels *normally acceptable* up to 60 dBA CNEL, *conditionally acceptable* up to 70 dBA CNEL, and *normally unacceptable* between 70 and 80 dBA CNEL;
- Commercial 2 — (Office/Business, Commercial, Professional & Mixed Use) exterior noise levels normally acceptable up to 65 dBA CNEL, conditionally acceptable up to 75 dBA CNEL, and normally unacceptable over 75 dBA CNEL;
- Institutional — (Schools, Libraries, Churches, Hospitals, Nursing Homes) exterior noise levels *normally acceptable* up to 60 dBA CNEL, *conditionally acceptable* up to 70 dBA CNEL, and *normally unacceptable* between 70 and 80 dBA CNEL;
- Industrial/other — (Industrial, Manufacturing, Utilities, Agriculture) exterior noise levels *normally acceptable* up to 70 dBA CNEL, *conditionally acceptable* up to 80 dBA CNEL, and *normally unacceptable* over 80 dBA CNEL.

Noise levels from various sources include 1) Construction Noise, 2) On-Site Operational Noise, 3) Exterior Noise, and 4) Interior Noise. The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that for new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

A project-specific Noise Study for the proposed Project (logistics/distribution warehouse) has not been conducted to date; however, a Noise Study for the Project will be required prior to the issuance of the pending Project EIR.

To ensure a comprehensive discussion as to whether the Project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project

in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, this issue will be analyzed in an EIR.

Would the Project result in?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Generation of excessive groundborne vibration or groundborne noise levels?	X			

Potentially Significant Impact

Vibration is the movement of mass over time. It is described in terms of frequency and amplitude, and unlike sound there is no standard way of measuring and reporting amplitude.

Groundborne vibration can be described in terms of displacement, velocity, or acceleration. Each of these measures can be further described in terms of frequency and amplitude. Displacement is the easiest descriptor to understand; it is simply the distance that a vibrating point moves from its static position. The velocity describes the instantaneous speed of the movement and acceleration is the instantaneous rate of change of the speed.

Common sources of vibration within communities include construction activities and railroads. Vibration can impact people, structures, and sensitive equipment. The primary concern related to vibration and people is the potential to annoy those working and residing in the area. Groundborne vibration can also disrupt the use of sensitive medical and scientific instruments such as electron microscopes. Vibration with high enough amplitudes can also damage structures (such as crack plaster or destroy windows). Structural damage is generally only of concern where large construction equipment is necessary to complete a development project (e.g., large bulldozers, vibratory pile drivers), where blasting is required, or where very old buildings are involved (e.g., ancient ruins). Groundborne vibration generated by construction projects is generally highest during pile driving or rock blasting. Next to pile driving, grading activity has some potential for structural vibration impacts if large bulldozers, large trucks, or other heavy equipment are used where very old structures are present.

A project-specific Noise Study for the proposed Project (logistics/distribution warehouse), which would include an analysis of potential vibration impacts, has not been conducted to date; however, a Noise Study for the Project will be required prior to the issuance of the pending Project EIR. Potential vibration impacts will be analyzed in the pending Noise Study with respect to both construction and operational activities at the proposed Project.

To ensure a comprehensive discussion as to whether the Project would result in generation of excessive groundborne vibration or groundborne noise levels during construction, this issue will be analyzed in an EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	**X**			

Potentially Significant Impact

March Air Reserve Base (MARB)

The Project site is located in Compatibility Zone B1 (Inner Approach/ Departure Zone) and Compatibility Zone C1 (Primary Approach/ Departure Zone) of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Reference **Figure 6, *March Air Reserve Base / Inland Port Airport Influence Area*** in Section I. of this Initial Study.

The runway for March Air Reserve Base/Inland Port Airport (MARB/IPA) is located approximately 9,170 feet (1¾ miles) to the northwest of the Project site (Google Earth).

As set forth in Table MA-1, Compatibility Zone Factors of the *MARB Comp. Plan*, the noise impact to properties within Zone B1 is "High" and the noise impact to properties within Zone is "Moderate to High." Furthermore, properties within Zone B1 are within or near the 65-CNEL contour and single-event noise sufficient to disrupt many land use activities including indoors if windows are open; and properties within Zone C1 are within or near the 60-CNEL contour and single-event noise mat be disruptive to noise-sensitive land use activities (aircraft, 2,000 feet above runway elevation on arrival and generally <3,000 feet above runway elevation on departure).

The Project site is located within an area that is exposed to elevated levels of noise from aircraft flying operations at MARB/IPA. Given the Project site's proximity to MARB, employees of the proposed Project would be subject to noise occurrences that may impact their work environment. Additionally, hearing protection for employees may be required by Occupational Safety and Health Administration (OSHA) or other agencies as it relates to safety and health in a high noise level work environment.

As the proposed Project will have a potentially significant impact, a pending EIR will address the Project's consistency with noise regulations related to MARB.

Perris Valley Airport

The Perris Valley Airport and Skydiving Center is a privately owned and operated airport within the City located approximately 5¼ miles south of the Project site (Google Earth).

As shown on Map PV-1, Compatibility Map – Perris Valley Airport, the Project site is not located within any Compatibility Zones of the Perris Valley Airport. Also, as shown on Map PV-3, Ultimate Noise Impacts – Perris Valley Airport, the Project site is located beyond the 55-CNEL contour. No impacts are anticipated with respect to the privately owned Perris Valley Airport and Skydiving Center.

Private Airstrips

There are no private airstrips in the Project site vicinity; there will be no impacts related to excessive noise near a private airstrip. No impacts related to excessive noise from private airstrips would occur. No additional analysis with respect to private airstrips will be required in an EIR.

Standard Conditions and Requirements

To be determined if necessary, in an EIR.

Mitigation Measures

The proposed Project is required to comply with the following PVCCSP EIR mitigation measures. Additional mitigation to be determined if necessary, in an EIR.

PVCCSP MM Noise 1: During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.

PVCCSP MM Noise 2: During all construction activity, the contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.

PVCCSP MM Noise 3: During all construction activity, the construction contractor shall ensure that equipment is shut off and not left to idle when not in use.

PVCCSP MM Noise 4: During all construction activity, the contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the Project site during all project construction.

PVCCSP MM Noise 5: The Project proponent shall mandate that the construction contractor prohibit the use of music or sound amplification on the project site during construction.

PVCCSP MM Noise 6: During all construction activity, the construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment.

14. POPULATION AND HOUSING.

Source(s): *Map My County*, (**Appendix A**); City of Perris General Plan Draft Environmental Impact Report (GP-DEIR), Appendix A, Initial Study, Section XII, *Population and Housing*, Appendices; Perris Valley Commerce Center Specific Plan Draft Environmental Impact Report (PVCCSP-DEIR), Section 5, Other CEQA Topics, *Growth Inducing Impacts*; Perris Valley Commerce Center Specific Plan Draft Environmental Impact Report (PVCCSP-DEIR), Appendix A, Initial Study, Section 2, *Population and Housing*; **Figure 5, *Aerial Photo*** in Section I. of this Initial Study; Project Site Visit – April 13, 2020 by Matthew Fagan.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			**X**	

Less Than Significant Impact

The Project applicant proposes the development of a 347,918-square-foot light-industrial warehouse building with 8,000 square feet of office area on a 16-acre site.

In order to accomplish the proposed development plan, the Project also proposes to modify the current Perris Valley Commerce Center Specific Plan (PVCCSP) land use designation for the Project site from Commercial (C) to Light Industrial (proposed PVCC Specific Plan, Amendment No. 10).

As set forth in the existing PVCCSP DEIR/Initial Study, the PVCCSP included land use changes that may induce population growth relative the City's GP 2030. This conversion of land uses is reflected in the land use designations found in the Specific Plan. The PVCCSP acknowledged that it may induce population growth by providing employment opportunities, but it also noted that an overall reduction in designated residential land uses will occur as part of the PVCCSP in comparison with the GP 2030.

The PVCCSP was originally approved by the Perris City Council on January 10, 2012, as Ordinance No. 1284. There have been nine (9) amendments to date, the most recent being Amendment No. 9, approved on August 28, 2018 as Ordinance No. 1371. There are no standards and guidelines, or mitigation measures related to population and housing resources included in the PVCCSP or associated PVCCSP DEIR.

According to the US Census Bureau, the City's population as of July 2015 was 74,971 (US Census Bureau 2016). The Southern California Association of Governments (SCAG) estimates that the population of Perris is expected to increase to about 116,700 by the year 2020 although this figure is significantly above current City development conditions.

While the proposed Project will include some expansion of infrastructure, this new limited infrastructure will serve the proposed Project's specific requirements and is not anticipated to contribute to additional growth as existing development contiguous to the Project site and consistent with the PVCCSP is in place. The additional employment and infrastructure requirements to support development of the overall PVCCSP were previously addressed and analyzed in the PVCCSP EIR.

Furthermore, although the proposed Project includes a specific plan amendment to change the PVCCSP land use designation of the Project site from Commercial (C) to Light Industrial (LI), this is not considered a substantial change and the new LI designation, which is considered a less intensive land use in comparison with the existing C designation, would not attract a substantial number of people to the area.

The proposed Project does not involve construction of any new homes and will not contribute to a direct increase in the City's population. The proposed Project may indirectly contribute to population growth within the City by creating additional employment both during construction and operation. However, it is anticipated that the majority of new jobs would be filled by workers who already reside in the Project vicinity and that the Project would not attract a significant number of new residents to the City.

Based on the above data and analysis, the Project will not induce substantial unplanned population growth in the area, either directly or indirectly. Project impacts to population growth will be less than significant and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				**X**

No Impact

The Project site is vacant undeveloped land and there are no building structures or site improvements. Therefore, the Project will not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impacts will occur, and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Standard Conditions and Requirements

None are required.

Mitigation Measures

No mitigation measures are required.

15. PUBLIC SERVICES.

Source(s): *Map My County* (**Appendix A**); City of Perris General Plan 2030 - Draft Environmental Impact Report (GP-2030 DEIR), October, 2004, Section 4.6, *Public Services*, Chapter 4.6.1, *Police Protection*, Chapter 4.6.2, *Fire Protection/Emergency Rescue,* Chapter 4.6.3, *Health Services*, Chapter 4.6.4, *Schools*, Chapter 4.6.5 *Libraries*; Perris Valley Commerce Center Specific Plan Amendment No. 9, (PVCC-SPA9), Section 13.0, Implementation and Administrative Process, Chapter 13.4, *Financing and Maintenance Mechanisms*; Perris Valley Commerce Center Specific Plan - Draft Environmental Impact Report (PVCCSP-DEIR), July, 2011, Appendix A, Initial Study, Section 11, *Public Services*; City of Perris, Departments, Fire and Police websites; Val Verde School District, Home & Info-graphic; and City of Perris, Ordinance No. 1182, *An Ordinance of The City Council of The City of Perris, California, Amending Municipal Code Chapter 19.68, Regarding the Development Impact Fees Applicable to New Development*.

Analysis of Project Effect and Determination of Significance:

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Fire protection?			**X**	

Less Than Significant Impact

The City of Perris contracts with the Riverside County Fire Department (RCFD) for fire prevention, suppression, and paramedic services. RCFD, in turn, operates under contract with the California Department of Forestry and Fire Protection (Cal Fire).

According to the City of Perris website (accessed March 2020), the City began contracting with the Riverside County Fire Department for fire and emergency services in 1983. The City of Perris has fourteen firefighters assigned to two fire stations.

There are two fire stations within the City boundary:

- City of Perris, Fire Station #1, 210 W. San Jacinto Avenue; and
- City of Perris, Fire Station #2, 333 Placentia Avenue.

The City of Perris, Fire Station #1 (210 W. San Jacinto Avenue; aka RCFD Perris Station #1) is located approximately four (4) miles south of the Project site at the northwest corner of W. San Jacinto Avenue and C Street. Operated by Battalion 1, Perris Fire Station #1 is also the Riverside County Fire Department Headquarters (aka Truman Holland Administrative Headquarters) and houses the Emergency Command Center (ECC). The ECC is one of the largest regional fire

service organizations in California and is dedicated to Integrated, Cooperative, Regional Fire Protection and Emergency Services.

The City of Perris, Fire Station #2 (333 Placentia Avenue; aka RCFD North Perris Station #90) is located approximately one and one-half (1½) miles south/southeast of the Project site on the south side of Placentia Street, west of Redlands Avenue. Completed in late 2005 and operated by Battalion 1 to serve North Perris, the site is located within a leased area of Paragon Park, which fronts Placentia Avenue.

Fire services were analyzed in conjunction with the Perris Valley Commerce Center Specific Plan (PVCCSP), originally approved on January 10, 2012, as Ordinance No. 1284, and amended nine times since, most recently as Amendment No. 9, approved on August 28, 2018, as Ordinance No. 1371.

The Initial Study (IS), dated August 2009, prepared in conjunction with the PVCCSP and included as Appendix A of the PVCCSP EIR, concluded that potential impacts to Fire Protection services related to the PVCCSP are Less Than Significant (no further discussion in DEIR).

As identified in the IS, Fire Station #2 (333 Placentia Ave) is expected to provide first response to the PVCCSP project area (including the Project site), and Fire Station #1 (210 W. San Jacinto Ave) is expected to also serve the PVCC.

The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). The proposed change in land use will not have a substantial change in the level of fire protection services needed for this property beyond those previously identified in the PVCCSP EIR.

Implementing development projects within the PVCCSP planning area will be required to annex to the North Perris Public Safety Community Facilities District (CFD) and pay a special tax for the provision of public safety (i.e. police and fire) services. These special tax proceeds help finance public safety services, including police and fire protection.

In addition, the Project site is subject to City of Perris Ordinance No. 1182 which establishes a Developer Impact Fee (DIF) to mitigate the cost of public facilities that serve new development. The Fire Department will receive a portion of the DIF to offset the impact of developing new facilities to support fire services.

It is noted that payment of DIF is a standard condition of approval by the City and is not considered mitigation under CEQA. Reference **Standard Condition SC-PS-1**.

An additional performance objective with respect to fire services is the provision for adequate fire flow to provide water pressures strong enough to serve the given type of construction. Without adequate fire hydrant spacing and fire flow, structures could be at undue risk and performance objectives are not met. However, the City requires new projects provide or demonstrate provision of adequate fire flow as a standard condition of approval. Therefore, impacts related to fire flow would be less than significant and no mitigation would be required under CEQA. Reference **Standard Condition SC-PS-2** (Municipal Code Section 20.01.010 (Fire Code) requires adequate hydrants (number and spacing), adequate fire flows (volume of flow per minute) and sprinklers for new structures.

With implementation of standard conditions of approval, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, any impacts related to fire protection will be less than significant and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
b) Police protection?			**X**	

Less Than Significant Impact

The City of Perris contracts with the Riverside County Sheriff's Department (RCSD) to provide police service for the City. The Riverside County Sheriff's Department – Perris Station is located at 137 N. Perris Boulevard in the City of Perris approximately 3.75 miles south of the Project site.

The RCSD Perris Station, located directly east across Perris Boulevard from the Perris City Hall, is RCSD's newest station and serves three incorporated cities including the City of Perris, the City of Canyon Lake, and the City of Menifee, in addition to serving adjacent unincorporated communities of Glen Valley, Mead Valley, Woodcrest, Romoland, and Sun City.

The RCSD provides a crime prevention program to the City of Perris, consisting of support to the Neighborhood Watch program in the City and officer visits to schools and churches with presentations on topics including drug education and personal safety.

As set forth on the City of Perris website (accessed March 2020), the RCSD Perris Station features the following statistics for its service area:

- Sworn officers: 175
- Non-sworn personnel: 25
- Volunteers: 200
- Service Area (Sq. Mi.): 250
- Population: 270,000
- Annual incidents of police service: 125,000
- Specialized units: Regional gang and narcotics task forces, forensics, coroner's bureau, mounted posse, dive team
- Station commander: Capt. Brandon Ford

The Perris Station serves as the headquarters for regional drug and gang task forces. Police divisions include narcotics, gang-suppression, homicide and internal affairs, among others. The Riverside County Coroner's Department and forensics bureau operate out of Perris, as does a troop of Mounted Posse. Furthermore, the sheriff's dive team is based out of the Perris Station and the station's helipad serves as a backup landing and take-off spot for law-enforcement helicopters.

Police services were analyzed in conjunction with the PVCCSP, originally approved on January 10, 2012, as Ordinance No. 1284, and amended nine times since, most recently as Amendment No. 9, approved on August 28, 2018, as Ordinance No. 1371.

The Initial Study (IS), dated August 2009, prepared in conjunction with the PVCCSP and included as Appendix A of the PVCCSP EIR, concluded that potential impacts to Police Protection services related to the PVCCSP are Less Than Significant (no further discussion in EIR).

The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). The proposed change in land use will not have a substantial effect on anticipated police services previously identified in the PVCCSP-DEIR.

Implementing development projects within PVCCSP planning area will be required to annex to the North Perris Public Safety CFD and pay a special tax for the provision of public Safety (i.e., police and fire) services. These special tax proceeds help finance public safety services, including police protection.

In addition, the Project site is subject to City of Perris, Ordinance No. 1182. Ordinance No. 1182 establishes DIF to mitigate the cost of public facilities needed to serve new development. The Police Department will receive a portion of the DIF to offset the impact of developing new facilities to support police services.

It is noted that payment of DIF is required and is not considered unique mitigation under CEQA. Reference **Standard Condition SC-PS-1**.

With implementation of the standard condition of approval, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Therefore, any impacts related to police protection will be less than significant and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Schools?			X	

Less Than Significant Impact

The Project site along with the entire PVCCSP planning area is located within the boundaries of the Val Verde Unified School District (VVUSD).

The VVUSD consists of twenty-two (22) schools serving 20,141 students from preschool through high school. There are 4 high schools, 4 middle schools, 12 elementary schools, 1 preschool, 1 virtual/SSA, and 1 adult school with 1,967 employees and annual revenue of $290,792,794. The district boundary is bisected by Interstate-215 and generally extends from Van Buren Boulevard on the north to Orange Avenue on the south, and Gavilan Road on the west to Lake Perris on the east. The district serves students from the Cities of Perris and Moreno Valley, as well as the unincorporated area of Mead Valley.

The proposed Project will not directly create a source of school-aged children because the Project (logistics/distribution warehouse) does not include a residential component. It may indirectly affect schools by providing a source of employment that may draw new residents into the area; however, appropriate developer impact fees, as required by state law, shall be assessed and paid to the school district.

School services were analyzed in conjunction with the PVCCSP, originally approved on January 10, 2012, as Ordinance No. 1284, and amended nine times since, most recently as Amendment No. 9, approved on August 28, 2018, as Ordinance No. 1371.

The Initial Study (IS), dated August 2009, prepared in conjunction with the PVCCSP and included as Appendix A of the PVCCSP EIR, concluded that potential impacts to School services related to the PVCCSP are Less Than Significant (no further discussion in EIR).

The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). The proposed change in land use will not have a substantial impact on school services beyond that identified in the PVCCSP-DEIR.

Impacts to VVUSD facilities will be offset through the payment of impact fees to the VVUSD, prior to the issuance of a building permit. This fee is subject to change, and the applicable fees, at time of building permit issuance, shall apply.

Payment of these fees (**Standard Condition SC-PS-3**) is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

With the payment of these fees, the impacts to schools would be mitigated to a level that is considered less than significant.

With implementation of the standard condition of approval, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools. Therefore, any impacts related to schools will be less than significant and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
d) Parks?			**X**	

Less Than Significant Impact

Demand for parks and recreational facilities are generally the direct result of residential development.

The proposed Project (logistics/distribution warehouse) will not directly require the construction or expansion of parks or recreational facilities as it does not include a residential component. It may indirectly affect parks by providing a source of employment that may draw new residents into the area; however, appropriate developer impact fees, as required by Ordinance No. 1182, shall be assessed and paid to the City for parks.

Potential impacts to parks were analyzed in conjunction with the PVCCSP, originally approved on January 10, 2012, as Ordinance No. 1284, and amended nine times since, most recently as Amendment No. 9, approved on August 28, 2018, as Ordinance No. 1371.

The Initial Study (IS), dated August 2009, prepared in conjunction with the PVCCSP and included as Appendix A of the PVCCSP EIR, concluded that potential impacts to parks related to the PVCCSP are Less Than Significant (no further discussion in EIR).

The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). The proposed change in land use will not have a substantial effect on anticipated parks and recreation facilities previously identified in the PVCCSP-DEIR.

The Project is subject to City of Perris Ordinance No. 1182 which establishes DIF to mitigate the cost of public facilities needed to serve new development. The City's Community Services Department will receive a portion of the DIF to offset the impact of developing new facilities to

support parks and recreation services. Credits may be afforded to the applicant if improvements are made to these facilities as part of the Project development.

Payment of DIF is required and is not considered unique mitigation under CEQA. Reference **Standard Condition SC-PS-1**.

With implementation of the standard condition of approval, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks and recreation facilities. Therefore, any impacts related to parks will be less than significant and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
e) Other public facilities?			**X**	

Less Than Significant Impact

A discussion of the impacts the proposed Project would potentially have on other public facilities including libraries and hospitals is included below. The proposed Project (logistics/distribution warehouse) would not result in a significant increase in the demand for these public facilities and services.

Library Facilities

The City of Perris contracts with the Riverside County Public Library System and provides library services at the Cesar E. Chavez Library located approximately four (4) miles south of the Project site at 163 E. San Jacinto Boulevard. Impacts to library services are typically attributed to residential development.

The proposed Project would not directly increase the demand for library services as it does not include a residential component. It may indirectly affect library services by providing a source of employment that may draw new residents into the area; however, appropriate developer impact fees, as required by Ordinance No. 1182, will be assessed and paid to the City for libraries.

Potential library impacts were analyzed in conjunction with the Perris Valley Commerce Center Specific Plan (PVCCSP), originally approved on January 10, 2012, as Ordinance No. 1284, and amended nine times since, most recently as Amendment No. 9, approved on August 28, 2018, as Ordinance No. 1371.

The Initial Study (IS), dated August 2009, prepared in conjunction with the PVCCSP and included as Appendix A of the PVCCSP EIR, concluded that potential library impacts related to the PVCCSP are Less Than Significant (no further discussion in EIR).

The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). The proposed change in land use will not have a substantial effect on anticipated library facilities previously identified in the PVCCSP-DEIR.

The Project site is subject to City of Perris Ordinance No. 1182 which establishes DIF to mitigate the cost of public facilities needed to serve new development. The City will receive and allocate a portion of the DIF to offset the impact of developing new facilities to support community library services.

Payment of DIF is required and is not considered unique mitigation under CEQA. Reference **Standard Condition SC-PS-1**.

With implementation of the standard condition of approval, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for community library facilities. Therefore, any impacts related to library facilities will be less than significant and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Hospital/Emergency Medical Facilities

The nearest emergency medical service available to the proposed Project is the Riverside County Regional Medical Facility in Moreno Valley, approximately 4½ miles northeast of the Project site (Google Earth). Healthcare facilities are developed in response to perceived market demand by free enterprise. Therefore, the development of the proposed Project will not result in the construction for new or expanded medical facilities.

The PVCCSP IS determined that any substantial adverse physical impacts associated with the provisions of new or physically altered medical facilities associated with development within the PVCC is considered to be less than significant. Therefore, impacts are considered less than significant.

Based on the above, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities (i.e., libraries, hospitals). Therefore, any impacts related to other public facilities will be less than significant and no mitigation is required.

As a result of this analysis, no additional analysis will be required in an EIR.

Standard Conditions and Requirements

SC-PS-1 Development Impact Fee (DIF). The Project applicant shall pay Development Impact Fees; DIF for nonresidential development shall be paid prior to the issuance of a building permit.

SC-PS-2 Municipal Code Section 20.01.010 (Fire Code). The Project shall comply with applicable version of Section 20.01.010 of the Municipal Code at the time of permit issuance.

SC-PS-3 Prior to the issuance of a building permit for nonresidential development, the Project applicant shall pay the most recent developer fee to the Val Verde Unified School District applicable at the time of building permit issuance.

Mitigation Measures

No mitigation measures are required.

Monitoring:

No mitigation monitoring is required.

16. RECREATION.

Source(s): City of Perris General Plan Draft Environmental Impact Report (GP-DEIR), Chapter 4.8, *Parks and Recreation*; Perris Valley Commerce Center Specific Plan, Section 8, *Industrial Design Standards and Guidelines*; Perris Valley Commerce Center Specific Plan - Draft Environmental Impact Report (PVCCSP-DEIR), Appendix A, Initial Study, Section 15, *Recreation*; Municipal Code Section 18.32.050; Ordinance No. 1182 (*An Ordinance of the City Council of the City of Perris, California, Amending Municipal Code Chapter 19.68 Regarding the Development Impact Fees Applicable to New Development*); and *Park and Recreation Facilities Development Impact Fee Justification Study, City of Perris*, prepared by David Taussig & Associates, June 29, 2017 (*DIF Study*).

Analysis of Project Effect and Determination of Significance:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	

Less Than Significant Impact

Demand for park and recreational facilities are generally the direct result of residential development while the proposed Project is an industrial project that does not generate new residents.

The Project proposes the development of a 347,918 square foot light-industrial warehouse building with 8,000 square feet of office area on a 16-acre site. The proposed Project does not include a housing component.

The Project site's existing General Plan land use designation and Zoning classification are both Specific Plan (SP). The existing PVCCSP zoning classification for the Project site is Commercial (C), and the Project proposes to amend the existing PVCCSP by changing the existing zoning classification for the Project site from Commercial (C) to Light Industrial (LI).

- Existing PVCCSP zoning classification for the Project Site: Commercial (C)
- Proposed PVCCSP zoning classification for Project Site: Light Industrial (LI)

As set forth in the PVCCSP DEIR/Initial Study, the City requires that large projects provide an on-site recreational amenity, but it is noted the proposed Project's logistics/distribution warehouse use, absent a housing component, would not directly impact and will not require the construction or expansion of off-site recreational facilities or result in or accelerate the physical deterioration of existing neighborhood and regional parks or recreational facilities.

There are no PVCCSP EIR mitigation measures related to recreation. The PVCCSP Standards and Guidelines for light industrial development relevant to recreation are summarized below:

Industrial Development Standards and Guidelines, Employee Break Areas and Amenities:

- An outdoor break area should be provided at each office area location.
- Buildings exceeding 100,000 square feet shall require employee amenities such as, but not limited to, cafeterias, exercise rooms, locker rooms and shower, walking trails, and recreational facilities.
- Site design should consider pedestrian access when adjacent to area wide open space, trails, parks, or other community amenities.

The City of Perris Ordinance No. 1182 incorporates park dedication procedures consistent with California Government Code Section 66477 (Quimby Act) thereby establishing a requirement for dedication of 3 acres of parkland per 1,000 population, or payment of a fee in lieu of such dedication.

The proposed Project would indirectly affect recreational facilities by providing a source of employment that may draw a limited number of new residents into the area. Appropriate developer impact fees (DIF), as required by Ordinance No. 1182, shall be assessed and paid toward parks and recreation facilities. With the payment of these fees, the indirect impacts to parks and other recreational facilities caused by the proposed Project are considered reduced to a level that is considered less than significant.

It is noted, DIF for nonresidential development shall be paid prior to the issuance of a building permit.

Indirect impacts to park facilities will be offset through payment of the applicable Park and Recreation Facilities developer impact fees. With payment of these fees, impacts to parks and other public recreational facilities will be less than significant.

Reference **Standard Condition SC-REC-1**. It should be noted that payment of DIF's is required and is not considered unique mitigation under CEQA.

Based on this information, no additional analysis will be required in an EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			**X**	

Less Than Significant Impact

Please reference the discussion in Threshold 16.a. Demand for park and recreational facilities are generally the direct result of additional residents generated by residential development. Incremental indirect impacts to park facilities will be offset via payment of applicable Park and Recreation Facilities development impact fees; therefore, impacts will be less than significant.

Based on this information, no additional analysis will be required in an EIR.

Standard Conditions and Requirements

SC-REC-1 The Project applicant shall pay Development Impact Fees (DIF) for nonresidential development prior to the issuance of a building permit.

Mitigation Measures

No mitigation measures are required.

17. TRANSPORTATION.

Source(s): *Project Plans* (**Appendix H**); **Table 1, *Surrounding Land Uses***, **Figure 3, *Existing and Proposed General Plan Land Use*** Designations, and **Figure 4, *Existing and Proposed* Zoning *Classifications*** in Section I. of this Initial Study; City of Perris General Plan 2030, Circulation Element; City of Perris General Plan - Draft Environmental Impact Report (GP-DEIR), Chapter 4.9, *Transportation/Circulation*; Perris Valley Commerce Center Specific Plan (PVCCSP), Amendment No.9, May 2018, Chapter 3, *Infrastructure Plan*; Perris Valley Commerce Center Specific Plan - Draft Environmental Impact Report (PVCCSP-DEIR), July 2011, Section 4.10, *Transportation and Traffic*; City of Perris – Municipal Code, Title 19, Zoning, Chapter 19.68, Fees, Section 19.68.020 *Development Impact Fees*; City of Perris Ordinance No. 1352 "Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance of 2017"; North Perris Road and Bridge Benefit District Analysis Report, Albert A. Webb and Associates, June 2008; City of Perris, *Perris Trail Master Plan*, adopted February 26, 2013 as Resolution No. 4562; and State of California Code of Regulations § 15064.3.

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	**X**			

Potentially Significant Impact

The Project applicant proposes a Specific Plan Amendment to accommodate the development of a 347,918 square foot light-industrial warehouse building with 8,000 square feet of office area on a 16-acre site.

The Project site is located in the ±3,500-acre PVCCSP planning area, in the City of Perris. The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI) as proposed PVCC Specific Plan Amendment No. 10.

It is noted, a Project-specific Traffic Impact Study (TIS) for the proposed Project (logistics/distribution warehouse) has not been conducted to date; however, a TIS for the Project will be required prior to the issuance of the pending Project EIR.

The ±3,500-acre PVCCSP was originally approved by the Perris City Council on January 10, 2012, as Ordinance No. 1284. There have been nine (9) amendments to date, the most recent being Amendment No. 9, approved on August 28, 2018 as Ordinance No. 1371.

The PVCCSP planning area is located in the North Perris area of western Riverside County, generally bordered by Interstate-215 (I-215) to the west, March Air Reserve Base and Oleander

Avenue to the north, the Perris Valley Storm Channel (PVSC) to the east, and Placentia Avenue to the south.

The PVCCSP location contiguous to the I-215 freeway is key to the rapidly expanding distribution warehouse development taking place within the specific plan boundaries.

At the time the PVCCSP was adopted in 2012 the area was largely undeveloped land used for agricultural purposes (sod farming, other) with smaller elements of development consisting of some warehousing/distribution facilities, neighborhood and community commercial, small scale industrial facilities, a rural residential neighborhood and a mobile home park.

Over the past nine (9) years since its adoption, a substantial amount of new development activity (primarily warehouses) and infrastructure (i.e., road improvements, dry and wet utilities, other) has been built within the PVCCSP boundary, including a 579,708-square-foot distribution warehouse contiguous south of the Project site (3900 Indian Avenue) completed in 2014.

The Project site is located less than 1¼ mile east of I-215 with extensive frontage along three public street rights-of-way situated along the south side of Ramona Expressway and bounded by Perris Boulevard to the east and Indian Avenue to the west.

- Interstate-215 runs along the western boundary of the PVCCSP. Existing freeway on and off-ramps are located at Harley Know Boulevard and Ramona Expressway. A future interchange is planned at Placentia Avenue.
- Ramona Expressway is the principal east/west travel route through the center portion of the specific plan. It is classified as an “Expressway” in Figure 3.0-1, Circulation Plan of the PVCC Specific Plan (revised July 12, 2017) which is consistent with the Circulation Element of the City of Perris General Plan 2030 (adopted June 14, 2005; amended August 26, 2008 as GPA 08-07-0010). An expressway is a limited access divided highway built to accommodate high-speed travel by automobiles within a 184-foot right-of-way. At least two traffic lanes in each direction are physically separated within a 134-foot curb-to-curb width. Ramona Expressway provides direct access to Interstate-215. The cross-section for Ramona Expressway was modified for the City’s General Plan to provide non-curb adjacent sidewalks and provide for the future regional trail. Existing conditions along the Project site’s Ramona Expressway frontage consist of a fully dedicated six-lane public right-of-way. Project site development will require street frontage improvements (6-lane asphalt paving with a dedicated right-turn lane onto Perris Boulevard is in place).
- Perris Boulevard is identified as an “Arterial” roadway in both the City of Perris General Plan (PGP) and the PVCCSP. An arterial serves major traffic movements or major traffic corridors within 128-foot right-of-way. While they may provide access to abutting land, their primary function is to serve traffic moving through the area. Arterial streets generally have a curb-to-curb width of 94-feet. Perris Boulevard provides direct access to Moreno Valley and the 60 Freeway to the north and is a designated Truck Route. Existing conditions along the Project site’s Perris Boulevard frontage consist of a fully dedicated asphalt paved 6-lane public right-of-way with concrete curb. A sidewalk extends along a portion of the Project site from Ramona Expressway to the existing bus stop.
- Indian Avenue is identified as a “Secondary Arterial” in both the PGP and PVCCSP. A secondary arterial is designed to carry local traffic between the local street system and the primary arterial system. Secondary arterial streets generally vary from a curb-to-curb width of 64-feet to 70-feet and may have one or two lanes in each direction. Indian Avenue runs north/south extending the entire length of the PVCCSP and points beyond. Like Perris

Boulevard and Redlands Avenue to the east it is one of three designated north/south Truck Routes serving the PVCCSP.
Existing conditions along the Project site's Indian Avenue frontage consist of a fully dedicated asphalt paved 4-lane public right-of-way with concrete curb (no sidewalk in place).

Regional east-west access to the PVCCSP planning area is provided by through points of entry along Interstate-215 from Ramona Expressway/Cajalco Road, Harley Knox Boulevard, Rider Street and future Placentia Avenue along the southern boundary. Ramona Expressway and Harley Knox Boulevard also provide direct and indirect regional access to Interstate-15, State Route-60, and Interstate-10. Points of entry from the San Jacinto region to the east include Ramona Expressway/Cajalco Road, future Rider Street and future Placentia. Regional north-south access to the PVCCSP planning area is provided via Interstate-215, Perris Boulevard and Indian Avenue. The vehicular circulation plan for the PVCCSP is illustrated in Figure 3.0-1, Circulation Plan, of the PVCCSP and is consistent with the City of Perris Circulation roadway designations unless otherwise noted.

The PVCCSP planning area is primarily intended to accommodate commercial and industrial uses and as such, requires a greater need for established truck routes to serve existing and future businesses. The City has adopted specific truck routes throughout the PVCC area in an effort to separate passenger and truck traffic and move truck traffic efficiently through the project area while avoiding residential communities as much as possible. As discussed above, both Perris Boulevard and Indian Avenue adjacent to the Project site are identified as designated Truck Routes.

As part of the Project, six-foot sidewalks would be constructed along the Project frontages (Ramona Expressway, Perris Boulevard, and Indian Avenue). In addition, bicycle lanes will be added on Ramona Expressway (Class IV), Perris Boulevard (Class IID), and Indian Avenue (Class II).

Employers, employees, and vendors utilizing the proposed Project will have the opportunity to use a variety of transportation modes including automobile, mass transit and non-vehicular travel. As set forth in the PVCCSP, the City of Perris encourages the use of mass transit whenever possible. Bus transit is available and the extension of Metrolink facilities along the west side of the I-215 corridor with a station at I-215/Ramona Expressway/Cajalco Road has recently been completed several years ago (see Section 3.2.3, Mass Transit Circulation, PVCCSP). With respect to non-vehicular circulation, the City of Perris has designated a community trail system of existing and proposed pedestrian trails and bike paths depicted on Figure 3.0-5 (Trails System) of the PVCCSP, which is generally consistent with the City's Park and Trails with the exception of expansions to some of the bike trails. Pedestrian and bike trails are also components of the PVCCSP. The reader is referred to the PVCCSP for additional information.

The proposed Project, like all Projects in the City, will be subject to Transportation Uniform Mitigation Fee (TUMF) and the Development Impact Fee (DIF) programs. In addition, all new development within the PVCCSP boundary is subject to the North Perris Road and Bridge Benefit District (NPRBBD). The TUMF, DIF and NPRBBD programs are briefly summarized below.

- **TUMF.** The County of Riverside Board of Supervisors and the Councils of the Cities of Western Riverside County enacted the TUMF to fund the mitigation of cumulative regional transportation impacts resulting from new development (Riverside County Ordinance No. 2009-62). The mitigation fees collected through the TUMF program are utilized to complete capital improvements to the regional transportation system necessary to meet the increased

travel demand and to sustain appropriate levels of service (LOS).

- **DIF.** The Project site is subject to City of Perris – Municipal Code, Section 19.68.020 Development Impact Fees (DIF). Payment of the DIF is required and is not considered unique mitigation under CEQA. DIF is used to pay for the following traffic improvements: transportation – roads, bridges, major improvements; and transportation signals. Credits may be afforded to the applicant if improvements are made to these facilities as part of the Project development.
- **NPRBBD.** The North Perris Road and Bridge Benefit District (NPRBBD) encompasses approximately 3,500 acres (five square-miles) of land in north Perris. The NPRBBD boundary is the same as the PVCCSP boundary. The purpose of the NPRBBD is to streamline the financing of specific regional road and bridge improvements determined to provide benefit to the developing properties within the boundaries of the NPRBBD. The road and bridge improvement fee for the NPRBBD is a one-time fee paid to the City prior to recordation of a final tract map or parcel map, or prior to issuance of a building permit.

The Project will be required to pay TUMF, DIF, and NPRBBD fees. These are reflected in **PVCCSP EIR mitigation measure MM Trans 3**.

To ensure a comprehensive discussion as to whether the Project would conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, this issue will be analyzed in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	**X**			

Potentially Significant Impact

State CEQA Guidelines Section 15064.3 reads as follows:

"*Section 15064.3. Determining the Significance of Transportation Impacts*

(a) Purpose.

This section describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay does not constitute a significant environmental impact.

(b) Criteria for Analyzing Transportation Impacts.

(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.

Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

(c) Applicability.

The provisions of this section shall apply prospectively as described in Section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on January 1, 2020, the provisions of this section shall apply statewide."

To ensure a comprehensive discussion as to whether the Project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), this issue will be analyzed in a qualitative manner in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			**X**	

Less Than Significant Impact

The Project applicant proposes direct access to two (2) arterial roadways (Perris Boulevard and Indian Avenue) and indirect access to one (1) expressway (Ramona Expressway). All three of these roadways are public rights-of-way under the jurisdiction of the City of Perris. Final Project

site plans will be subject to City review and approval which will ensure that Project driveway intersections and internal circulation are safe, with adequate sight distance, driveway widths and stop signs where necessary for entering and exiting the site. This will eliminate any Project impacts due to a geometric design feature. Any potential impacts will be less than significant, and no mitigation is required.

No additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in inadequate emergency access?			X	

Less Than Significant Impact

A limited potential exists to interfere with an emergency response or evacuation plan during construction. Construction work in the street associated with the project will generally be limited to street frontage improvements and lateral utility connections (i.e., water, sewer) that will be limited to nominal potential traffic diversion.

Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). Reference **PVCCSP EIR mitigation measure MM Air 2**.

The TCP is designed to mitigate any construction circulation impacts.

Following construction, emergency access to the Project site and area will remain as it was prior to the proposed Project. Any potential impacts during construction are considered less than significant.

The proposed Project is required to comply with Fire Department requirements for adequate access. Project site access and circulation will provide adequate access and turning radius for emergency vehicles, consistent with the Fire Department's requirements. Any impacts during construction are considered less than significant and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Standard Conditions and Requirements

To be determined if necessary, in an EIR.

Mitigation Measures

The proposed Project is required to comply with the following PVCCSP EIR mitigation measures. Additional mitigation to be determined if necessary, in an EIR.

PVCCSP MM Air 2: Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and

practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

PVCCSP MM Trans 1: Future implementing development projects shall construct on-site roadway improvements pursuant to the general alignments and right-of-way sections set forth in the PVCC Circulation Plan, except where said improvements have previously been constructed.

PVCCSP MM Trans 2: Sight distance at the project entrance roadway of each implementing development project shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

PVCCSP MM Trans 3: Each implementing development project shall participate in the phased construction of off-site traffic signals through payment of that project's fair share of traffic signal mitigation fees and the cost of other off-site improvements through payment of fair share mitigation fees which include TUMF (Transportation Uniform Mitigation Fee), DIF (Development Impact Fee) and the NPRBBD (North Perris Road and Bridge Benefit District). The fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build or improve roads to their build-out level.

This Initial Study analysis includes early consultation with RTA so the Project has complied with the pre-approval portion of the following applicable PVCCSP EIR mitigation measure (specific input regarding local bus stops from the RTA will be presented in an EIR):

PVCCSP MM Trans 4: Prior to the approval of individual implementing development projects, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing in the project area that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that would serve the project area, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalk and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.

PVCCSP MM Trans 5: Bike racks shall be installed in all parking lots in compliance with City of Perris standards.

PVCCSP MM Trans 7: Implementing project-level traffic impact studies shall be required for all subsequent implementing development proposals within the boundaries of the PVCCSP as approved by the City of Perris Engineering Department. These subsequent traffic studies shall identify specific project impacts and needed roadway improvements to be constructed in conjunction with each implementing development project. All intersection spacing for individual tracts or maps shall conform to the minimum City intersection spacing standards. All turn pocket lengths shall conform at least to the minimum City turn pocket length standards. If any of the proposed improvements are found to be infeasible, the implementing development project applicant would be required to provide alternative feasible improvements to achieve levels of service satisfactory to the City.

18. TRIBAL CULTURAL RESOURCES.

Source(s): Assembly Bill 52 (AB 52); and Senate Bill 18 (SB 18).

Analysis of Project Effect and Determination of Significance:

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.i) Listed or eligible for listing in the California Register of Historical resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)	X			

Potentially Significant Impact

Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB 52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project. AB 52 identifies examples of mitigation measures that will avoid or minimize impacts to a TCR. The bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015. AB 52 amends Sections 5097.94 and adds Sections 21073, 21074, 2108.3.1., 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to the California PRC, relating to Native Americans.

Because the Project includes a Specific Plan Amendment, the Project is also subject to the requirements of Senate Bill (SB) 18. SB 18 requires a city or county to consult with the NAHC and any appropriate Native American tribe for the purpose of preserving relevant Traditional Tribal Cultural Places (TTCP) prior to the adoption, revision, amendment, or update of a city's or county's general plan, specific plan, or designating land as open space. SB 18 provides a new definition of TTCP, which requires that the site must be shown to actually have been used for activities related to traditional beliefs, cultural practices, or ceremonies. In addition, SB 18 law also adds California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

The City of Perris will use their experience and input from the Native American Heritage Commission (NAHC) to send AB 52 and SB 18 Notices to the appropriate Tribes.

To ensure a comprehensive discussion as to whether the Project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code

section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), and to provide a detailed discussion of the consultation with the Tribes, this issue will be analyzed in an EIR.

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a.ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	**X**			

Potentially Significant Impact

Please reference the discussion in Threshold 18.a.i.

To ensure a comprehensive discussion as to whether the Project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe, this issue will be analyzed in an EIR.

Standard Conditions and Requirements

To be determined if necessary in an EIR.

Mitigation Measures

Mitigation Measures MM-CR-1 and **MM-CR-2** are applicable to this topic. Additional mitigation to be determined if necessary, in an EIR.

19. UTILITIES AND SERVICE SYSTEMS.

Source(s): *Map My County* **(Appendix A)**; *Project Plans* (**Appendix H**); *SAN 53 – Will Serve – APN: 303-060-020*, prepared by Eastern Municipal Water District, 8-26-2020 (**Appendix G**); Eastern Municipal Water District website, Development Services Information; City of Perris General Plan 2030 - Draft Environmental Impact Report (GP-2030 DEIR), October, 2004, Chapter 4.10, *Utilities and Service Systems*; Perris Valley Commerce Center Specific Plan - Draft Environmental Impact Report (PVCCSP-DEIR), July, 2011, Section 4.11, *Utilities and Service Systems*; Eastern Municipal Water District *2015 Urban Water Management Plan*, June 2016 (*EMWD 2015 UWMP*); Metropolitan Water District *2015 Urban Water Management Plan* (*2015 RUWMP*); *Perris Valley Regional Water Reclamation Facility (PVRWRF) – Fact Sheet*, issued by EMWD, October 2016; Southern California Edison website; CalRecycle, SWIS Facility Detail, El Sobrante Landfill (33-AA-0217), El Sobrante Landfill Fact Sheet, issued by Waste Management of California, El Sobrante Landfill Annual Monitoring Report, Jan 1, 2017 through Dec 31, 2017, by USA Waste of CA, Inc., August, 2018 (Final).

Analysis of Project Effect and Determination of Significance:

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	**X**			

Potentially Significant Impact

The Project applicant proposes a Specific Plan Amendment to accommodate the development of a 347,918-square-foot light-industrial warehouse building with 8,000 square feet of office area on a 16-acre site.

The Project site is located in the ±3,500-acre PVCCSP planning area within the City of Perris. The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI) as proposed PVCC Specific Plan Amendment No. 10.

It is noted the Project is in the initial preliminary planning stages at present. Project plans and project-specific studies are limited to the Overall Site Plan prepared by HPA Architecture, Inc., August 19, 2019, as of the date this Initial Study. Therefore, much of the data and analysis included in Section 19, Utilities and Service Systems, including Threshold 19.a, is based on information included in the City of Perris General Plan 2030 – Draft Environmental Impact Report (GP – DEIR; October 2004), the Perris Valley Commerce Center - Draft Environmental Impact Report (PVCCSP-DEIR, July 2011), and published reports available on-line by the various utility providers.

Water

The Project site, along with the PVCCSP planning area and the entire City of Perris, is located within the water service boundary of the Eastern Municipal Water District (EMWD).

The Project site is not currently connected to the EMWD water supply system given its vacant undeveloped condition. The EMWD has provided a Will Serve letter indicating that they will provide water service for the Project.

As set forth in the *EMWD 2015 UWMP*, the EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County from Moreno Valley southward along the I-215 corridor to Temecula. The EMWD is both a retail and wholesale agency, serving a retail population (2015) of 546,146 people and a wholesale population of 215,075 people (761,221 total retail & wholesale). The agency was initially formed in 1950 to bring imported water to the area and in 1951 was annexed into the Metropolitan Water District of Southern California (MWD). The EMWD is currently one of the MWD's 26 member agencies.

The EMWD has four sources of water supply including: 1) imported water purchased from the MWD; 2) local groundwater; 3) desalinated groundwater; and 4) recycled water. Delivery points for each source of water are located throughout the EMWD service area.

The majority of the EMWD's supplies are imported water purchased through the MWD from the State Water Project (SWP) and the Colorado River Aqueduct (CRA). Imported water is delivered to the EMWD either as potable water treated by the MWD, or as raw water that the EMWD can either treat at one of its two local filtration plants or deliver as raw water for non-potable uses.

The EMWD depends on the MWD for approximately half of its retail water supply. For the past five years (2010 – 2015), the EMWD has been able to maintain a balance of local and imported water even as new connections were added. This was accomplished through the implementation of local supply projects and increased water use efficiency. In 2015, the EMWD's reliance on the MWD was lower than average due to mandatory restrictions put in place by the State Water Resources Control Board (SWRCB), which required EMWD customers to reduce their demands. This demand reduction resulted in reduced imported water purchases by the EMWD in 2015.

- The EMWD relies on the MWD for the majority of its potable water supply.
- Over the past five years (2010 - 2015), deliveries from the MWD to the EMWD's retail service area ranged between 56,397 and 75,294 acre-feet (AF).
- In 2015, approximately 40 percent of the EMWD's total retail supply was imported water delivered through the MWD.
- Reduced imported water use in 2015 was a direct result of the the SWRCB's mandatory restrictions put in place to meet a statewide reduction of 25 percent (25%).
- In 2015, retail water supply comprised approximately 84% of the EMWD's total water supply; conversely, in 2015, wholesale water supply comprised approximately 16% of the EMWD's water supply.
- The MWD stated in its Regional Urban Water Management Plan (RUWMP) that, with the addition of all water supplies, existing and planned, the MWD would have the ability to meet all of its member agencies projected supplemental demand through 2035 even under a repeat of historic multi year drought scenarios. Based on present information and the assurance that the MWD is engaged in planning processes that will identify solutions that, when combined

with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, the EMWD has determined that it will be able to provide adequate water supply to meet the potable demand for the PVCCSP as a part of its existing and future demands.

Detailed information regarding the EMWD's historical and current (2010 – 2015) water supplies for retail and wholesale service customers (included in Table 6-1 and Table 6-2 of the *EMWD 2015 UWMP)* is summarized below:

Imported Water

- In 2015, the EMWD's imported retail water supply from the MWD consisted of 36,828 AF of treated water, 18,628 AF locally treated water, and 941 AF of raw (untreated) water. This equates to a total imported retail supply of 56,397 AF or 46% of the total 2015 retail supply from all sources;
- In 2015, the EMWD's imported wholesale water supply from the MWD consisted of 6,532 AF of treated water, and 15,236 AF of raw (untreated) water. This equates to a total imported wholesale supply of 21,768 AF;
- In 2015, the EMWD's total imported water supply (retail & wholesale) from the MWD consisted of 43,360 AF of treated water, 18,628 AF of locally treated water, and 16,177 AF of raw (untreated) water;
- In 2015, the total imported water supply (retail & wholesale; treated, locally treated & raw) from the MWD was 78,165 AF or 54% of total supply from all sources.
  In comparison, total imported water supply (retail & wholesale; treated locally treated & raw) from the MWD varied from 88,778 AF in 2010 to 107,129 AF in 2014;
- The EMWD procures water from the MWD that has been treated at one of two MWD facilities. Treated potable water is available in the north potion of the service district from the Mills Water Treatment Plant in Riverside, and in the south portion of the service district through the Skinner Water Treatment Plant in Winchester.
- The EMWD also owns and operates two water filtration plants that treat raw imported water: Perris Water Treatment Plant and Hemet Water Treatment Plant. Raw imported water is also used for recharge purposes and to meet agricultural demands.

Groundwater

- The EMWD produces potable groundwater from two management plan areas within the San Jacinto Groundwater Basin. These two areas are identified as the West San Jacinto Groundwater Basin Management Plan area (West San Jacinto Basin) and the Hemet/San Jacinto Water Management Plan area (Hemet/San Jacinto Basin). The EMWD also owns and operates two desalination plants that convert brackish groundwater from the West San Jacinto Basin into potable water.
- Approximately twenty-five percent (25%) of the EMWD's potable retail water supply is derived from EMWD groundwater wells in the Hemet/San Jacinto and West San Jacinto Basins. The EMWD's potable groundwater supply varied from 12,037 to 15,748 AF between 2010 and 2015; the 2015 figure was 15,252 AF.
- The desalinated water supply originating from the EMWD's two desalination plants in the West San Jacinto Basin varied from 4,800 to 7,288 AF between 2010 and 2015, with the 7,288 AF figure logged in 2015. The 2015 desalinated water supply figure represents 13% of the potable retail water supply.

Recycled Water

- The EMWD provides wastewater collection, treatment, and recycled water services throughout its service area. Recycled water is extensively used in the EMWD's service area to meet non-potable water demands.
- In 2015, the EMWD's recycled water production was 45,385 AF including a retail supply of 44,150 AF and a wholesale supply of 1,235 AF. This represents 31% of the total 2015 water supply. In comparison recycled water production varied between 45,385 and 48,877 AF between 2010 and 2015.

As set forth in the PVCCSP EIR, in 2010, the EMWD's potable water system consisted of 2,421 miles of transmission and distribution pipeline, 77 water storage tanks, and a maximum storage capacity of 193 million gallons with 133,810 active domestic accounts and 146 active agriculture and irrigations accounts. In addition, the EMWD operates 84 pumping plants, 18 active domestic wells with a production capacity of 32,843 acre-feet per year (AFY), 7 active desalter wells, 2 desalter treatment plants with a combined capacity of 8 million gallons per day (MGD), and 2 filtration treatment plants with a combined capacity of 32 million gallons per day.

He EMWD currently provides service to the PVCCSP planning area through its system of existing pipelines ranging from 8" to 42" diameter within the 1627 and 1705 pressure zones. Although the EMWD has no conceptual plans for expansion of these waterlines, they will assess demand as growth occurs and upgrades are designed by the development community to meet the future demands of the Project area.

Based on a review of PVCCSP-DEIR, Table 4.11-B, Existing Waterlines, and Figure 4.11-1 Existing EMWD Water, there is a 39" water transmission line extending along the Project site's Perris Boulevard frontage, and a distribution line (size not specified) serving the existing commercial development and mobile home park adjacent east of the Project site at the southeast quadrant of Ramona Expressway and Perris Boulevard extending south to Dawes Street. There are additional water transmission and distribution pipelines shown in the general proximity of the Project site with a block or two.

It is further noted, EMWD water service is currently in place serving the 579,708-square-foot distribution warehouse contiguous south of the Project site (3900 Indian Ave) completed in 2014, and to the existing 1.25-million-square-foot Lowe's Distribution Center adjacent west of the Project site at the southwest corner of Ramona Expressway and Indian Avenue (3984 Indian Avenue) completed in 2001.

According to the PVCCSP EIR, the overall water supply available to the EMWD in 2010 totaled 154,700 acre-feet per year (AFY); in 2035 the water supply and demand is anticipated to total between 302,200 AFY to 315,300 AFY depending on hydrologic conditions. According to the Water Supply Assessment (WSA) prepared by the EMWD for the PVCC project (Appendix G, PVCCSP-DEIR):

- The PVCC's water demand at full build-out is estimated at 2,671.5 AFY. This represents 1.73% of the EMWD's total 2010 water supply (2,671.5 AFY ÷ 154,700 AFY = 1.73%) and between 0.8% and 0.9% of the EMWD's projected 2035 water supply and demand depending on hydrologic conditions (2,671.5 AFY ÷ 302,200 AFY = 0.9%; 2,571.5 AFY ÷ 315,300 AFY = 0.8%).

- As documented in the PVCC WSA, the EMWD UWMP, and the MWD's RUMWP, the EMWD has adequate capacity to serve the PVCC's water demand and will not require facilities to be expanded.

The Project's proposed specific plan land use designation change from Commercial (C) to Light Industrial (LI) for the 16-acre Project site is anticipated to have a nominal impact on the overall PVCC water supply/demand. Moreover, the water supply/demand associated with Project's proposed Light Industrial use is anticipated to be less than the water supply/demand associated with the existing Commercial land use reflected in the above PVCC water supply/demand analysis. This conclusion is supported by data from the EMWD website which indicates the water consumption rate for light industrial/manufacturing uses is 120 gallons per thousand square feet compared to the rate for commercial uses at 150 gallons per thousand square feet.

Connections to the local EMWD water system will involve temporary and less than significant construction impacts that will occur in conjunction with other on-site Project improvements. Furthermore, operational impacts related to the proposed Project are considered incremental and less than significant and no mitigation is required. Reference **Standard Condition SC-USS-2** (EMWD Water Efficient Guidelines), and **Standard Condition SC-USS-3** (Water Connection Fees).

Wastewater

The Project site, along with the PVCCSP planning area and the entire City of Perris, is located within the wastewater (sewer) service boundary of the EMWD.

The Project site is not currently connected to the EMWD wastewater/sewer system given its vacant, undeveloped condition. The EMWD has provided a Will Serve letter indicating that they will provide sewer service for the Project.

The EMWD owns and maintains the sanitary sewer system within the PVCC project area. Wastewater generated by the implementing development projects within the PVCC, inclusive of the proposed Project (logistics/distribution warehouse), will be treated at the Perris Valley Regional Water Reclamation Facility (PVRWRF).

The EMWD wastewater collection systems include 1,534 miles of gravity sewer, 53 lift stations, and five regional water reclamation facilities (RWRF) (four operating RWRFs and one planned RWRF), with interconnections between local collection systems serving each treatment plant.

The Perris Valley Regional Water Reclamation Facility (PVRWRF) provides wastewater treatment for a 120-square-mile area surrounding Perris (inclusive of the Project site), Menifee, Homeland, Winchester, and beyond. Wastewater from the Project site would be delivered through EMWD sewers to the PVRWRF.

The PVRWRF is the EMWD's largest RWRF located on approximately 300 acres just west of Interstate-215 (I-215) and south of Case Road (±6½ miles south/southeast of the Project site). In March 2014, the EMWD completed the seven-year $180 million expansion of the PVRWRF, the largest capital improvement project in the EMWD's 64-year history. The PVRWRF expansion project increased the previous capacity of the facility from 14 million gallons a day (14 mgd) to a current capacity of 22 mgd, with an ultimate capacity of 100 mgd. The expansion allows the EMWD to not only meet the projected demands of anticipated development in the region, but also

to meet more stringent environmental requirements for wastewater treatment and recycled water quality. Typical daily flows as of 2016 are reported at 13.8 mgd.

As depicted on PVCCSP-DEIR, Figure 4.11-2, Existing EMWD Sewer, the sewer system's primary trunk line within the PVCC project area is located within Redlands Avenue (varies from 16" to 24" in diameter), with secondary trunk lines varying from 15" to 24" in diameter located within Harley Knox Boulevard and Morgan Street. Collection lines varying from 8"" to 10" are shown in-place in Dawes Street and Ramona Expressway serving the existing commercial development and mobile home park adjacent east of the Project site at the southeast quadrant of the Ramona Expressway and Perris Boulevard.

The EMWD currently provides sewer service to the 579,708-square-foot distribution warehouse just south of the Project site (3900 Indian Ave) which was completed in 2014, as well as to the existing 1.25-million-square-foot Lowe's Distribution Center just west of the Project site at the southwest corner of Ramona Expressway and Indian Avenue (3984 Indian Avenue) which was completed in 2001.

As set forth in the PVCCSP EIR, the EMWD has sufficient capacity to provide wastewater services to the PVCC project area and its implementing development projects would be subject to conditions imposed by the City and the EMWD associated with the installation of additional pipelines within the specific plan area to serve individual implementing projects within the PVCC.

Similar to the previous discussion of water supply/demand, the Project's proposed specific plan land use designation change from Commercial (C) to Light Industrial (LI) for the 16-acre Project site is anticipated to have a nominal impact on the larger PVCC wastewater supply/demand. Moreover, the wastewater supply/demand associated with Project's proposed Light Industrial use is anticipated to be less than the water supply/demand associated with the existing Commercial land use reflected in the PVCCSP EIR wastewater supply/demand analysis. This conclusion is supported by data from the EMWD website which indicates the wastewater generation rate for light industrial/manufacturing uses is 80 gallons per thousand square feet compared to the rate for commercial uses at 100 gallons per thousand square feet.

Implementation of the proposed Project will not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Reference **Standard Condition SC-USS-1** (Sewer Connection Fees), and **Standard Condition SC-HYD-3** (Wastewater). Any impacts will be less than significant, and no mitigation is required.

Stormwater/Drainage

Potentially significant impacts could occur as a result of the proposed Project if storm water runoff was increased to a level that would require construction of new storm drainage facilities.

All new development in the City of Perris is required to comply with provisions of the National Pollutant Discharge Elimination System (NPDES) program, including Waste Discharge Requirements (WDR), and the 2010 Santa Ana Municipal Separate Sewer Permit (MS4) Permit, as enforced by the Santa Ana Regional Water Quality Board (SARWQCB).

At present, the Project site is vacant, undeveloped land with a 100 percent pervious earthen surface. The Project site is relatively flat with an existing slope gradient estimated at less than 2%. According to Map My County, the Project site's average elevation is 1,460 feet above mean

sea level (AMSL); the minimum elevation is 1,460 AMSL and the maximum elevation is 1,464 AMSL. There are no on-site drainage improvements.

In the existing undeveloped condition, on-site stormwater runoff generally sheet flows toward Ramona Expressway, Indian Street, and Perris Boulevard.

The Project applicant would construct a single 347,918-square-foot light-industrial distribution-warehouse building, access drives, walkways, parking lot, utility infrastructure, and landscaping.

The ±3,500-acre PVCCSP planning area is relatively flat and generally slopes in a southeasterly direction towards the Perris Valley Storm Channel (PVSC) which forms the PVCCSP east boundary. The PVSC conveys flow in a southerly direction to the San Jacinto River. The San Jacinto River is the main drainage feature in the San Jacinto watershed and drains southwesterly from its headwaters in the San Jacinto Mountains towards Canyon Lake and ultimately to Lake Elsinore.

The existing drainage system in the City of Perris is owned and operated by both the City of Perris and Riverside County.

The PVCCSP planning area is located within the Riverside County Flood Control and Water Conservation District's (RCFC's), Perris Valley Master Drainage Plan (PVMDP) and the Perris Valley Area Drainage Plan (PVADP). The PVMDP and PVADP were adopted in July 1987 and revised in Summer 1991 and as such reflect conditions no longer consistent with the City's General Plan 2030 (adopted October 2004) or the PVCCSP (Amendment No. 9, approved August 2018).

The PVMDP identifies a series of open concrete lined trapezoidal channels to convey runoff from the area to the Perris Valley Storm Channel (PVSC), then discharging into the San Jacinto River. At the time the PVMDP was adopted, the drainage concept contained therein was deemed feasible as most of the area's land use was agricultural and the land was relatively inexpensive. Due to development in the area and an increase in land values, open channels are no longer the best option, and it has become economically feasible to place backbone drainage facilities underground in the existing roadways.

A major obstacle identified in the PVCCSP EIR involves the ultimate design and construction of the PVSC. The PVMDP is dependent on the ultimate build-out of the PVSC to include deepening and widening of the channel. However, two large diameter Colorado River Aqueduct lines, owned by MWD, cross the PVSC prohibiting the construction of the PVSC to its ultimate depth. Relocation of these two MWD facilities is estimated to cost between $25-35 million.

Therefore, an updated master drainage plan was prepared for the PVCC in order to meet the development goals of the specific plan. The drainage systems that will be developed in conjunction with the PVCC will consist of two basic components: storm drains and detention basins. The drainage system will capture surface runoff from implementing projects in the area and convey it to proposed storm drains and detention basins before continuing to the PVSC. These facilities, as shown in Figure 4.7-3 of the PVCCSP-DEIR (Project-Related Modifications to Existing Perris Valley MDP) are modifications to the existing Perris Valley MDP. The Project site is located between proposed Line E and the existing Line G storm drains as depicted on Figure 4.7-3.

Build-out of the PVCCSP will require significant area wide drainage infrastructure improvements, including interim and long-term improvements discussed in detail in the PVCCSP-DEIR, Section 4.7 Hydrology and Water Quality. The Project site along with the entire PVCCSP is located within the within the Perris Valley ADP. Accordingly, implementing development projects (inclusive of the proposed Project) will be subject to applicable ADP fees.

Consistent with the City of Perris General Plan 2030, Implementation Measures, new development will be accompanied by construction of both on-site storm detention basins and related structures in the near-term and construction of storm water master plan facilities in the City that will accompany longer term improvements to the PVSC and the San Jacinto River Channel.

Project-specific drainage design will be addressed in the pending Water Quality Management Plan and Drainage Plan for the proposed Project.

Pursuant to the City's GP 2030, the PVCCSP, and Municipal Code, Chapter 14.22. - Stormwater/Urban Runoff Management and Discharge Control (Sec. 14.22.080. - Reduction of pollutants contacting or entering stormwater required) all construction projects shall apply Best Management Practices (BMPs) to be contained in the Project applicants submitted Stormwater Pollution Prevention Plan (SWPPP).

The Project applicant will also be required to submit a Water Quality Management Plan (WQMP) in identifying post-construction BMPs that include drainage controls such as infiltration pits, detention ponds, bioswales, berms, rain gardens, and pervious pavement. Reference **Standard Condition SC-HYD-1** (SWPPP), and **Standard Condition SC-HYD-2** (WQMP).

Also, the Project applicant will be required to submit a drainage study to ensure onsite and offsite drainage is accurately assessed and sufficient infrastructure is required for construction of the Project. Reference **Standard Condition SC-HYD-4** (Site Drainage Plan).

Electricity

There is no electricity connection currently serving the Project site in its vacant and undeveloped condition. The Project site development plan which proposes construction of a light-industrial logistics/distribution warehouse will require electrical service.

The electrical service provider for the Project site, the PVCCSP planning area, and the greater City of Perris is Southern California Edison (SCE). Based on a review of the PVCCSP, Figure 3.0-13 (Existing Electric), Google Earth aerial photographs, and a site inspection, undergrounded electrical service lines are currently in place within the public street right-of-way contiguous to the Project site (Ramona Expressway, Perris Boulevard & Indian Avenue) serving existing commercial and light industrial uses adjacent south, east and west of the Project site.

SCE is responsible for providing power supply to the City of Perris and the greater Riverside County area while complying with county, state, and federal regulations. According to their website, SCE maintains 12,635 miles of transmission lines, 91,375 miles of distribution lines, 1,433,336 electric poles, 720,800 distribution transformers, and 2,959 substation transformers.

Operation of the proposed Project would consume electricity for building power, lighting, and water conveyance, among other operational requirements. Pursuant to PVCCSP EIR mitigation

measure MM Air 20, the Project will be required to exceed Title 24 energy conservation requirements by at least 15 percent.

Because the proposed Project design is required to exceed all applicable local, state, and federal requirements and represents an incremental and relatively modest increase in area wide electrical consumption, the Project would not result in potentially significant environmental effects from wasteful, inefficient, or unnecessary consumption of energy.

Adequate commercial electricity supplies are presently available in Southern California to meet the incremental increase in demand attributed to the proposed Project. The proposed Project will not require new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects. Impacts will be less than significant, and no mitigation is required.

Natural Gas

There is no natural gas connection currently in place serving the Project site in its vacant and undeveloped condition. The natural gas provider for the Project site and the greater City of Perris is the Southern California Gas Company (SoCal Gas), also known as The Gas Company.

The proposed Project will be connected to The Gas Company's natural gas distribution system. Based on a review of PVCCSP, Figure 3.0-12 (Existing Natural Gas), natural gas lines are in place contiguous to the Project site within the Ramona Expressway and Perris Boulevard public right-of-way.

Adequate natural gas supplies are available to meet the incremental increase in demand attributed to the Project. The proposed Project will not require new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects. Potential impacts in this regard will be less than significant, and no mitigation is required.

Telecommunications

Telephone service to the Project site and the greater City of Perris is provided by Verizon. Verizon is a private company that provides connection to the communication system on an as needed basis. No expansion of facilities will be necessary to connect the Project to the communication system located adjacent to the Project site. The proposed Project will not require new or expanded telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Any impacts will be less than significant, and no mitigation is required.

Based on the above data and analysis, implementation of the proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Based on the preceding analysis, potential utility system impacts would be less than significant, and no mitigation is required.

In a memo dated April 5, 2021, the City Engineer stated that a study analyzing the downstream 54-inch storm drain in Perris Boulevard was needed to determine if the Project will have sufficient storm drain service. Therefore, Threshold a. will be analyzed further in an EIR in order to address stormwater/drainage concerns.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	

Less Than Significant Impact

As previously discussed under Threshold 19.a, the Project site is located within the water service boundary of the EMWD which has an existing water line located adjacent to the Project site within Perris Boulevard, and water service is currently in place serving existing commercial and light industrial uses adjacent south, east and west of the Project site. No additional off-site water infrastructure is anticipated in conjunction with the Project site development, as proposed.

The EMWD provides water service to the City of Perris, and beyond. The water agency prepares an Urban Water Management Plan every five years, which identifies historical and projected water usage and existing and future water supply sources, describes purveyors' demand management programs, and sets forth a program to meet water demands during normal, dry, and multiple dry years.

The EMWD water supply/demand analysis within its service area is set forth in the *EMWD 2015 UWMP* which assesses the District's ability to satisfy demands during three (3) hydrologic scenarios, including: 1) a normal water year, 2) single-dry water year, and 3) multiple-dry water years. The supply-demand balance for each of the hydrologic scenarios within the EMWD service area was projected for the 25-year planning period 2015 to 2040.

Based on the analysis and conclusions set forth in the *EMWD 2015 UWMP* (Sec 7.6 *Supply and Demand Assessment*), EMWD will be able to meet 100% of its demand under all three hydrologic scenarios through the year 2040.

Reference **Standard Condition SC-USS-2** (EMWD Water Efficient Guidelines), and **Standard Condition SC-USS-3** (Water Connection Fees.

Therefore, sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Any impacts are considered less than significant, and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?			X	

Less Than Significant Impact

As previously discussed under Threshold 19.a, the Project site is located within the wastewater/sewer service boundary of the EMWD. Sewer lines varying from 8"" to 10" are shown within Dawes Street and Ramona Expressway serving the existing commercial development and mobile home park adjacent east of the Project site at the southeast quadrant of Ramona Expressway and Perris Boulevard. It is further noted, the EMWD sewer service is currently in place serving existing commercial and light industrial uses adjacent south, east and west of the Project site. No additional off-site wastewater infrastructure is anticipated in conjunction with the Project site development, as proposed.

Wastewater from the Project site would be delivered through EMWD sewer lines to the EMWD's PVRWRF located on approximately 300 acres just west of Interstate-215 (I-215) and south of Case Road (±6½ miles south/southeast of the Project site. It is noted, the PVRWRF recently underwent a seven-year $180 million expansion that was completed in March 2104 and increased the previous capacity of the facility from 14 million gallons per day (14 mgd) to a current capacity of 22 mgd, with an ultimate capacity of 100 mgd. Further specifics are summarized in Section 19.a. Typical daily flows as of 2016 are reported at 13.8 mgd which indicates the facility is operating at approximately sixty-three percent (63%) of its current 22 mgd capacity.

Sufficient wastewater treatment capacity is available to serve the Project from existing EMWD resources and EMWD has adequate capacity to serve the Project's projected demand in addition to serving its existing commitments. Reference **Standard Condition SC-USS-1** (Sewer Connection Fees) and **Standard Condition SC-HYD-3** (Wastewater). Based on this analysis, impacts will be less than significant, and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			**X**	

Less Than Significant Impact

Significant impacts could occur if the proposed Project would exceed the existing permitted landfill capacity or violates federal, state, and local statutes and regulations.

Non-hazardous solid waste including trash, recycling, and green waste service in the City of Perris is provided by CR&R Environmental Services, Inc. (CR&R). In addition, the County of Riverside also sponsors several hazardous waste collection events throughout the year. CR&R is one of Southern California's largest waste and recycling collection companies, serving more than 3 million people and over 25,000 businesses throughout Orange, Los Angeles, San Bernardino, Imperial and Riverside counties, with additional operations in Southern Arizona and Colorado.

Non-hazardous solid waste generated within the City of Perris is transported to the Perris Materials Recovery Facility located at 1706 Goetz Road where recyclable materials are separated

from solid wastes. Recyclable materials are sold in bulk and transported for processing and transformation for other uses. Solid wastes are transported to either the El Sobrante Landfill or to the Badlands Landfill.

The Badlands Landfill on Ironwood Avenue in Moreno Valley, has a permitted daily capacity of 4,800 tons per day (tpd) and the El Sobrante Landfill on Dawson Canyon Road in Corona, has a permitted daily capacity of 16,054 tpd (CalRecycle 2016a, 2016b).

Construction-Related Solid Waste

As set forth in the PVCCSP EIR, total construction associated with implementing projects within the PVCCSP planning area is anticipated to generate approximately 104,671.09 tons of construction-related solid waste over a 20-year buildout period. The proposed Project (light-industrial distribution warehouse) includes a specific plan amendment to change the PVCCSP Land Use Designation of the entire site from Commercial (C) to Light Industrial (LI). However, it is noted, because the construction-related solid waste generation factor is the same for all non-residential land uses within the PCVVSP, the proposed Project implementation will not generate a substantially greater amount of solid waste during construction than evaluated in the PVCCSP EIR. Therefore, due to the limited contribution of solid waste during the projected 20-year buildout/construction period, the PVCCSP EIR concluded that construction within the PVCC would have a less than significant contribution to the exceedance of the permitted capacity of the designated landfills.

Based on the U.S. Environmental Protection Agency's (EPA's) construction waste generation factor for light industrial, business park/professional office, commercial, and general office projects of 3.89 pounds per square foot (PVCCSP, Table 4.11-J), the proposed Project would generate approximately 676.7 tons of construction-related solid waste [(347,918 SF x 3.89 lbs/SF) ÷ 2,000 lbs/ton)]. This represents less than one percent of the total estimated construction-related waste to be generated by development of allowed PVCCSP uses, which was determined to be able to be accommodated by the landfills serving the City. Therefore, the disposal of construction-related solid waste associated with the proposed Project would not exceed the permitted capacity of the Badlands or El Sobrante landfills and there would be a less than significant impact and no mitigation required.

Operational Solid Waste

The PVCCSP EIR estimates that operation of future development under the Specific Plan would generate approximately 544,048.96 tons per year of solid waste, which was determined to be approximately 10.65 percent of the combined annual capacity (i.e., yearly intake) of the Badlands and El Sobrante landfills (PVCCSP-DEIR, Table 4.11-K). The PVCCSP EIR concludes that, with development of the PVCCSP, operational solid waste would not substantially contribute to exceeding the permitted capacity of these landfills.

Based on the California Department of Resources, Recycling and Recovery operational solid waste disposal factor of 0.0108 ton per square foot per year for the Business Park/Professional, General Industrial, and Light Industrial PVCC land use designations applied in the PVCCSP-DEIR, the Project's 347,918 square feet (SF) of proposed industrial warehouse/manufacturing uses would generate approximately 3,758 tons/year of solid waste. This represents less than one percent of the estimated annual operational solid waste stream for development of allowed PVCCSP uses, which was determined to be accommodated by the landfills serving the City. Therefore, consistent with the findings of the PVCCSP EIR, the disposal of operational solid waste

associated with the proposed Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills and there would be a less than significant impact and no mitigation required.

The proposed Project's additional solid waste stream will have a less than significant impact on landfill capacity and no mitigation is required in this regard.

Therefore, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Solid waste impacts will be less than significant, and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Less Than Significant Impact

All land uses within the City of Perris that generate waste are required to coordinate with the City's contracted waste hauler (CR&R Environmental Services, Inc.) to collect solid waste on a common schedule as established in applicable local, regional, and state programs.

Additionally, all development within the City of Perris is required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939 (CalRecycle), Title 7 of the City Municipal Code, and other local, state, and federal solid waste disposal standards.

The California Integrated Waste Management Act of 1989 (AB 939) requires every city and county in the state to prepare a Source Reduction and Recycling Element (SRRE) to its Solid Waste Management Plan, that identifies how each jurisdiction will meet the mandatory state diversion goal of 50 percent by and after the year 2000. The purpose of AB 939 is to "reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible."

All solid waste disposals within the City of Perris are subject to the requirements set forth in *Title 7, Health and Welfare*, Chapter 7.16 Rubbish Collection and Disposal as provided in the Municipal Code. Chapter 7.16 provides integrated waste management guidelines for service, prohibitions, and provisions of service. The provisions of service require that the City of Perris shall provide for or furnish integrated waste management services relating to the collection, transfer, and disposal of refuse, recyclables, and compostables within and throughout the city.

The Project site's development plan would be required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939, Title 7 of the City Municipal Code, and other applicable local, state, and federal solid waste disposal standards as a matter of regulatory policy, thereby ensuring that the solid waste stream to the waste disposal facilities is reduced in accordance with existing regulations.

The Project development, as proposed, would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Any impacts would be less than significant, and no mitigation required. Reference **Standard Condition SC-USS-4** (Solid Waste).

Therefore, no additional analysis will be required in an EIR.

Standard Conditions and Requirements

SC-USS-1 Sewer Connection Fees. Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable sewer connection fees to EMWD.

SC-USS-2 EMWD Water Efficient Guidelines. The Project will be required to comply with shall be required to comply with the EMWD Water Efficient Guidelines for New Development which are in effect at the time of building permit issuance.

SC-USS-3 Water Connection Fees. Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable water connection fees to EMWD.

SC-USS-4 Solid Waste. The Project applicant shall comply with the requirements of AB 939 ("California Integrated Waste Management Act of 1989"), which requires waste diversion mandates. During construction and operation, the applicant shall achieve diversion of 50 percent of all solid waste through source reduction, recycling, and composting activities.

SC-HYD-1 SWPPP. Erosion and siltation reduction measure BMPs contained in the required SWPPP will be implemented during construction. At the completion of construction, the Project will consist of impervious surfaces, landscaped planters, and post-construction BMPs.

SC-HYD-2 WQMP. The Project proponent is required to submit a Water Quality Management Plan (WQMP) for review and approval. The WQMP identifies post-construction BMPs in addressing increases in impervious surfaces, methods to decrease incremental increases in off-site stormwater flows, and methods for decreasing pollutant loading in off-site discharges as required by the applicable NPDES requirements.

SC-HYD-3 Wastewater. All wastewater associated with the Project's interior plumbing systems will be discharged into the local sewer system for treatment at the regional wastewater treatment plant.

SC-HYD-4 Site Drainage Plan. A site drainage plan is required by the City of Perris and will be reviewed by the City Engineering Department. The final grading and drainage plan will be approved by the City Engineering Department during plan check review.

Mitigation Measures

No mitigation measures are required.

20. WILDFIRE.

Source(s): *Map My County* (**Appendix A**); County of Riverside General Plan – Mead Valley Area Plan, *Land Use Concept*, *Wildland Fire Hazard*, and Figure 12, *Wildfire Susceptibility*; City of Perris General Plan 2030, Safety Element, Fire Hazards, *Risk of Wildland Fire*, and Exhibit S-16, *Wildfire Constraint Areas*; City of Perris General Plan Draft Environmental Impact Report (GP-DEIR), Chapter 4.6.2, *Fire Protection/Emergency Rescue*, and Exhibit 4.5-12, *Dam Inundation Map*; City of Perris Municipal Code, Section 16.08.058 (*Adoption of the 2019 California Fire Code)* and Section 16.08.059 (*Amendments to the California Fire Code*); **Figure 7-1, *Surrounding Topography***, provided in Section 7, Geology and Soils of this Initial Study; and Google Earth.

Analysis of Project Effect and Determination of Significance:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			**X**	

Less Than Significant Impact

The City of Perris (Project site is a part) is located within and largely constitutes the eastern half of the Mead Valley Area Plan (MVAP) of the Riverside County General Plan. The Mead Valley land use plan, exclusive of the existing and future urbanized land use within the City of Perris, provides for a predominantly rural community with an equestrian focus located west/southwest of Interstate-215.

As set forth in *Map My County*, the Project site is not located within a County Fire Hazard Zone, nor is it located in a state identified Fire Responsibility Area.

Furthermore, the Project site is not located within a Wildfire Constraint Area, as depicted on Exhibit S-16, *Wildlife Constraint Areas,* of the City of Perris General Plan.

The Project site is located in a relatively wide north-south urbanizing corridor within the City of Perris' PVCCSP planning area. There are no wildland conditions in the immediate vicinity of the Project site. The closest Wildfire Constraint Area is located approximately 1¼ miles southwest of the Project site, consisting of the rural Gavilan Hills community portion of the MVAP southwest of I-215 and Rider Way.

The California Department of Forestry and Fire Protection, under contract with the County of Riverside and operating as the Riverside County Fire Department (RCFD), provides fire prevention, suppression, and paramedic services to the City of Perris. Station No. 1 serves the City of Perris and serves as the Riverside County Fire Department Headquarters. Station No. 1 is located at 210 W. San Jacinto Avenue.

The City of Perris participates in the Riverside County Multi-Agency Multi-Hazard Functional Plan (MHFP), which outlines requirements for emergency access and standards for emergency responses. The PVCCSP Initial Study (IS; PVCCSP DEIR, Appendix A) determined that because emergency access will be maintained and improved throughout the Specific Plan area in

accordance with the MHFP, development within the PVCCSP will not interfere with adopted emergency response plans.

A limited potential exists to interfere with an emergency response or evacuation plan during construction. Construction work in the street associated with the Project will be limited to lateral utility connections (i.e., sewer) that will be limited to nominal potential traffic diversion.

Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). Reference **PVCCSP EIR mitigation measure MM Air 2**.

The TCP is designed to mitigate any construction circulation impacts.

Once the Project is constructed, emergency access to the Project site will be maintained via driveway curb cut aprons along both Perris Boulevard and Indian Avenue, consistent with requirements outlined in the MHFP. Additionally, the proposed Project is consistent with the industrial land use requirements outlined in the PVCCSP; therefore, the proposed Project will have a less than significant impact on implementation of the adopted emergency response plan.

All Project elements, including landscaping, will be sited with sufficient clearance from the proposed buildings so as not to interfere with emergency access to and evacuation from the site. The proposed Project is required to comply with the California Fire Code as adopted by the City of Perris Municipal Code.

The Project will comply with all applicable state, regional, and local wildfire safety regulations inclusive of the California Fire Code, the City of Perris Municipal Code, and the PVCCSP, and will not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan, because no permanent public street or lane closures are proposed.

In summary, the Project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and the Project will not substantially impair an adopted emergency response plan or emergency evacuation plan. Based on this analysis, potential impacts related to an adopted emergency response plan or emergency evacuation plan will be less than significant and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			**X**	

Less Than Significant Impact

As set forth in *Map My County*, the Project site is not located within a County Fire Hazard Zone, nor is it located in a state identified Fire Responsibility Area.

Furthermore, the Project site is not located within a Wildfire Constraint Area, as depicted on Exhibit S-16, *Wildlife Constraint Areas,* of the City of Perris General Plan.

The Project site is located in a relatively wide north-south urbanizing corridor within the City's PVCCSP. There are no wildland conditions in the immediate vicinity of the Project site. The closest Wildfire Constraint Area is located approximately 1¼ miles southwest of the Project site, consisting of the rural Gavilan Hills community portion of the MVAP southwest of I-215 and Rider Street.

The Project site topography is relatively flat with natural gradients less than 2% to the north-northeast toward Ramona Expressway. The site elevation varies from is approximately 1,460 to 1,464 feet above mean sea level (AMSL). According to **Figure 7-1, *Surrounding Topography***, provided in Section 7, Geology and Soils of this Initial Study, there are no steep slopes within a one-quarter mile radius of the Project site. The closest steep slope is located over 1¼ mile southwest of the Project site at the northeast extent of the Gavilan Hills, southwest of Interstate 215 and Rider Street.

Based on this information, the Project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts in this regard would be less than significant and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project?	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			**X**	

Less Than Significant Impact

As set forth in *Map My County*, the Project site is not located within a County Fire Hazard Zone, nor is it located in a state identified Fire Responsibility Area.

Furthermore, the Project site is not located within a Wildfire Constraint Area, as depicted on Exhibit S-16, *Wildlife Constraint Areas,* of the City of Perris General Plan.

The Project site is located in a relatively wide north-south urbanizing corridor within the City's PVCCSP planning area. There are no wildland conditions in the immediate vicinity of the Project site. The closest Wildfire Constraint Area is located approximately 1¼ miles southwest of the Project site, consisting of the rural Gavilan Hills community portion of the MVAP southwest of I-215 and Rider Street.

The Project would provide fire hydrants at locations throughout the Project area per City Fire requirements. This would provide more fire suppression, which would not exacerbate fire risk. The Project would require the installation of power to serve the Project, as well as other utilities

(sewer, water, gas, cable), which would be underground, and installed pursuant to the utility providers regulations. Underground utilities would not exacerbate fire risk. Based on this information, impacts in this regard would be less than significant and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			**X**	

Less Than Significant Impact

As set forth in *Map My County*, the Project site is not located within a County Fire Hazard Zone, nor is it located in a state identified Fire Responsibility Area.

Furthermore, the Project site is not located within a Wildfire Constraint Area, as depicted on Exhibit S-16, *Wildlife Constraint Areas,* of the City of Perris General Plan.

The Project site is located in a relatively wide north-south urbanizing corridor within the City's PVCCSP planning area. There are no wildland conditions in the immediate vicinity of the Project site. The closest Wildfire Constraint Area is located approximately 1¼ miles southwest of the Project site, consisting of the rural Gavilan Hills community portion of the MVAP southwest of I-215 and Rider Street.

The Project site topography is relatively flat with natural gradients less than 2% to the north-northeast toward Ramona Expressway. The site elevation varies from is approximately 1,460 to 1,464 feet above mean sea level (AMSL). According to **Figure 7-1, *Surrounding Topography***, provided in Section 7, Geology and Soils of this Initial Study, there are no steep slopes within a one-quarter mile radius of the Project site. The closest steep slope is located over 1¼ mile southwest of the Project site at the northeast extent of the Gavilan Hills, southwest of Interstate 215 and Rider Street.

The Project site is located approximately two (2) miles southwest of Lake Perris (Perris Reservoir). Based on a review of Exhibit 4.5-12, Dam Inundation Map, City of Perris General Plan, with the exception of a small area at the very northeast corner of the Project site, the east boundary of the Project site along N. Perris Boulevard coincides with western extent of the maximum Dam Inundation Area. The proposed Project site and building layout have designed accordingly to limit this condition to a less than significant impact.

Based on the above data and analysis, the Project would not, expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts in this regard would be less than significant and no mitigation is required.

Therefore, no additional analysis will be required in an EIR.

Standard Conditions and Requirements

None are required.

Mitigation Measures

The proposed Project is required to comply with the following PVCCSP EIR mitigation measure:

PVCCSP MM Air 2: Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

21. MANDATORY FINDINGS OF SIGNIFICANCE.

Source(s): Staff review and *Project Plans* (**Appendix H**).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	**X**			

Potentially Significant Impact

In order to ensure a comprehensive discussion as to whether the Project will have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory, this issue will be analyzed in an EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	**X**			

Potentially Significant Impact

Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long term, due to the permanent land use changes and operational characteristics involved with the Project.

Based on the analysis of the Project's impacts in the responses to items 1 through 20, the Project may result in impacts that are individually limited, but cumulatively considerable.

To ensure a comprehensive discussion as to whether the Project will have impacts that are individually limited, but cumulatively considerable ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects), this issue will be analyzed in an EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	**X**			

Potentially Significant Impact

Based on the analysis of the Project's impacts in the responses to items 1 through 20, the Project may result in substantial adverse effects on human beings as it pertains to portions of these issue areas.

In order to ensure a comprehensive discussion as to whether the Project will have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly to those specific issue areas, they will be further analyzed in an EIR.

For those issue areas identified as having "no impact," or a "less than significant impact" it was determined in items 1 through 20 that the Project would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. No additional analysis would be required in an EIR.

For those issue areas identified as having a "less than significant impact with mitigation required" it was determined in items 1 through 20 that the Project would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly with the incorporation of mitigation measures. No additional analysis would be required in an EIR.

VI. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063 (c) (3) (D). The original and subsequent EIRs for the PVCC (available for review at the City of Perris) are included under these earlier analysis scenarios.

VII. SOURCES/REFERENCES

All websites accessed between June 2020 and April 2021

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https://archive.org/details/gov.ca.bsc.title24.2016.02.1

California Code of Regulations
https://govt.westlaw.com/calregs/index?__lrTS=20170303204906242&transitionType=Default&contextData=(sc.Default)

California Health and Safety Code Sections
https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=HSC

CalRecycle, SWIS Facility Detail, El Sobrante Landfill (33-AA-0217)
https://www2.calrecycle.ca.gov/swfacilities/Directory/33-AA-0217
https://www.wmsolutions.com/pdf/factsheet/El_Sobrante_Landfill.pdf
http://www.rcwaste.org/Portals/0/Files/ElSobrante/2018/ARC%20Agenda%20Package%20August%2016%202018.pdf

City of Perris *Climate Action Plan*
http://www.cityofperris.org/city-gov/agenda/2016/02-23-16-council-8b.pdf

City of Perris Fire
http://www.cityofperris.org/departments/fire.html

City of Perris General Plan and Draft EIR
http://www.cityofperris.org/city-hall/general-plan.html

City of Perris Police
http://www.cityofperris.org/departments/police.html
http://www.cityofperris.org/dept-profiles/profiles/PerrisPoliceStation.html

City of Perris Zoning Map
http://www.cityofperris.org/city-hall/zoning/2016-zone-map.pdf

City of Perris Municipal Code
https://library.municode.com/ca/perris/codes/code_of_ordinances?nodeId=COOR_TIT19ZO_CH19.20ZOLIAGINDE

City of Perris, Ordinance No. 1182
http://www.cityofperris.org/city-gov/ordinances/1182.pdf

City of Perris Ordinance No. 1352 “Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance of 2017”
http://www.cityofperris.org/city-gov/ordinances/1352.pdf

City of Perris, *Perris Trail Master Plan*, adopted February 26, 2013 as Resolution No. 4562
http://www.cityofperris.org/city-gov/resolutions/2013/4562.pdf

County of Riverside General Plan – Mead Valley Area Plan
https://planning.rctlma.org/Portals/14/genplan/2019/ap/MVAP_062618.pdf

Eastern Municipal Water District *2015 Urban Water Management Plan*, June 2016
https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan_0.pdf?1537303453

Eastern Municipal Water District
https://www.emwd.org/new-development-process

Federal Emergency Management Agency Flood Insurance Rate Maps
http://msc.fema.gov/portal

GEOTRACKER
http://geotracker.waterboards.ca.gov

The Department of Toxic Substances Control's Hazardous Waste and Substances Site List
http://www.envirostor.dtsc.ca.gov

Google Earth
https://www.google.com/earth/

Google Maps
https://www.google.com/maps

March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MAR Comp. Plan)
http://www.rcaluc.org/Portals/0/17%20%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700

Metropolitan Water District *2015 Urban Water Management Plan*
http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf

mindat.org website
https://www.mindat.org/

MSHCP Information Map of the Western Riverside County Regional Conservation Authority
http://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=a73e69d2a64d41c29ebd3acd67467abd

North Perris Road and Bridge Benefit District Analysis Report, Albert A. Webb and Associates, June 2008
http://www.cityofperris.org/business/news/northperris-bridgedist-report-v3_0308.pdf

Park and Recreation Facilities Development Impact Fee Justification Study, City of Perris, prepared by David Taussig & Associates, June 29, 2017
http://www.cityofperris.org/city-gov/agenda/2017/07-11-17-council-9c.pdf

Perris Valley Airport Land Use Compatibility Plan
http://www.rcaluc.org/Portals/13/19%20-%20Vol.%201%20Perris%20Valley%20(Final-Mar.2011).pdf?ver=2016-08-15-155627-183

Perris Valley Commerce Center Specific Plan, Amendment No. 9
http://www.cityofperris.org/departments/development/duke-markham/Perris_Valley_Commerce_Center_Specific_Plan_Amendment_No9.pdf

Perris Valley Commerce Center Specific Plan Draft Environmental Impact Report
http://www.cityofperris.org/city-hall/specific-plans/PVCC/PVCC-DEIR%2007-20-11.pdf

Perris Valley Regional Water Reclamation Facility (PVRWRF) – Fact Sheet, issued by EMWD, October 2016
https://www.emwd.org/sites/main/files/file-attachments/pvrwrffactsheet.pdf

Public Resources Codes
http://codes.findlaw.com/ca/public-resources-code/

SB18
https://www.opr.ca.gov/s_localandtribalintergovernmentalconsultation.php

SCAQMD *Final 2016 Air Quality Management Plan*
https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15

Southern California Edison website
https://www.sce.com/about-us/who-we-are

State of California Public Resources Code
https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PRC&tocTitle=+Public+Resources+Code+-+PRC

Title 24 Building Efficiency Standards
http://www.energy.ca.gov/title24/

Title 24 building requirements
http://www.bsc.ca.gov/codes.aspx

Val Verde Union School District
https://www.valverde.edu/attendance-boundary-maps-632a4f64
https://www.valverde.edu/
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APPENDIX 8.4

TECHNICAL APPENDICES/MATERIALS USED TO PREPARE THE DEIR

(PROVIDED ELECTRONICALLY SEE CHAPTER 2 FOR LINK TO FILES)